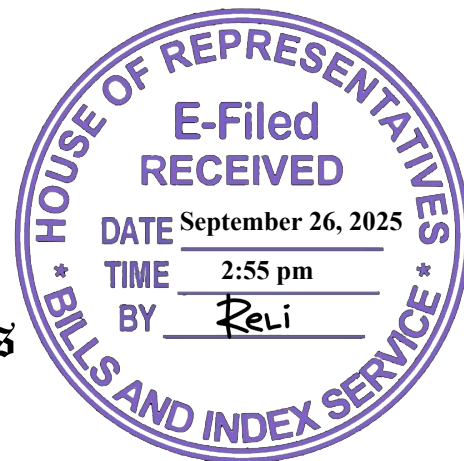




Republic of the Philippines
House of Representatives
Quezon City, Metro Manila

Twentieth Congress
First Regular Session

HOUSE BILL NO. 4919



**Introduced by Representatives Ferdinand Martin G. Romualdez,
Yedda Marie K. Romualdez, Andrew Julian K. Romualdez
and Jude A. Acidre**

AN ACT
PROHIBITING THE USE OF MOBILE DIGITAL WALLETS,
FINANCIAL TECHNOLOGY PLATFORMS, AND OTHER
ELECTRONIC PAYMENT SYSTEMS IN ONLINE GAMBLING,
ELECTRONIC WAGERING, AND OTHER SIMILAR ACTIVITIES,
PROVIDING PENALTIES THEREFOR, AND FOR OTHER PURPOSES

EXPLANATORY NOTE

In recent years, the growth of mobile digital wallets, financial technology (fintech) platforms, and electronic payment systems has transformed the way Filipinos conduct financial transactions. Platforms such as GCash, Maya, GrabPay, and other similar services have provided unparalleled convenience, accessibility, and efficiency in making payments, transferring funds, and engaging in commerce.

However, the same technology that enables legitimate economic activity has also been exploited for illegal and socially harmful purposes, particularly online gambling, electronic wagering, and other unregulated betting activities. These activities not only pose risks to public morals but also create serious financial, social, and legal consequences.

Online gambling—often operating outside of Philippine jurisdiction or without proper licensing—has become accessible to anyone with a mobile phone and a payment account. Such activities have led to increased cases of gambling

addiction, particularly among the youth and low-income sectors, causing financial distress, family breakdowns, and even criminal activity. Moreover, these platforms are at risk of being used for money laundering, fraud, and other illicit financial flows.

While existing laws such as Republic Act No. 9160 (Anti-Money Laundering Act), as amended, and Republic Act No. 10175 (Cybercrime Prevention Act of 2012) provide safeguards against certain illicit activities, there remains no explicit prohibition on the use of mobile digital wallets and fintech platforms to facilitate online gambling and similar activities. The absence of clear restrictions leaves a regulatory gap that online gambling operators and unscrupulous individuals have exploited.

This proposed measure seeks to fill that gap by:

1. Prohibiting the use of mobile digital wallets, fintech platforms, and other electronic payment systems in processing or facilitating payments for online gambling, electronic wagering, and similar activities, unless expressly authorized by law;
2. Mandating compliance by fintech operators through Know-Your-Customer (KYC) procedures, transaction monitoring, and reporting obligations;
3. Imposing criminal and administrative penalties on individuals, operators, and corporate officers who knowingly facilitate prohibited transactions;
4. Empowering regulators such as the Bangko Sentral ng Pilipinas (BSP) and the Anti-Money Laundering Council (AMLC) to implement and enforce this prohibition effectively, including the power to immediately suspend or revoke licenses of violators, block transactions in real time, freeze related funds, and coordinate with foreign regulators to combat cross-border gambling operations; and
5. Establishing a presumption of knowledge when operators fail to act on clear and repeated gambling-related activity, closing common enforcement loopholes.

By clearly defining prohibited acts, assigning enforcement authority, and providing regulators with decisive powers, this bill aims to protect public morals, uphold consumer welfare, combat money laundering, and strengthen financial integrity in the digital age.

In doing so, it recognizes that technology is a powerful tool that must be responsibly managed. While fintech innovations are vital for economic growth and financial inclusion, they should never be used as enablers for activities that undermine the moral, social, and economic fabric of our society.

In view of the foregoing, approval of this bill is earnestly requested.



