

Evolution's Online Casino Presence in Illegal Markets

Investigative Report

November 2021

Evolution's Online Casino Presence in Illegal Markets

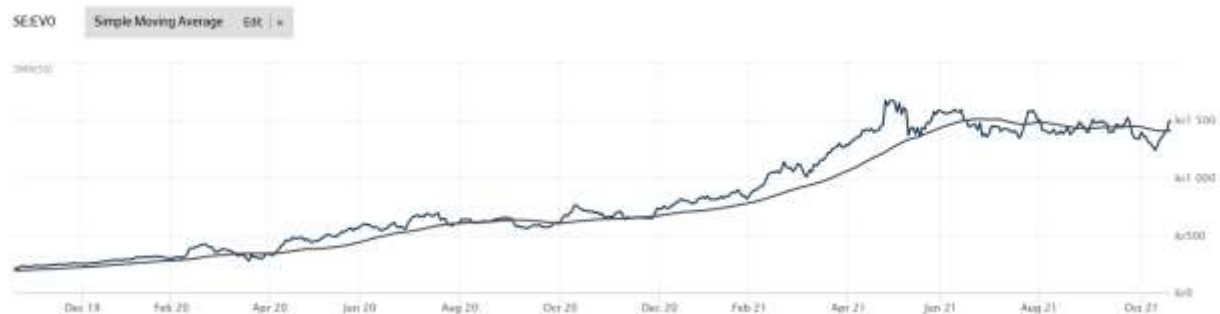
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Key Investigation Findings

1. Evolution AB (publ) (“Evolution”) is a public limited company, listed on Nasdaq Stockholm and a leading online gambling software developer, with its products being played by millions of players globally. Furthermore, due to the COVID-19 pandemic, Evolution’s operations (and subsequently its share price – as per graph below) have skyrocketed. This includes Evolution being named as Live Casino Supplier of the Year and winning five times at the EGR B2B Awards. Furthermore, the company’s brands – Evolution, NetEnt and Red Tiger – won four EGR awards for the Group’s live, slots, RNG and mobile offering. At the Global Gaming Awards 2021 ceremony, Evolution was crowned the best Online Casino Supplier, while the group’s NetEnt and Red Tiger brands both won top Product awards. Evolution was named Online Casino Supplier of the Year for the third consecutive year. NetEnt won the Product Launch of the Year award for its Divine Fortune™ Megaways™ video slot game. Red Tiger, meanwhile, picked up the Casino Product of the Year accolade for Gonzo’s Quest™ Megaways™.



2. Evolution’s growth in North America: Evolution mention that they obtained relevant licenses for live casinos in New Jersey and that they comply with regulators in Pennsylvania. As to October 2021, Evolution plans to launch in Connecticut and before the end of the year to open another casino in Ontario. Each will have a new live dealer studio which will introduce their popular slot games from Red Tiger, NetEnt and BTG. Evolution have acquired Big Time Gaming (“BTG”), who had executed several licensing agreements with other suppliers, who’s successful games will continue to be offered to their players. Going forward, BTG has been working on exciting new titles that will be proprietary to Evolution and will be part of its offering alongside NetEnt and Red Tiger. These new BTG titles are expected to be introduced in 2022.

3. **Yet an in-depth investigation has uncovered that behind Evolution's recent success, there are countless illegal activities as well as regulatory and contractual violations.** Despite claiming in its 2020 annual report that it *"has stringent monitoring processes in place to detect attempts at fraud and money laundering"*, the investigation revealed that Evolution consistently offers its games on multiple online gaming websites (operators) that enables prohibited gambling in jurisdictions where gambling is prohibited and considered as criminal offence. Furthermore, the operators accept cash and bitcoin payments from end-users playing their games, and, in turn, Evolution receives direct cash payments from these operators. **This is a gross violation of Evolution's official anti-money laundering policy, as well as money laundering laws and acts.** Ironically, Evolution itself claims in its annual report that the majority of its revenues are generated from unregulated territories.
4. Furthermore, the investigation reveals, that **Evolution does not carry out a KYC ("Know Your Customer") process to implement its anti-money laundering policy, thus in practice it does nothing to track the source of funding used by its users.** Furthermore, the investigation reveals, that **Evolution games are being used in large-scale cash wagering and Evolution's own use of intermediaries to funnel cash from operators to Evolution.**
5. **Clear evidence shows that Evolution games are being offered in designated terror states such as Iran, Syria and Sudan,** as determined by the U.S. Department of State and Office of Foreign Assets Control (US Department of the Treasury) – a direct violation of US sanctions on these terror states. Of course, this is also another violation of Evolution's Counter Terrorist Financing Policy. Crucially, part of the time period which Evolution supplied its games in Sudan was during the Sudanese Revolution, taking place between December 2018 – August 2019, during which time the U.S. Department of Treasury had imposed sanctions in place.
6. **Furthermore, live casino games produced by Evolution are being offered to end-users - those who ultimately use their product – in territories where gambling is illegal, including in Hong Kong, Singapore, France and the UAE.**
7. Our investigation reveals that **Evolution is fully aware of its end-users' physical location within the mentioned above illegal markets,** via its direct and indirect offerings in these territories. For instance, once Evolution games are being played, **Evolution sees the end-**

user's IP address. Furthermore, Evolution receives revenues, yet continues to offer its games in these very same illegal markets.

8. **Evidently, Evolution also breaches local regulatory requirements in countries such as Italy, Spain and Sweden, by offering its games by means of unlicensed operators, or by using physical studios which aren't local to the countries where they're offered, as required by local laws.**
9. Evolution has existing agreements in place with brand owners such as Hasbro, Endemol and Sony Studios - who have ownership over branded games such as Deal or No Deal and Monopoly. According to our research, **Evolution violates these commercial agreements by enabling these branded games to be offered in territories such as Spain and France – a clear violation of the contract between them.**
10. This in-depth investigation's findings are based on multiple sources including open-source research, databases, documented interviews with current and former senior representatives from the company, and experimental investigative gambling (which were documented) within countries where it is considered illegal to do so – including deposits and withdrawals.

Evolution – Company Overview



12. Evolution develops, produces, markets and licenses fully integrated B2B Live Casino solutions to gaming operators. Since its incorporation in 2006, Evolution has developed into a leading B2B provider with 200+ operators among its customers. According to its publications, Evolution currently employs over 10,000 people in studios across Europe and in North America. Evolution is based in Sweden and listed on Nasdaq Stockholm with the ticker EVO.
13. **Stock Market:** The shares of Evolution were originally listed on Nasdaq First North Premier on 20th March 2015. On 7th June 2017, the shares started trading on the main market of Nasdaq Stockholm under the ticker EVO.
14. **Countries of Operation:** Today, over 10,000 people are employed in the company's sites in the U.S., Malta, Latvia, Georgia, Holland, Canada, Estonia, Romania, Spain, Belgium, the U.K. and Sweden.



15. Evolution's 10 largest shareholders (as of 31st August 2021):

Shareholders	Number of shares	% of capital and votes
Capital Group (<i>US-based</i>)	32,379,962	15.3%
Österbahr Ventures AB	23,043,180	10.7%
Richard Livingstone	10,634,238	4.9%
BlackRock (<i>US-based</i>)	10,565,839	4.9%
Vanguard (<i>US-based</i>)	4,663,913	2.2%
WCM Investment Management (<i>US-based</i>)	4,166,679	1.9%
Norges Bank	3,663,942	1.7%
GQG Partners (<i>US-based</i>)	3,283,968	1.5%
Morgan Stanley Investment Management	3,272,788	1.5%
Fidelity Investments (FMR) (<i>US-based</i>)	3,202,303	1.5%
Total, 10 largest shareholders	98,876,812	46.2%
Other shareholders	116,234,303	53.8%
GRAND TOTAL	215,111,115	100%

16. Evolution's Board of Directors:

Name	Position
Jens Von Bahr	Co-Founder & Chairman of the Board
Jonas Engwall	Board Member
Ian Livingstone	Board Member (<i>brother of shareholder Richard Livingstone</i>)
Joel Citron	Board Member (American, US-based.)
Fredrik Österberg	Co-Founder & Board Member
Mimi Drake	Board Member (American)

17. Evolution's presence in the USA:

- a. Evolution currently has seven companies registered in the USA, as per the below table:

Name	Company No.	Registered Territory
Evolution New Jersey LLC	5362945	New Jersey
Ezugi NJ LLC	600424206	New Jersey
Evolution Pennsylvania LLC	7732917	Pennsylvania
Evolution Studio AM LLC	2861101116835	USA
Evolution Michigan LLC	7857957	Michigan
NetEnt Americas Holding Inc.	5627584	USA
NetEnt Americas LLC	400697458	USA

- b. On 17th August 2018, Evolution entered the US casino gaming market by opening the company's first USA Live Casino studio in New Jersey (in 2013 they gained the New Jersey Preliminary Waiver approval).
- c. 888casino, Resorts Casino Hotel, Hard Rock Hotel & Casino Atlantic City, PlaySugarHouse.com operated by Rush Street Interactive and Ocean Resort Casino Atlantic City use the new Evolution US studio to launch Live Casino services for players in New Jersey.
- d. Evolution states in its website that it complies with US regulators such as:
 - i. Division of Gaming Enforcement, State of New Jersey, USA – Casino Service Industry Enterprise Evolution's CSIE license in New Jersey, USA.
 - ii. Pennsylvania Gaming Control Board, Commonwealth of Pennsylvania, USA – Conditional Interactive Gaming Manufacturer License. An Evolution studio is operating in Pennsylvania since 2020.
- e. A third US studio of Evolution is active in Michigan since 2021.

Evolution Breaches its Own Code of Conduct

18. As stated in its own website, Evolution claims to be “100% committed to compliance”, boasting about its regular inspection to ensure they meet all regulatory requirements. This is also repeated and elaborated in their 2020 annual report:

ETHICAL BUSINESS PRACTICES

Evolution is fully committed to its Code of Conduct and actively counteracts corruption in all forms, including bribes and extortion.

The risk of impropriety to Evolution can be found within the company, among suppliers and partners and could damage the company's finances, brand and employees' well-being as well as the trust for the company. We manage this by internal stable regulatory structures consisting of policies and guidelines as well as applying a Code of Conduct and a whistleblower function. Substantial resources are also invested in complying with local and national legislation in each country of operation.

2020 Highlights

- ISO 27001:2013 certification for all locations
- 27 official approvals to offer our games in market
- 78 percent* of relevant employees completed Information Security training
- 80+ team members working solely on Game Integrity & Risk.

A fair business is a healthy business

Fair and just business practices are essential to Evolution's continued growth and thus a strategic priority. Activities in this area span background checks of business partners and a solid setup for information security and fair treatment of our workforce. With thousands of concurrent players and millions of bets each day, one of the most important strategic objectives is to offer a safe gaming environment without compromising the in-play experience.

The ultimate responsibility for this area lies with the Board of Directors and it is outlaid in our Code of Conduct. All business partners and employees are expected to adhere to this policy. It is presented to all newcomers upon joining the company and always readily available via both internal and public corporate channels. In addition to the Code of Conduct, the company has also adopted an Anti-Bribery and Anti-Corruption Policy as well as an Anti-Money Laundering Counter Terrorist Financing Policy which are supported by our established due diligence and procurement processes for customers and major suppliers.

19. Evolution claims to apply to the Swedish Companies Act, EU Market Abuse Regulation, the Swedish Code of Corporate Governance and other regulations and rules applicable to companies listed on the Nasdaq Stockholm exchange.
20. As stated in Evolution's Code of Conduct concerning Anti-money Laundering and Counter Terrorist Financing:

“Evolution applies robust and consistent anti-money laundering and counter terrorist financing standards and procedures to prevent use of its businesses for purposes of facilitating the transfer of any proceeds derived from criminal activity or from an act of participation in such activity (“Money Laundering”) or the provision or collection of funds, by any means, directly or indirectly, with the intention that they

be used or in the knowledge that they are to be used, in full or in part, in order to carry out any terrorist act (“Terrorist Financing”).”

“Evolution is committed to identify and manage the Money Laundering and Terrorist Financing risks that it is exposed to and to take proportionate measures required to manage these risks across all jurisdictions in which it operates.”

21. **As will be clearly shown in this report, our investigation reveals that Evolution violates all its official obligations and code of conduct, and by that enabling money laundering, terrorist financing and tax evasion.** Furthermore, it seems that a large portion of Evolution’s success in recent years is based on its products being sold in illegal markets and via consistent regulatory and contractual violations.

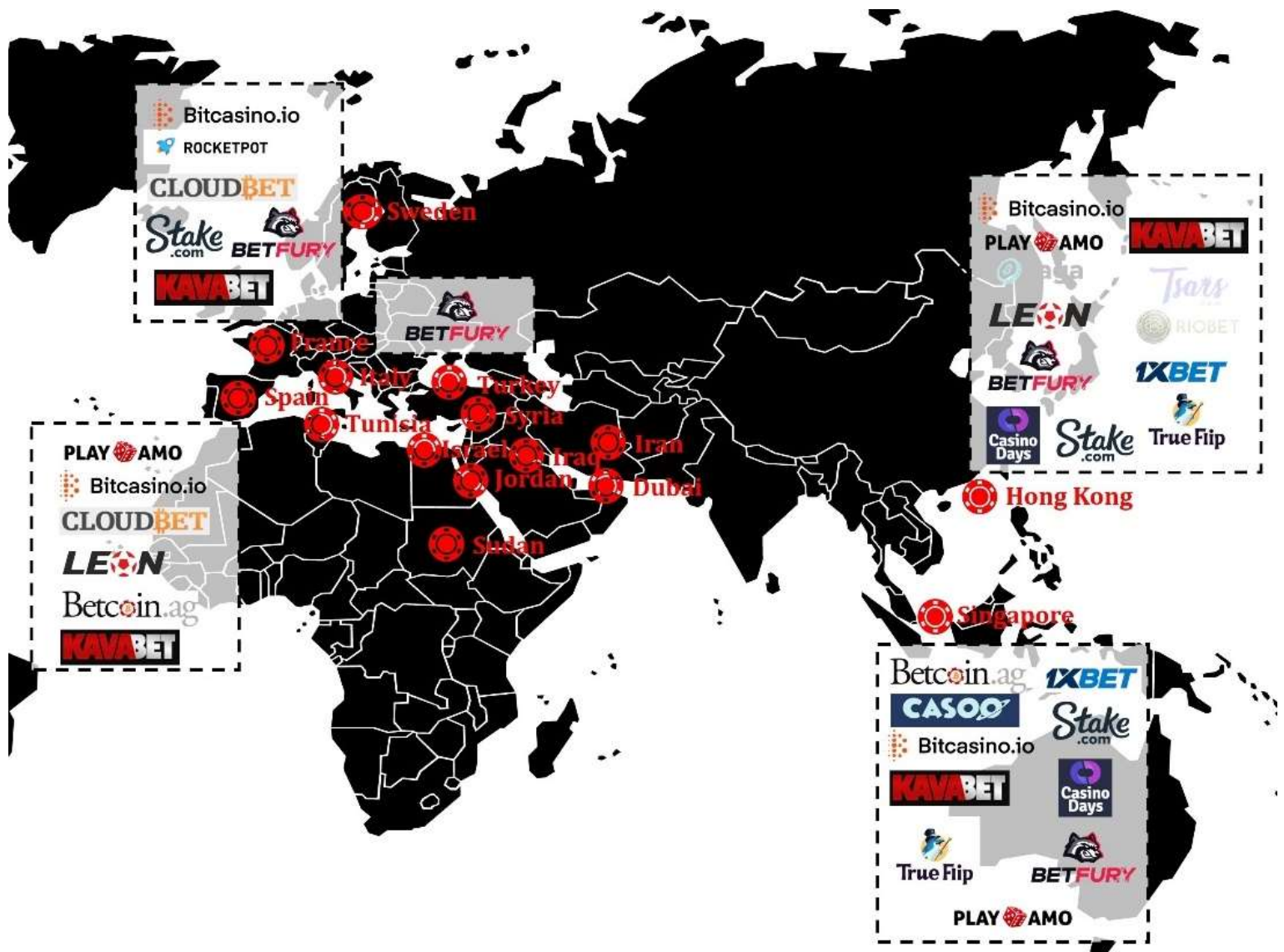
Evolution's Operations in Illegal Markets - Overview

22. **Evolution's worldwide violations:** as illustrated in the below table, Evolution operate in illegal markets who are banned designated terror states or where online gambling is officially prohibited by local criminal laws. These countries possess strict local laws and regulations which request users and operators to abide by. This investigative document will break down how Evolution violated such laws in each country.

Country	Legal Status
Iran	'State Sponsor of Terrorism' as declared by OFAC
Syria	'State Sponsor of Terrorism' as declared by OFAC
Sudan*	'State Sponsor of Terrorism' as declared by OFAC
Hong Kong	Online gambling is prohibited
Singapore	Online gambling is prohibited
France	Casino online gambling is prohibited
Spain	Only Spain-based studios and licensed operators are allowed to operate
Italy	Only licensed operators are allowed to operate
Sweden	Only licensed operators are allowed to operate
UAE	Online gambling is prohibited
Turkey	Casino online gambling is prohibited
Tunisia	Online gambling is prohibited
Saudi Arabia	Online gambling is prohibited

*Evolution operated in Sudan when the country was declared a terror state by OFAC.

23. **Evolution's violations by territory:** as illustrated below, Evolution games are being offered in illegal markets via operators such as Stake.com, Betfury, Kavabet and more.



24. **Territory Violations by Evolution:** The table below displays two violations by Evolution:

- a. In orange: examples of specific games which are offered by Evolution in illegal markets.
- b. In yellow: samples of branded games trademarked by Endemol, Hasbro, etc., which are offered by Evolution in illegal markets, and thus breach the contract between Evolution

and the branded games' owning companies – which conclusively states the restricted territories for the brands, which among other countries, are:

- Spain
- France
- Hong Kong
- Singapore
- Italy

25. Moreover, the sections marked by the red border are case studies in which players from these territories were able to withdraw their winnings.

Withdrawal							
Endemol/ Hasbro							
Evolution							
	Hong Kong	Singapore	France	Spain	Italy	Iran	Sweden
rocketpot.io			Roulette, Monopoly			Lightning Dice	
casinodays.com	Roulette	Roulette					
trueflip.io	Roulette	Roulette					
playamo.com	Roulette	Roulette, DOND		DOND, Monopoly	DOND, Monopoly		
tsars.com	Roulette						Crazy Time
stake.com	Craps, Blackjack, Roulette	Blackjack, Roulette	Roulette				
bitcasino.io	Monopoly	Roulette	Blackjack, Monopoly, DOND	Roulette, Blackjack, Monopoly	DOND	DOND, Monopoly, Blackjack	
casoo12.com	Roulette						
cloudbet.com			Monopoly, Roulette	DOND, Monopoly	DOND, Monopoly		
betfury.io	Monopoly	Roulette	Roulette, Blackjack, Monopoly		Super SICBO		
betcoin.ag		DOND		DOND	DOND		
1xbet.com	Roulette	Roulette					
riobet.com	Roulette, Blackjack						
kavabet.com	Dream Catcher, Blackjack	Roulette, Blackjack	Roulette	Monopoly			
coinsaga.com	Monopoly, Blackjack						
365topbet.com							
kingbitcasino.com						Roulette	
casinoextra.com						Roulette	

26. Territory Violations of Evolution Branded Slots: As described below, It can be seen that many branded slot games developed by Evolution (such as Dracula, Emoji Planet, etc.), are available on various operators sites (such as funcasino.com, lucky-31.com, etc.) and are played by end-users in illegal markets such as Hong Kong and Singapore, again also breaching their commercial agreements.

	Hong Kong	Singapore	France	Spain
Funcasino.com	Jumanji, Guns N Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix, Creature from Black Lagoon	Jumanji, Guns N Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix, Creature from Black Lagoon	Jumanji, Guns N Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix, Creature from Black Lagoon	
yakocasino.com	Jumanji, Guns N Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix, Creature from Black Lagoon	Jumanji, Guns N Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix, Creature from Black Lagoon	Jumanji, Guns N Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix, Creature from Black Lagoon	
mil-lion-funs.com	Emoji Planet, Planet of the Apes, Guns n Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix	Emoji Planet, Planet of the Apes, Guns n Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix	Emoji Planet, Planet of the Apes, Guns n Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix	Emoji Planet, Planet of the Apes, Guns n Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix
lucky-31.com	Jumanji, Guns N Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix, Creature from Black Lagoon	Jumanji, Guns N Roses, Dracula, Invisible Man, Motorhead, Jimi Hendrix, Creature from Black Lagoon		
leon.bet	Jumanji, Guns n' Roses, Dracula, The Invisible Man, Motörhead Video Slot, Jimi Hendrix Online Slot, Creature from the Black Lagoon	Jumanji, Guns n' Roses, Dracula, The Invisible Man, Motörhead Video Slot, Jimi Hendrix Online Slot, Creature from the Black Lagoon	Jumanji, Guns n' Roses, Dracula, The Invisible Man, Motörhead Video Slot, Jimi Hendrix Online Slot, Creature from the Black Lagoon	Jumanji, Guns n' Roses, Dracula, The Invisible Man, Motörhead Video Slot, Jimi Hendrix Online Slot, Creature from the Black Lagoon
lsbet723.com	Jumanji, Guns n' Roses, Dracula, The Invisible Man, Motörhead Video Slot, Jimi Hendrix Online Slot, Creature from the Black Lagoon	Jumanji, Guns n' Roses, Dracula, The Invisible Man, Motörhead Video Slot, Jimi Hendrix Online Slot, Creature from the Black Lagoon		Restricted for Netent, played Evolution games

Evolution is Undoubtedly Aware of Users' IP Address in Illegal Markets

27. As confirmed repeatedly by reliable sources (former and current Evolution employees as well as those who have collaborated with them), the investigation unveils that Evolution are undeniably aware of the IP addresses by end-users of their games. Indeed, this includes IP addresses from illegal markets, as will be described in further breakdown below.

28. [REDACTED] - A senior Evolution Executive who reports directly to the CEO confirms that Evolution (and Ezugi) can see whether an end-user of their games is playing from Dubai – an illegal market. To be precise, he explains that Evolution can see all IP addresses, and also knows when they are manipulated through VPN, by cross-checking the player's IP address with their operator (knowing in advance the location of their operator), as well as with the local currency used for the game – to see that they all matchup:

*“Payment, it could be done from anywhere. There are people nowadays, I don't understand them, but people are paying with Bitcoins, and other crypto coins, but **the IP of where he's playing from, you can always see.**”*

29. Moreover, it appears that Evolution checks on end-users' VPN only when it might harm them financially – i.e., a player might be in one country, yet use a different country's currency within the game, which has a lower value, so that he won't have to pay as much. In such a case, Evolution will consequently be paid less, and therefore knows to look out for this. This is strengthened by the **senior Evolution Executive**:

*“We have a lot kinds of these frauds that **someone from Pakistan will play with Armenian currency...** and this is because, you know, the currency value is lower, and they don't want to pay us, **so we make all those matches.**”*

30. [REDACTED] - A former financial executive at Evolution – a major Evolution subsidiary in charge of a large portion of the Evolution's operations in Europe and Asia - reinforces the

above mentioned by the senior Evolution Executive, stating that if a player from France plays an Evolution game via an operator, it is considered illegal, and that the supplier of that game would be in trouble. Most crucially, it is stated that Evolution can see that the player's IP address is at a restricted country. Thus, they are able to monitor their end-users' location:

“Evolution can see if a player have an IP address from restricted countries”.

Evolution Offers it's Games in Banned State Sponsors of Terrorism – Iran Sudan and Syria

31. Evolution games are being offered in banned “State Sponsors of Terrorism” such as Iran and Syria (and according to the senior Evolution Executive, also in Sudan until its removal from the list in December 2020), as determined by the U.S. Department of State and Office of Foreign Assets Control (US Department of the Treasury):

The image displays two overlapping web pages. The background page is from the U.S. Department of State, titled "State Sponsors of Terrorism" under the "BUREAU OF COUNTERTERRORISM". It explains that countries designated as state sponsors of terrorism are subject to sanctions under three laws: section 1754(c) of the National Defense Authorization Act, section 40 of the Arms Export Control Act, and section 620A of the Foreign Assistance Act of 1961. It lists four countries: Cuba, the Democratic People's Republic of Korea (North Korea), Iran, and Syria. The foreground page is from the U.S. Department of the Treasury, titled "Sudan and Darfur Sanctions". It features a sidebar with links to "Specially Designated Nationals List (SDN List)", "SDN List - Data Formats & Data Schemas", "Consolidated Sanctions List (Non-SDN List)", "Additional Sanctions Lists", "Recent Actions", and "Search OFAC's Sanctions Lists". The main content area includes a sign-up for e-mail updates, a section for "IMPORTANT ADVISORIES AND INFORMATION" (highlighted with a red box), and a notice that Sudan's designation as a state sponsor of terrorism was rescinded effective December 14, 2020. It also mentions the revocation of certain sanctions on Sudan and the Government of Sudan effective October 12, 2017.

State Sponsors of Terrorism
BUREAU OF COUNTERTERRORISM

Share

Countries determined by the Secretary of State to have repeatedly provided support for acts of international terrorism are designated pursuant to three laws: section 1754(c) of the National Defense Authorization Act for Fiscal Year 2019, section 40 of the Arms Export Control Act, and section 620A of the Foreign Assistance Act of 1961. Taken together, the four main categories of sanctions resulting from designation under these authorities include restrictions on U.S. foreign assistance; a ban on defense exports and sales; certain controls over exports of dual use items; and miscellaneous financial and other restrictions.

Designation under the above-referenced authorities also implicates other sanctions laws that penalize persons and countries engaging in certain trade with state sponsors. Currently there are four countries designated under these authorities: Cuba, the Democratic People's Republic of Korea (North Korea), Iran, and Syria.

U.S. DEPARTMENT OF THE TREASURY

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FINANCIAL SANCTIONS

Specially Designated Nationals List (SDN List)

SDN List - Data Formats & Data Schemas

Consolidated Sanctions List (Non-SDN List)

Additional Sanctions Lists

Recent Actions

Search OFAC's Sanctions Lists

Sanctions Programs and Country Information

Sudan and Darfur Sanctions

Sign up for Sudan and Darfur Sanctions e-mail updates.

IMPORTANT ADVISORIES AND INFORMATION

Effective December 14, 2020, the determination regarding Sudan as a State Sponsor of Terrorism was rescinded. Accordingly, the prohibitions of the Terrorism List Governments Sanctions Regulations, 31 C.F.R. part 586, and section 606(a)(1) of the Trade Sanctions Reform and Export Enhancement Act of 2000 (22 U.S.C. 7205) no longer apply to Sudan.

Effective October 12, 2017, certain sanctions with respect to Sudan and the Government of Sudan - namely sections 1 and 2 of Executive Order (E.O.) 13667 of November 3, 1997 and all of E.O. 13412 of October 13, 2006 - were revoked, pursuant to E.O. 15761 of January 13, 2017, as amended by E.O. 13804 of July 11, 2017. This revocation of certain sanctions:

- Does not affect OFAC sanctions related to the conflict in Darfur, which were imposed pursuant to E.O. 13406 of April 26, 2006 and pursuant to the national emergency declared in E.O. 13067, which remains in effect; and
- Does not affect OFAC's imposition of sanctions on any Sudanese person pursuant to sanctions authorities other than E.O.s 13667 and 13412.

32. **Iran** – the senior Evolution Executive exposes the fact that Evolution offers its games extensively under the radar in State Sponsors of Terrorism such as Iran. Put simply, Evolution know that Iran is a big and fruitful market for the live casino industry, therefore in practice, they supply their games to Iran, through operators – which conceals their part in this illegal market, thus protecting them, and of course allowing them access to wealthy players:

“What we do is that we supply products. This is, you know, unofficial. So, we do have games for Iran”

33. The senior Evolution Executive’s statements very clearly display that **Evolution knows the Iranian live casino market inside out**, by explaining that it is a competitive market insofar as knowing that in order to reach their potential customer, one would need to lure him or her with attractive terms such as bonuses, better odds, and more.

“When you go to Iran, I can tell you that there is already a competition. Unless you know who you’re gonna market it to, you have no unique advantage of going into Iran, none. All the players there, they do good money, why would someone-- why would a player go to you? You can say, ‘Okay, I’m gonna offer him a bonus, I can offer him better odds, I can offer promotion.’”

34. In a continuous display of his knowledge of the Iranian market, the senior Evolution Executive shares that one needs skills and expertise to operate in an unregulated market, as a brand cannot be established in Iran with the proper marketing which would usually be used.

*“That’s an entry strategy, okay, but you need to have the skills and the knowhow, **and it’s harder in an unregulated market** where you are not able to actually establish a brand.”*

35. **Syria** – the senior Evolution Executive yet again displays his knowledge of the live casino market in another state designated as State Sponsors of Terrorism – Syria. He confidently states that Syria is one of the countries where live casino Evolution games are played, strongly emphasizing that this 100% includes the Assad family.

“Are there players in Syria? I’m sure that Assad’s Family are playing. 100%”

36. Even more so, the senior Evolution Executive mentions that whether the players are wealthy or not would depend on who you know – implying that via the right connections, you could target those in order to make gains. He points out that in such cases **Evolution do not connect to the end-user, but do indeed get their ID, and income per country. That is, they know the amount which players bet, and what revenues they generate for Evolution.**

“We only get the ID and we have the numbers per country.”

37. **Sudan** – Having checked Evolution’s number of players and monthly Gross Gaming Revenues in Sudan within **the last three years**, the senior Evolution Executive implies that **it is not one of the countries where they have many players, or in other words, that it is not very profitable for them.** It is established, nevertheless, that as a matter-of-fact Evolution supply their games to hundreds of end-users from Sudan, who play online in the Mayfair casino – including the years when Sudan was declared a terror state.

“It’s not a big country for us. It might be for many reasons, but most of the people from Sudan are have been playing in Mayfair”

38. The senior Evolution Executive also details how to **operate in prohibited markets such as Sudan, by suggesting the notion of setting up a password-protected website platform for**

an exclusive and limited number of VIP customers only, which would allow Evolution games to be played online, and for the winnings to be in the form of a cash collection.

“My strategy would be a VIP business with a very simple platform that enable slots and Evolution games online to a limited amount of players on a password-protected website where you provide cash collection to VIP players ”

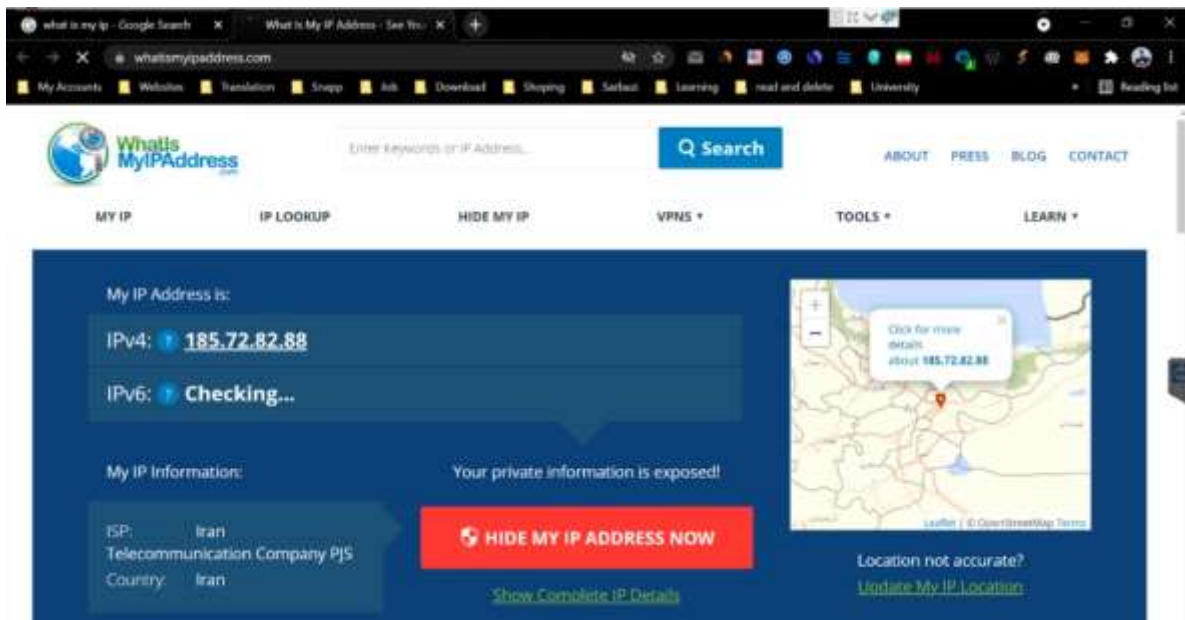
39. Whilst providing more detail on how to operate in the prohibited market of Sudan (with Evolution’s games), the senior Evolution Executive explains that as the main issue is depositing money in and out of Sudan. He emphasizes the need for a bank that ***“will not look and ask where the money goes and where the money is being paid”***. According to the senior Evolution Executive, once this side of the business has been sealed, then 90% of the operation is set.
40. Thus, by allowing gambling to take place in designated States Sponsors of Terrorism such as Iran and Syria, Evolution clearly violates US sanctions on these states and its own Counter Terrorist Financing Policy.

