Open Letter to the UK Gambling Commission

Dated: 3 November 2025

To: The Chief Executive and Compliance Directorate
UK Gambling Commission

Subject:

Systemic Misuse of AML and Affordability Checks by Tek Fox Ltd (trading as MrQ) — Withheld Withdrawals Despite Verified Funds

Introduction

I am writing to raise a formal complaint and policy concern regarding practices employed by Tek Fox Ltd, trading as MrQ, which appear to misuse the very consumer-protection measures set out in the Commission's Licence Conditions and Codes of Practice (LCCP).

Summary

After depositing and winning a total of £16,781.83, I was prevented from withdrawing my funds despite having provided complete Know-Your-Customer documentation, payslip evidence, and Open Banking access. The company's CEO, Savvas Fellas, personally confirmed that MrQ 'cannot process withdrawals during checks but is not required to restrict deposits.' This demonstrates a systemic distortion of regulatory intent — using AML and affordability checks as a mechanism to delay or deny withdrawals rather than to protect players or the integrity of the financial system.

1. Misapplication of AML & Affordability Rules

Money Laundering Regulations 2017 require a risk-based and proportionate approach. Blanket freezes of verified personal funds for arbitrary periods are neither risk-based nor proportionate. Tek Fox Ltd was aware all deposits originated from a personal UK bank account in my name — information ordinarily sufficient to satisfy routine Source-of-Funds checks. Despite this, the operator reopened my account for deposits after "verification," applying a new £2,000 limit while continuing to withhold all withdrawals, demonstrating selective enforcement.

2. Contradiction of LCCP SR Code 5.1.7

Social Responsibility Code 5.1.7 requires operators to ensure that the administration of withdrawals is fair, transparent, and not misleading. The CMA–UKGC joint guidance explicitly warns that operators must not place unreasonable obstacles in the way of consumers withdrawing money. By continuing to take deposits while blocking withdrawals under the guise of ongoing checks, Tek Fox Ltd has created precisely the kind of unfair barrier this rule was designed to prevent.

3. Erosion of Consumer-Protection Objectives

Players are encouraged to continue gambling even while winnings are frozen. The supposed 'safeguard' becomes a financial trap, increasing distress and potential further losses. This behaviour undermines confidence in the regulated market and the Commission’s oversight.

3.5 Failure of Social Responsibility and Compassionate Consideration

During my correspondence with the CEO, I explained that I was experiencing an extremely distressing personal situation — my father was hospitalised with a terminal illness, and I required access to my own verified funds for urgent family needs. Despite this, Mr Fellas declined to consider the matter on compassionate grounds, stating only that 'the process is the process' and threatening to block further communication. This demonstrates a failure of the operator’s duty under LCCP Social Responsibility Code 3.4.1, which obliges licensees to interact with customers 'in a way which minimises the risk of customers experiencing harms associated with gambling.' By ignoring a clear expression of distress, the operator failed to meet its duty to treat customers fairly and with care.

4. Statements by the CEO

‘Our process is our process.’ ‘We legally cannot process withdrawals during checks but are not required to restrict deposits.’ ‘My head of operations is not going to just call you… if you continue with this tone, I’ll block you.’ These remarks evidence a rigid internal policy, not a risk-sensitive assessment, and contradict the Commission’s expectations of proportionality and fairness.

5. Requested Regulatory Action

1. Investigate Tek Fox Ltd’s withdrawal-restriction procedures for compliance with LCCP 5.1.7, 3.4.1 and AML/affordability guidance. 2. Clarify publicly that operators cannot block withdrawals while continuing to accept deposits under the same verification status, or use affordability or AML checks as a pretext to withhold verified player funds. 3. Issue updated guidance reaffirming that protective checks must never operate to the detriment of consumers. 4. Require restitution where verified withdrawals have been delayed or withheld without lawful basis.

6. Broader Policy Concern

This case reveals a systemic regulatory inversion: rules meant to safeguard consumers are being weaponised to obstruct them. Unless corrected, this will continue to erode trust in licensed UK operators and drive players toward unregulated alternatives.

Conclusion

The Gambling Commission’s framework is founded on fairness, transparency, and proportionality. When an operator — led by its CEO — invokes 'compliance' to justify preventing withdrawals it knows to be legitimate, the integrity of the entire regulatory regime is placed at risk. I therefore urge the Commission to review this case urgently and issue explicit guidance closing this loophole.

Signed,
Mr Knight
(Consumer & Complainant)