Argentina (City and Province of Buenos A

Online casino launch roadmap

LOTBA S.E. (City of Buenos Aires) and IPLyC (Province of Buenos Aires)

There is no national licence: the City runs open-ended permits through LOTBA, the Province caps online licences at seven through IPLyC, and each one only covers players inside its own territory.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	SETUP COST	LOCAL PRESENCE	DIFFICULTY
CITY: permit for an online gaming agency from LOTBA…	**6-12 months (book estimate); Province depends…**	**City: online gaming tax reported at 6%, a bill…**	**USD 100K-300K first year (book estimate, varies…**	**City: domicile in the City and a local permit holder…**	**Medium-high; fragmented rules and tight licence…**

STAGE 1 · Weeks 0-6 — Market and jurisdiction choice

- No national regulator — 1.1
- Province route: IPLyC licences — 1.3
- Tax comparison before you commit — 1.5
- City route: LOTBA permits — 1.2
- Partner with a licensee instead — 1.4

STAGE 2 · Months 1-5 — Corporate setup and permit application

- Argentine entity and domicile — 2.1
- Financial proof and guarantees — 2.3
- Fitness of owners and managers — 2.2
- Consortium structure in the Province — 2.4

STAGE 3 · Months 2-7 — Platform, data and suppliers

- Regulator access to gaming data — 3.1
- Supplier alignment — 3.3
- Per-jurisdiction gateway — 3.2
- Retail onboarding in the Province — 3.4

STAGE 4 · Months 3-8 — Compliance controls

- KYC and AML — 4.1
- City exclusions: Ley 6971/2026 — 4.3
- Blocking and ads — 4.5
- Responsible gaming policy — 4.2
- Geolocation per territory — 4.4

STAGE 5 · Months 3-8 — Payments and player funds

- Regulated payment processors — 5.1
- Per-jurisdiction ledgers — 5.3
- Segregated player funds — 5.2

STAGE 6 · Months 5-9 — Certification and testing

- Homologation by recognized labs — 6.1
- Integration testing with regulators — 6.3
- RNG and game certificates — 6.2

STAGE 7 · Months 8-12 and after — Go-live and ongoing duties

- Launch within the licence territory — 7.1
- Regulatory change watch — 7.3
- Tax filings and contributions — 7.2
- Expansion to other provinces — 7.4

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Argentina (City and Province of Buenos Aires): launch roadmap in detail

LOTBA S.E. (City of Buenos Aires) and IPLyC (Province of Buenos Aires) · as of 2026-11

Licence	CITY: permit for an online gaming agency from LOTBA (Ley 538, Res. 321-LOTBA/18, 80-LOTBA/19). PROVINCE: one of up to 7 IPLyC licences, 15 years, not renewable (Ley 15.079 Title VIII, Decreto 181/2019)
Time to launch	6-12 months (book estimate); Province depends on a licence being available
Gaming tax	City: online gaming tax reported at 6%, a bill would raise it to 12%. Province: 2% prize contribution on instant-result games (Res. 1149/2026, per a text fragment). Verify both
Setup cost	USD 100K-300K first year (book estimate, varies widely by jurisdiction); Province licence fee set by RESOL-2019-1043, amount not confirmed
Local presence	City: domicile in the City and a local permit holder. Province: licensees are local consortia (uniones transitorias)
Difficulty	Medium-high; fragmented rules and tight licence supply

1. Market and jurisdiction choice Weeks 0-6

1.1 No national regulator RECOMMENDED

Each of the 23 provinces and the City regulates gambling itself. A licence covers players located in that jurisdiction only, so a City licence does not sell to the Province and vice versa. Pick the territory first, then the model.

In the book: Ch. 06 Licensing Guide, Ch. 29f Latin America Datacenter Infrastructure for Regulated Gaming

1.2 City route: LOTBA permits RECOMMENDED

LOTBA S.E. is the authority under Ley 538. The City was historically unusual for not capping permits, but one report says registration for new licences closed in 2024 and counts 11 to 12 active operators. Confirm the window is open before planning.

In the book: Ch. 06 Licensing Guide, Ch. 02 Regulation and Compliance Landscape

1.3 Province route: IPLyC licences RECOMMENDED

Under Ley 15.079 Title VIII (art. 152 makes an authorizing title mandatory) and Decreto 181/2019, the tender allowed up to seven licences for fifteen years, not renewable. IPLyC says seven online licences exist. Check for vacancies or partner arrangements with a licensee.