Investigative Gambling with Evolution Games in State Sponsors of Terrorism – Iran

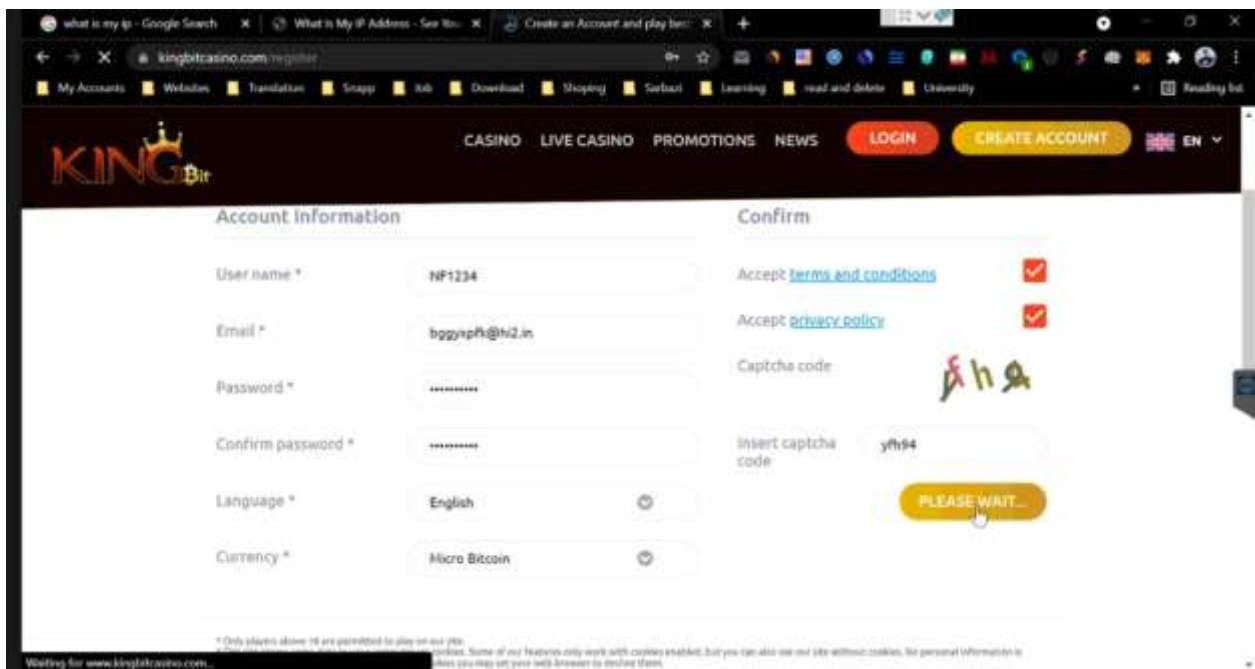
41. The example below shows that Evolution violates the law by enabling its games to be played in Iran. It was requested for a player who is physically in Tehran, Iran, to record the entire process of the experiment. This includes the initial IP verification, logging onto an operator website, depositing money, selecting an Evolution game, gambling – both winning and losing bets.

Example 1: An experimental player entering Kingbitcasino.com via an Iranian IP address

42. Step 1: The experimental player logs online with an **IP address from Iran**, before entering kingbitcasino.com – the operating platform which offers live casino games powered by Evolution.



43. Step 2: The player successfully enters **kingbitcasino.com** on a separate tab, after ensuring the IP from Iran, and goes through their registration process



The screenshot shows the KingBit Casino registration page. The browser address bar displays 'kingbitcasino.com/register'. The page features a dark header with the KingBit logo and navigation links: CASINO, LIVE CASINO, PROMOTIONS, NEWS, LOGIN, and CREATE ACCOUNT. The registration form is divided into two sections: 'Account information' and 'Confirm'.

Account information:

- User name *: NF1234
- Email *: bgyxpft@n2.in
- Password *: [masked]
- Confirm password *: [masked]
- Language *: English
- Currency *: Micro Bitcoin

Confirm:

- Accept [terms and conditions](#) [checked]
- Accept [privacy policy](#) [checked]
- Captcha code: yfh94
- Insert captcha code: yfh94
- PLEASE WAIT... button

At the bottom, there is a disclaimer: '* Only players above 18 are permitted to play on our site. Some of our features only work with cookies enabled. But you can also use our site without cookies. We personal information is stored on our servers to enhance your experience. You may opt out your web browser to enable them.'

Step 3: The player deposits currency to his account before commencing to choose an Evolution game and play. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.

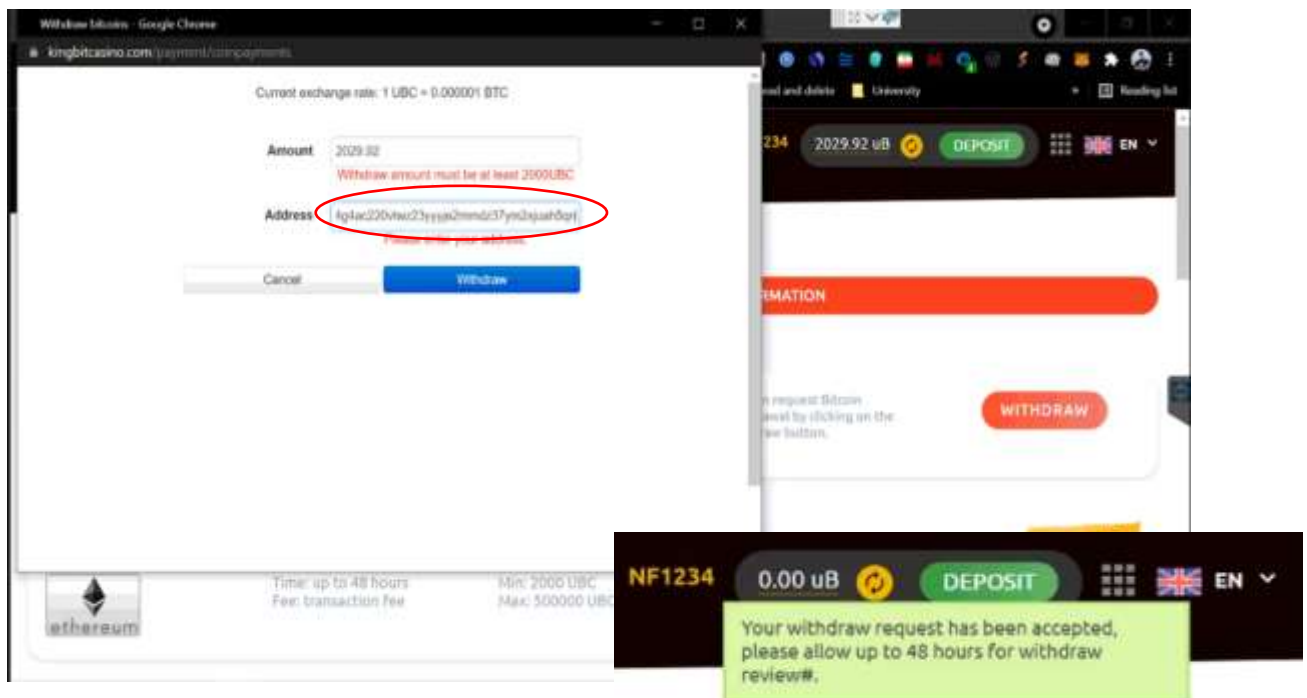


The screenshot shows the KingBit Casino deposit page. The browser address bar displays 'kingbitcasino.com/payment/outgoingpayments'. The page features a large QR code for depositing via Bitcoin. Below the QR code, the current exchange rate is shown: 'Current exchange rate: 1 BTC = 1000000.00000 UBC'. A 'Copy address' button is present. Below this, a text box contains the Bitcoin address: '3TL6uU8r1F4bZ2vmoS3MfHfUpd5TY'. A 'CONFIRM' button is visible. At the bottom, there is a section for 'ethereum' with a 'DEPOSIT' button and a 'WE'RE HERE! SPEAK TO US' button. A small banner at the bottom right says 'Promotion participation cancelled.'

44. Step 4: The player chooses an Evolution game – **Roulette**, then commences to place a bet successfully.



45. Step 5: The player then goes on to **withdraw** his winnings, and does so successfully via his **BTC** wallet.




46. Step 6: The player's withdrawal is **successful**.

Blockchain.com Wallet Exchange Explorer Buy Bitcoin Trade

Address USD BTC

This address has transacted 1 times on the Bitcoin blockchain. It has received a total of 0.00162992 BTC (\$101.66) and has sent a total of 0.00000000 BTC (\$0.00). The current value of this address is 0.00162992 BTC (\$101.66).



Address: bc1qq4g4ac220vtwz23yyje2mmdz37ym2xjuah5gn

Format: BECH32 (P2WPKH)

Transactions: 1

Total Received: 0.00162992 BTC

Total Sent: 0.00000000 BTC

Final Balance: 0.00162992 BTC

Transactions +

Fee: 0.00003176 BTC
(6.576 sat/B - 2.474 sat/WU - 483 bytes)
(8.894 sat/VByte - 321 virtual bytes) +0.00162992 BTC

Hash: ba331877c29f5b92e3f6bc3630f40b5555a8f297582caeb1066bd631b... 2021-11-06 09:41

<u>2McNFBtC5Z6ms3kLXZF6RpDQGmWJSzQEK</u>	0.00351990 BTC →	<u>1MYd4z5uJZkKZHKtZfZ3WMAx\$6A69mH6g</u>	0.16299832 BTC →
<u>33MUVqWGWUn7U6JXsg7jvdi361s24bJUp</u>	0.17203000 BTC →	<u>36dNBf9pusk6sk1MYQuu2f8TgptVzHH6N</u>	0.00230000 BTC →
		<u>bc1qq4g4ac220vtwz23yyje2mmdz37ym2xjuah5...</u>	0.00162992 BTC →
		<u>3B7jWZjuADYVVU4nFDt8eGKCsUoLH89ZP8</u>	0.00858890 BTC →

4G R 5:39 PM

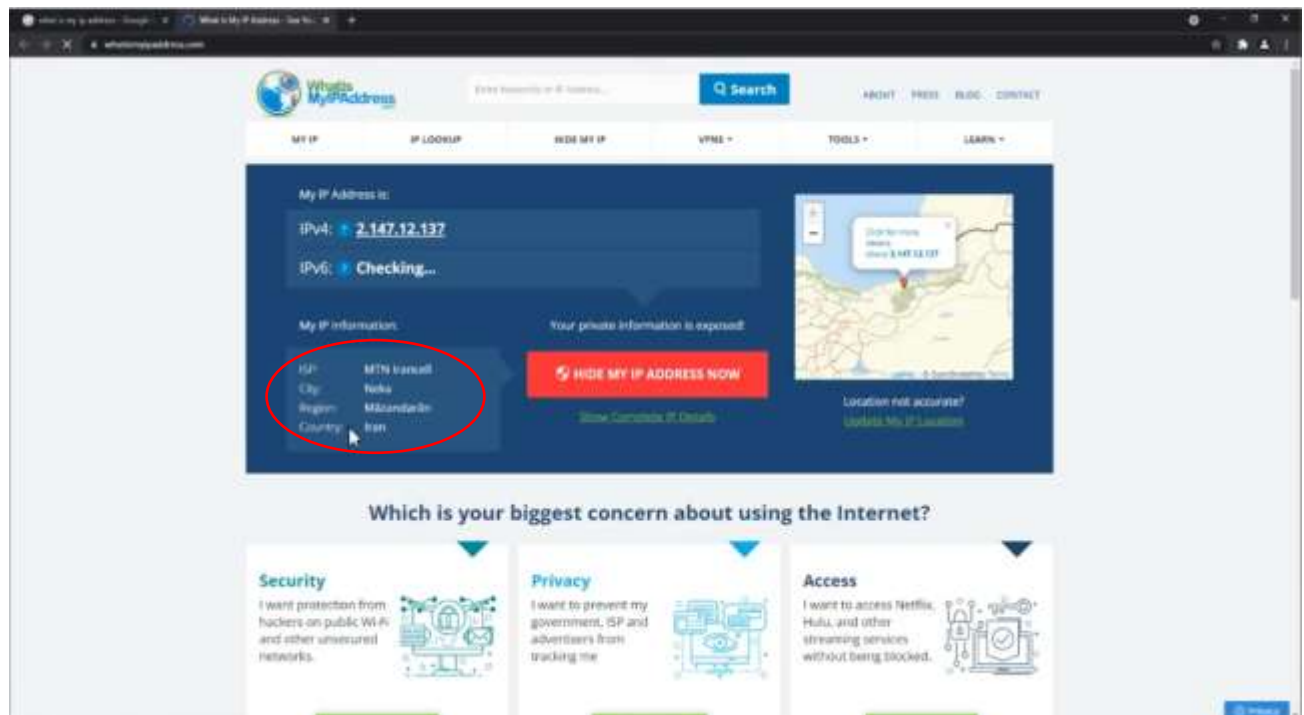
ACCOUNTS BALANCE TRANSACTIONS CRYPTO BETTING

11/6/21 Confirmed 0.00162992 BTC 100.86 USD

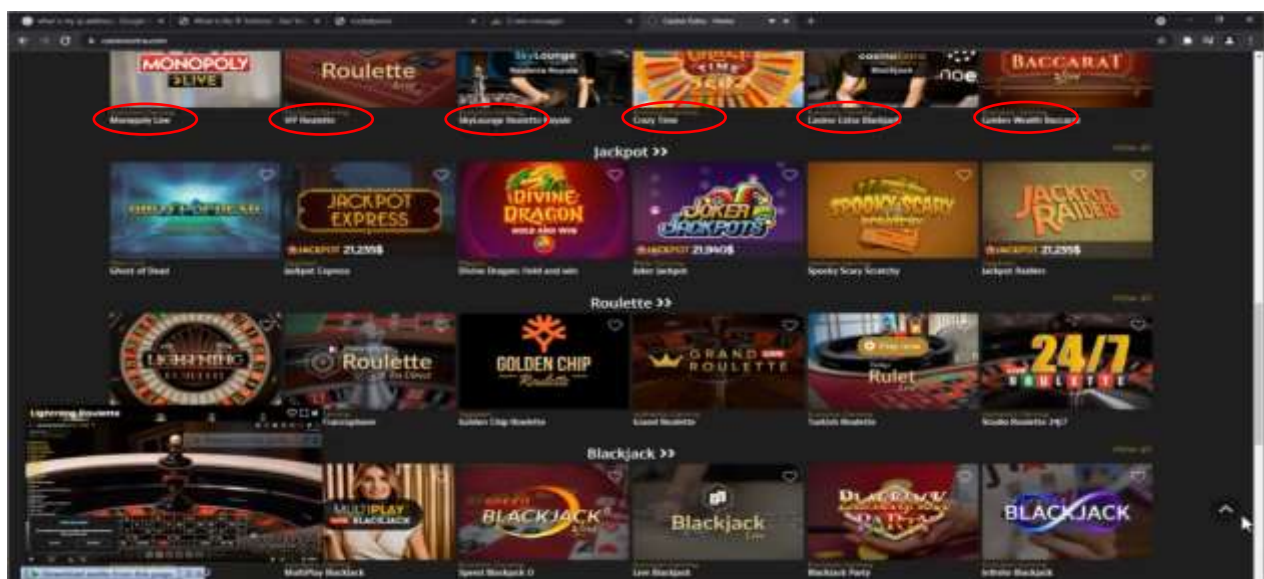
11/4/21 Confirmed 0.00082759 BTC 50.00 USD 51.21 USD

Example 2: An experimental player entering casinoextra.com via an Iran IP address

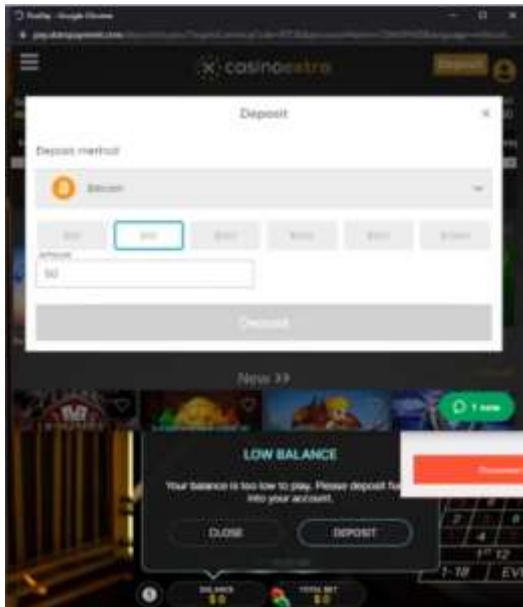
47. Step 1: The experimental player logs online with an **IP address from Neka, Iran**, before entering casinoextra.com – the operating platform which offers live casino games powered by Evolution.



48. Step 2: After ensuring the Iran IP address, the player enters **casinoextra.com** – the operating platform website who offer live casino games powered by Evolution. Notice the Evolution games offered.



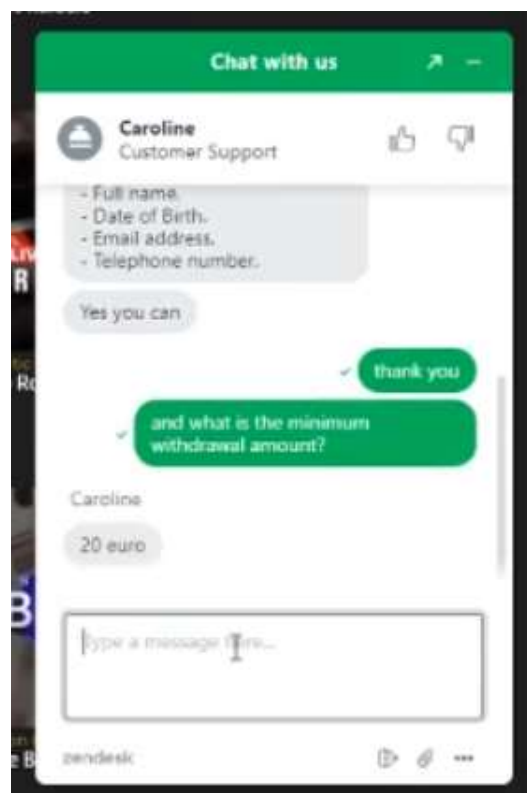
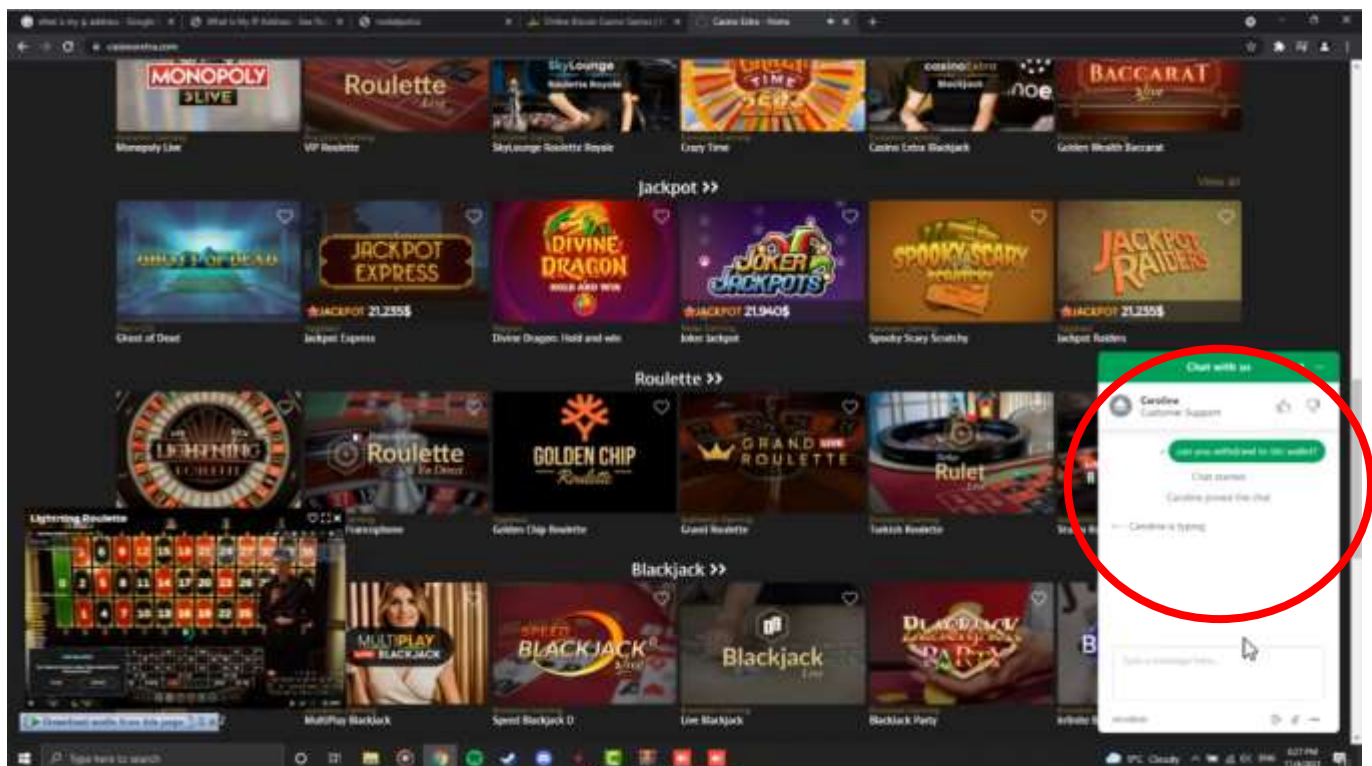
49. Step 3: The player deposits currency to his account before commencing to choose an Evolution game and play. Notice that this process does not alert the player to any due diligence or KYC procedure which needs to be done before playing – the funds are easily accepted without monitoring.



50. Step 4: The player commences to choose an **Evolution game** – **Lightning Roulette**, plays, and wins.

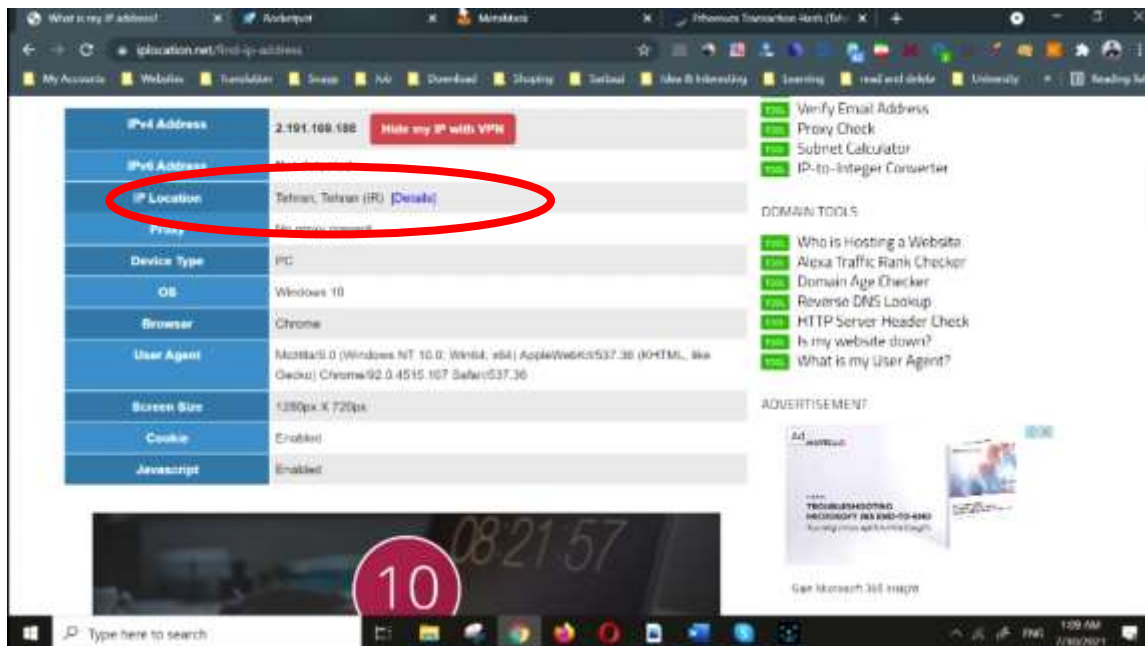


51. Step 5: The player asks regarding an option to withdraw from the website casinoextra.com, and the online representative explains about the process.

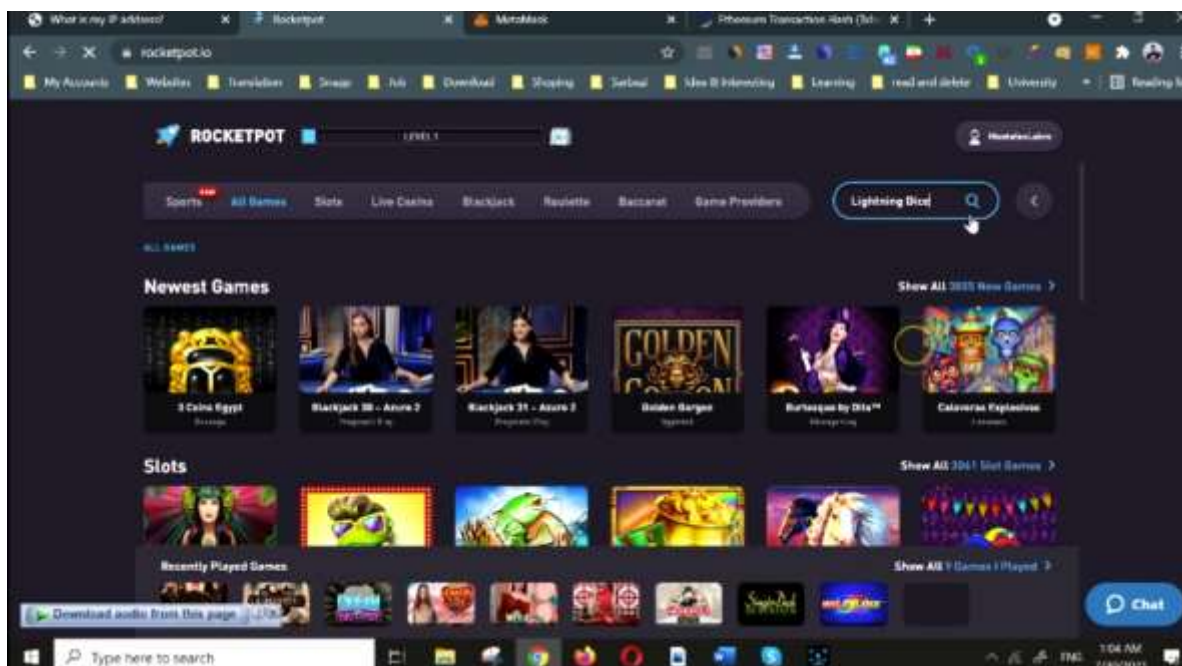


Example 3: An experimental player entering rocketpot.io via an Iranian IP address

52. Step 1: The experimental player logs online with an **IP address from Tehran, Iran**, before entering rocketpot.io – the operating platform which offers live casino games powered by Evolution.



53. Step 2: The player successfully enters **rocketpot.io** on a separate tab, after ensuring the IP from Iran.



54. Step 3: The player chooses an Evolution game – **Lightning Dice**, then commences to place a bet successfully.



Evolution Offers it's Games In "Black Markets" - Hong Kong & Singapore

55. Clear evidence shows that live casino games produced by Evolution are being offered to end-users - those who ultimately use their product – in territories where online gambling is illegal in Asia, including **Hong Kong** and **Singapore** (“**Black Markets**”) – see below for the relevant laws in Hong Kong and Singapore.



Home Affairs Bureau

The Government of the Hong Kong Special Administrative Region
of the People's Republic of China

Gambling Legislation

Under the Gambling Ordinance (Cap. 148), all gambling activities are illegal except those expressly authorized by the Government under the Betting Duty Ordinance (Cap. 108) (i.e. authorized horse racing, authorized football betting and the Mark Six Lottery), those licensed by the public officers appointed by the Secretary for Home Affairs (e.g. mahjong parlours) and those exempted under Section 3 of the Gambling Ordinance (mainly social gambling).

REPUBLIC OF SINGAPORE GOVERNMENT GAZETTE ACTS SUPPLEMENT

Published by Authority

NO. 37]

FRIDAY, NOVEMBER 28

[2014

The following Act was passed by Parliament on 7th October 2014 and assented to by the President on 18th November 2014:—

REMOTE GAMBLING ACT 2014

Unlawful remote gambling

8.—(1) An individual who, in Singapore, gambles —

- (a) using remote communication; and
- (b) using a remote gambling service that is not provided by —
 - (i) an exempt operator; or
 - (ii) a person otherwise exempt under section 40 from section 10 or 11,

shall be guilty of an offence and shall be liable on conviction to a fine not exceeding \$5,000 or to imprisonment for a term not exceeding 6 months or to both.

Providing unlawful remote gambling service for another

9.—(1) A person (called an agent) who, inside or outside Singapore —

- (a) organises, manages or supervises remote gambling by others in accordance with arrangements made by a principal of the agent, which may include —
 - (i) inviting others to gamble using remote communication in accordance with those arrangements; or
 - (ii) placing, making, receiving or accepting bets using remote communication in accordance with those arrangements;
- (b) distributes a prize offered in remote gambling by others in accordance with arrangements made by a principal of the agent;
- (c) distributes money or money's worth paid or staked by others in remote gambling in accordance with arrangements made by a principal of the agent;
- (d) facilitates participation by others in remote gambling in accordance with arrangements made by a principal of the agent, which may include allowing a person to participate in such remote gambling; or
- (e) assists in any conduct described in paragraph (a), (b), (c) or (d).

and as a result facilitates one or more individuals to commit an offence under section 8, shall be guilty of an offence and shall be liable on conviction to a fine of not less than \$20,000 and not more than \$200,000 or to imprisonment for a term not exceeding 5 years or to both.

Prohibition against overseas remote gambling service with Singapore-customer link

10.—(1) A person who provides outside Singapore a remote gambling service with a Singapore-customer link shall be guilty of an offence and shall be liable on conviction to a fine of not less than \$20,000 and not more than \$500,000 or to imprisonment for a term not exceeding 7 years or to both.

56. By allowing gambling to take place in these Black Markets, Evolution also violates its own Anti-Money Laundering Policy and Anti-Money Laundering laws by receiving cash and bitcoin originated from a prohibited gambling and without knowing their origin, and **do not carry out KYC processes** to implement its anti-money laundering policy and to check the source of funds.

57. From a conversation with [REDACTED] - **Evolution's current Board Member and Shareholder**, who played a significant role in Evolution's entering the Asian market, it is highly evident that Evolution is well aware of the regulatory restrictions in some countries in

Asia. He admits that this market is “*kind of shady, so it’s a difficult environment*”, and later acknowledges that Evolution operates in Asia, and is hugely successful there. He further confirms that within Asia, Evolution has a presence also in Singapore and Hong Kong.

Board Member: “I think we are in more or less in every country”.

Interviewer: “In every country. So, Singapore, Hong Kong?”

Board Member: “Yes.”

58. In more detail, the board member and shareholder explains that Evolution takes steps to study the Asian player’s behaviour, by understanding their culture, language, etc., specifically also for end-users in Hong Kong and Singapore.
59. [REDACTED] - a former **Managing Director at Evolution** also confirms that Evolution games are supplied in Singapore and Hong Kong and have been so “*for over ten years*”, and even have an office in the Philippines dedicated for operations in these Black Markets. He strengthens the matter raised above in the context of Sudan, that the issue with working in this market is knowing how to get money in and out of the country.
60. In the same conversation with the former Managing Director, it is unveiled that **Hong Kong and Singapore are one of Evolution’s strongest markets which bring “huge revenues”**. They have a presence of approximately 10%-20% of the Asian market.
61. The former financial executive at Evolution claims that it is possible to supply Live Casino games to Hong Kong and Singapore, if it is done directly from Curacao or Malta. **While working at Evolution, he explains that Evolution began supplying their games to Hong Kong and Singapore between 2015 – 2018** and assures that they are still available and offered there nowadays.

“Interviewer: So, you are experienced in the Asian market in Singapore and Hong Kong?”

*Former financial executive: During my time in Evolution, I spent three and a half years at Evolution between ’15 and ’18, and during that time we went, **they started supplying the Asian market**”*

62. The former Managing Director also goes on to describe how Evolution use aggregators/resellers such as **SoftGamings** or **Coingaming**, in order to offer their games in such illegal markets. That is, he explains, that one needs to **bypass authorities in unregulated markets such as Hong Kong and Singapore and operate in an indirect way via aggregators who offer Evolution Games in these markets:**

“So, basically, it’s also that you cannot take, for example, directly games from Evolution and sell them in Asia, you need to take it to some of the aggregators who do it for this market, it doesn’t matter, it doesn’t mean that Evolution will not work in Asia, but they will do it a little bit more tricky”.

63. [REDACTED] and [REDACTED] - Two executives at **SoftGamings** - a **top aggregator which is partnered with Evolution** - validate that they (SoftGamings) can provide Evolution live casino games to end-users in Hong Kong and Singapore, pending the right payments methods used for the local players. They state that as part of their role they support their client – the operator – with payment processing methods i.e., the client receives the licensing and bank account and all needed in order to start their business within the iGaming industry:

*“Interviewer: I can stream the Evolution games to Singapore and Hong Kong?
SoftGamings: Yes, absolutely. You can stream it all of the globe”.*

64. The two executives go on to disclose that SoftGamings can create a website platform for Evolution live casino games which only VIP players from Hong Kong and Singapore would have exclusive access to. Additionally, they claim that they have some clients (operators) who focus specifically on those territories.

65. According to the two executives, Evolution games are most loved by Hong Kong and Singapore players, as they use European looking dealers – which Asians knowingly admire. They underline that **they update Evolution whenever an operator client requests their**

games, regardless of whether it is in a forbidden territory. They claim their clients will use certain payment methods to allow end-users in Singapore to play Evolution games.