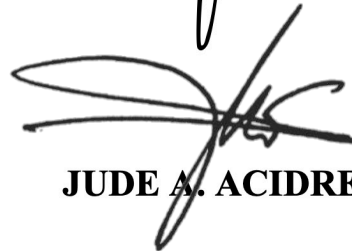
FERDINAND MARTIN G. ROMUALDEZ



YEDDA MARIE K. ROMUALDEZ



ANDREW JULIAN K. ROMUALDEZ



JUDE A. ACIDRE



Republic of the Philippines
House of Representatives
Quezon City, Metro Manila

Twentieth Congress
First Regular Session

HOUSE BILL NO. 4919

**Introduced by Representatives Ferdinand Martin G. Romualdez,
Yedda Marie K. Romualdez, Andrew Julian K. Romualdez
and Jude A. Acidre**

AN ACT
PROHIBITING THE USE OF MOBILE DIGITAL WALLETS,
FINANCIAL TECHNOLOGY PLATFORMS, AND OTHER
ELECTRONIC PAYMENT SYSTEMS IN ONLINE GAMBLING,
ELECTRONIC WAGERING, AND OTHER SIMILAR ACTIVITIES,
PROVIDING PENALTIES THEREFOR, AND FOR OTHER PURPOSES

*Be it enacted by the Senate and House of Representatives of the Philippines
in Congress assembled:*

SECTION 1. *Short Title.* – This Act shall be known as the “Anti-Fintech Gambling Facilitation Act of 2025.”

SEC. 2. *Declaration of Policy.* – It is hereby declared the policy of the State to safeguard public morals, promote responsible financial transactions, and protect individuals, especially the youth and vulnerable sectors, from the harmful effects of gambling. In pursuit of this policy, the State shall prohibit the use of mobile digital wallets, financial technology (fintech) platforms, and other electronic

payment systems as payment channels for online gambling, electronic wagering, and other similar activities.

SEC. 3. *Definition of Terms.* – As used in this act:

- a) Mobile Digital Wallet – refers to an electronic application or service that stores payment information and enables users to make transactions electronically via mobile devices, including but not limited to GCash, Maya, GrabPay, ShopeePay, and similar platforms.
- b) Financial Technology (Fintech) Platform – refers to any digital platform, application, or online service that facilitates financial transactions, payment transfers, or storage of electronic money through technology-enabled systems.
- c) Online Gambling and Similar Activities – refers to any gambling activity conducted via the internet or other digital networks. This includes, but is not limited to, casino games, poker, sports betting, electronic game betting, online lotteries not authorized by the Philippine Charity Sweepstakes Office (PCSO), unlicensed betting exchanges, electronic cockfighting (e-sabong), and other wagering systems using digital platforms in exchange for monetary value.
- d) Electronic Payment System – refers to any system that allows the transfer of monetary value electronically, including online banking facilities, payment gateways, and other digital payment channels.

SEC. 4. *Prohibited Acts.* – It shall be unlawful for:

1. Any mobile digital wallet, fintech platform, or electronic payment service provider to directly or indirectly process, facilitate, or accept payments for online gambling, electronic wagering, or similar activities, unless expressly authorized by law;

2. Any person to use, attempt to use, or conspire with others to use such platforms for the purposes mentioned above;
3. Any fintech company or payment gateway to knowingly allow, enable, or ignore suspicious gambling-related transactions passing through its systems; and
4. Any online gambling operator to receive or transmit payments through prohibited channels.

SEC. 5. *Duties of Mobile Digital Wallet and Fintech Operators.* – All mobile digital wallet and fintech operators shall:

- a) Implement robust Know-Your-Customer (KYC) procedures to verify user identity;
- b) Establish transaction monitoring systems capable of detecting prohibited gambling-related activities;
- c) Immediately block transactions and freeze accounts suspected of being used for online gambling in violation of this Act; and
- d) Submit periodic reports to the Bangko Sentral ng Pilipinas (BSP) and the Anti-Money Laundering Council (AMLC) on compliance with this Act.

SEC. 6. *Enforcement Authority and Administrative Powers.* – The BSP, in coordination with the AMLC, NTC, DICT, and law enforcement agencies, shall have exclusive authority to enforce the provisions of this Act.

