INDIALAW



COMPETITION ACT | REGULATORY

Market Shutdowns in App Store Disputes: Why the CCI Closed the Book on Winzo v Google LLC

The CCI has closed its abuse-of-dominance investigation against Google over real-money gaming apps on Google Play and Google Ads, holding that once the Online Gaming Act, 2025 banned online money games, no corrective order could lawfully issue.

AUTHOR Nikita Dlima

PUBLISHED 20 November 2026

Table of contents

- Details of the Dispute
- CCI's Analysis
- Conclusion

The intersection of digital platform governance, mobile app ecosystems, and competition law has become a primary battleground for technology and digital retail disputes. A notable illustration of this regulatory friction is the Competition Commission of India's ("**CCI**") decision to close its investigation into allegations of abuse of dominance against Google concerning real-money gaming (RMG) applications on Google Play and Google Ads.

Details of the Dispute

The dispute originated when Winzo Games approached the CCI under Section 19(1)(a) of the Competition Act, 2002, alleging that Google had contravened Section 4 of the Act through discriminatory and arbitrary market practices.

According to the information filed, Google operates the Android operating system's dominant app store, "Google Play," alongside its online advertising network, "Google Ads." Google's policies restricted the hosting of real-money gaming applications. However, on September 7, 2022, Google initiated a one-year Pilot Program to test the hosting of two specific categories of real-money games in India: Daily Fantasy Sports (DFS) and Rummy.

Winzo challenged this framework arguing that limiting the pilot program strictly to DFS and Rummy while excluding all other real-money skill games lacked objective justification, unfairly distorting the competitive landscape and denying market access to competing developers. Winzo also argued that from November 2022, Google modified its advertising policies to permit only DFS and Rummy app advertisers to run campaigns on Google Ads and YouTube. Winzo contended that blocking access to these channels lowered market visibility for other excluded developers. It also alleged that Google displayed arbitrary payment warnings when users attempted to complete transactions via Google Pay for non-pilot skill games, creating consumer friction and apprehension.

Finding merit in these contentions, the CCI formed a prima facie view that Google held a dominant position in relevant markets such as licensable smart mobile OS, Android app stores, and search advertising services and ordered a detailed investigation by the Director General (DG) under Section 26(1) of the Act.

CCI's Analysis

While the investigation was pending and the parties were navigating the statutory commitment process under Section 48B of the Act, a monumental legislative development occurred. Parliament enacted the Promotion and Regulation of Online Gaming Act, 2025 ("**Online Gaming Act**"), which came into force on May 1, 2026.

The Online Gaming Act introduced a statutory prohibition specifically under S**ections 5, 6 and 7 which** prohibited any person from engaging in online money games or real-money gaming services, banned advertisements that promote online money games and prohibited financial institutions from enabling transactions towards payments for online money gaming services.

Faced with this complete legislative interdiction, Google filed applications urging the CCI to close the inquiry because the relevant market for real-money gaming no longer existed legally, rendering any prospective antitrust remedy impossible to implement.

The CCI accepted this reasoning and in its final closure order, the Commission reasoned that **the** Online Gaming Act established a game-neutral, blanket prohibition across all real-money games. If the CCI issued a corrective order and directed Google LLC to open Google Play or Google Ads to RMG apps, it would be a violation of the law.

The CCI further emphasized that antitrust enforcement under the Act is primarily corrective and aimed at restoring market distortion. Invoking its inherent powers under Section 36(1) of the Act, the Commission recalled its earlier prima facie order and formally closed the investigation, clarifying that if the statutory framework is ever struck down or altered, the CCI reserves the right to re-examine similar conduct.

Conclusion

The Winzo v. Google LLC order demonstrates that when new legislation completely outlaws an underlying commercial sector, the CCI cannot force digital platforms to alter access policies for a non-existent legal market.

The closure also leaves open important questions about whether antitrust mechanism should serve a purely corrective function or whether investigating a platform's past conduct holds independent value. For technology companies, app developers, and digital enterprises navigating platform disputes, the case is a sharp reminder that contractual and platform-access rights depend on changes in legislation. It is important to closely monitor not only platform terms of service but also the laws governing digital commerce.