Alberta's iGaming Market ("iGaming Alberta Act")

What It Means for Operators and How Counsel Can Help

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June 15, 2026

On July 13, 2026, Alberta opens its online gaming market to private operators and ends Ontario's four-year monopoly on the regulated competitive model in Canada. The legal architecture is built. Registration opened on January 13, 2026. Fifty-five operator sites are working through the file, and the names that are going to be on the Day-One leaderboard are already pulling away from the names that are not.

Alberta's framework is governed by the *iGaming Alberta Act*, S.A. 2025, c. I-0.2 (the "**Act**"), which received Royal Assent on May 15, 2025; the *Gaming, Liquor and Cannabis Regulation* (the "**GLCR**"), amended on January 13, 2026 to add a new Division 4 that operationalizes iGaming; and the *Standards and Requirements for Internet Gaming* (the "**Standards**") published by the Alberta Gaming, Liquor and Cannabis Commission ("**AGLC**"). The Standards become conditions of registration by force of the Gaming, Liquor and Cannabis Act, and AGLC retains the unilateral authority to amend them whenever the market gives it a reason to do so.

This bulletin lays out what counsel and management teams considering Alberta entry should already have on the table: the regulatory architecture, the dual-track registration pathway, the economics, the five gating issues that decide the file, and the workstreams that need to start now.

Core architecture of the framework

1) The statutory stack and the two regulators

Alberta has split the regulator job and the commercial-counterparty job between two bodies, on purpose. AGLC is the cop. It writes the Standards, vets applicants, runs audits, and brings enforcement when things go sideways. The Alberta iGaming Corporation ("**AiGC**"), a Crown agent established under the Act, is the landlord. It signs the operating contract, runs the anti-money laundering ("**AML**") and FINTRAC reporting plumbing, fields public complaints, and tracks operator revenue against the province's 20 percent take.

It takes two yeses to go live in Alberta and only one no to stay dark. An AGLC-registered operator without an AiGC commercial agreement cannot launch. An AiGC-counterpartied operator out of compliance with AGLC Standards cannot stay launched. The architecture borrows directly from Ontario's split between the Alcohol and Gaming Commission of Ontario and iGaming Ontario, and Alberta has, on every contested design call, looked at Ontario's playbook first and then decided how it wanted to differ.

The practical take-away is that your registration timeline and your commercial timeline run in parallel but share a single point of failure. A weakness on either track stalls both, and a deadlock at the AiGC table can hold up a clean AGLC file indefinitely.

2) The three-stage AGLC registration

AGLC runs registration through three stages, and the friction is not where most applicants expect it to be.

Stage one is due diligence. AGLC confirms eligibility, vets principals and beneficial owners, and reviews ownership and control structures. If you have clean credentials in Ontario, the United Kingdom, Malta, or another comparable regulated jurisdiction, you move through this stage faster. If you do not, you move through it slower. Files rarely die here.

Stage two is compliance, and this is where most market entrants underestimate the workload by an order of magnitude. The compliance stage requires a standards gap analysis that maps the operator's controls against every applicable Standard, supported by a control activity matrix ("**CAM**") that summarizes every gaming-site control on the books (including the controls performed by third-party platform providers), and supported by an independent audit acceptable to AGLC. If AGLC pegs an applicant as elevated risk (new entrant, no prior regulated licences, a history of non-compliance), the CAM has to be done before registration rather than within three months after go-live. That single determination can move a launch date by a quarter or more.

Stage three is self-exclusion integration. Every registered operator has to connect to AGLC's centralized self-exclusion program. Treat this as a technical-plus-regulatory integration: a failure to honour a self-excluded patron is not a customer-service incident, it is a registration-level event.

3) The economics: fees, GGR, NGR, and the First Nations carveout

Here is the financial picture in the numbers that should be in your spreadsheet today. Operators pay a non-refundable application fee of $50,000 per iGaming site and an annual registration fee of $150,000 per site. Goods or service suppliers ("**Suppliers**"), the platform providers, game and game-system providers, oddsmakers, ewallet providers, integrity monitors, and accredited testing facilities that sit behind every operator, pay their own fee schedule.

Revenue is split 80/20 in favour of the operator on net gaming revenue ("**NGR**"), but three percent of gross gaming revenue ("**GGR**") is taken off the top before NGR is calculated. Of that three percent, two points go to First Nations programming and one point to social responsibility funding. The 80/20 split applies to what is left.

If you have been modelling Alberta at the headline 20 percent, redo the model. The effective provincial take is closer to 22 to 23 percent of GGR. The First Nations carveout belongs in the base case, not the sensitivity, and the program is being designed in partnership with First Nations through the Ministry of Indigenous Relations.