In the book: Ch. 06 Licensing Guide, Ch. 40 Case Study -- Launching in a New Regulated Market

1.4 Partner with a licensee instead ALTERNATIVE

Provincial licensees are consortia, for example BINBAIRES, DISSON and Intralot (Res. 1305/2026), and brands such as Stake operate under a provincial licence. Joining one can be quicker than a fresh award.

In the book: Ch. 47d Casino as a Service: White-Label Provisioning at the Press of a Button, Ch. 09 Legal Framework and Contracts

1.5 Tax comparison before you commit RECOMMENDED

Press reports a 6% City online tax with a bill to raise it to 12%, and a 2% Province prize contribution on instant-result games. Also expect Ingresos Brutos and federal taxes. We could not confirm these from official texts, so get an adviser's tax memo.

In the book: Ch. 30 FinOps Deep Dive, Ch. 06 Licensing Guide

2. Corporate setup and permit application Months 1-5

2.1 Argentine entity and domicile RECOMMENDED

In the City, the holder must show domicile in the City (Res. 321-LOTBA/18, art. 7) and cannot hold another agency permit under Ley 538. Form a local SA or SAS and a bank account.

In the book: Ch. 06 Licensing Guide, Ch. 09 Legal Framework and Contracts

2.2 Fitness of owners and managers RECOMMENDED

LOTBA reviews directors and owners, including their record abroad. Ley 6331 (now in Ley 538 art. 22) bars debtors to the State, people on the alimony debtor registry, and others. Prepare disclosures early.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 06 Licensing Guide

2.3 Financial proof and guarantees RECOMMENDED

Applicants show audited financials and guarantees that protect player funds. Amounts depend on the call, so read the current convocation.

In the book: Ch. 36 Financial Operations, Ch. 09 Legal Framework and Contracts

2.4 Consortium structure in the Province RECOMMENDED

Changes inside a consortium need IPLyC approval, as Res. 1305/2026 shows for a spin-off. Put replacement and step-in rules into your consortium agreement.

In the book: Ch. 09 Legal Framework and Contracts

3. Platform, data and suppliers Months 2-7

3.1 Regulator access to gaming data RECOMMENDED

The City requires real-time regulator access, through a mirror server or API, to monitoring systems. Some sources say servers must sit in the City, so confirm the exact rule in the annexes of Res. 80-LOTBA/19.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 29f Latin America Datacenter Infrastructure for Regulated Gaming, Ch. 25b Regulatory Reporting and Evidence Export

3.2 Per-jurisdiction gateway RECOMMENDED

Run the City and the Province as two separate regimes, with separate game catalogs, limits, taxes and branding. A jurisdiction gateway keeps one codebase honest.

In the book: Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

3.3 Supplier alignment RECOMMENDED

Your game suppliers must hold certificates accepted by each regulator and be able to report per jurisdiction.

In the book: Ch. 10b Supplier Integration Control Plane

3.4 Retail onboarding in the Province OPTIONAL

IPLyC Res. 17/2026 lets agencias hipicas register users on any platform licensed in the Province, and Res. 1015/2026 deals with live games and their location. Retail onboarding can help acquisition, but adds KYC flows.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 37 Marketing Technology and CRM Systems

4. Compliance controls Months 3-8

4.1 KYC and AML RECOMMENDED

Gambling operators are covered by Ley 25.246 (art. 20) and the UIF. LOTBA cites UIF Res. 199/2011 for the sector, which may have been replaced, so check the current UIF rule. Do identity verification and suspicious activity monitoring.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 19 Anti-Fraud System Deep Dive

4.2 Responsible gaming policy RECOMMENDED

LOTBA approved a Politica Integral y Social de Juego Responsable (Annex IV of Res. 80-LOTBA/19). Implement limits, self-exclusion and audit evidence.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail

4.3 City exclusions: Ley 6971/2026 RECOMMENDED

Ley 6971/2026 (published 5 October 2026) bars people on the alimony debtor registry from opening accounts, depositing, betting or withdrawing on LOTBA-licensed platforms. Integrate the registry check.

In the book: Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 24d KYC Evidence Lifecycle

4.4 Geolocation per territory RECOMMENDED

Verify that the player is physically in the City or the Province that matches your licence.

In the book: Ch. 24e Geofencing and Location Verification, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent

4.5 Blocking and ads OPTIONAL

Ley 6331 lets LOTBA ask for blocking of electronic media that promote unauthorized betting. Keep affiliates and influencers within authorized brands.