“Interviewer: If I understand correctly you updating Evolution that a certain provider bought their system and he operates in certain country?”

*Softgamings: “Yes. Yes. We provide, **it doesn’t matter basically the territory.**”*

66. The two executives provide multiple examples of SoftGamings operator clients such as **1xbet / Riobet / Parimatch / Favbet / Leonbet / Kavabet**, who work in Singapore and Hong Kong, where they provide Evolution games with branded tables:

As I've said before during our conversation most of the projects are international, they don't aim at one country or a region, some of them have 10-20 languages on board and operate internationally. I believe all of the projects I've mentioned can be opened from Singapore and HK (with or without VPN). In the list there are few examples with CN language, so they are working directly in China, including HK.

It was our pleasure to meet you and have a productive conversation.

Please find presentation with our services attached to this email, and here are some of our existing live projects:

casoo.com

casibom.com/en

webbyslot.com

betzino.com

maxcasino.com

goodwincasino.com

betitall.com

betpat.com

You can explore a variety of design features, exclusive layouts and different gaming providers that we cooperate with.

Some projects with CN languages:

fortunazone.com/en

coinywin.com

You can find branded Evolution tables exploring our clients - 1xBet.com, Riobet.com, PariMatch.com, Favbet.com, Leonbet.com

You can contact me via Skype/WhatsApp/Telegram any moment with any quick questions on your mind.

Best regards.

Evolution is well-aware their games are supplied in “Black Markets” - Hong Kong & Singapore

67. In a conversation with a former Managing Director at Evolution, he reinforces that Evolution are very much aware that their games are played in illegal markets and can see down to the end-user’s city and IP address and proxy base:

“Interviewer: But do you know if Evolution Games are aware that operators offer their games from grey markets, such as the bunkers that we are speaking about, Mainland, China or Hong Kong or Singapore?”

Former Managing Director: Okay. That’s a very nice question. If you ask Evolution management, they will tell you they have no idea... In reality, actually, of course, everybody knows what is going on, it’s electronic business, which is very, very transparent”

68. In a conversation with a **SoftGamings** executive, he admits that if end-users play Evolution games in Singapore and Hong Kong, Evolution will be aware of the players’ location via the operator. Furthermore, he explains that Evolution can see all IP’s, statistics and revenue reports when their games are played in Hong Kong or Singapore.

“They have all the statistics, they have all the reports regarding the revenue, the players, their IP addresses, of course.”

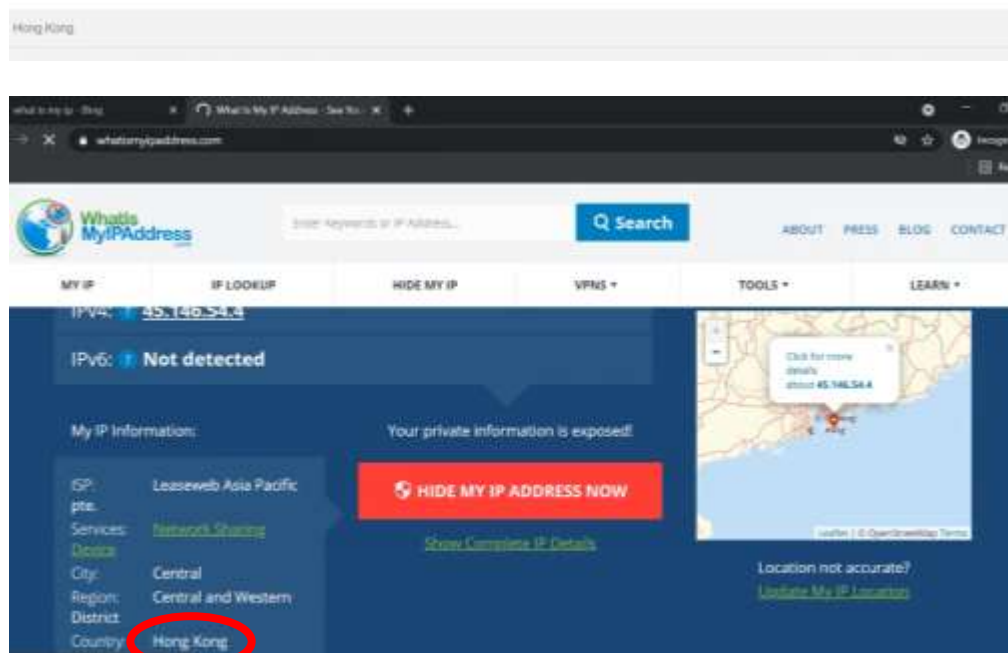
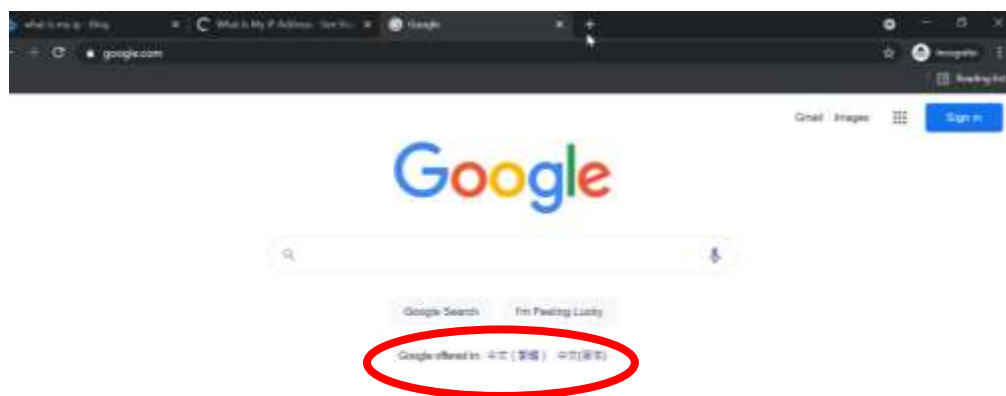
69. He easily states that Evolution don’t care how the aggregator or operator deal with payments in forbidden markets such as Singapore or Hong Kong, as long as they get their monthly revenue share.

Investigative Gambling with Evolution Games in Black Markets – Hong Kong & Singapore

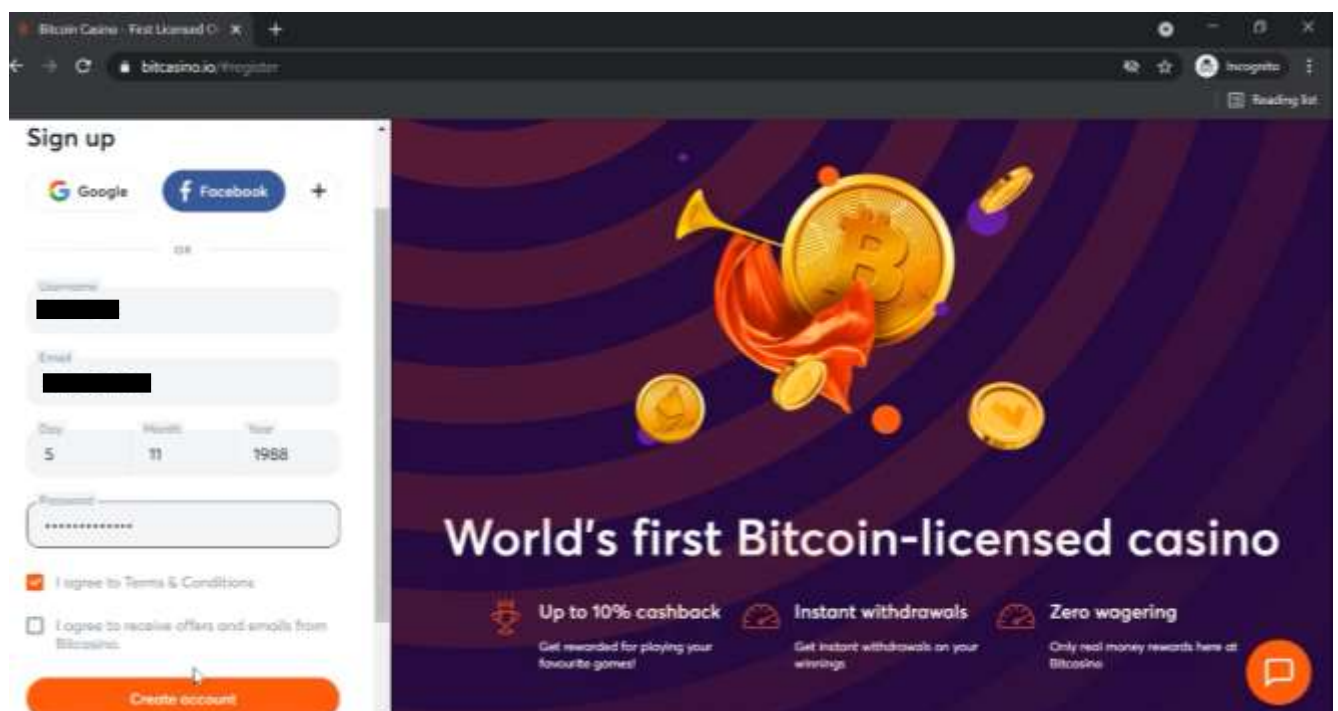
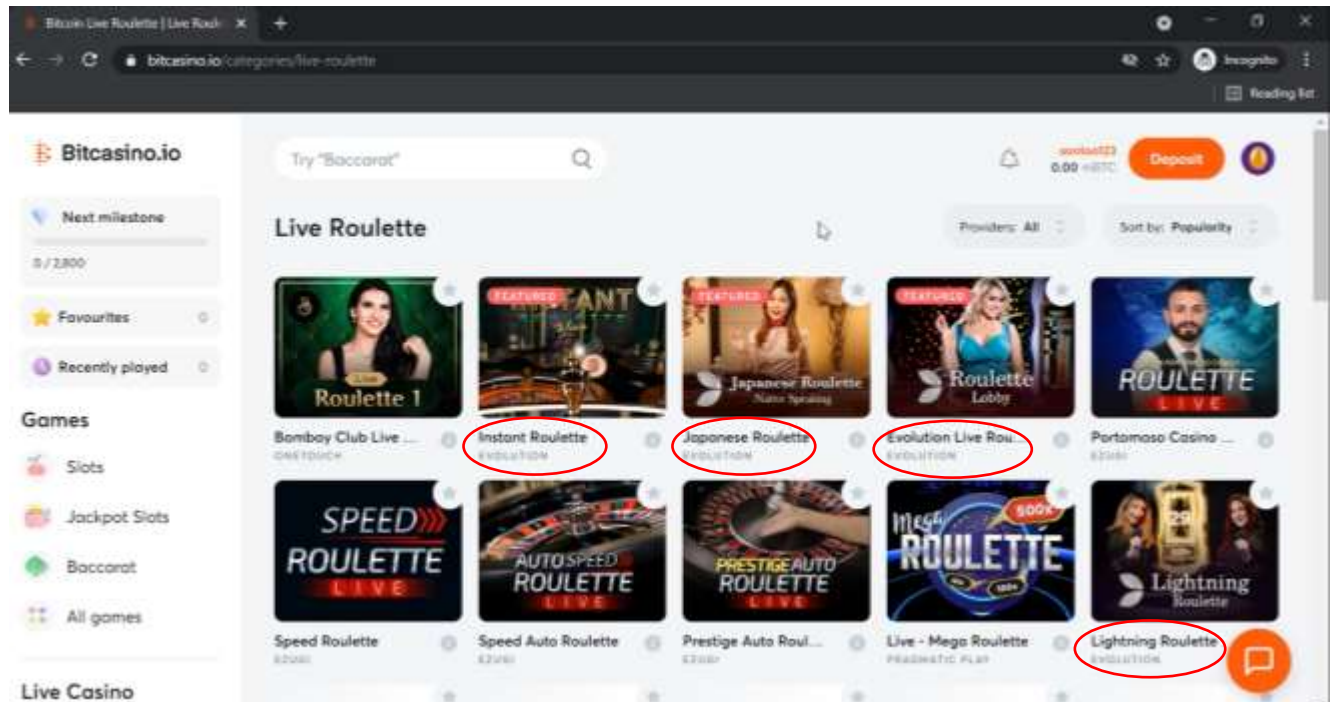
70. Several tests were conducted to play Evolution games in Hong Kong and Singapore, in order to support the evidence noted so far that Evolution do indeed operate in such illegal markets. Furthermore, by allowing such gambling to take place in these Black Markets, Evolution violates its own Anti-Money Laundering Policy by receiving cash and bitcoin payments originated from a prohibited gambling and without knowing their origin, and moreover, do not carry out monitoring processes to check this either.

Example 1: An experimental player entering bitcasino.io via a Hong Kong IP address

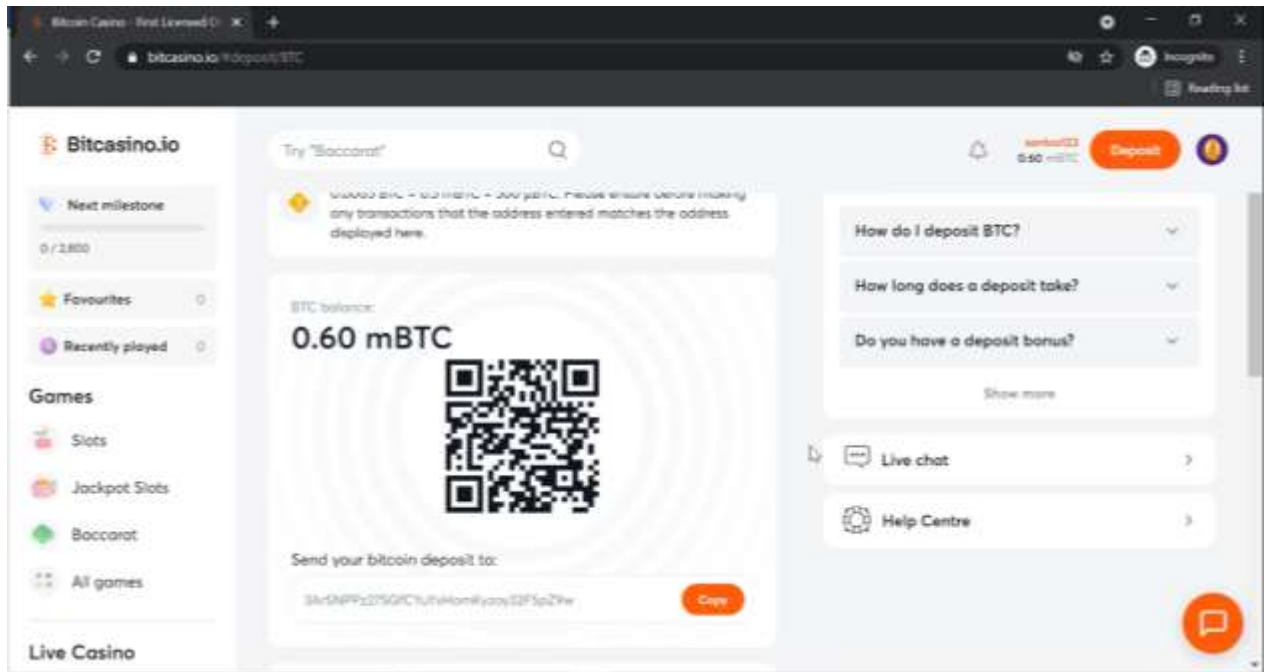
71. Step 1: The player uses a **Hong Kong-based IP address**. Notice the language change on Google due to the location.



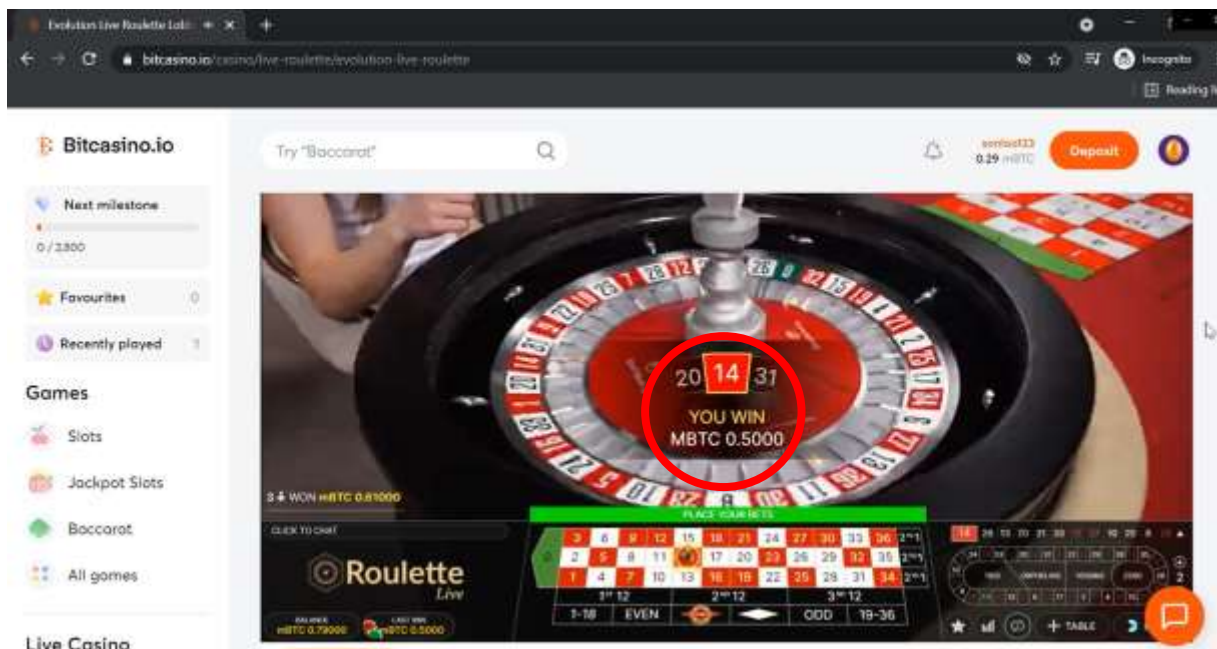
72. Step 2: After ensuring the Hong Kong IP address, the player enters **bitcasino.io** – the operating platform website who offer live casino games powered by Evolution and goes through their registration process. Notice the Evolution games offered.



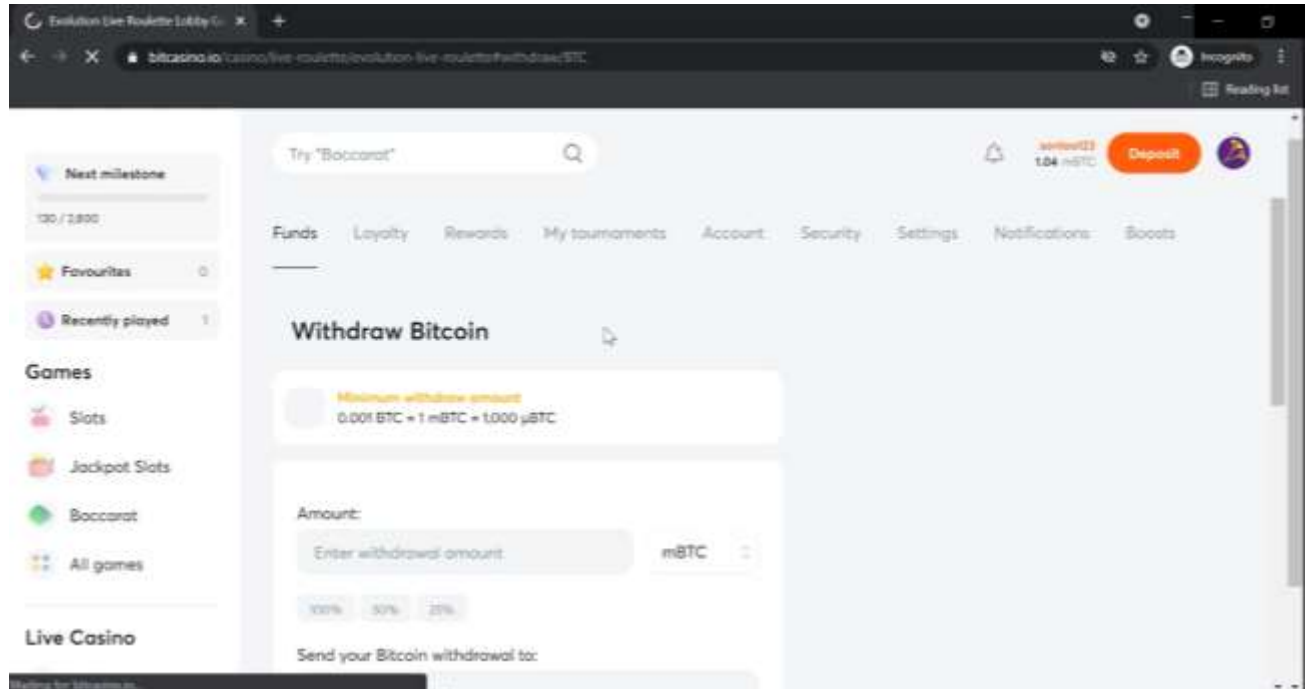
73. Step 3: The player deposits currency to his account before commencing to choose an Evolution game and play. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



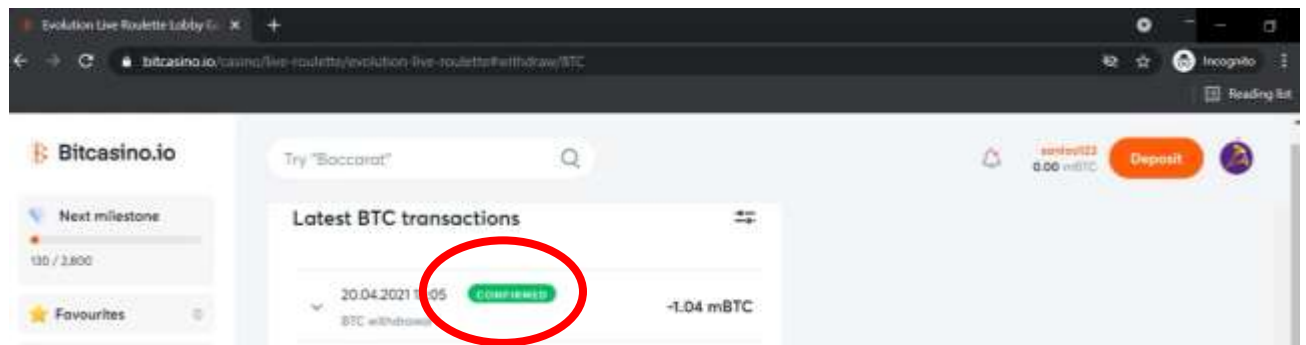
74. Step 4: The player commences to choose an **Evolution game – Roulette Live**, places bets and wins MBTC 0.5000 (1/1000 bitcoin).



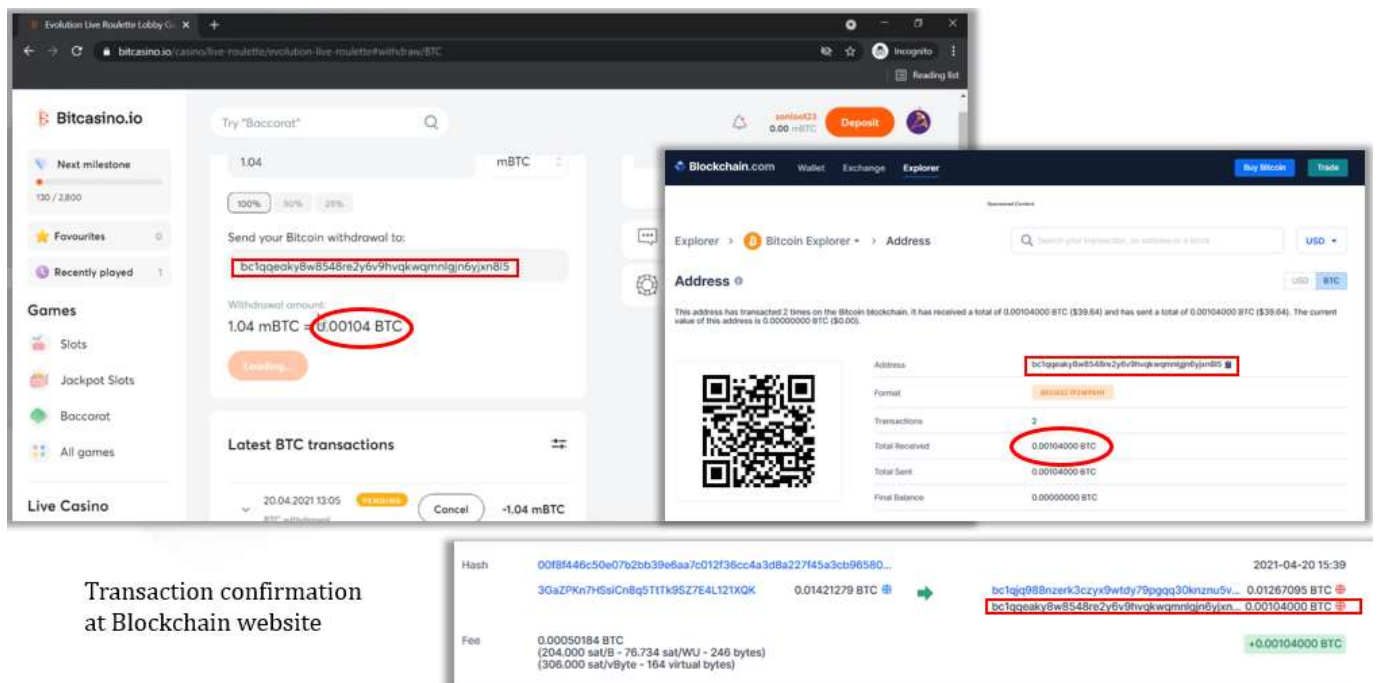
75. Step 5: Once the player wins, **he commences to withdraw his winnings.**



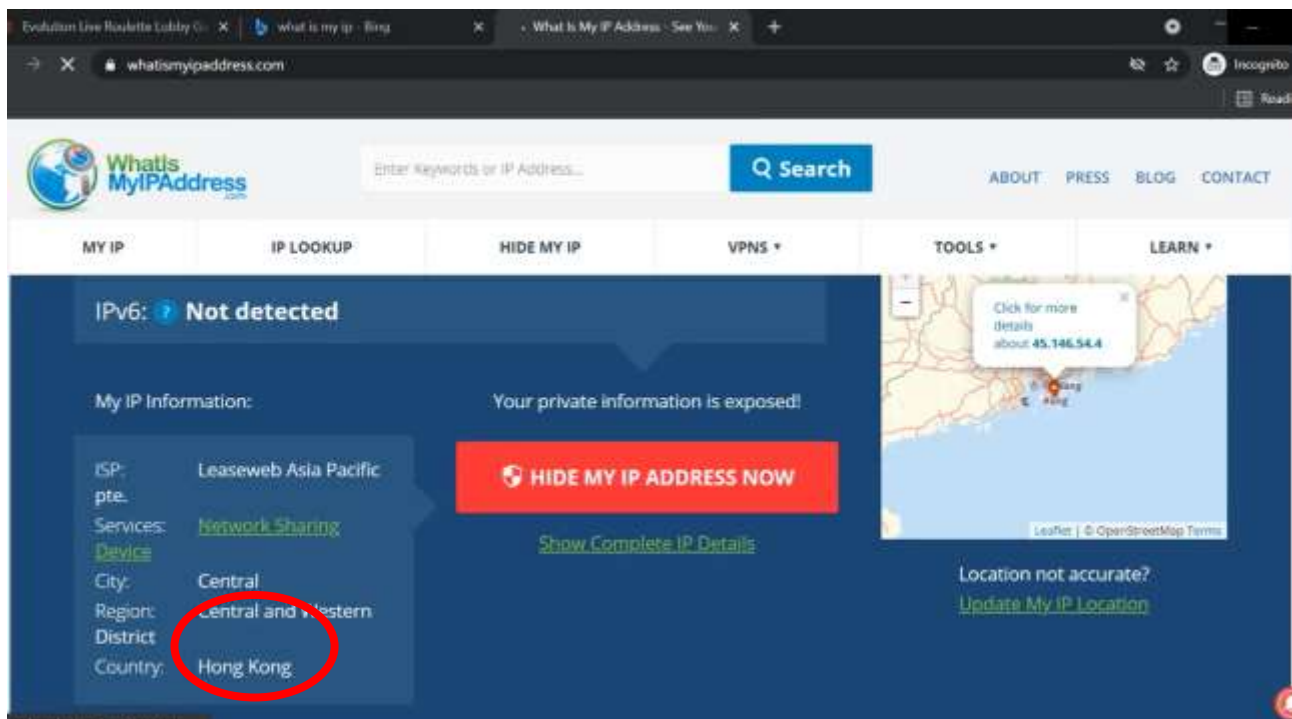
76. Step 6: The player's withdrawal is **successful.**



77. Step 7: The player's transaction for the withdrawal is **confirmed on a blockchain website.**

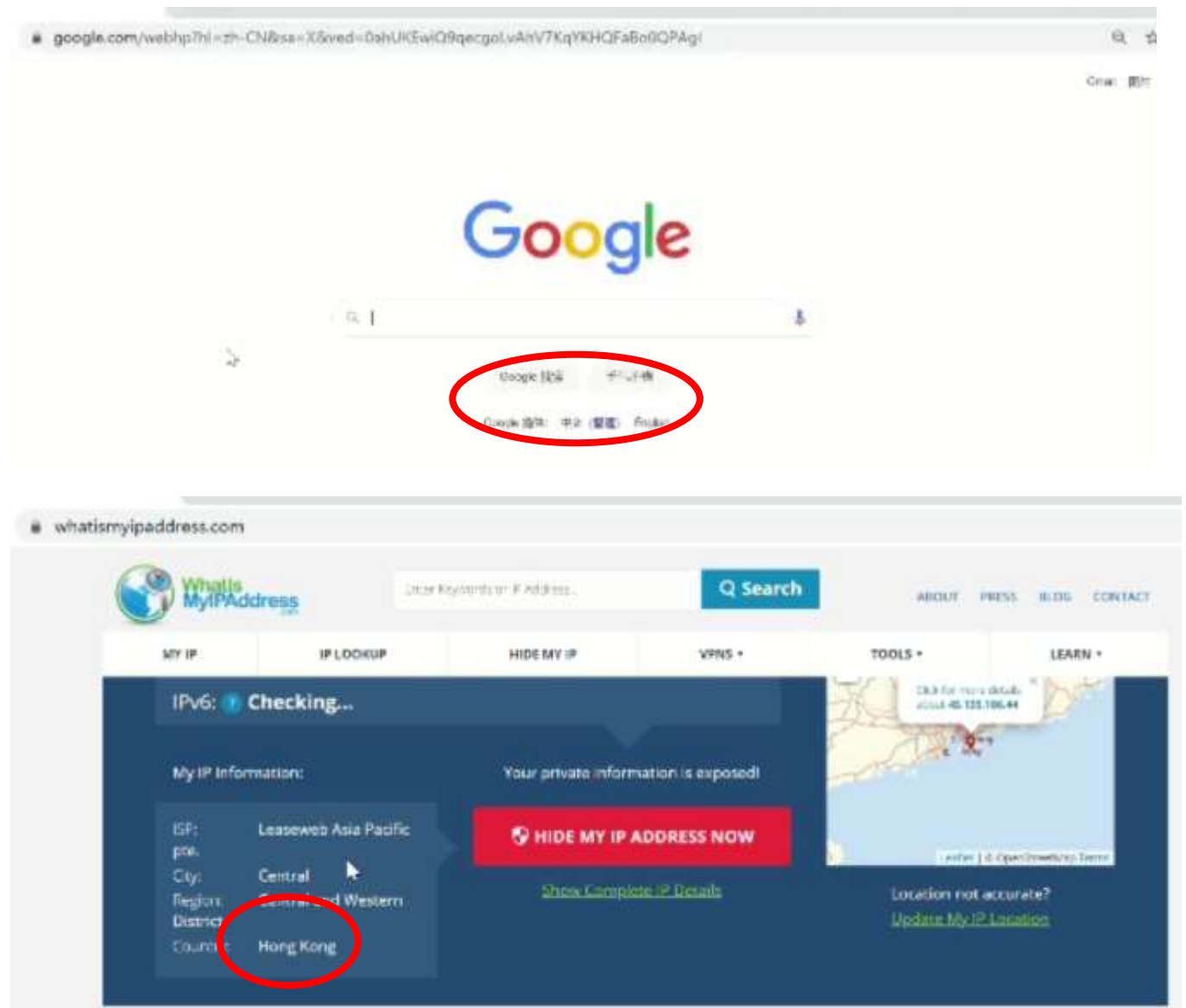


78. Step 8: The player exits the game whilst still using a Hong Kong IP address:



Example 2: An experimental player entering playamo.com via a Hong Kong IP address

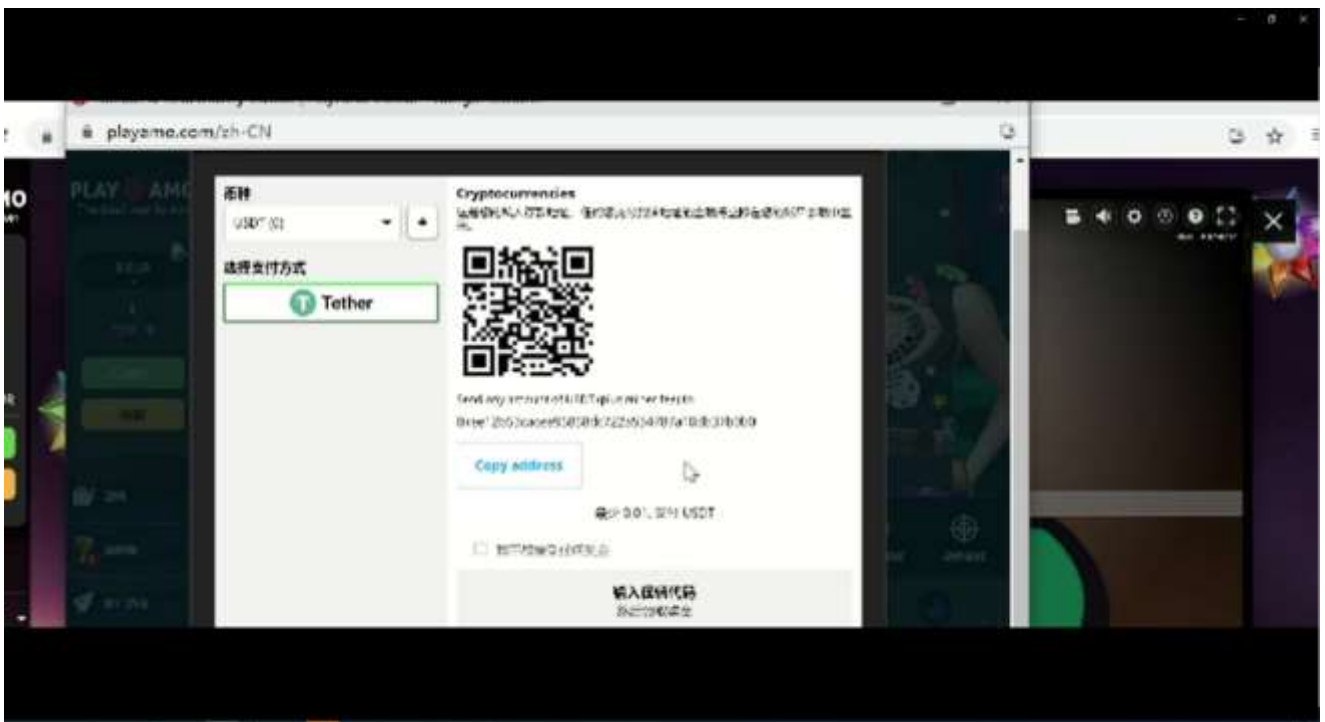
79. Step 1: The player uses a **Hong Kong-based IP address** before entering playamo.com, the operating platform website which offer games powered by Evolution. Notice that Google is in the local language letters.