The five gating issues operators should watch

Issue I: Pre-July 13 conduct in the Alberta grey market

AGLC is asking the grey-market question, and it is asking everyone. It is asking operators that have been telling their CFOs for years that the question would never be asked, and it is asking operators that have been preparing for the question since 2024. The question is not whether your pre-launch Alberta revenue was lawful in some other jurisdiction. The question is what the regulator will infer from that conduct when it sits down to assess your character and your suitability to hold an Alberta registration. For most applicants there is a defensible posture available, but it needs to be built with documentation before the question is on the table, not after.

Issue II: First Nations partnership beyond the statutory carveout

Two percent of GGR is what the statute requires you to contribute. It is not what a thoughtful Alberta strategy ends at. Six Host First Nations operate on-reserve casinos in the province (Stoney Nakoda, Alexis Nakota Sioux, Tsuut'ina, Cold Lake, Enoch Cree, and Louis Bull Tribe), each with its own brand, its own player base, and its own marketing apparatus. The strategically valuable Indigenous relationships in Alberta over the next eighteen months are going to be commercial. They will look like joint ventures, sponsorships, on-reserve hospitality tie-ins, and affiliate structures that sit well above the regulatory floor. They take time to build, they take the right kind of counsel to build, and they will not be available to the operators that show up on July 14 wondering where the conversation should start.

Issue III: Advertising, inducement, and athlete or celebrity endorsements

Anyone who watched the AGCO's 2024 enforcement run against the Ontario advertising rulebook knows where this is going. Alberta has imported Ontario's advertising and inducement architecture, including the restrictions on athlete and celebrity endorsements likely to appeal to minors, and the same regulatory muscles are going to exercise themselves here. Promotional inducements, affiliate marketing compliance, and bonus structures all sit on AGLC's review list. In Ontario, promotional rule enforcement has been the highest-volume category of regulatory attention, and the pattern is going to repeat in Alberta. The operators that build advertising compliance into the marketing function on Day One will spend less of the next two years writing apology letters to the regulator.

Issue IV: Payment flows, FINTRAC, and cross-border treasury

iGaming operators are reporting entities under the *Proceeds of Crime* (*Money Laundering*) *and Terrorist Financing Act*. Alberta then layers AiGC reporting on top of FINTRAC's. Most operators centralize payments and treasury offshore, which sets up a cross-border choreography that is much easier to design before launch than during the first quarter. The pieces that have to fit together include the *Personal Information Protection and Electronic Documents Act* (**"PIPEDA"**)

on cross-border data, Part XIII withholding tax under the *Income Tax Act* on platform and content-licensing payments, GST/HST treatment of gaming and ancillary supplies under the *Excise Tax Act* (including the place-of-supply rules), and FINTRAC's electronic funds transfer reporting thresholds. The right move is to treat treasury and AML architecture as a single workstream rather than two.

Issue V: Privacy, data disclosure, and corporate structure

Alberta's *Personal Information Protection Act* (**"PIPA"**) covers everything the operator collects from its players. The Act and the GLCR also pull in AiGC's obligations under the *Freedom of Information and Protection of Privacy Act* (**"FOIP"**). The Act expressly authorizes AiGC to collect, use, and disclose personal information to provincial and territorial partners, and that authority interacts in non-obvious ways with the privacy commitments you have already made to your players and the data-protection covenants you owe upstream to your platform suppliers and content licensors. Work the intersection out on paper before AiGC ever exercises the power.

Most operators will hold the Alberta registration and the AiGC contract through an Alberta-resident entity, either freshly incorporated or extra-provincially registered. The choice of vehicle under the *Business Corporations Act* (Alberta) (**"ABCA"**), the director and officer architecture, the share structure, the intra-group services and intellectual property licensing, and the capital stack all flow into AGLC's beneficial ownership disclosure, your AML reporting, your tax efficiency, and your exit optionality. None of these decisions becomes easier after you have filed.

What this means for operators engaging with Alberta

1) The compliance build, not the application, decides your launch date.

The application is the easy part. The standards gap analysis, the CAM, the SOC 2 attestation, the RG Check certification, and the independent system testing are the workstreams that decide when you go live. Treat the application as the output of the compliance work, not the trigger for it.

2) Multi-brand strategy is a regulatory question first and a marketing question second.

Every distinct iGaming site needs its own application, its own fee, and its own registration. For an operator running multiple brands or skins, the call on how many sites to register is a multi-year decision on fees, audits, and operational complexity. Decide before you file. Restructuring after the fact is expensive and slow.

3) Indigenous engagement is a commercial opportunity, not a tax line.

The Host First Nations are sophisticated commercial counterparties. Operators that approach the relationship as a relationship will find more durable structures and better partners than operators that treat the two percent carveout as the end of the conversation.

4) Your pre-launch conduct is on the record.