They shall be empowered to:

- a) Monitor all mobile digital wallet and fintech transactions for potential violations;
- b) Require immediate submission of transaction records related to suspected online gambling activities;

- c) Issue cease-and-desist orders to any operator found facilitating prohibited transactions;
- d) Coordinate with telecommunications companies, internet service providers, and law enforcement agencies to block, suspend, or disable access to gambling-related platforms in real time;
- e) Immediately suspend or revoke licenses of mobile digital wallet providers, fintech platforms, and payment gateways found to have willfully or negligently facilitated prohibited transactions;
- f) Impose administrative fines ranging from One million pesos (₱1,000,000.00) to Fifty million pesos (₱50,000,000.00) per violation;
- g) Order the immediate freezing of funds suspected to be related to online gambling activities, subject to existing anti-money laundering regulations;
- h) Publish the names of sanctioned entities in a public registry of violators maintained on the BSP and AMLC websites; and
- i) Exercise cross-border enforcement measures, including but not limited to:
 - 1. Requesting the cooperation of foreign financial intelligence units (FIUs) and regulators in blocking, freezing, or recovering funds linked to offshore gambling operators using Philippine-based fintech systems;
 - 2. Denying or suspending access of foreign-based gambling platforms to Philippine payment gateways and merchant accounts; and
 - 3. Blacklisting foreign domains, applications, or merchant identifiers found to be engaged in prohibited gambling activities targeting Philippine residents.

The exercise of these powers shall be subject to due process, but preventive measures such as transaction blocking, account freezing, suspension of licenses, and domain blacklisting may be executed without prior hearing when there is

probable cause to believe that continued operations will cause irreparable injury to the public interest.

The BSP and AMLC shall promulgate the necessary rules and regulations to implement this Act within sixty (60) days from its effectivity.

SEC. 7. *Presumption of Knowledge.* – For purposes of enforcement under this Act, a mobile digital wallet provider, fintech platform, or electronic payment service shall be presumed to have knowledge of prohibited transactions when:

- a) The volume, frequency, or nature of transactions is reasonably indicative of gambling-related activity;
- b) Multiple user complaints or regulatory advisories have been issued regarding gambling payments passing through the platform; or
- c) The operator has failed to act upon clear and repeated transactional patterns pointing to online gambling within a reasonable period.

Such presumption shall shift the burden of proof to the operator to demonstrate that it exercised due diligence and implemented adequate monitoring and compliance measures to prevent prohibited activities.

SEC. 8. *Penalties.* –

- a) For individuals – Imprisonment of not less than one (1) year but not more than five (5) years, or a fine of not less than ₱200,000.00 but not more than ₱5,000,000.00, or both, at the discretion of the court.
- b) For corporations or juridical entities – A fine of not less than ₱1,000,000.00 but not more than ₱10,000,000.00, without prejudice to the revocation of licenses to operate.
- c) For officers or employees of fintech companies – Responsible officers or employees who knowingly allow or facilitate prohibited transactions shall

suffer the penalties in paragraph (a) and be perpetually disqualified from engaging in the financial services industry.

SEC. 9. *Non-Exemption from Other Liabilities.* – The prosecution of offenses under this Act shall be without prejudice to any liability for violations of other laws, including but not limited to Republic Act No. 10927 (Casino Anti-Money Laundering Law), Republic Act No. 10175 (Cybercrime Prevention Act of 2012), and Republic Act No. 9160 (Anti-Money Laundering Act), as amended.

SEC. 10. *Transitory Provision.* – Existing mobile digital wallet and fintech operators shall, within ninety (90) days from the effectivity of this Act, adopt necessary system changes, terminate existing arrangements with online gambling operators, and submit a compliance plan to the BSP and AMLC. Failure to comply within the period shall be grounds for administrative sanctions and possible criminal prosecution under this Act.

SEC. 11. *Implementing Rules and Regulations.* – The BSP, AMLC, NTC, and DICT, in consultation with industry stakeholders, shall jointly issue the implementing rules and regulations within sixty (60) days from the effectivity of this Act.

SEC. 12. *Separability Clause.* – If any provision of this Act is declared unconstitutional or invalid, the remaining provisions shall not be affected thereby.

SEC. 13. *Repealing Clause.* – All laws, decrees, orders, rules and regulations, or parts thereof inconsistent with the provisions of this Act are hereby repealed or modified accordingly.

SEC. 14. *Effectivity.* – This Act shall take effect fifteen (15) days after its complete publication in at least two (2) newspapers of general circulation or in the *Official Gazette*.

Approved,