80. Step 2: The player then successfully enters **playamo.com** and registers, having ensured he is on the Hong Kong IP address. **Notice the language change.**



81. Step 3: The player deposits money via bitcoin:



82. Step 4: After successfully registering, the player chooses Evolution's **Speed Blackjack Live** game.

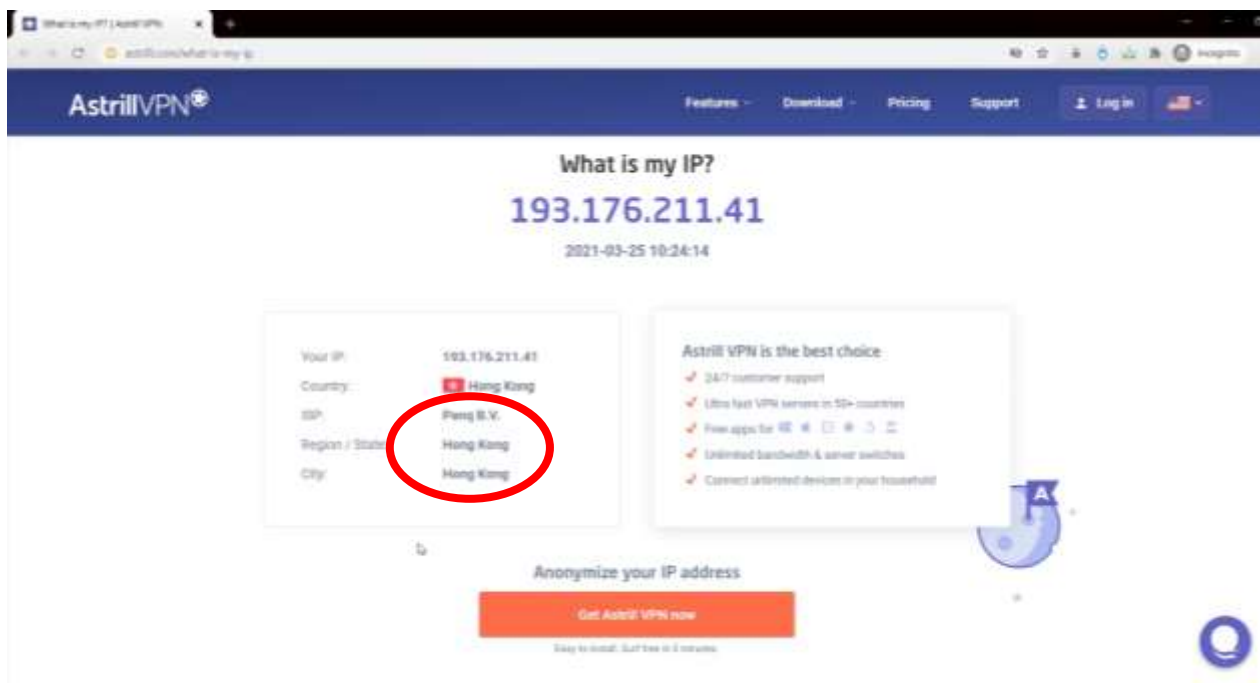


83. Step 5: The player actively plays the game. Notice the language automatically changes on the website due to the location.

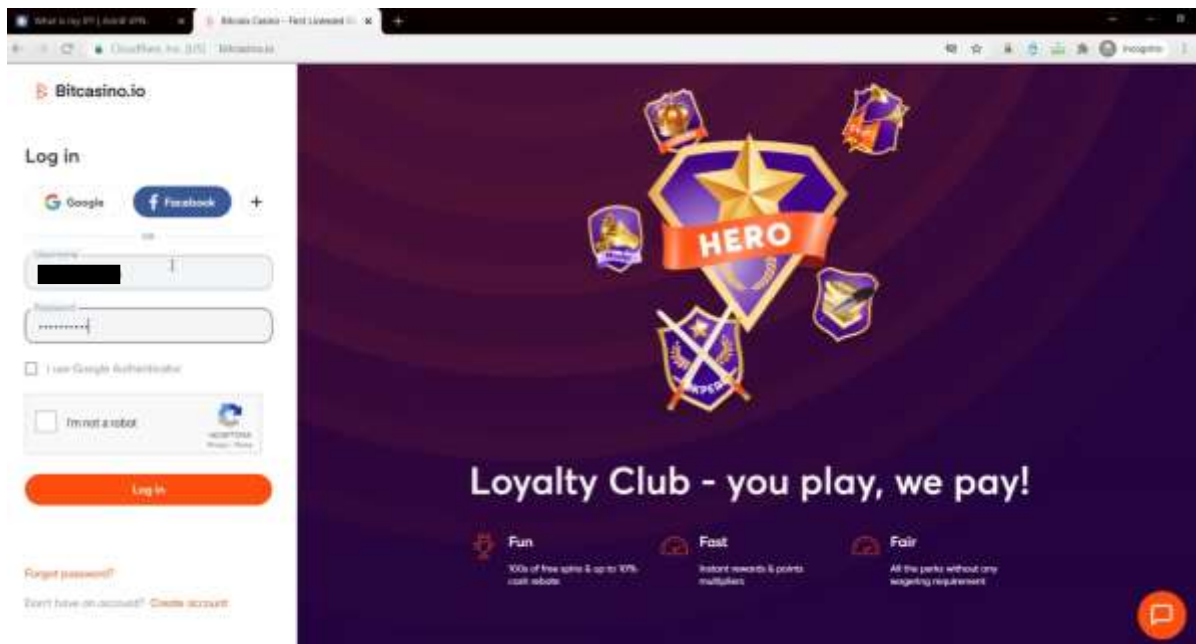


Example 3: An experimental player entering bitcasino.io via a Hong Kong IP address

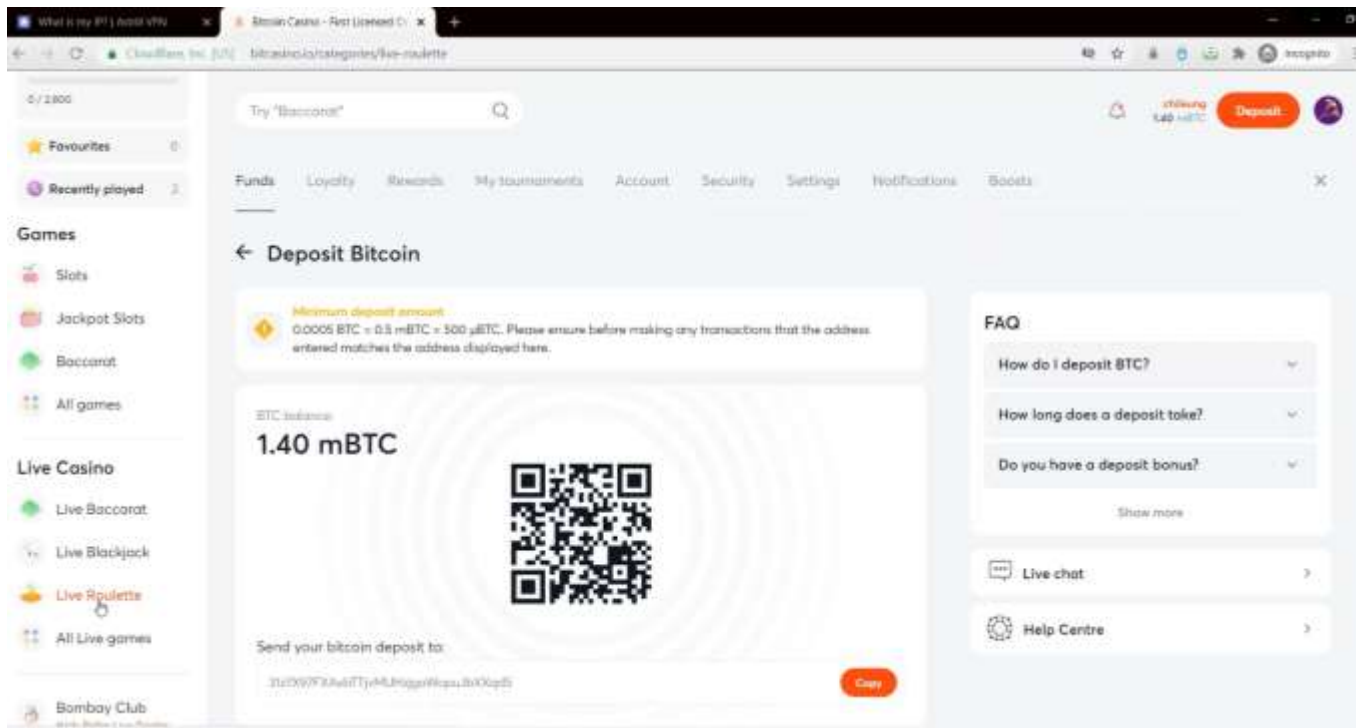
84. Step 1: The player ensures that he is using a **Hong Kong-based IP address** in order to play an Evolution game.



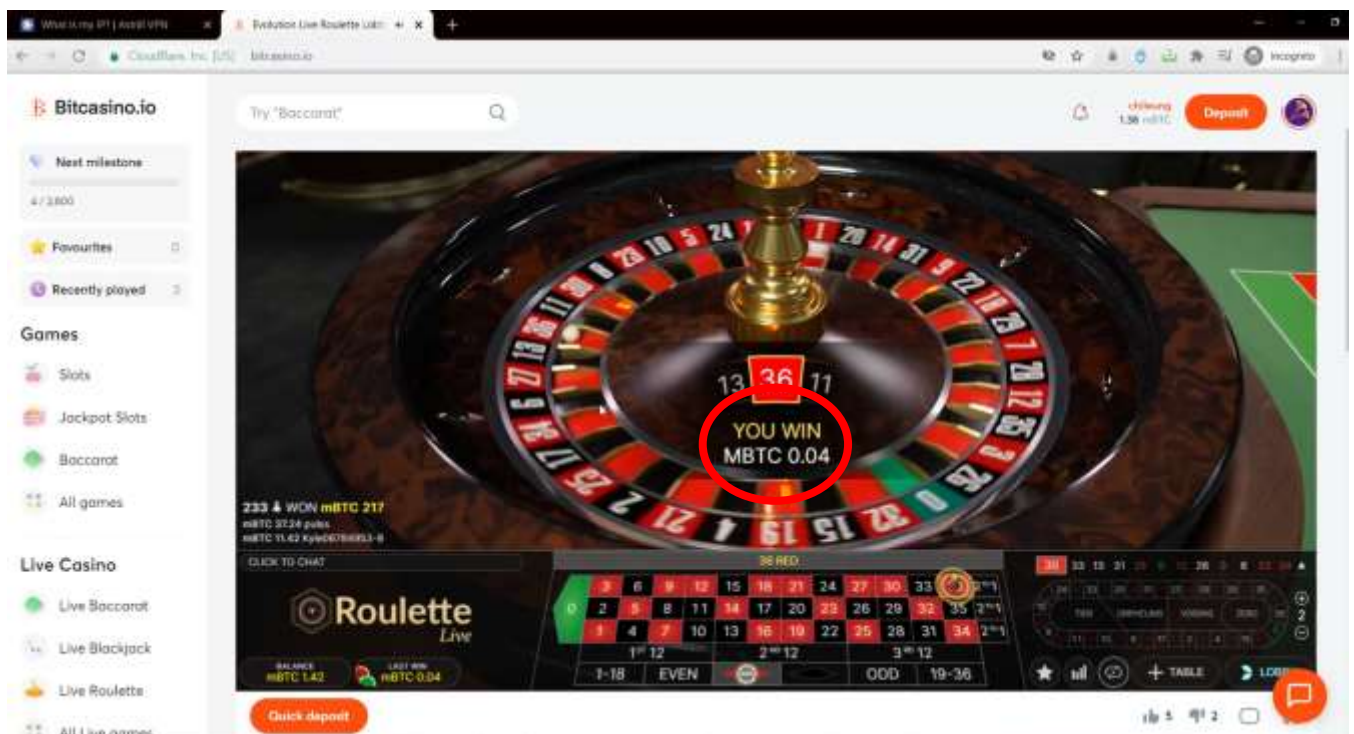
85. Step 2: Once the Hong Kong IP address is successful, the player enters **bitcasino.io** – an operator platform which offers Evolution powered games to end users. He then logs into his account.



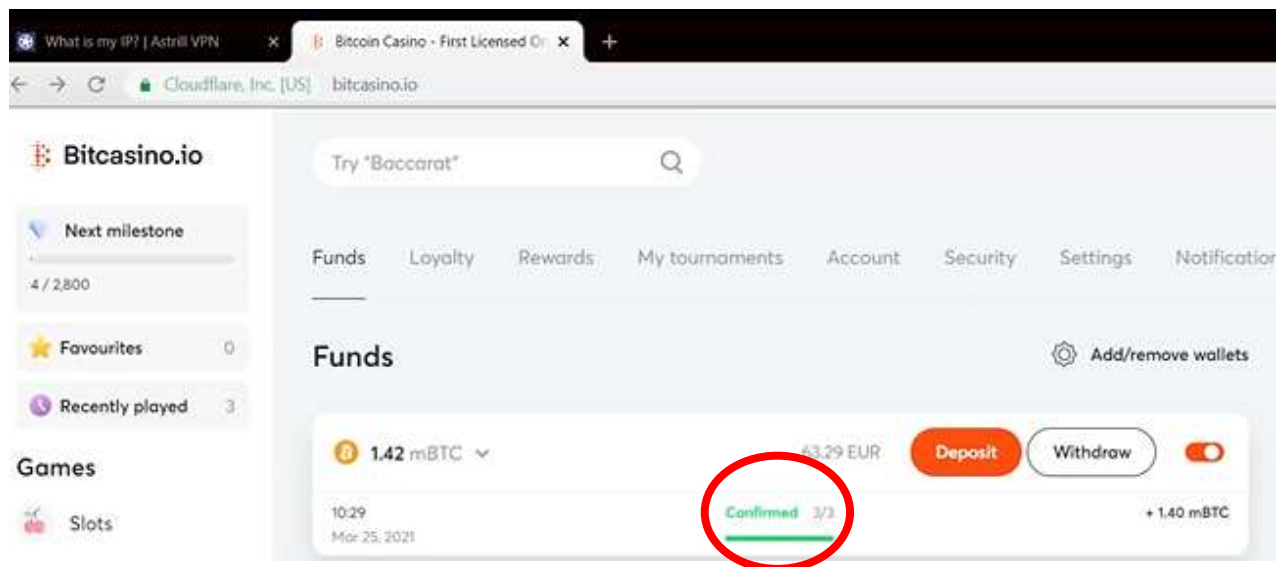
86. Step 3: Once logged into the operator's account, the player deposits money into his account "wallet" which would enable him to place bets in the Evolution game of his choice. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



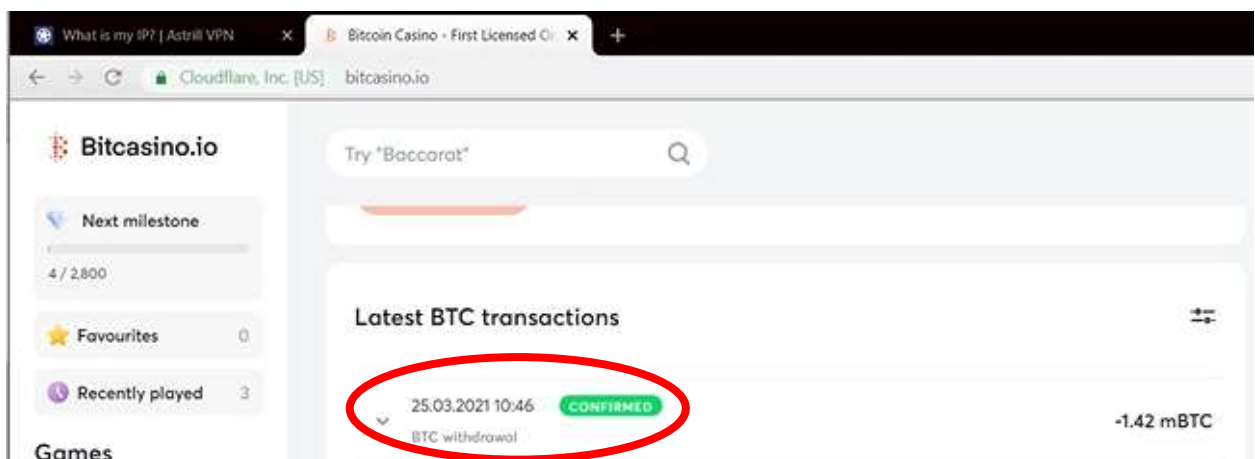
87. Step 4: While still being on the Hong Kong IP address, the player goes ahead and chooses to play an Evolution game – **Roulette Live**, places bets and wins.



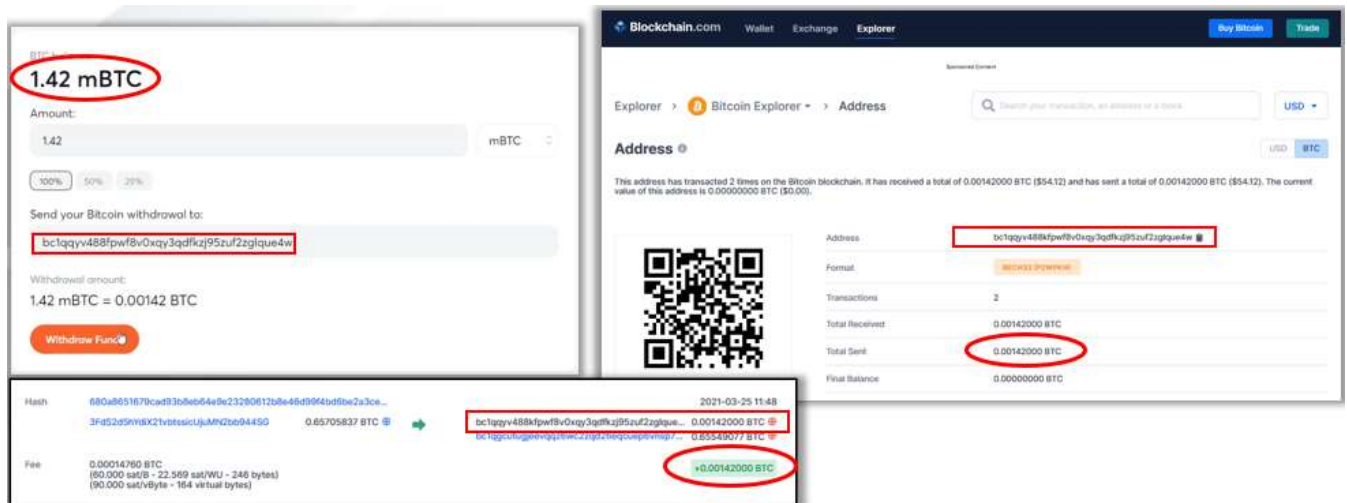
88. Step 6: The player wins on Evolution's Roulette Live, and then goes on to withdraw his winning money.



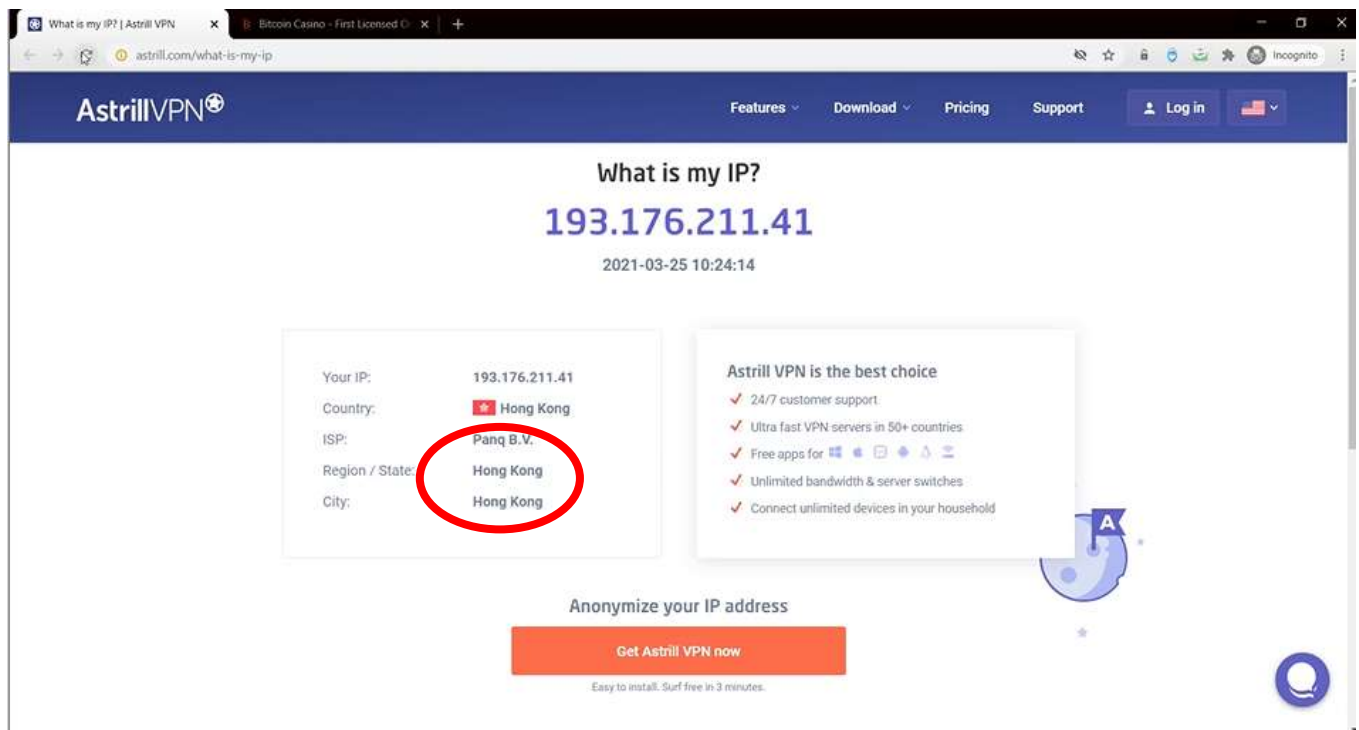
89. Step 7: The player's withdrawal attempt is **successful**, as can be seen from the confirmation below by Bitcasino.io.



90. Step 8: The transaction confirmation on the Blockchain website.

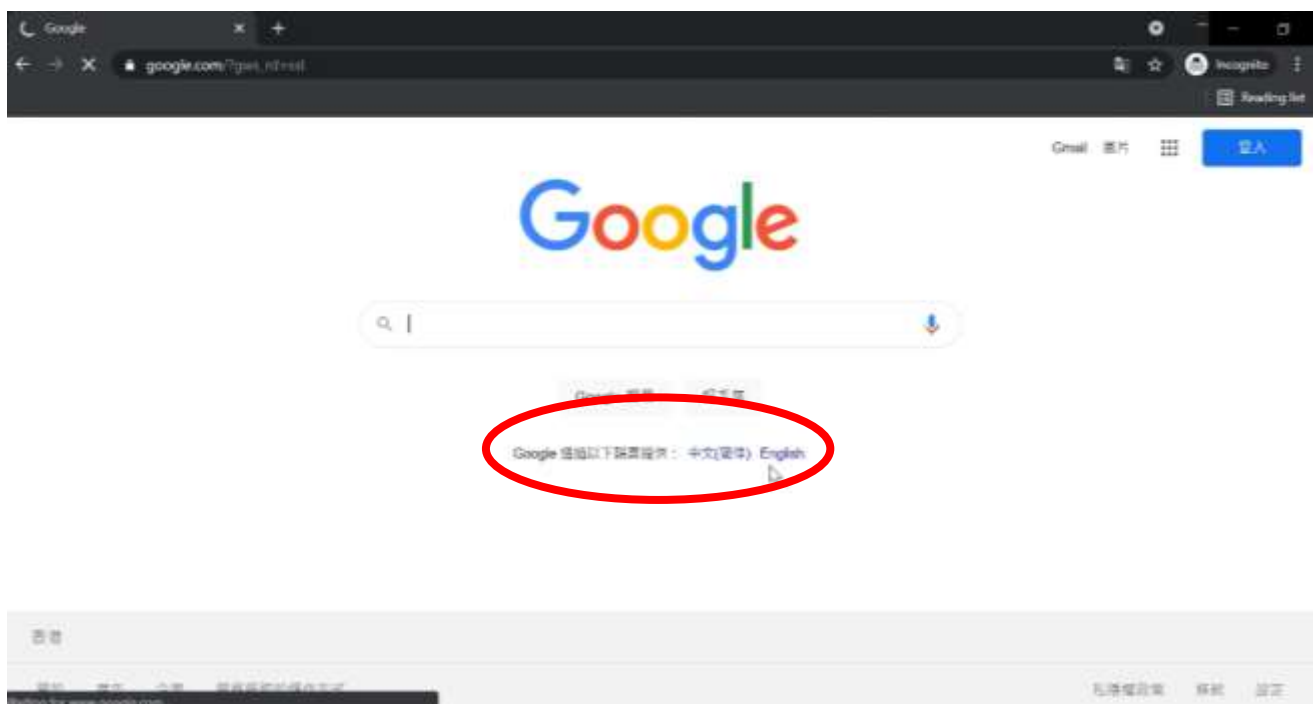
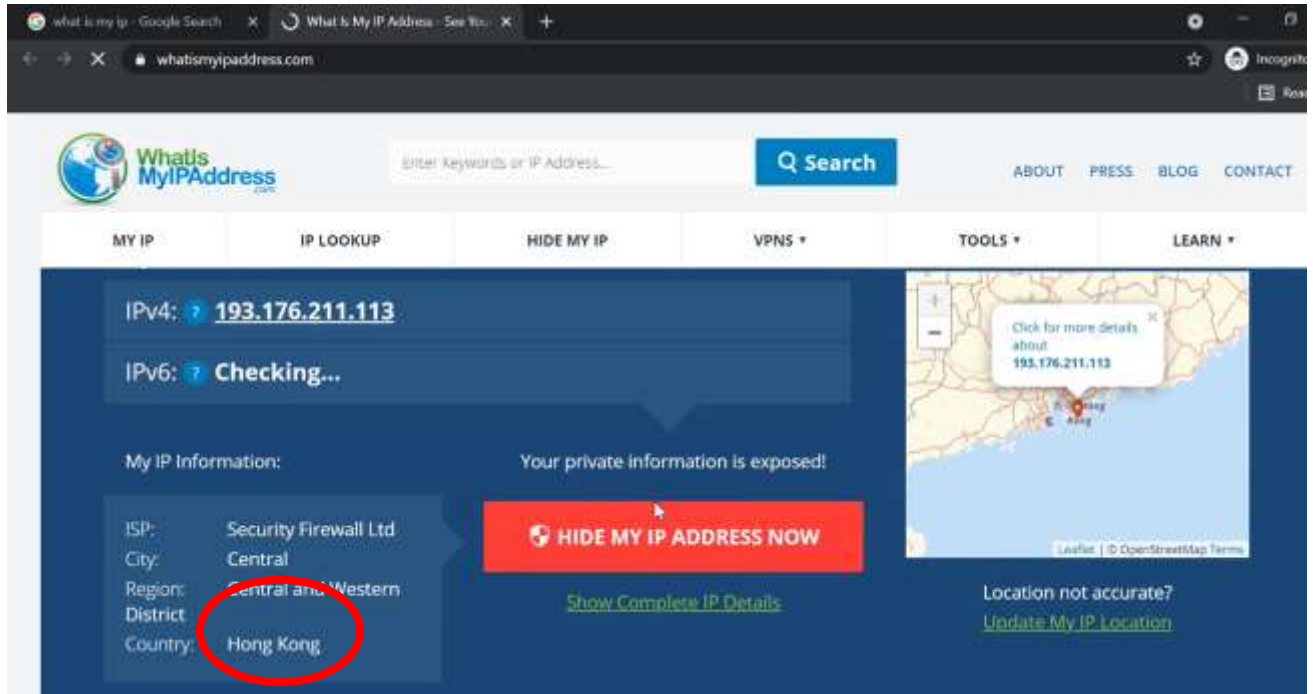


91. Final step: The player exits bitcasino.io still via the Hong Kong IP address.

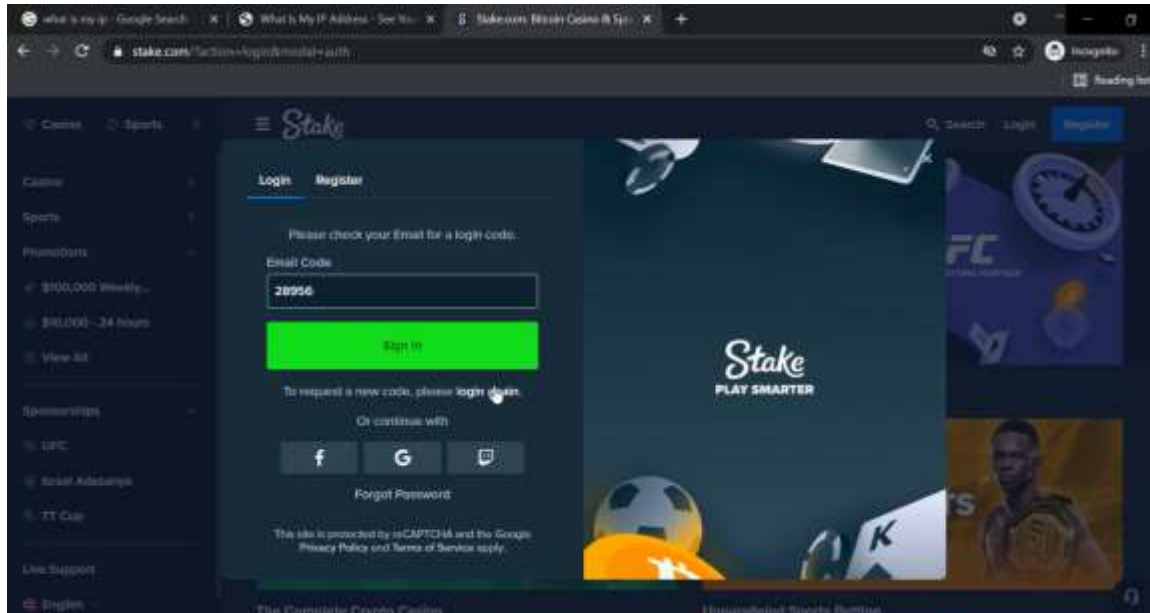


Example 4: An experimental player entering Stake.com via a Hong Kong IP address

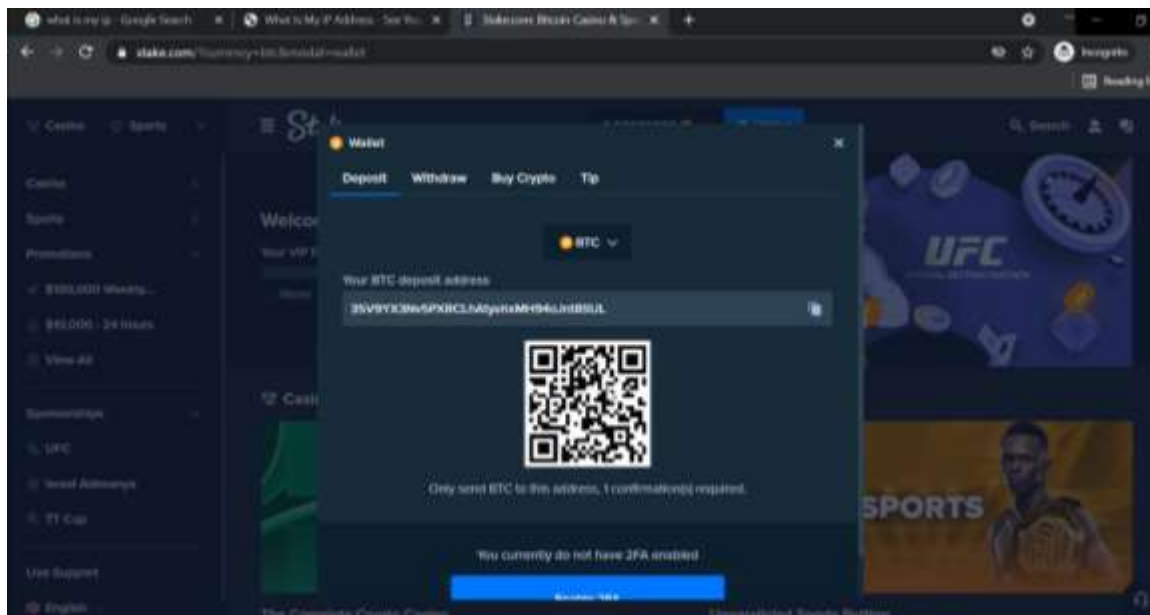
92. Step 1: The player uses a **Hong Kong-based IP address**. Notice the language change on Google due to the location.