In the book: Ch. 37 Marketing Technology and CRM Systems

5. Payments and player funds Months 3-8

5.1 Regulated payment processors RECOMMENDED

Use recognized, regulated processors and bank rails. Argentina's FX and tax rules change often, so confirm settlement paths with local counsel.

In the book: Ch. 36 Financial Operations, Ch. 29f Latin America Datacenter Infrastructure for Regulated Gaming

5.2 Segregated player funds RECOMMENDED

Keep player money apart from operating capital and reconcile daily.

In the book: Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 36 Financial Operations

5.3 Per-jurisdiction ledgers RECOMMENDED

Track wagers, prizes and taxes by territory so each regulator and each tax filing ties to its own ledger.

In the book: Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 25b Regulatory Reporting and Evidence Export

6. Certification and testing Months 5-9

6.1 Homologation by recognized labs RECOMMENDED

LOTBA requires homologation of software, hardware and game components by internationally recognized laboratories it accepts. GLI and BMM are the main certifiers named in the region.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 17 Random Number Generation (RNG)

6.2 RNG and game certificates RECOMMENDED

Provide RNG and game certificates for every title and keep versions tied to deployed builds.

In the book: Ch. 17 Random Number Generation (RNG), Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security

6.3 Integration testing with regulators RECOMMENDED

Test data feeds and exports with each regulator before go-live.

In the book: Ch. 32 Testing and QA in Gambling, Ch. 25b Regulatory Reporting and Evidence Export

7. Go-live and ongoing duties Months 8-12 and after

7.1 Launch within the licence territory RECOMMENDED

Open only to verified players inside the territory. Rehearse support and incident handling first.

In the book: Ch. 33 Operational Playbooks, Ch. 35 Incident Management, Ch. 07 Casino Implementation Planning and Timeline

7.2 Tax filings and contributions RECOMMENDED

Pay the City online gaming tax and, in the Province, apply the prize contribution set by Res. 1149/2026 (published 15 September 2026), paid into the municipal fund and the Fondo de Progreso e Inclusion Social. Confirm start date and base in the annexes.

In the book: Ch. 36 Financial Operations, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation

7.3 Regulatory change watch RECOMMENDED

Pending items include the City tax bill and a Province bill on biometric validation and licence review. Follow both Boletines Oficiales.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 42 War Stories: When Everything Goes Wrong

7.4 Expansion to other provinces OPTIONAL

Cordoba, Santa Fe, Entre Rios, Mendoza and others have their own rules, for example Mendoza's Ley 9.267 with 2 to 7 licences for 10 years. Treat each as a new project.

In the book: Ch. 29f Latin America Datacenter Infrastructure for Regulated Gaming, Ch. 40 Case Study -- Launching in a New Regulated Market

Common pitfalls

- Assuming one licence covers Argentina. It covers one territory.
- Planning for a City permit without checking whether registration is open.
- Counting on a fifteen-year Province licence being renewable. The tender says it is not.

- Using tax rates from press without an adviser memo. The City and Province figures here are secondary reports.
- Skipping the alimony debtor registry check. Ley 6971/2026 makes it a hard block in the City.
- Letting a consortium partner change without IPLyC approval.
- Using the Province or City marketing in the other jurisdiction.

Sources

1. LOTBA Resolution 80/2019 (Boletin Oficial CABA)
   https://boletinoficial.buenosaires.gob.ar/normativaba/norma/471168
2. Ley 6331 (CABA), changes to Ley 538
   https://boletinoficial.buenosaires.gob.ar/normativaba/norma/529606
3. Ley 6971/2026 (CABA), online betting
   https://boletinoficial.buenosaires.gob.ar/normativaba/norma/880787
4. IPLyC Resolution 1305/2026 (licensee consortium)
   https://normas.gba.gob.ar/documentos/VwwbZ1f5.pdf
5. IPLyC Resolution 1149/2026 (prize contribution)
   https://normas.gba.gob.ar/ar-b/resolucion/2026/1149/618043
6. Online casino map in Argentina (iProfesional)
   https://www.iprofesional.com/recreo/437047-regulacion-y-licencias-el-mapa-2025-de-los-casinos-online-en-argentina
7. How the City regulates online gambling (Sitio Andino, sponsored)
   https://www.sitioandino.com.ar/sociedad/de-la-pantalla-al-control-estatal-como-regula-la-ciudad-buenos-aires-el-juego-online-n5705751
8. LOTBA
   https://www.lotba.gob.ar

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