AGLC is asking the grey-market question of every applicant. Operators with Alberta exposure prior to July 13 should build the narrative, paper the documentation, and assemble the remediation evidence now. The story is much easier to tell before the regulator asks for it than from the back foot afterwards.

5) The Standards will change. Build for that.

AGLC retains the authority to amend the Standards, and Ontario's last four years tell us it will. Build a compliance program that absorbs amendment without re-tooling, and negotiate platform-supplier and affiliate contracts that flow regulatory change downstream without requiring you to re-paper the supply chain every time the regulator adjusts a rule. The operators that win the second year are not always the operators that won the first.

How McLeod Law Can Help

Practical, high-value workstreams:

A. Regulatory registration and AiGC commercial onboarding

- Three-stage AGLC application strategy and drafting (due diligence package, compliance submissions, and self-exclusion integration coordination).
- AiGC commercial-agreement negotiation, with operating-agreement risk allocation on indemnities, audit rights, change-of-control consents, data protection, and termination triggers.
- Standards gap analysis legal review, coordinated with the operator's compliance team and external auditors.
- CAM design review and "distinct iGaming site" structuring advice for multi-brand entrants.

B. Corporate, capital, and beneficial ownership

- ABCA entity formation and extra-provincial registration, holding-company architecture, director and officer arrangements, and intra-group services agreements.
- Beneficial ownership disclosure planning aligned with AGLC's suitability review.
- Shareholders' agreements, unanimous shareholder agreements, and capital-stack design for inbound investors and strategic partners.

C. Commercial contracts

- Platform supply, game and content licensing, integrity monitoring, identity verification and KYC vendor, payment processing, and affiliate agreements.
- Sponsorship, ambassador, and hospitality partnership agreements drafted against the Standards' advertising and inducement rules.

D. Indigenous and First Nations engagement

- Joint venture, limited partnership, and other partnership structures with Host First Nations and other Indigenous counterparties.
- Sponsorship, marketing, and community benefit agreements that go beyond the statutory carveout.
- Counsel on the cultural and procedural dimensions of building these relationships well, not just quickly.

E. Privacy, data, and cybersecurity

- PIPA and PIPEDA compliance programs, cross-border data transfer arrangements, and FOIP-side analysis on AiGC disclosure pathways.
- SOC 2 and ISO 27001 readiness support coordinated with auditors, and breach response planning before the breach.
- FINTRAC compliance program design and AML policy drafting.

F. Tax and treasury

- GST/HST and provincial tax analysis on gaming and ancillary supplies.
- Withholding tax planning on cross-border platform and content payments, and transfer pricing analysis.
- Treasury structure review aligned with the AiGC reporting cadence.

G. Employment, key persons, and immigration

- Background and suitability advice for key persons, employment agreements for Alberta-based staff, and restrictive covenant drafting.
- Immigration support for senior personnel relocating to Calgary or Edmonton.

H. Disputes and enforcement response

- Regulatory enforcement defence before AGLC and judicial review in the Alberta Court of King's Bench.
- Commercial dispute strategy and litigation through the Alberta appellate courts.

Immediate "next steps" for clients

1. Decide your distinct-site strategy now. Map your intended brands and skins to AGLC's separate-application rule, and model the fee, audit, and operational impact across the three-year horizon. Pick the structure you want rather than the structure you end up with.

2. Start the compliance build now. The standards gap analysis, the CAM, and the SOC 2 attestation are the workstreams that drive your launch date more than any other. Running counsel and auditors in parallel shortens the critical path materially.

3. Build the character-and-suitability narrative. If your business has any pre-July 13 Alberta exposure, paper the file before the regulator asks for it. The story is much harder to tell from the back foot.

4. Open the Indigenous engagement conversation. Strategic operator and Indigenous nation structures take six to twelve months to put together. The two percent carveout pays the statute. Commercial partnership pays the strategy.

5. Stress-test the AiGC operating agreement. The form contract is the starting point and nothing more. Run the termination, change-of-control, audit, indemnity, and data-protection clauses against your operating model before you sign. If your operating reality breaks the form, fix the form.

6. Confirm your privacy and AML architecture end-to-end. Map AiGC's disclosure authority against your player-facing privacy commitments and your upstream platform contracts, and run the FINTRAC reporting workflow under load before go-live. Day One is too late to discover a gap.

Need help navigating Alberta's iGaming Alberta Act?

If you are pursuing operator or supplier registration in Alberta, or evaluating an investment, partnership, or expansion within the iGaming framework, we can help you move from the questions in this bulletin to a plan you can actually run.

JP Smith and Eugene Chen lead McLeod Law's iGaming work, with the regulatory and commercial deal experience on one side of the table and the corporate, capital, and securities depth on the other. Get in touch to discuss registration strategy, AiGC commercial-agreement negotiation, corporate and capital structuring, compliance build, Indigenous engagement, and your next steps under the *iGaming Alberta Act*.

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