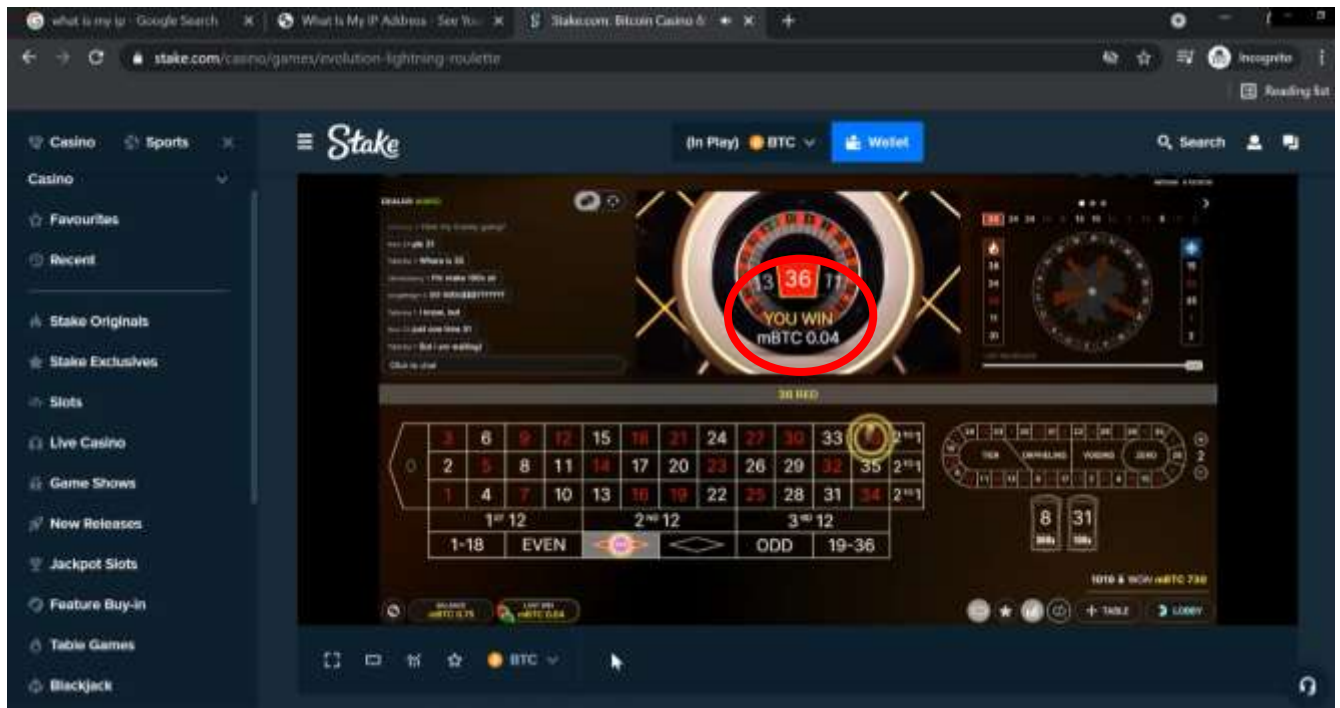
93. Step 2: After ensuring the Hong Kong IP address, the player enters **stake.com** – the operating platform website who offer live casino games powered by Evolution and goes through their registration process.



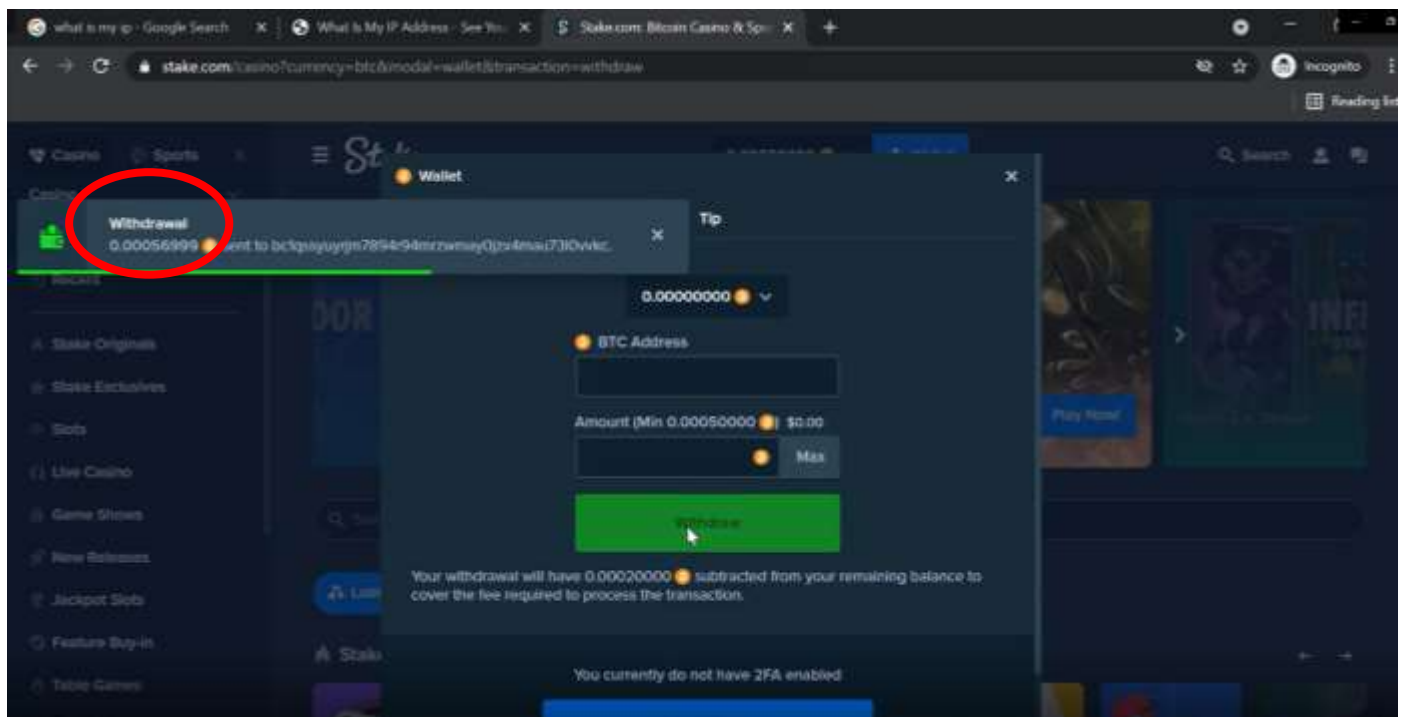
94. Step 3: The player deposits currency to his account before commencing to choose an Evolution game and play. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



95. Step 4: The player commences to choose an **Evolution** game – **Lightning Roulette**, places bets and wins.

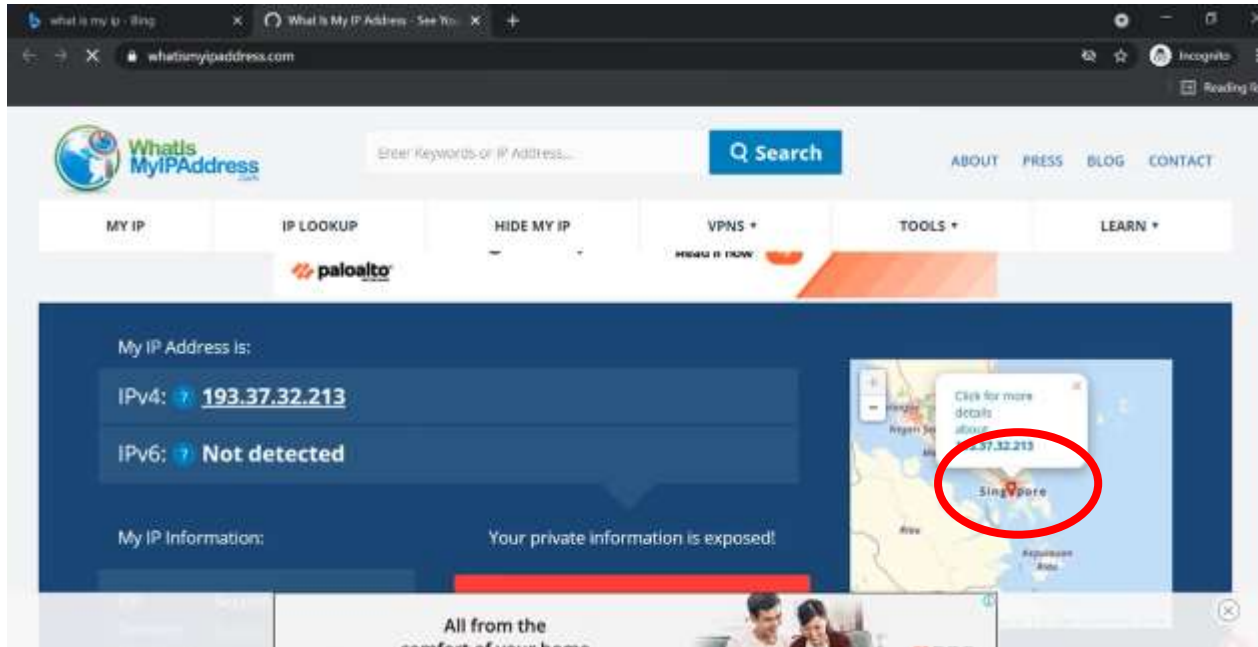


96. Step 5: Once the player wins, he commences to withdraw his winnings.

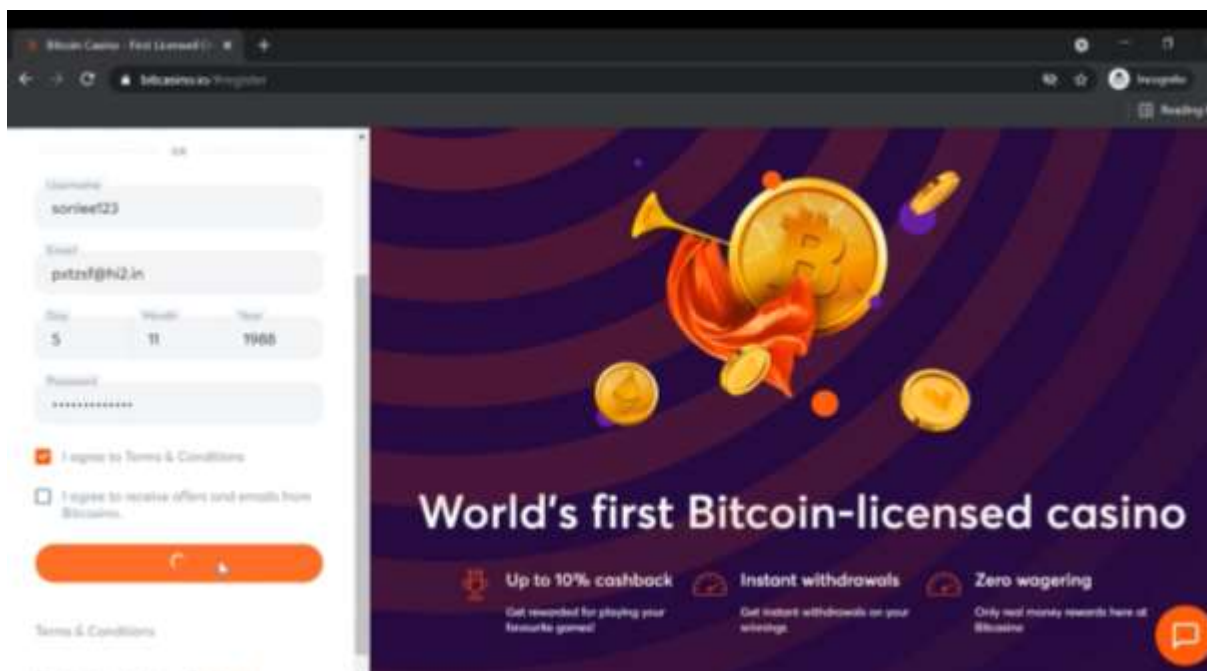


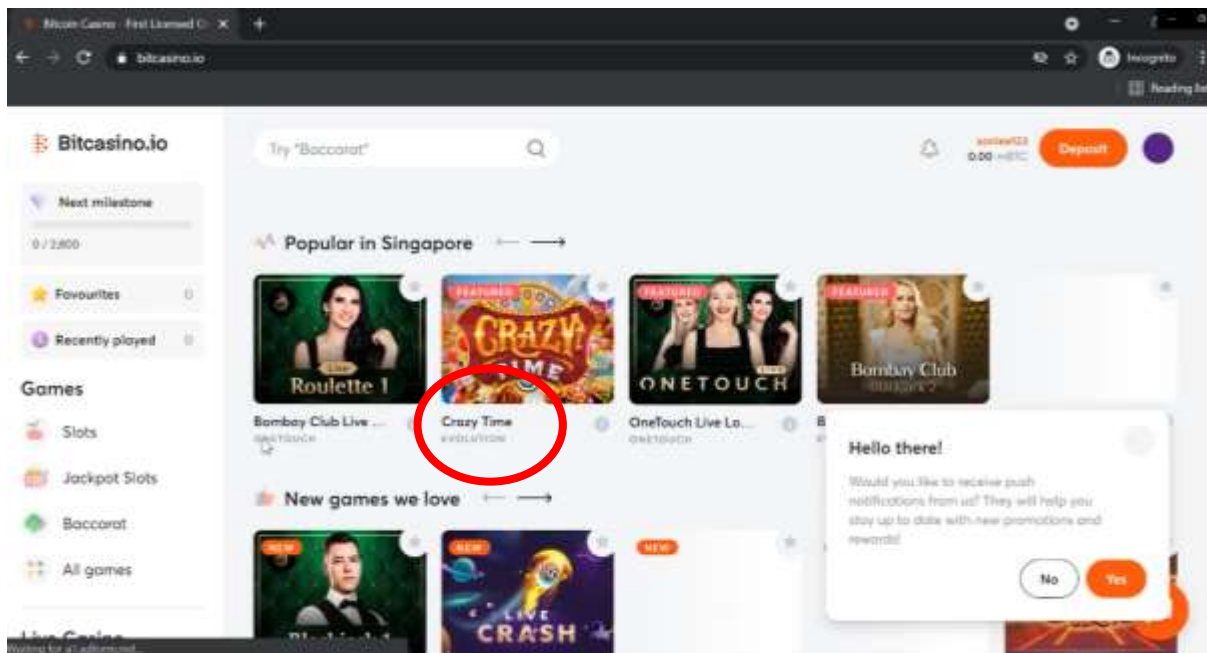
Example 5: An experimental player entering Bitcasino.io via a Singapore IP address

97. Step 1: The player ensures that he is using a **Singapore-based IP address** in order to play an Evolution game.

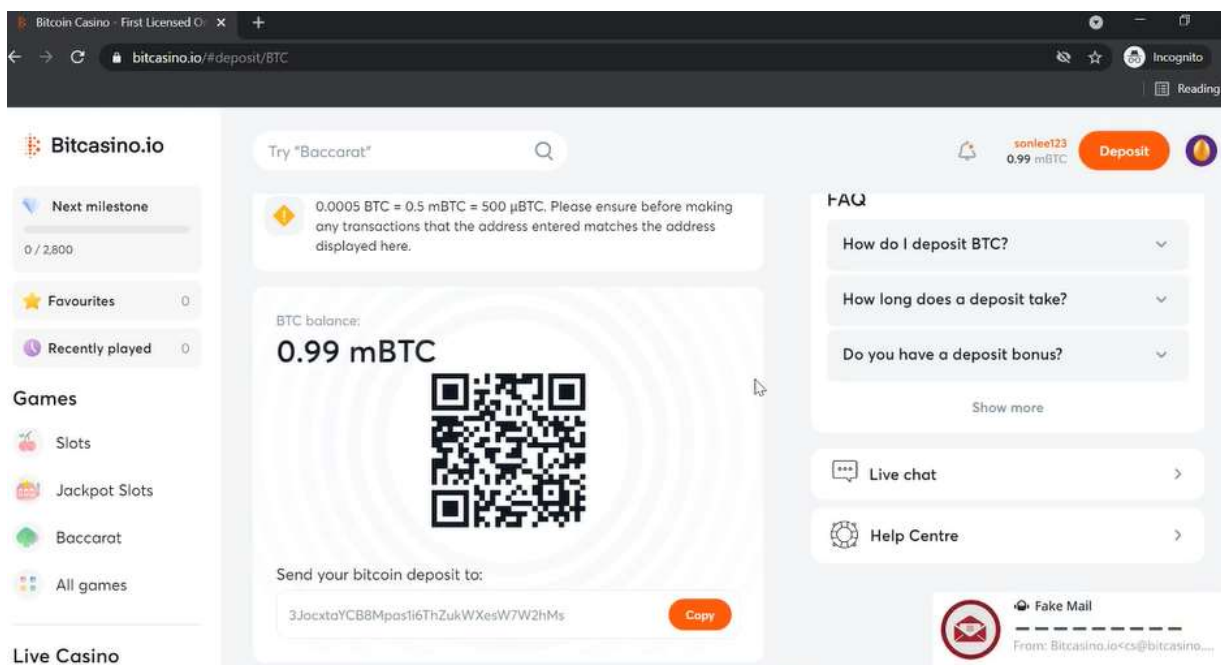


98. Step 2: The player enters **bitcasino.io**, the operator site which offers Evolution games, and registers to open an account.

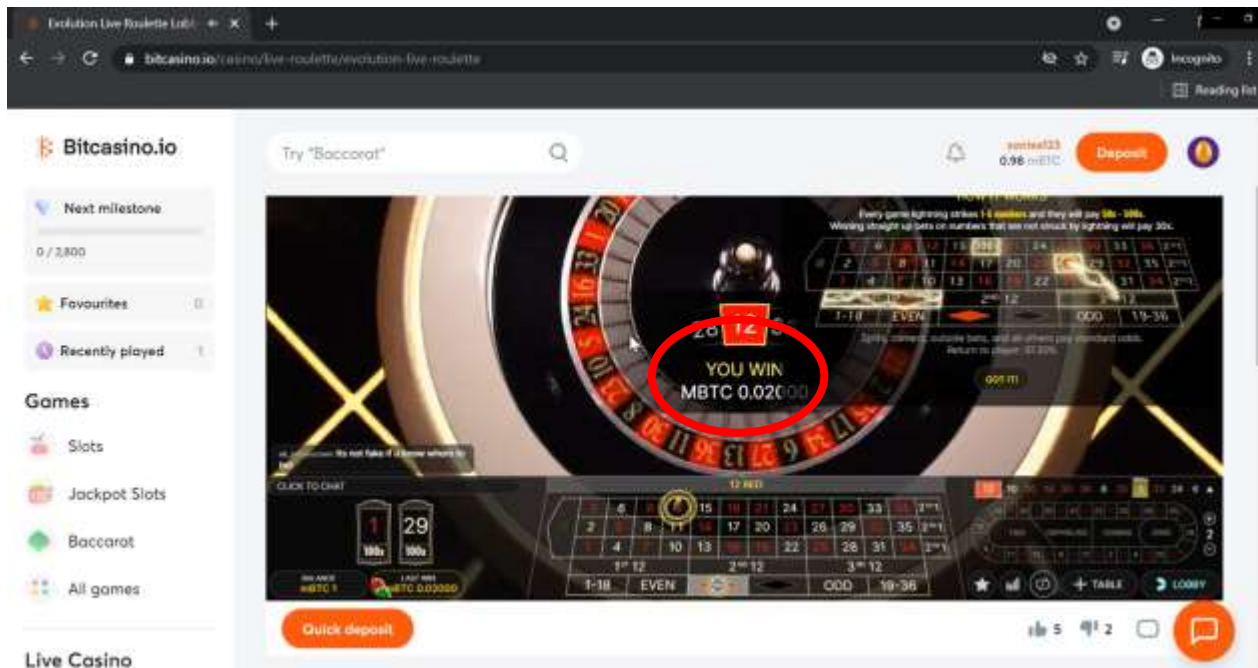




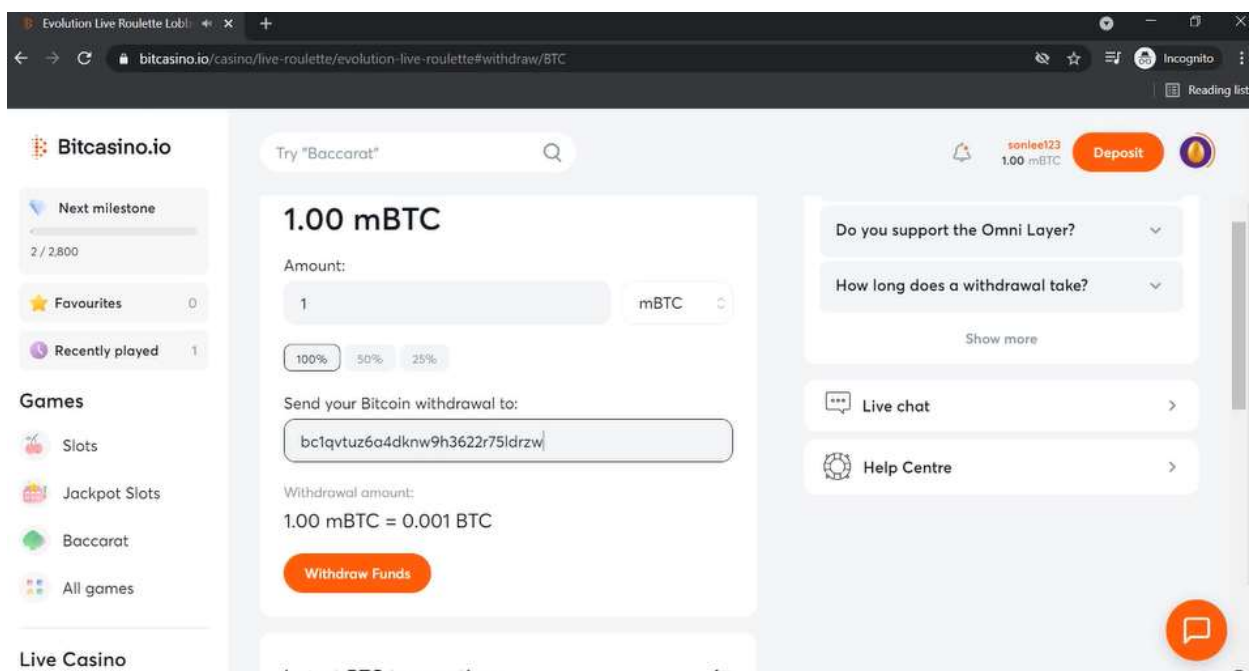
99. Step 3: In order to place bets on the operator site, the player needs to deposit money into his account, as can be seen below. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.

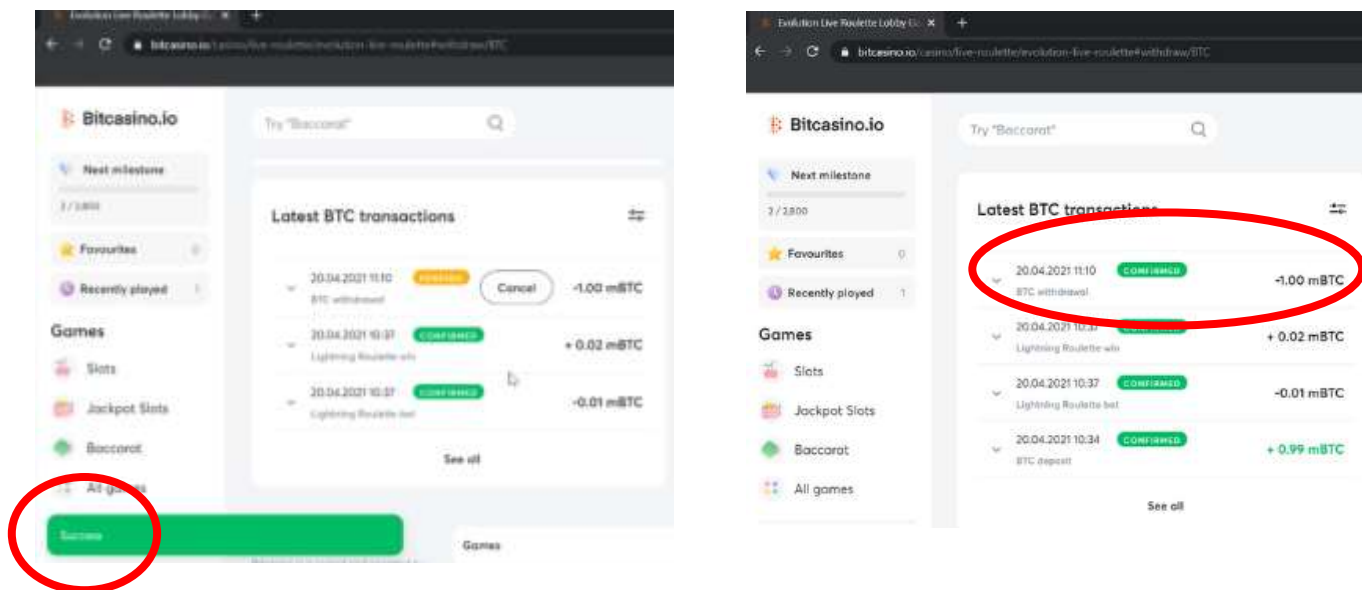


100. Step 4: The player then commences to choose an Evolution game – Live Roulette, he then places bets successfully and wins.



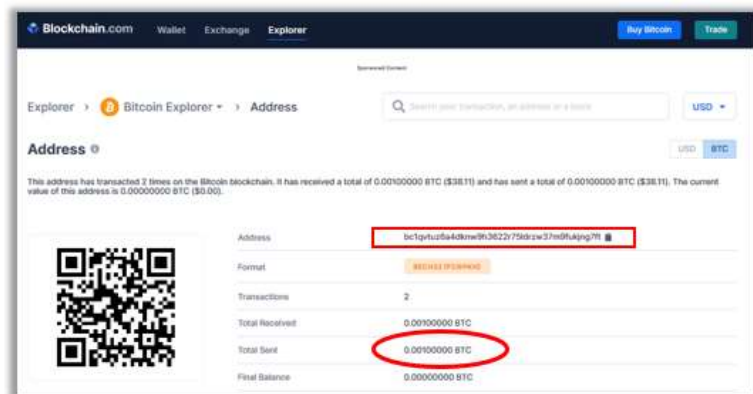
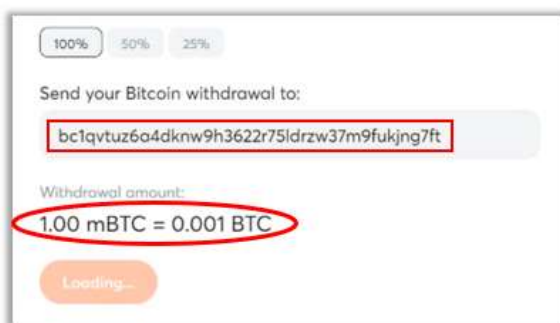
101. Step 5: The player proceeds to withdraws money from his winnings, as per confirmation below.





102. Step 6: The transaction confirmation on blockchain website can be viewed below.

Transaction confirmation
at Blockchain website



103. Step 7: The player then exits bitcasino.io, whilst ensuring he is still on the Singapore IP address.

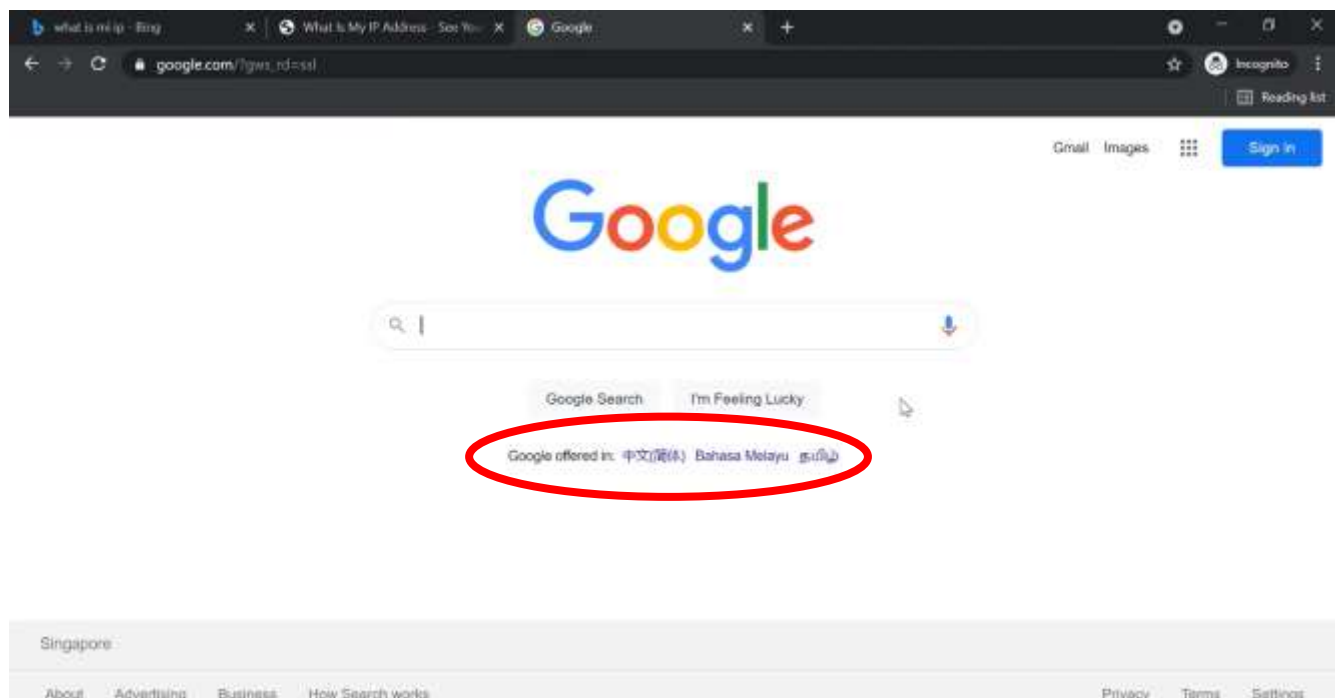
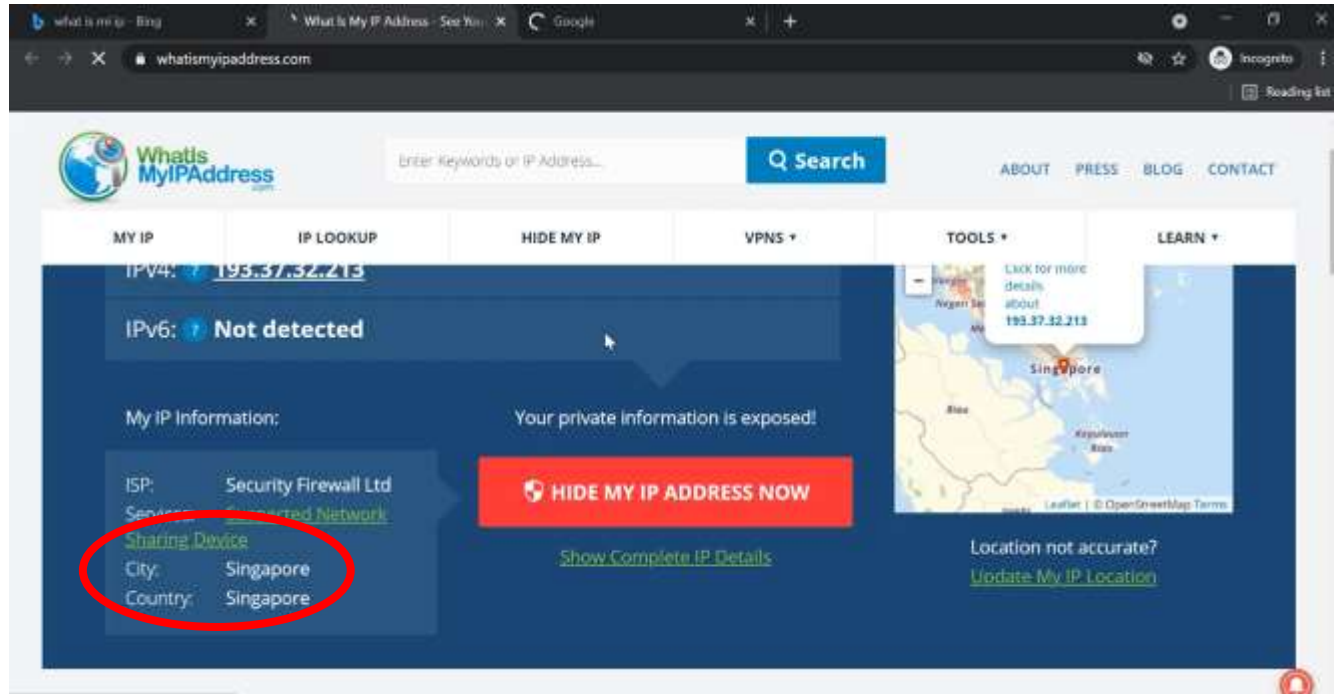
The screenshot shows the WhatIsMyIPAddress.com website in an Incognito browser window. The page displays the following information:

- My IP Address is:**
 - IPv4: **193.37.32.213**
 - IPv6: **Checking...**
- My IP Information:**
 - ISP: Security Firewall Ltd
 - Services: [Suspected Network Sharing Service](#)
 - City: **Singapore** (circled in red)
 - Country: **Singapore**
- Tools:** A map of Singapore with a tooltip for IP 193.37.32.213.
- Actions:** A red button labeled "HIDE MY IP ADDRESS NOW", a link "Show Complete IP Details", and a link "Update My IP Location" (with the text "Location not accurate?" above it).

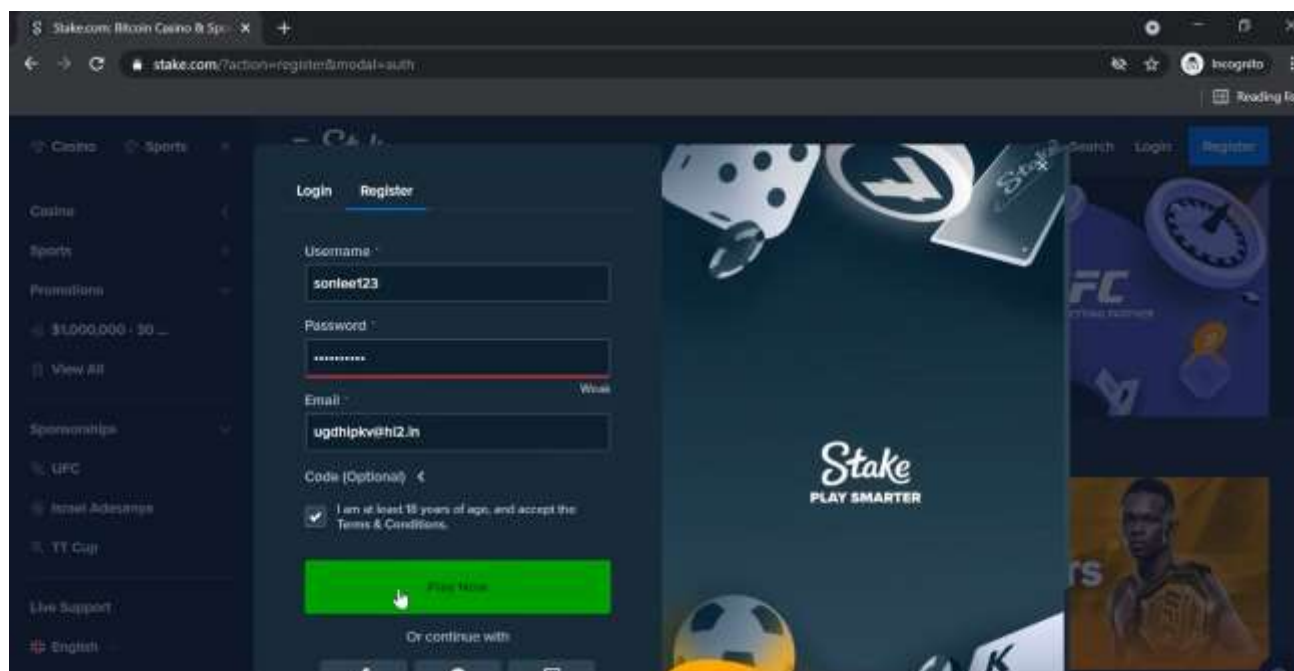
The browser's address bar shows the URL whatismyipaddress.com.

Example 6: An experimental player entering Stake.com via a Singapore IP address

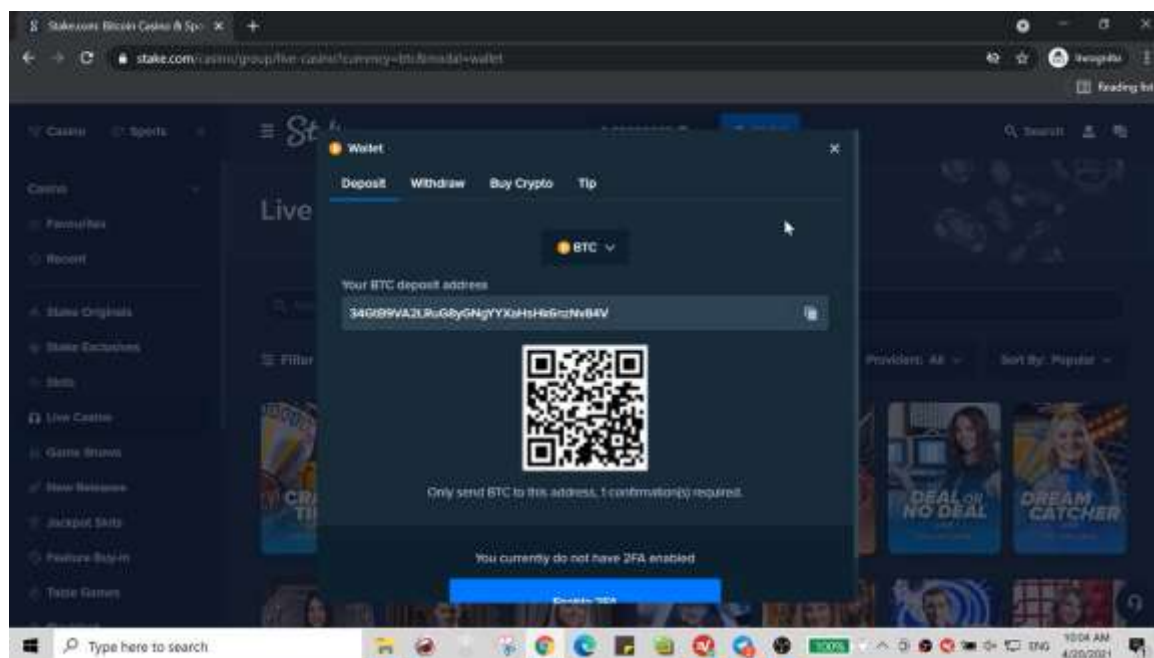
104. Step 1: The player ensures that he is using a **Singapore-based IP address** in order to play an Evolution game. Notice the automatic language change on Google.

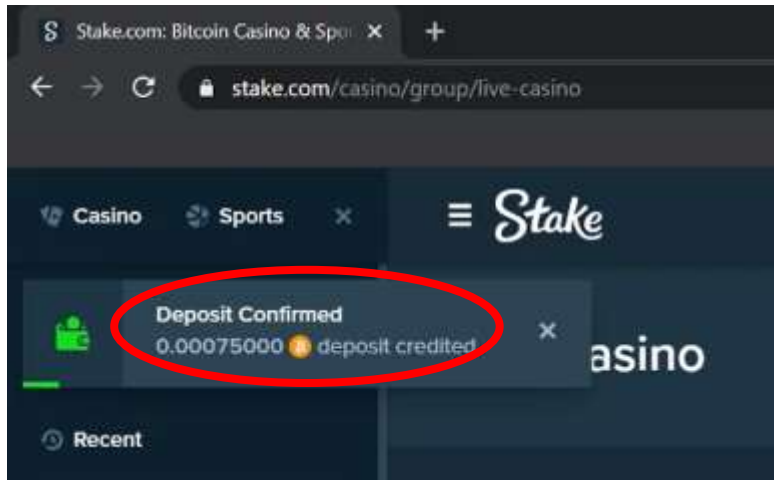


105. Step 2: The player enters **Stake.com** – the operator website offering Evolution games to end users, and then proceeds to open an account.

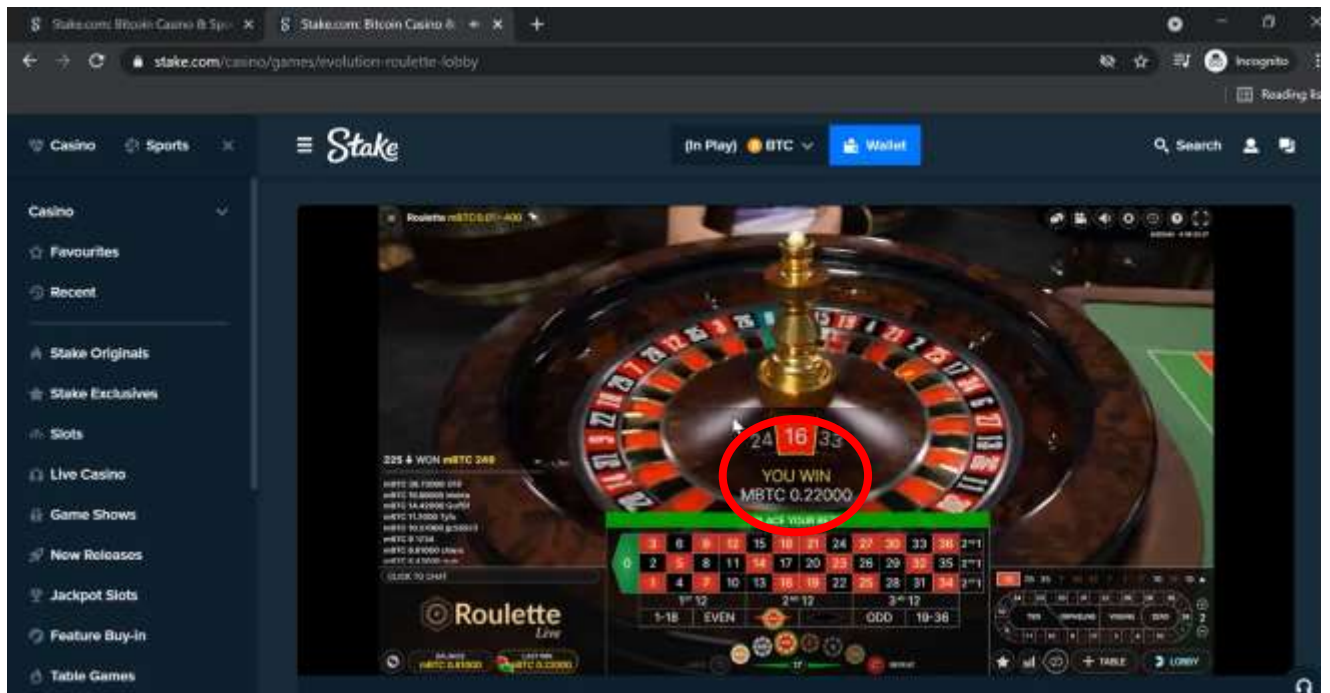


106. Step 3: In order to place bets, the player deposits money into his account before choosing an Evolution game and playing. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.

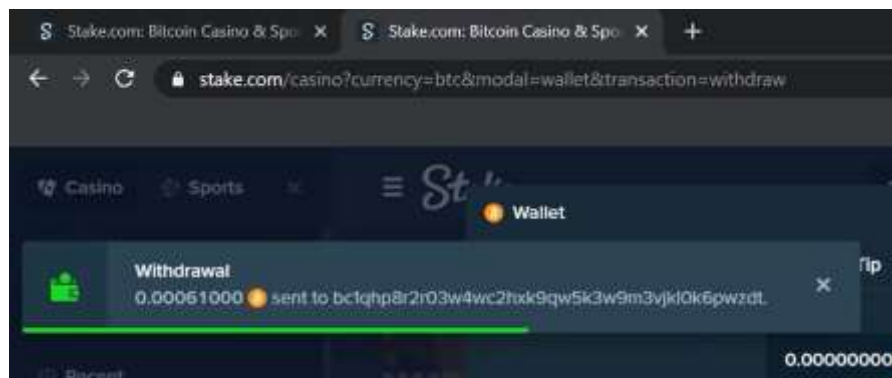
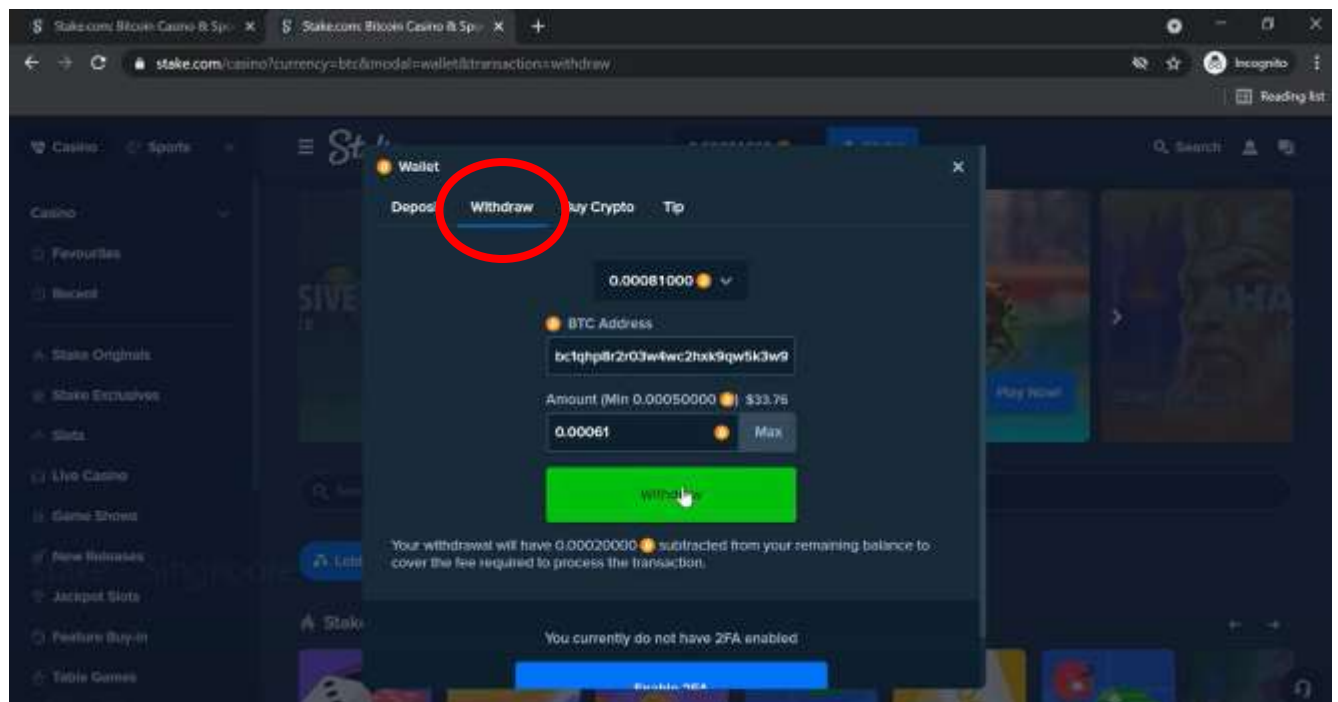




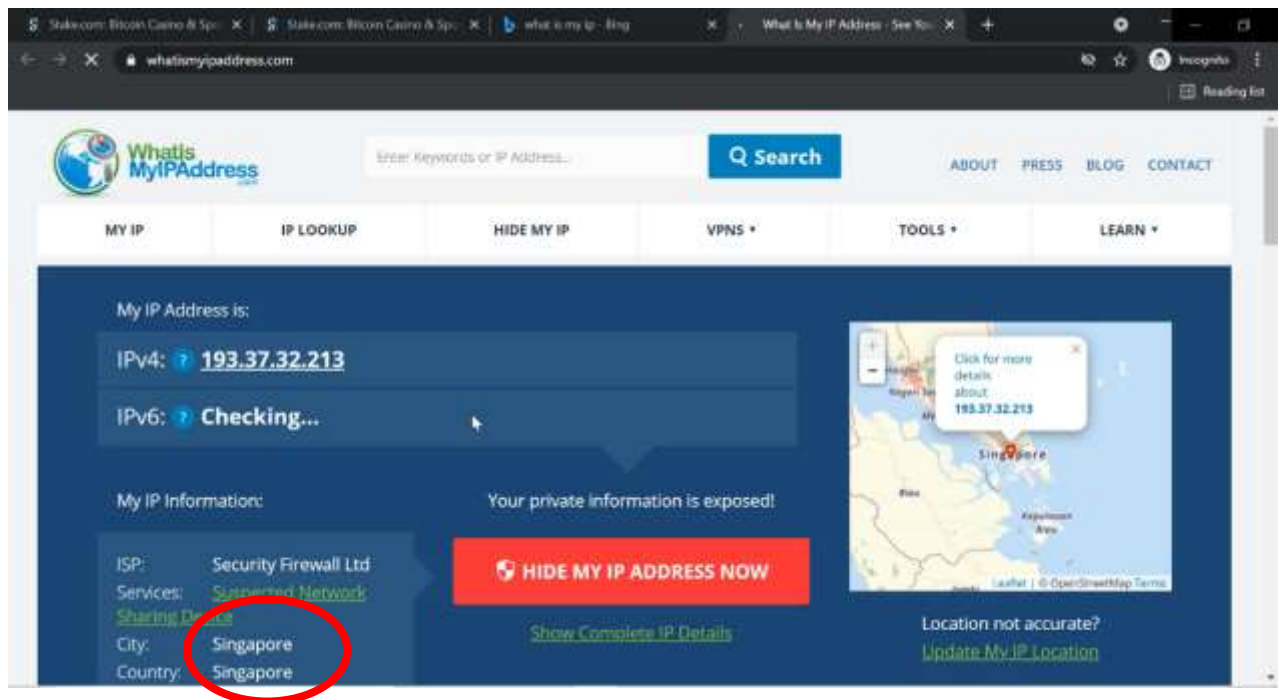
107. Step 4: The player successfully places bets on an Evolution game – **Roulette Live** and wins.



108. Step 5: The player is then able to successfully withdraw his winnings, as can be viewed below.



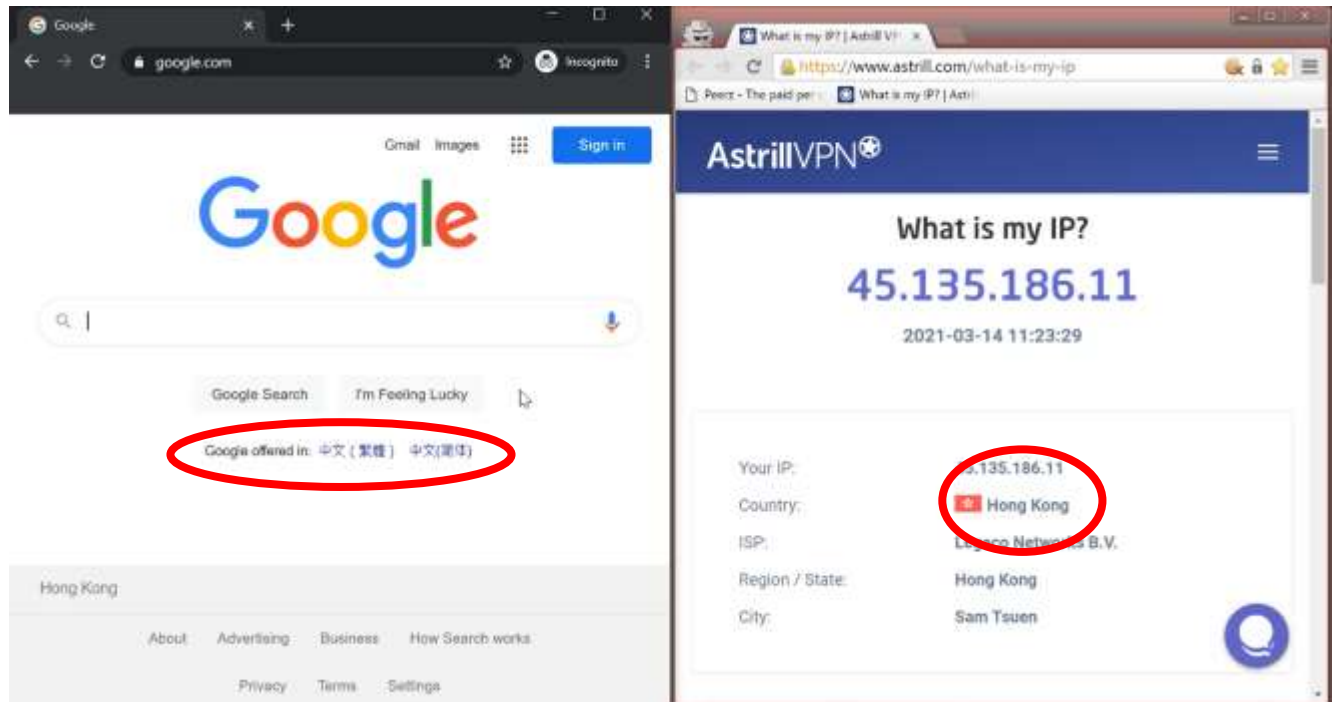
109. Step 6: The player exits the operating website stake.com, whilst ensuring he is still on the Singapore IP address.



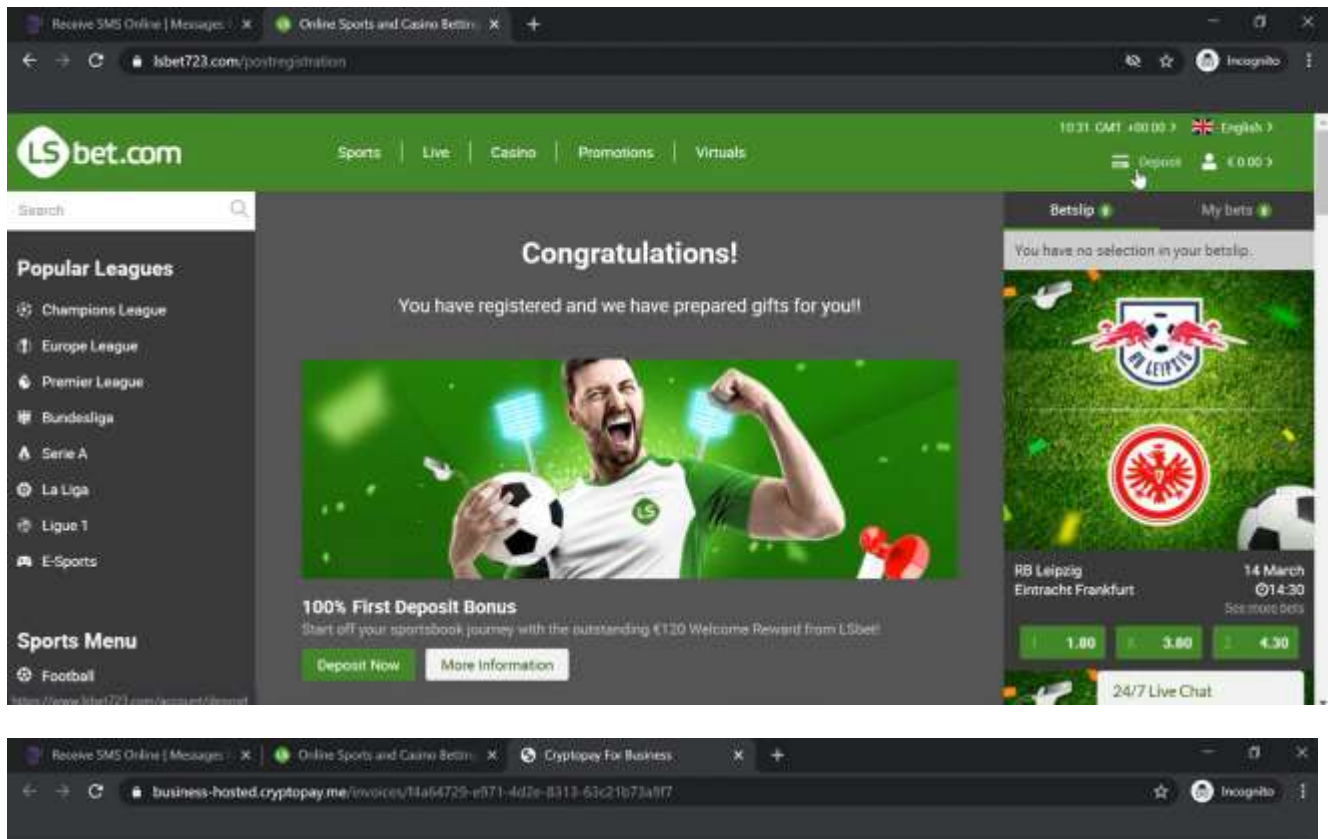
110. The games played in the following two examples are of branded slots, which in turn means that by **Evolution enabling such games to be played in restricted territories, means that they are also violating their contract with the brand owning companies** (such as Dracula = NBC Universal, and Jumanji = Sony).

Example 7: Dracula game on Isbet723.com via Hong Kong IP address

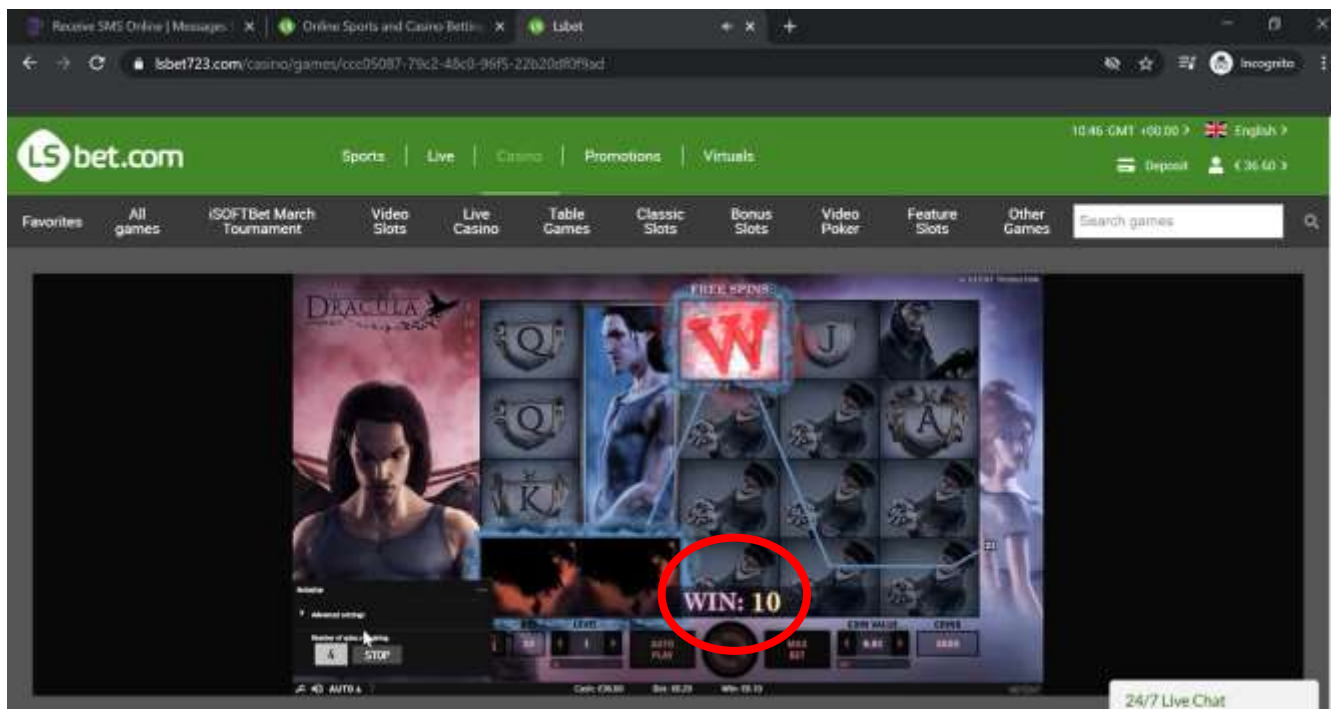
111. Step 1: In the below example it can be seen that the experimental player firstly ensures that he is on a **Hong Kong IP address** (notice the language change on Google).



112. Step 2: He then enters **isbet723.com** - the operator website which offers Evolution games, and deposits money into his account in order to place bets. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



113. Step 3: Following his deposit, and whilst still being on a Hong Kong IP address, the player then chooses **NetEnt's branded slot machine game Dracula**, successfully plays, and wins.



114. Step 4: Finally, the player then exits the operator site, whilst ensuring he is still on the Hong Kong IP address.



Example 8: Jumanji game on lucky-31.com via Singapore IP address

115. Step 1: In the below example it can be seen that the experimental player firstly ensures that he is on a **Singapore IP address**.

The image consists of two screenshots from a web browser. The top screenshot shows the Astrill VPN 'What is my IP?' page. The IP address 198.105.221.192 is displayed, along with the date and time 2021-03-14 11:23:08. A table lists the following information: Your IP: 198.105.221.192, Country: Singapore (highlighted with a red circle), ISP: Astrill, Region / State: Singapore, and City: Singapore. To the right, there is a section titled 'Astrill VPN is the best choice' with several bullet points. A mobile app interface for Astrill VPN is shown on the right side of the page, indicating it is turned 'ON' and connected to 'Singapore 1'. The bottom screenshot shows the Google homepage. The search bar is empty, and the 'Google Search' button is visible. Below the search bar, the text 'Google offered in: 中文(简体) Bahasa Melayu தமிழ்' is circled in red. The mobile app interface for Astrill VPN is also visible on the right side of the page, showing it is turned 'ON' and connected to 'Singapore 1'.

What is my IP? | Astrill VPN

198.105.221.192

2021-03-14 11:23:08

Your IP: 198.105.221.192
Country: Singapore
ISP: Astrill
Region / State: Singapore
City: Singapore

Astrill VPN is the best choice

- ✓ 24/7 customer support
- ✓ Ultra fast VPN servers in 50+ countries
- ✓ Free apps for
- ✓ Unlimited bandwidth & server switches
- ✓ Connect unlimited devices in your household

Are you using VPN?

Google

Google Search

I'm Feeling Lucky

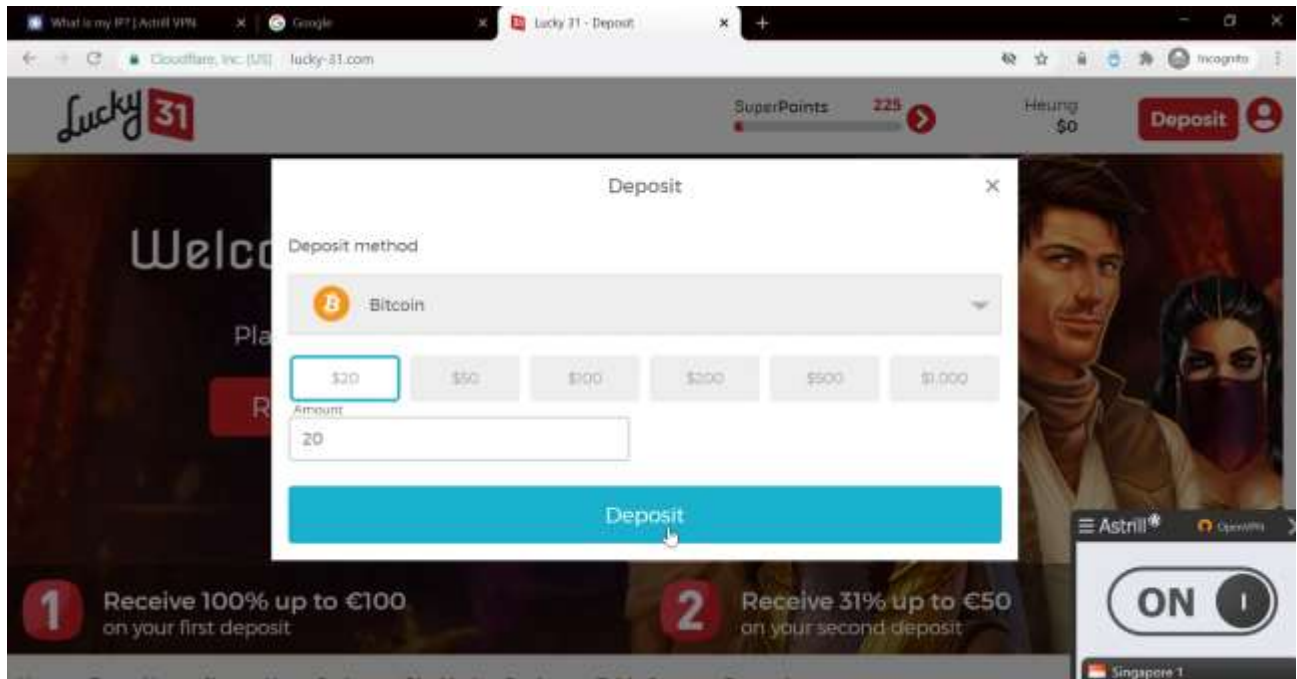
Google offered in: 中文(简体) Bahasa Melayu தமிழ்

Singapore

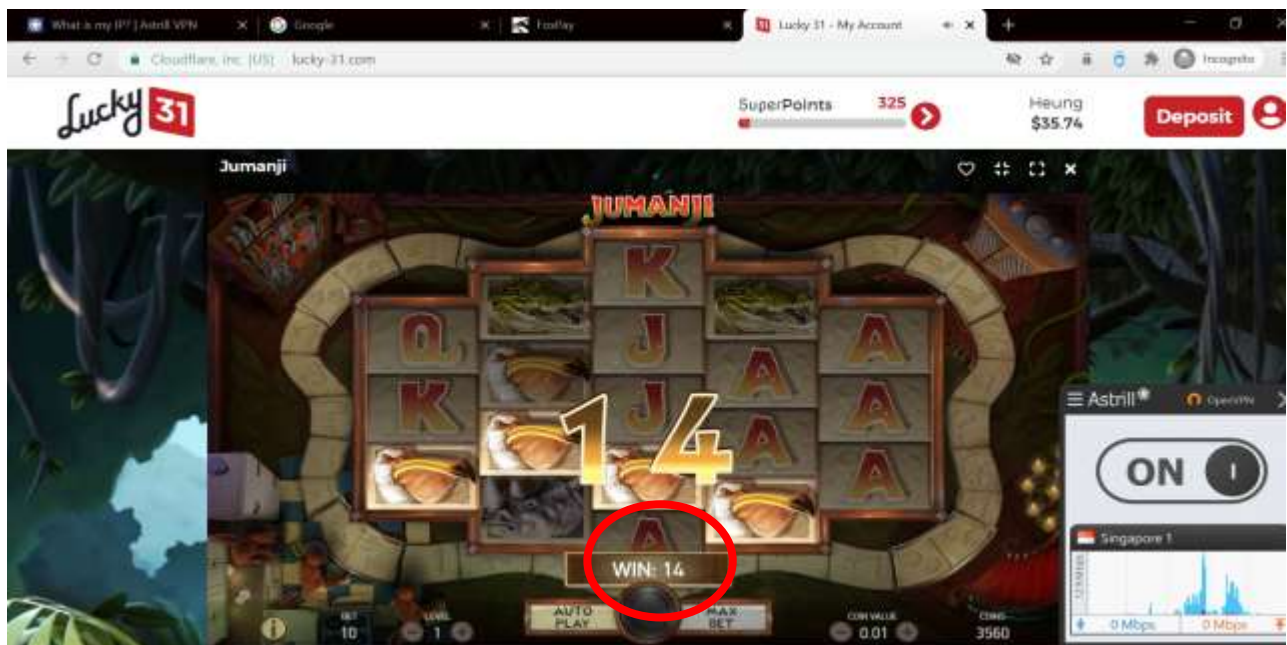
About Advertising Business How Search works

Privacy Terms Settings

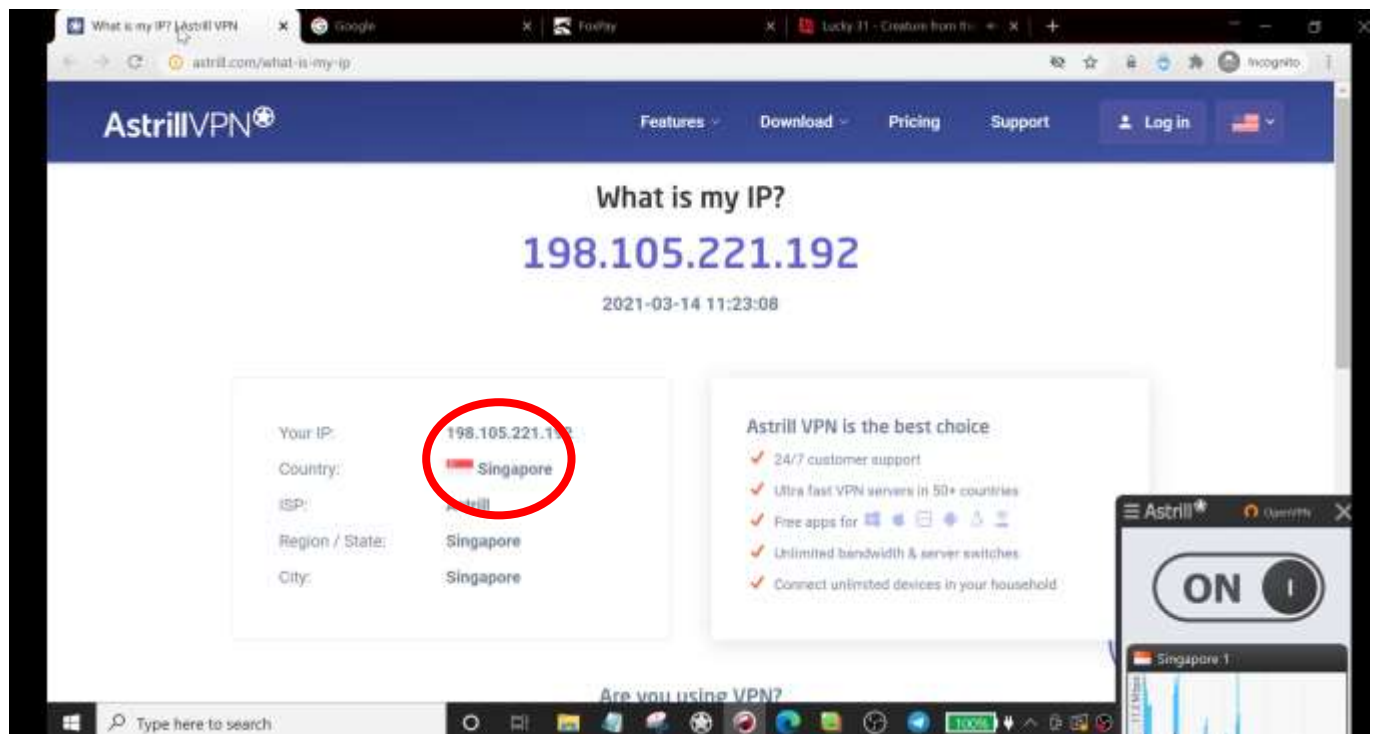
116. Step 2: He then enters **lucky-31.com** - the operator website which offers Evolution games, and deposits money into his account in order to place bets. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



117. Step 3: Following his deposit, and whilst still being on a Singapore IP address, the player then chooses **NetEnt's branded slot machine game Jumanji**, successfully plays, and wins.

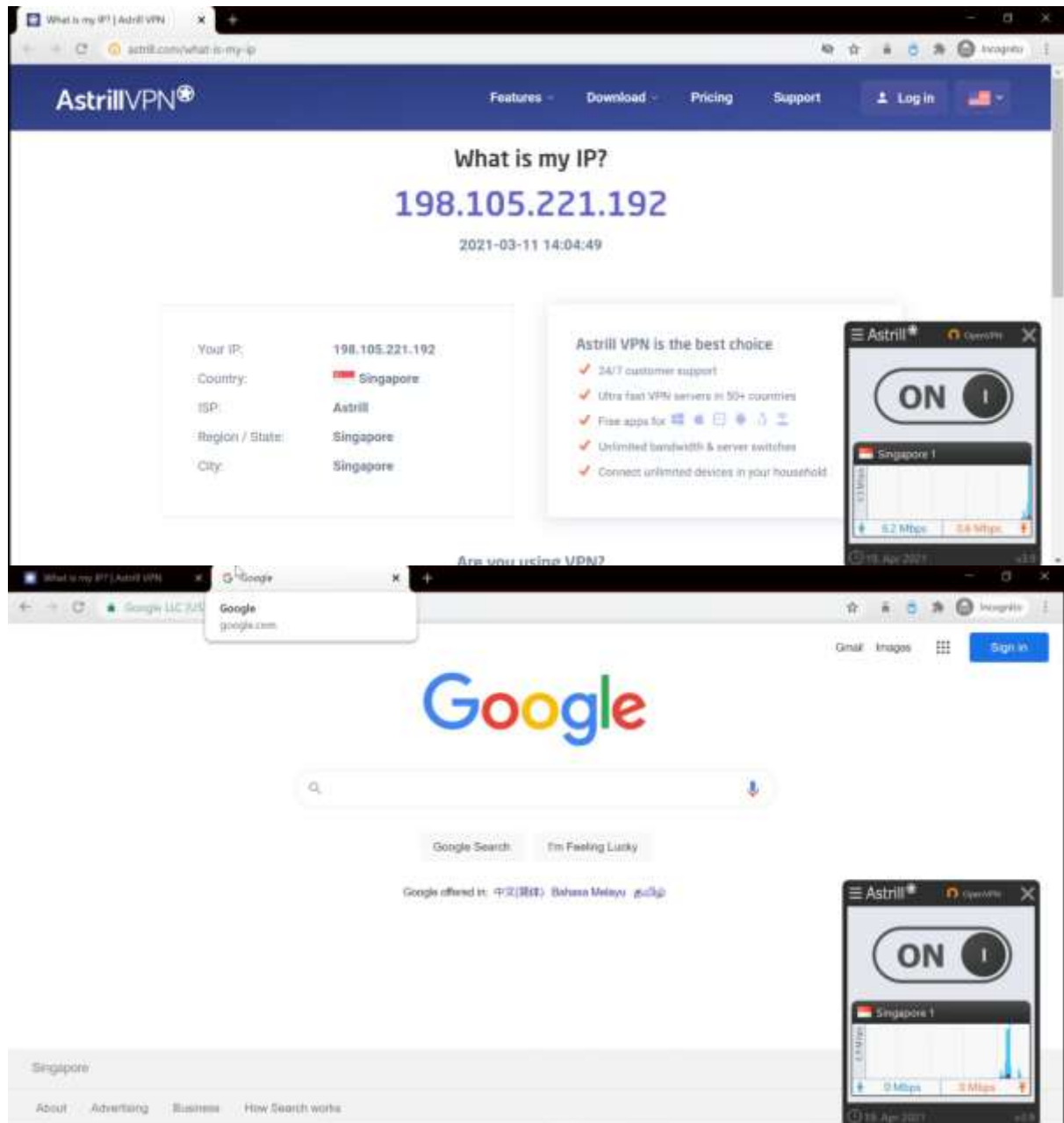


118. Step 4: Finally, the player then exits the operator site, whilst ensuring he is still on the Singapore IP address.

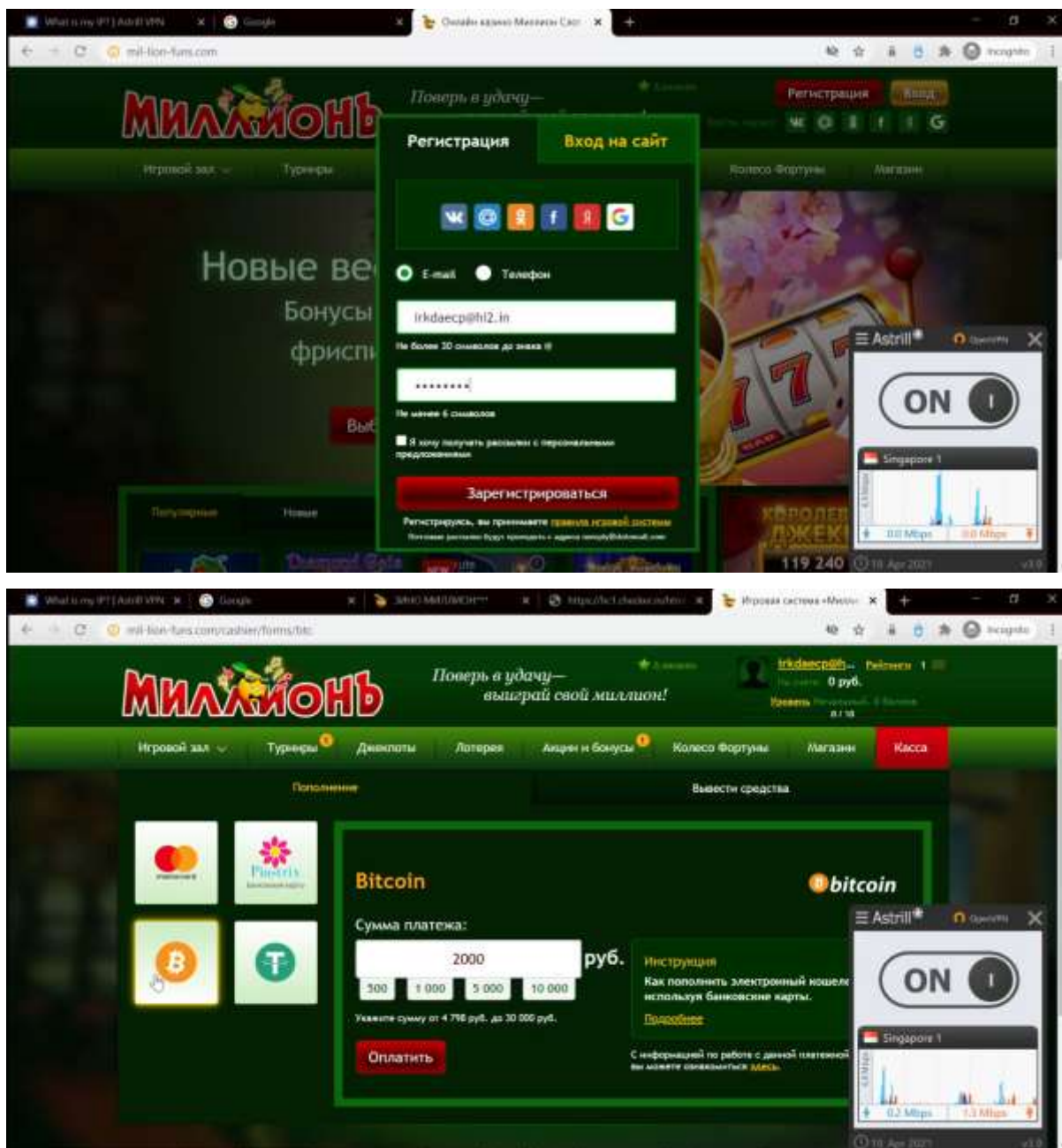


Example 9: Planet of the Apes game on mil-lion-funs.com via Singapore IP address

119. Step 1: In the below example it can be seen that the experimental player firstly ensures that he is on a **Singapore IP address**.



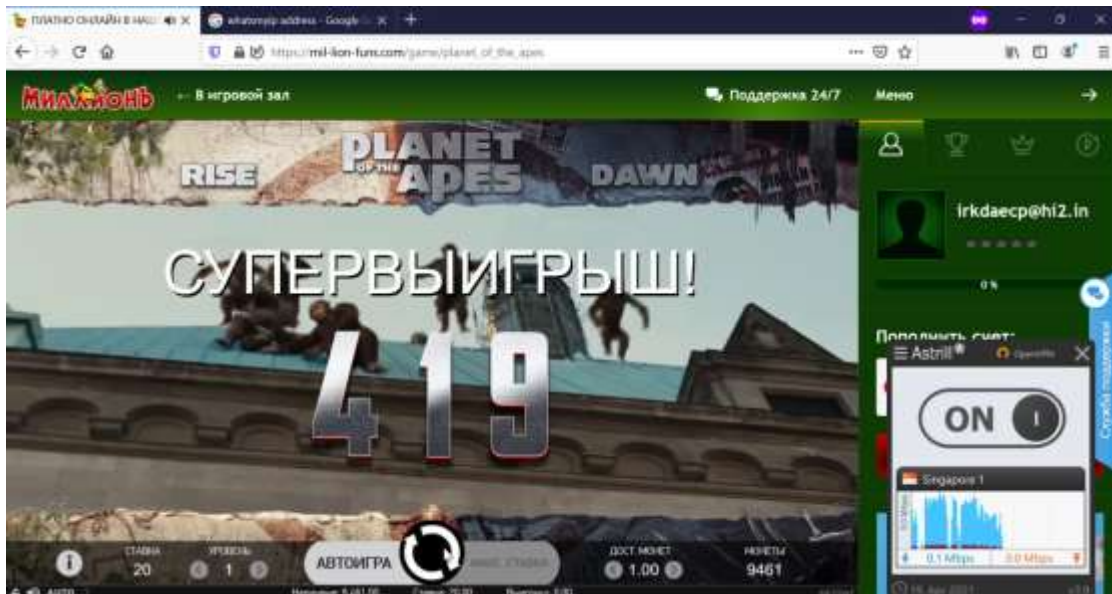
120. Step 2: He then enters and signs in **mil-lion-funs.com** - operator website which offers NetEnt branded games of Evolution, and deposits money into his account in order to place bets.



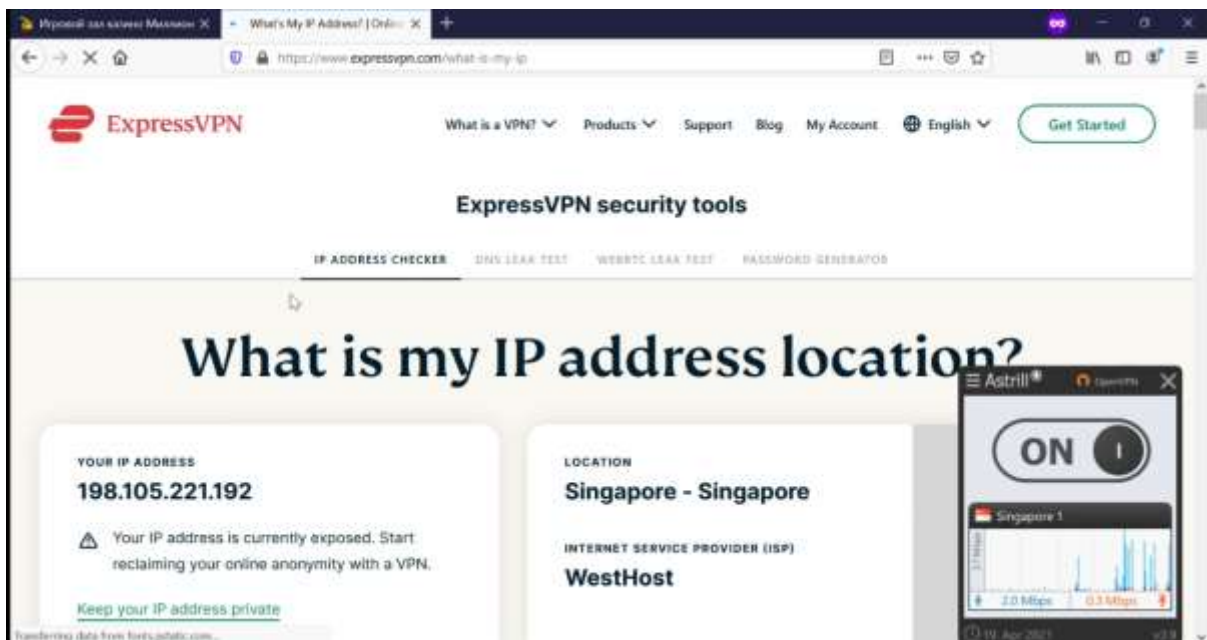


121. Step 3: Following his deposit, and whilst still being on a Singapore IP address, the player then chooses **NetEnt's branded slot machine game Planet of the Apes**, successfully plays, and wins.



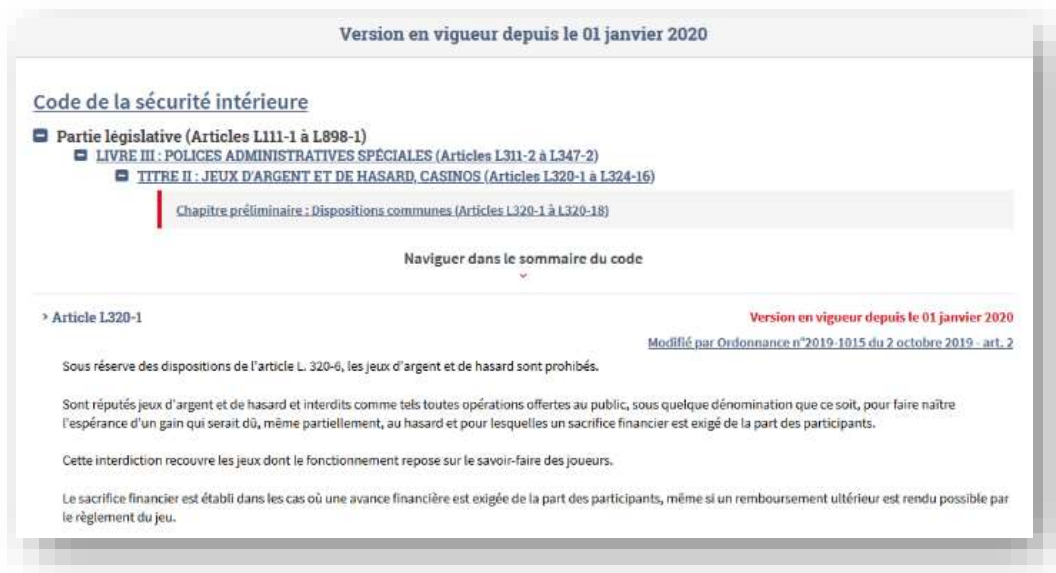


122. Step 4: Finally, the player then exits the operator site, whilst ensuring he is still on the Singapore IP address.



Evolution Offers it's Games in Black Markets - France

123. Clear evidence shows that live casino games produced by Evolution are being offered to end-users - those who ultimately use their product – also in territories in Europe, where online casino gambling is illegal, such as **France**.
124. The law in France specifies that all forms of gambling in France are illegal. In direct translation of the image of the law below, this means:



Article L320-1

Version in force since January 01, 2020

Amended by Ordinance No. 2019-1015 of October 2, 2019 - art. 2

*Subject to the provisions of Article L. 320-6, **games of money and chance are prohibited.***

Are deemed to be games of money and chance and prohibited as such all operations offered to the public, under any name whatsoever, to give rise to the hope of a gain which would be due, even partially, to chance and for which a sacrifice financial is required from the participants.

This ban covers games the operation of which is based on the skills of the players.

The financial sacrifice is established in cases where a financial advance is required from the participants, even if a later reimbursement is made possible by the rules of the game. In

accordance with Article 50 of Ordinance No. 2019-1015 of October 2, 2019, these provisions come into force on January 1, 2020.

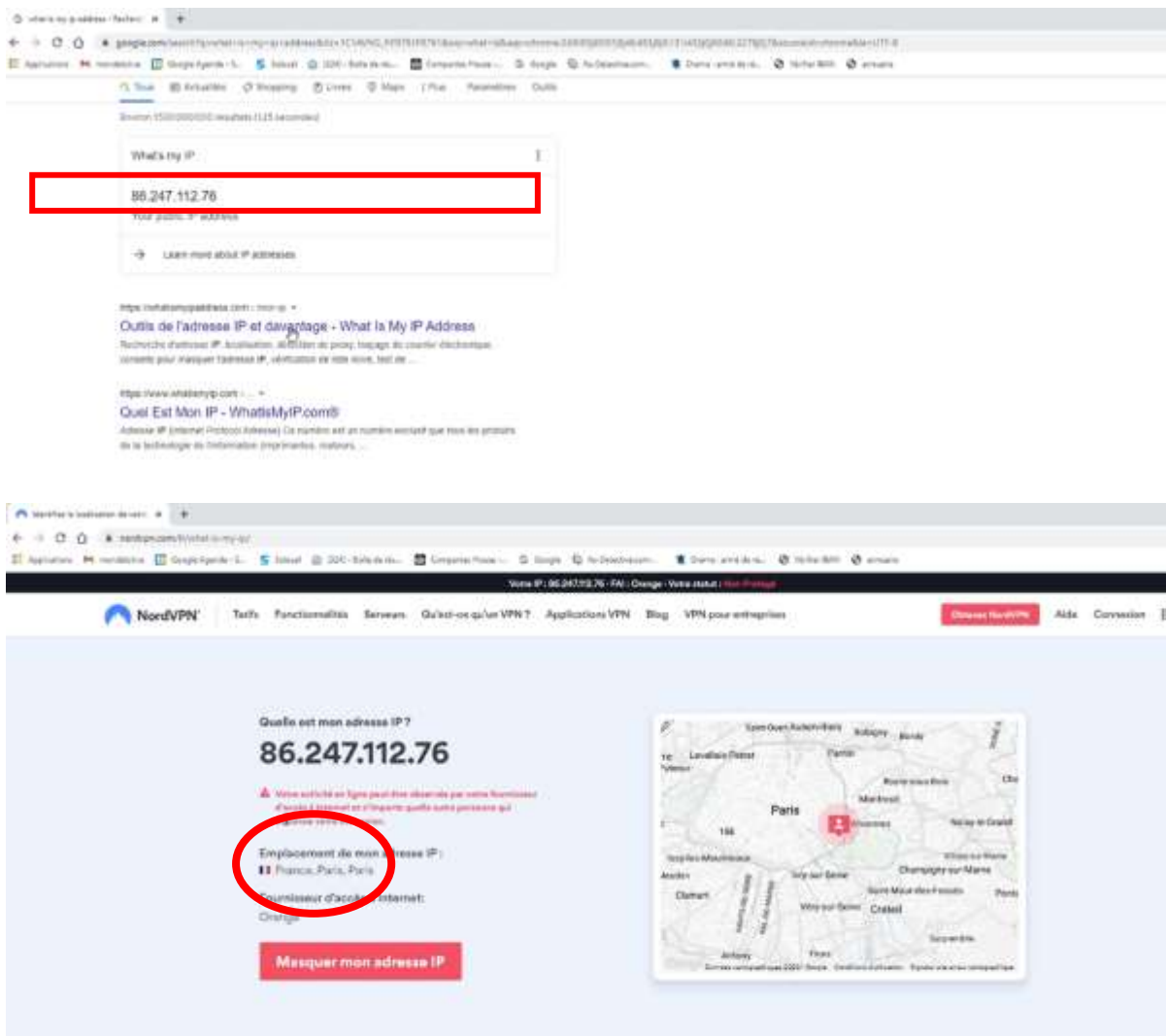
125. As mentioned before, by allowing gambling to take place in these Black Markets, Evolution also violates its own Anti-Money Laundering Policy and Anti-Money Laundering laws by receiving cash and bitcoin originated from a prohibited gambling and without knowing their origin, and do not carry out monitoring processes to check this either.
126. One of Evolution's former senior financial executives reveals that Evolution are well aware that France is an illegal market which their games cannot be supplied. More specifically, he says that "***Evolution Gaming is not allowed to supply to France***". He also confirms that Evolution can see the player's IP address even from restricted countries:

"Evolution can see if a player have an IP address from restricted countries."

Investigative Gambling with Evolution Games in Black Markets – France

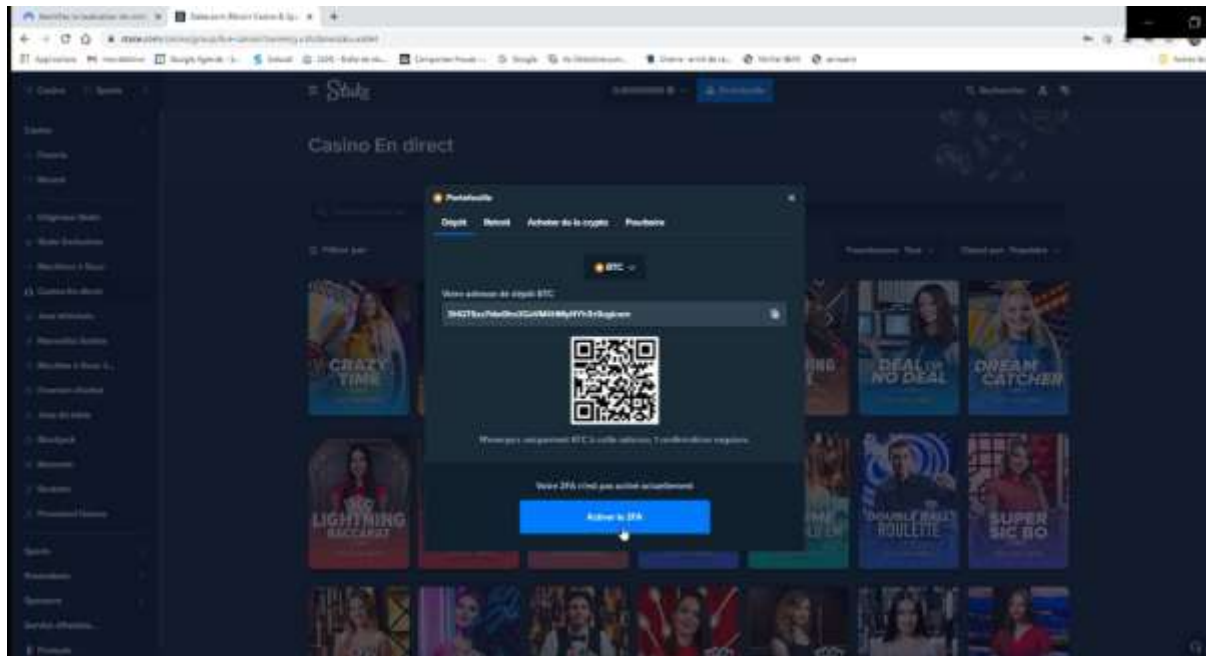
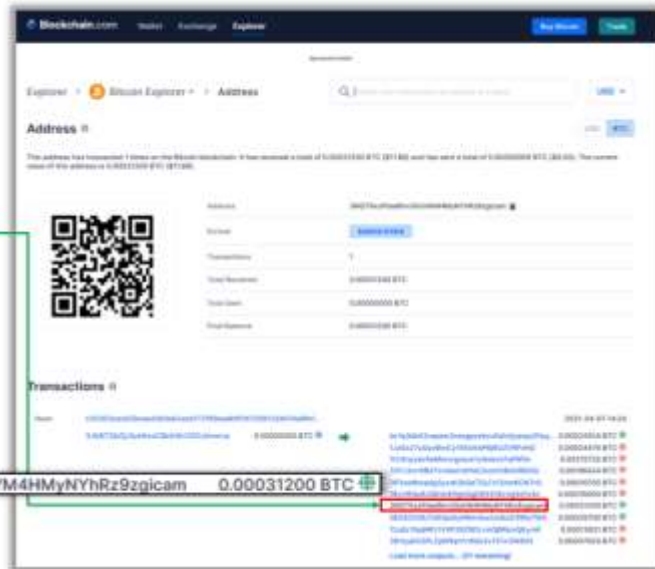
Example 1: An experimental player entering Stake.com via a France IP address

127. Step 1: The player ensures he is on an **IP address from France** before commencing to enter the operator site offering Evolution games – **notice the automatic language change**.

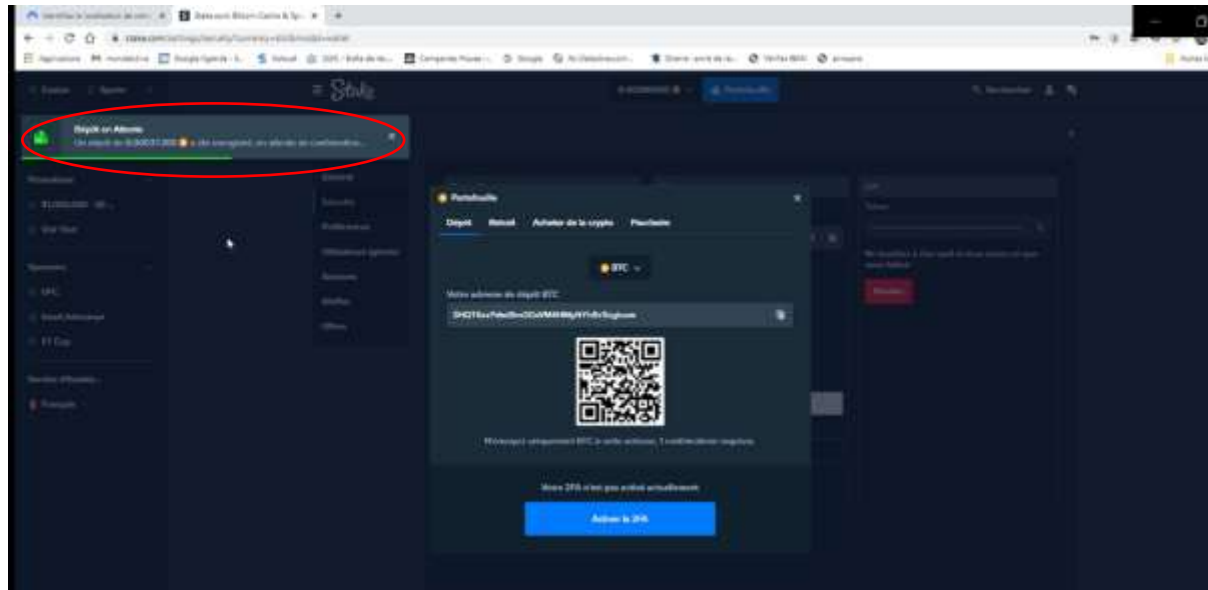


128. Step 2: The player then enters **stake.com**, the operator site offering Evolution games, and then enters his account and deposits funds into it so that he can place bets. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.

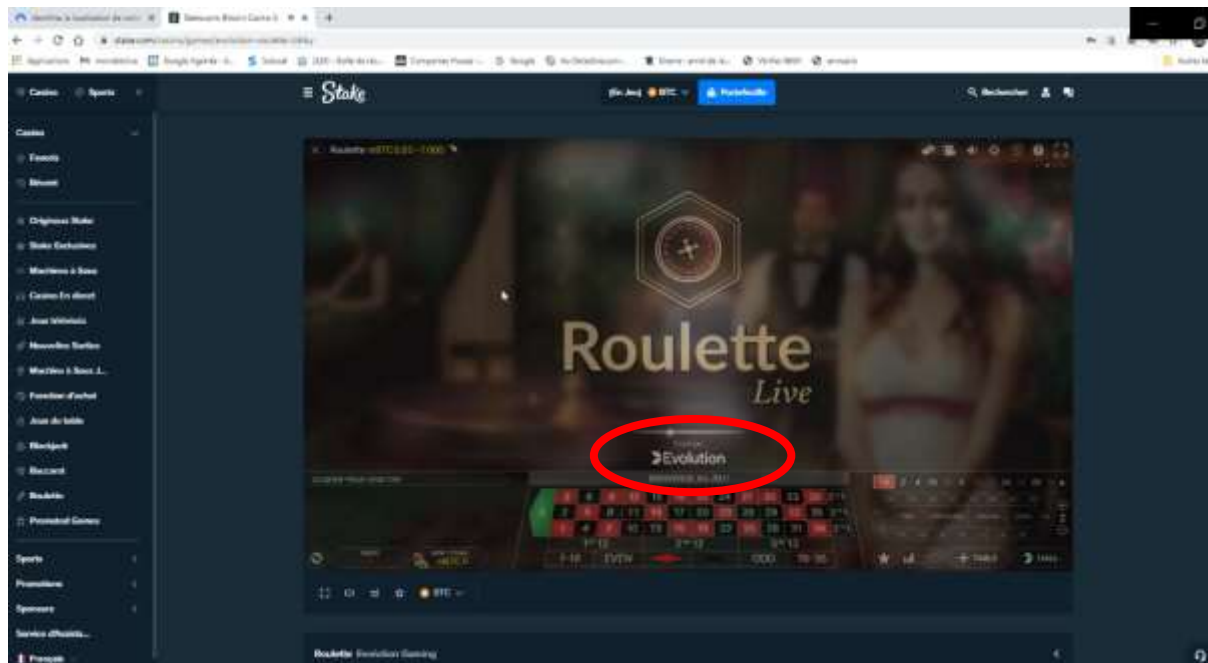
Player deposits money to Stake.com
BTC's wallet to commence gambling

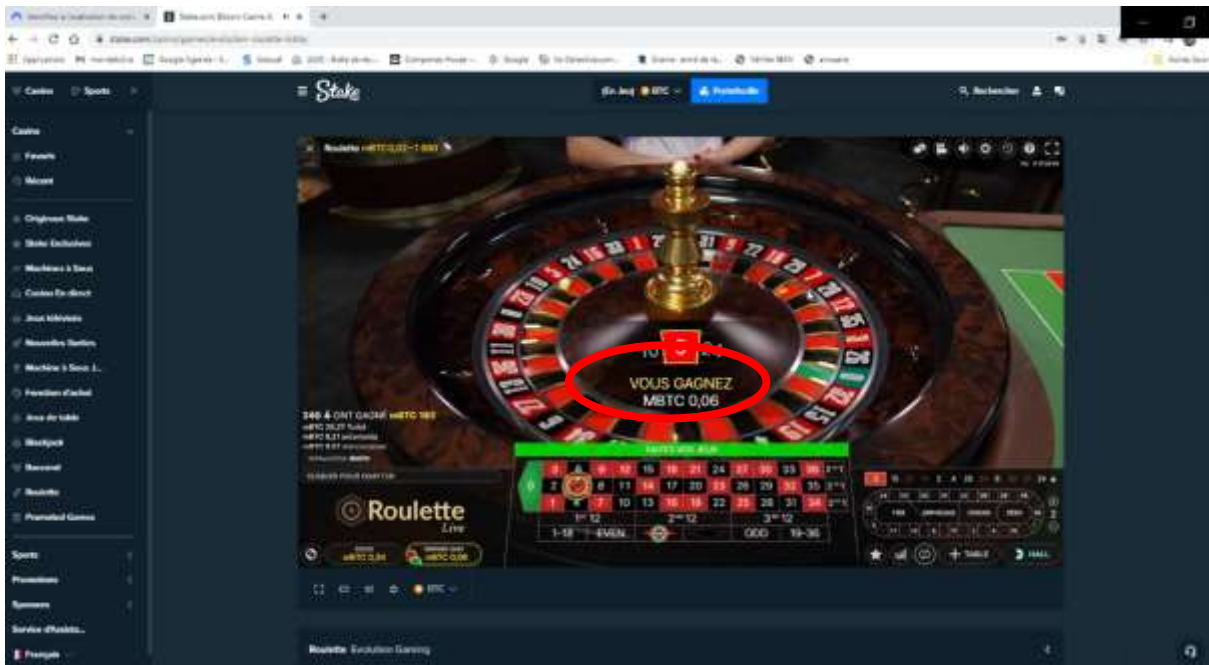
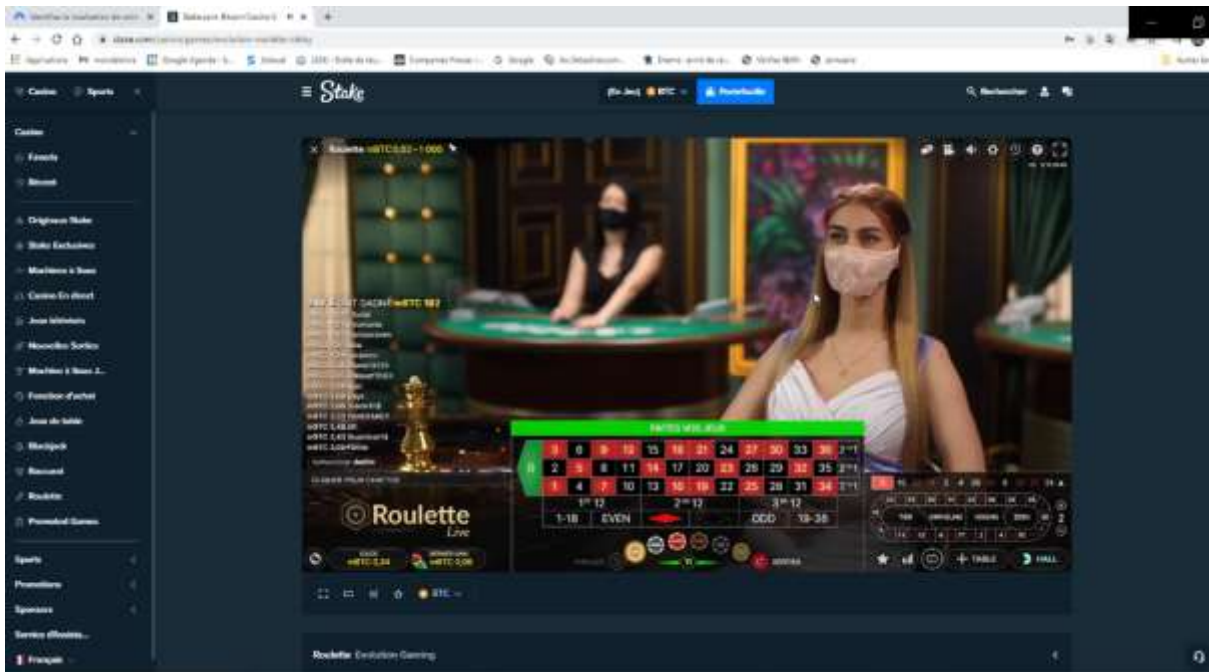


129. Step 3: Below is the confirmation of the deposit, which was successful.

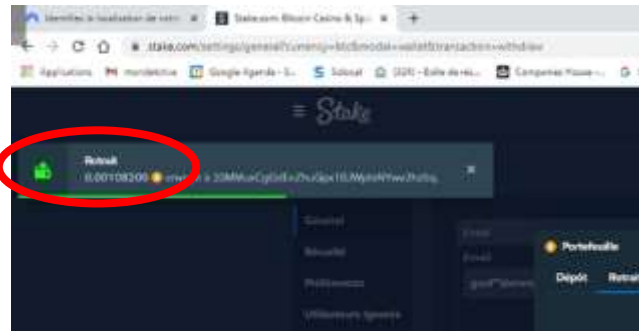
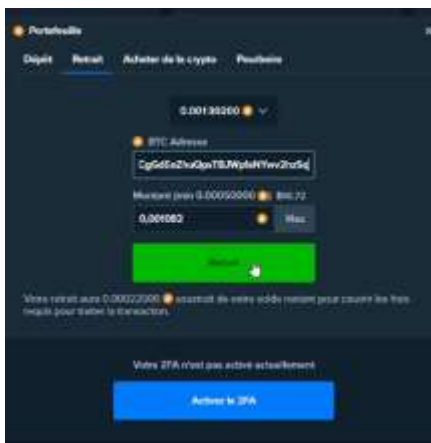


130. Step 4: The player then chooses to play an Evolution game – **Roulette Live**, places bets and wins.

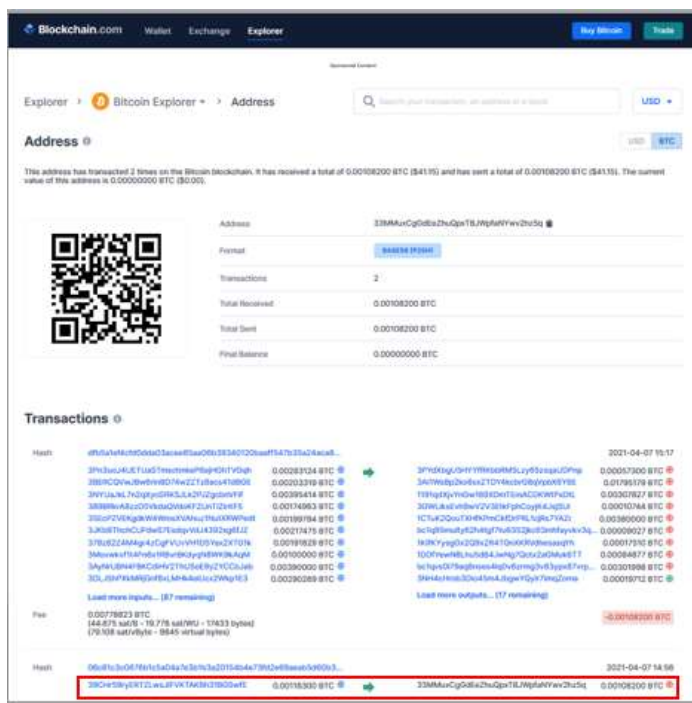




131. Step 5: The player then goes on to **withdraw his winnings, and does so successfully via his BTC wallet.**

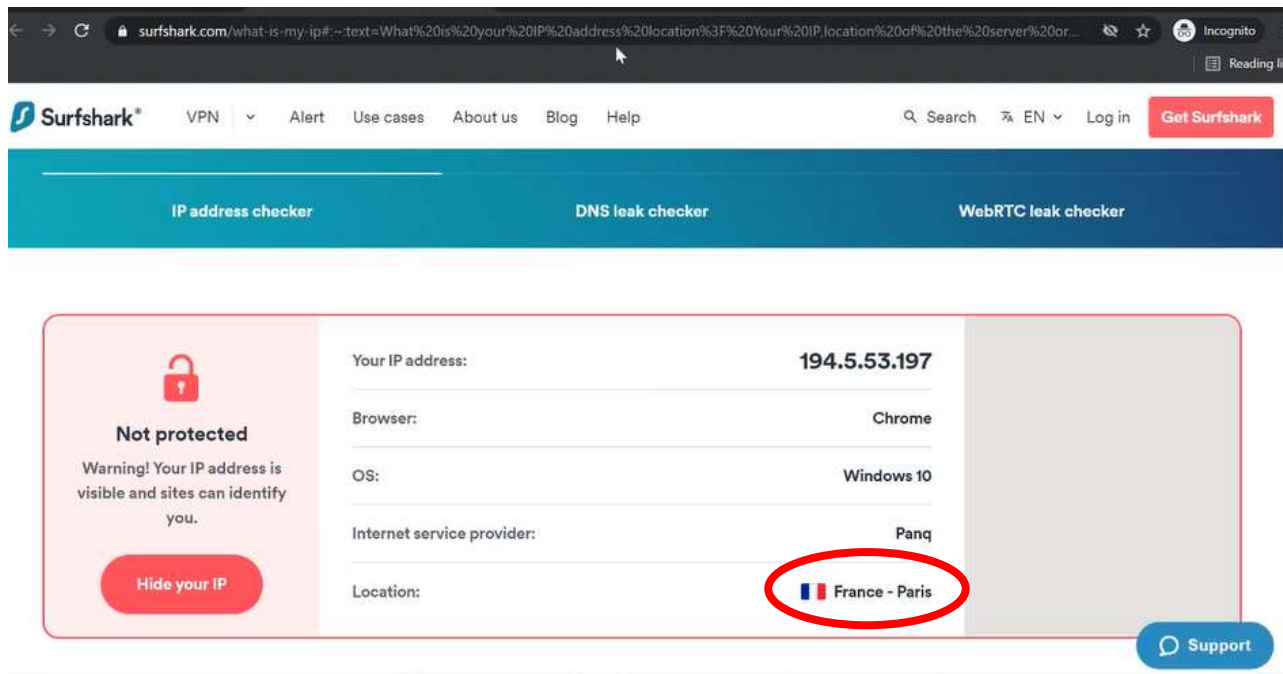


132. Step 6: Below is the **confirmation of the transaction on the blockchain website.**

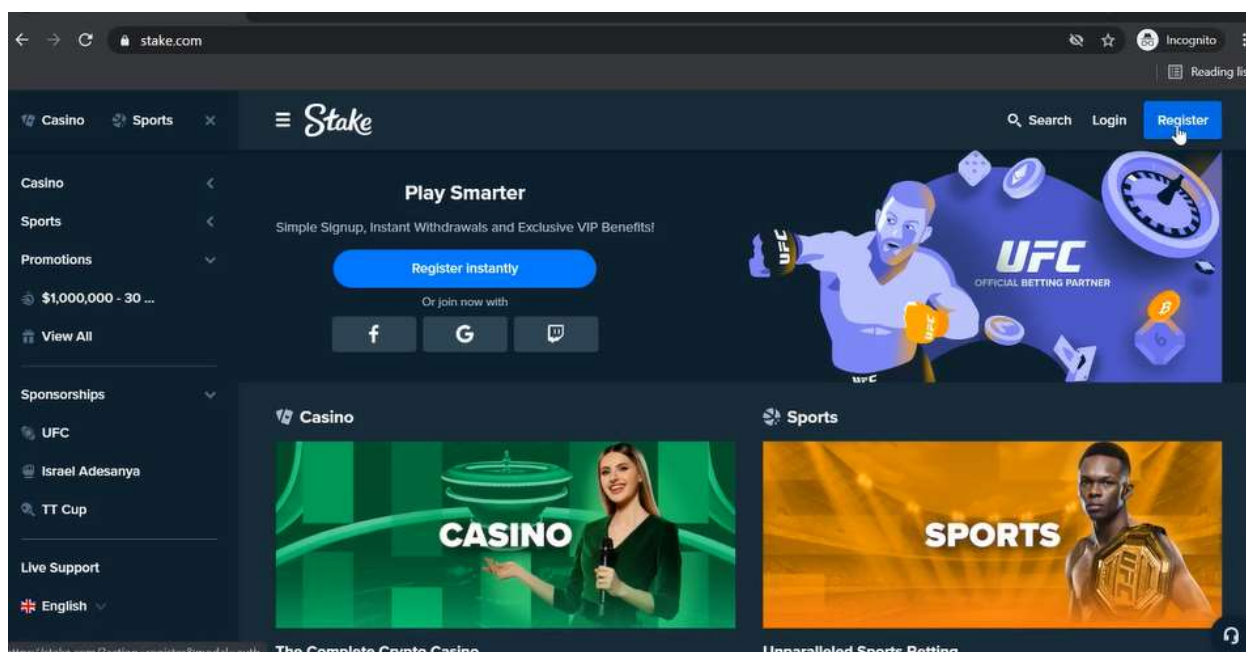


Example 2: An experimental player entering Stake.com via a France IP address

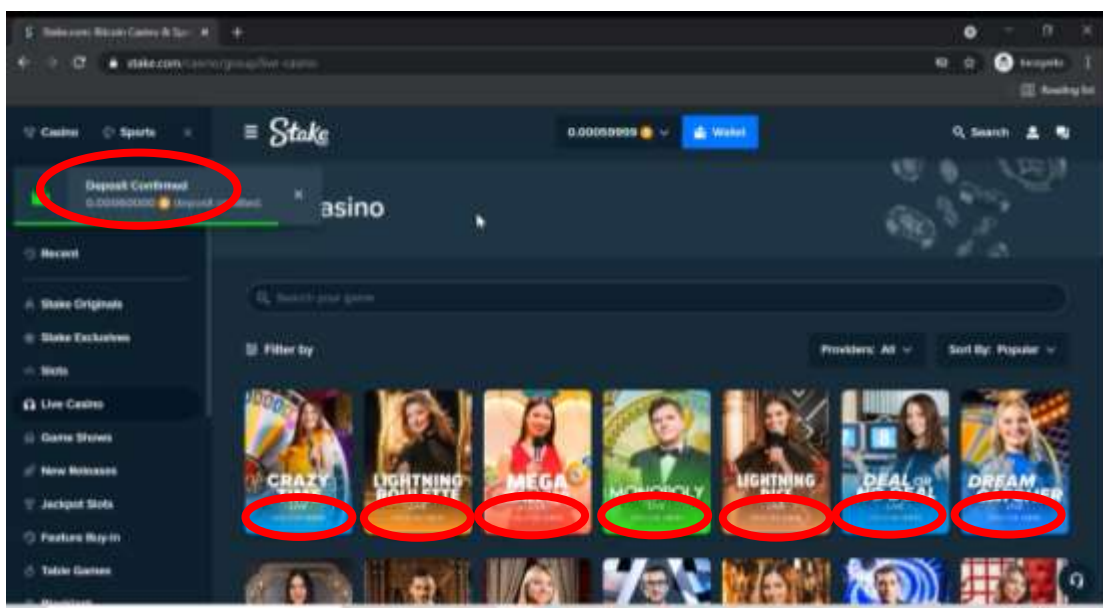
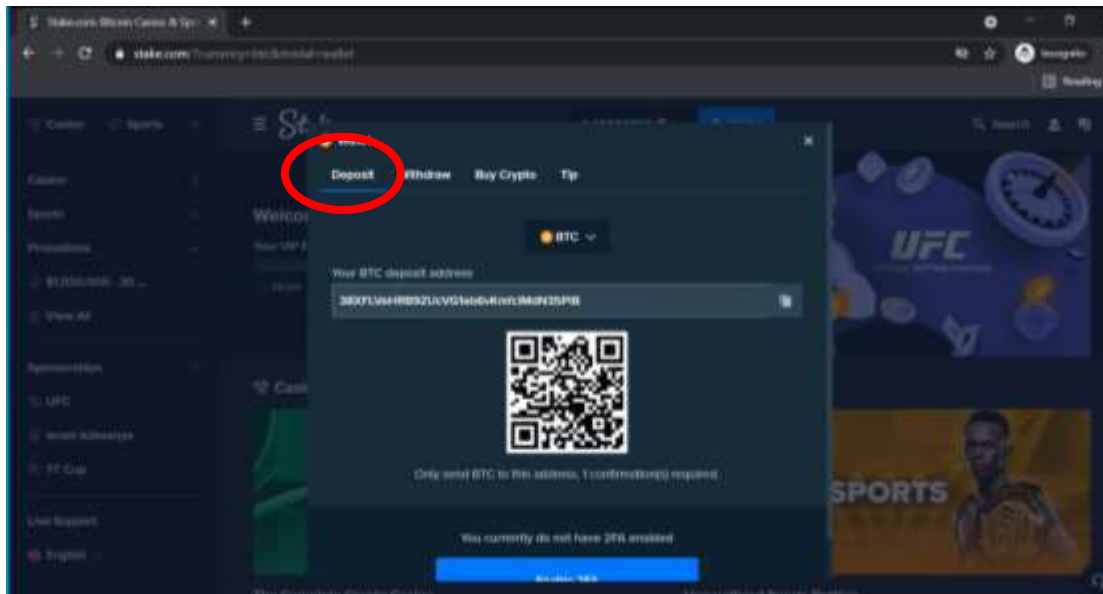
133. Step 1: The player ensures he is on **an IP address from France**. Notice the automatic language change on Google.



134. Step 2: The player then enters **stake.com** – the operator website offering Evolution games. He registers in order to enter and play.



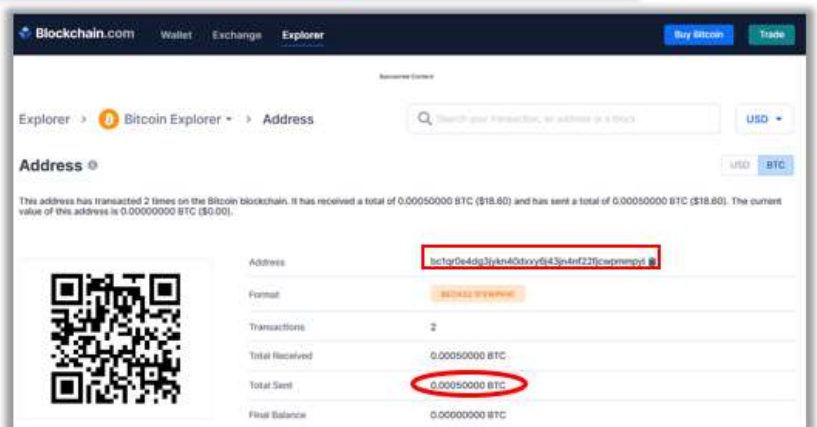
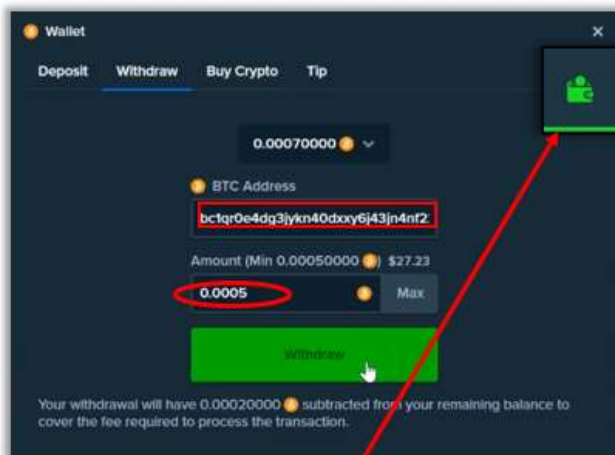
135. Step 3: In order to place bets, the player deposits money into his account before choosing an Evolution game to play. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



136. Step 4: The player then chooses to play an Evolution game – **Roulette Live**, successfully places bets and wins.



137. Step 5: The player then goes on to withdraw his winnings, as also confirmed on the blockchain website below.



Player wins and withdraws money



138. Step 6: Finally, the player exits whilst still using an IP address from France.

The screenshot shows the iplocation.net website in a browser window. The main heading displays "Your IP Address is 194.5.53.197" with a "Hide IP with VPN" button. Below this is an "IP Location Finder" section with a search bar and an "IP Lookup" button. A message states: "This is the public IP address of your computer, and the accuracy of geolocation may vary. Do you have a problem with IP location lookup? Report a problem."

The "IP Address Details" table is shown below:

IP Address	194.5.53.197
IP Location	Paris, Ile-de-France (FR) [Details]
ISP	Paris
Proxy	No proxy present
Platform	Windows 10
Browser	Chrome 89.0.4389.128

A red circle highlights the "IP Location" row, specifically the text "Paris, Ile-de-France (FR)".

On the right side, there are sections for "IP TOOLS" and "DOMAIN TOOLS".

IP TOOLS

- Trace Email Source
- Verify Email Address
- Proxy Check
- Subnet Calculator
- IP-to-Integer Converter

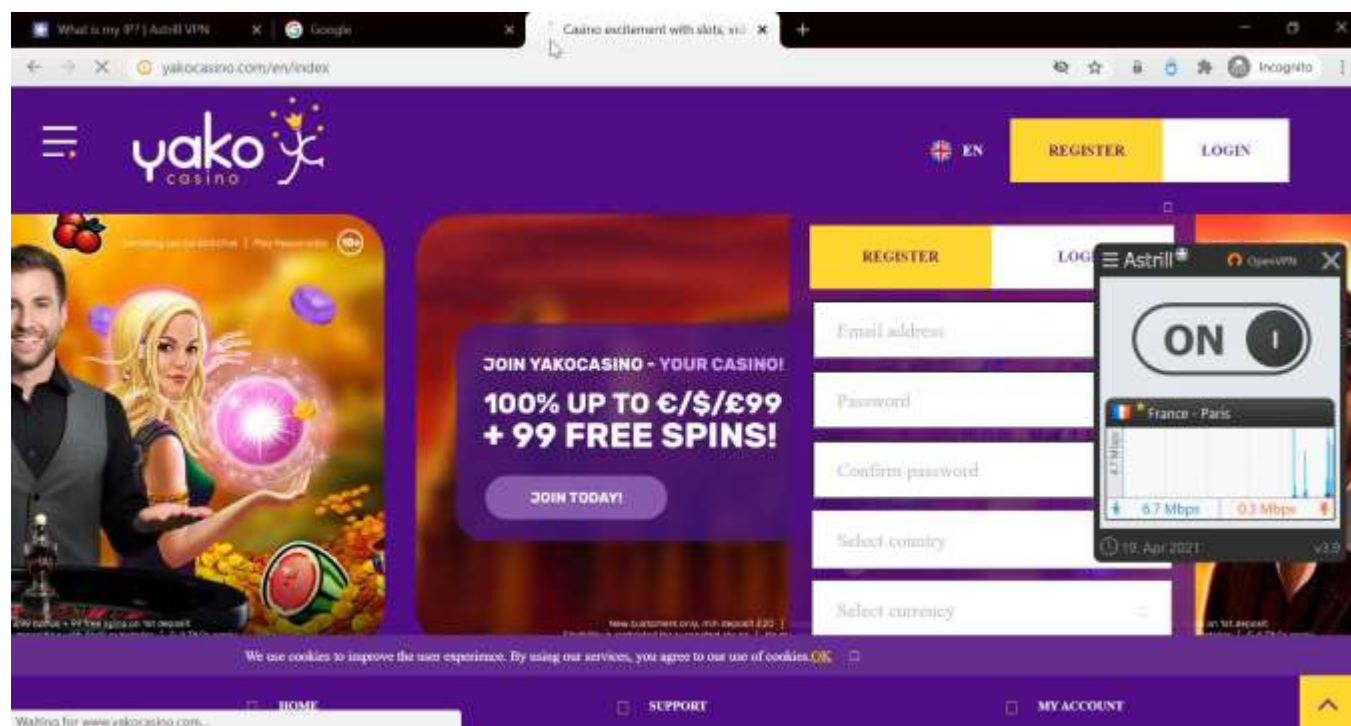
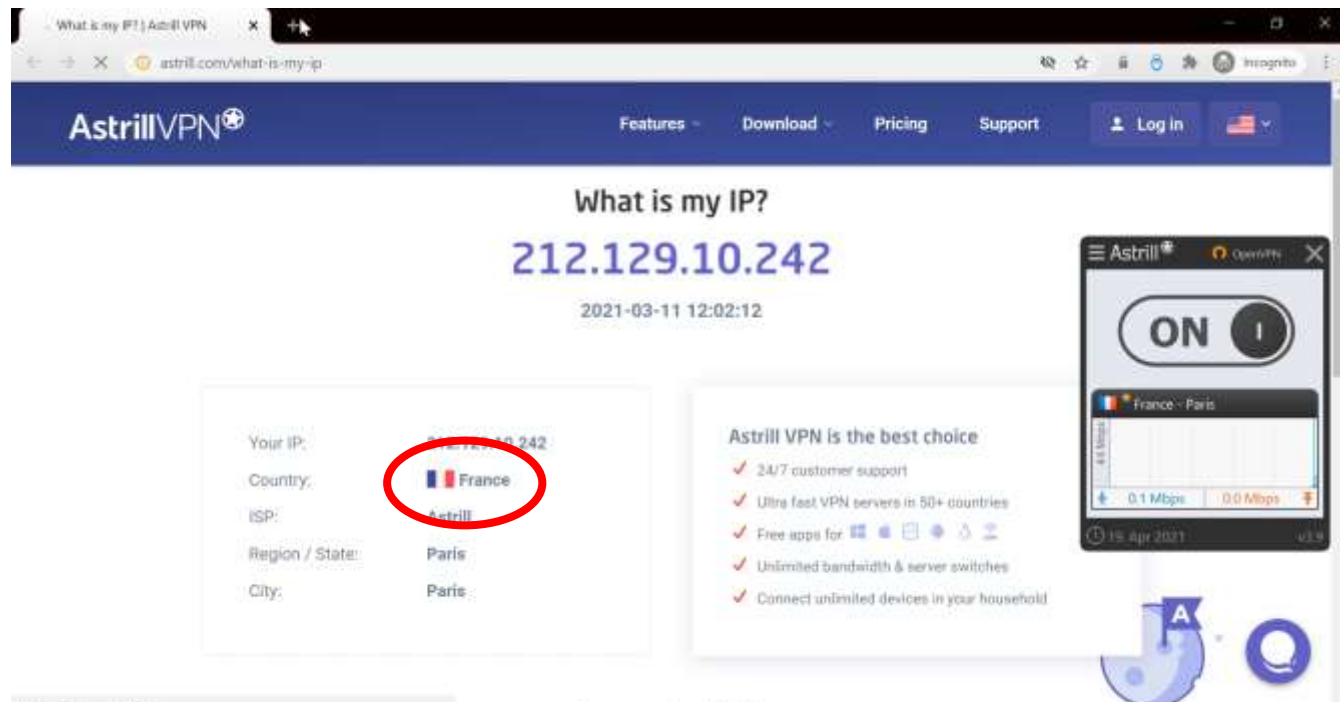
DOMAIN TOOLS

- Who is Hosting a Website
- Alexa Traffic Rank Checker
- Domain Age Checker
- Reverse DNS Lookup
- HTTP Server Header Check
- Is my website down?
- What is my User Agent?

At the bottom, there is an "ADVERTISEMENT" section.

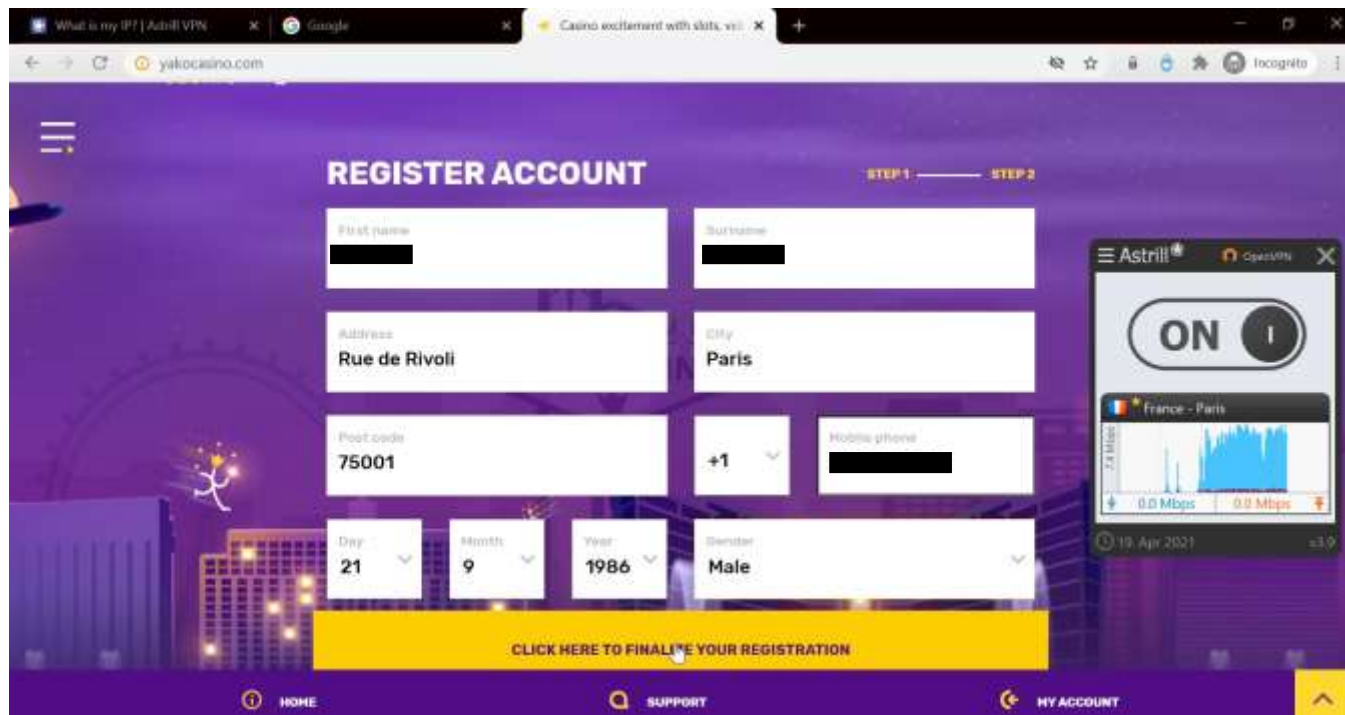
Example 3: An experimental player entering yakocasino.com via a France IP address

139. Step 1: In the below example it can be viewed that the player enters **yakocasino.com** (the operator site offering Evolution games) via a France IP address.



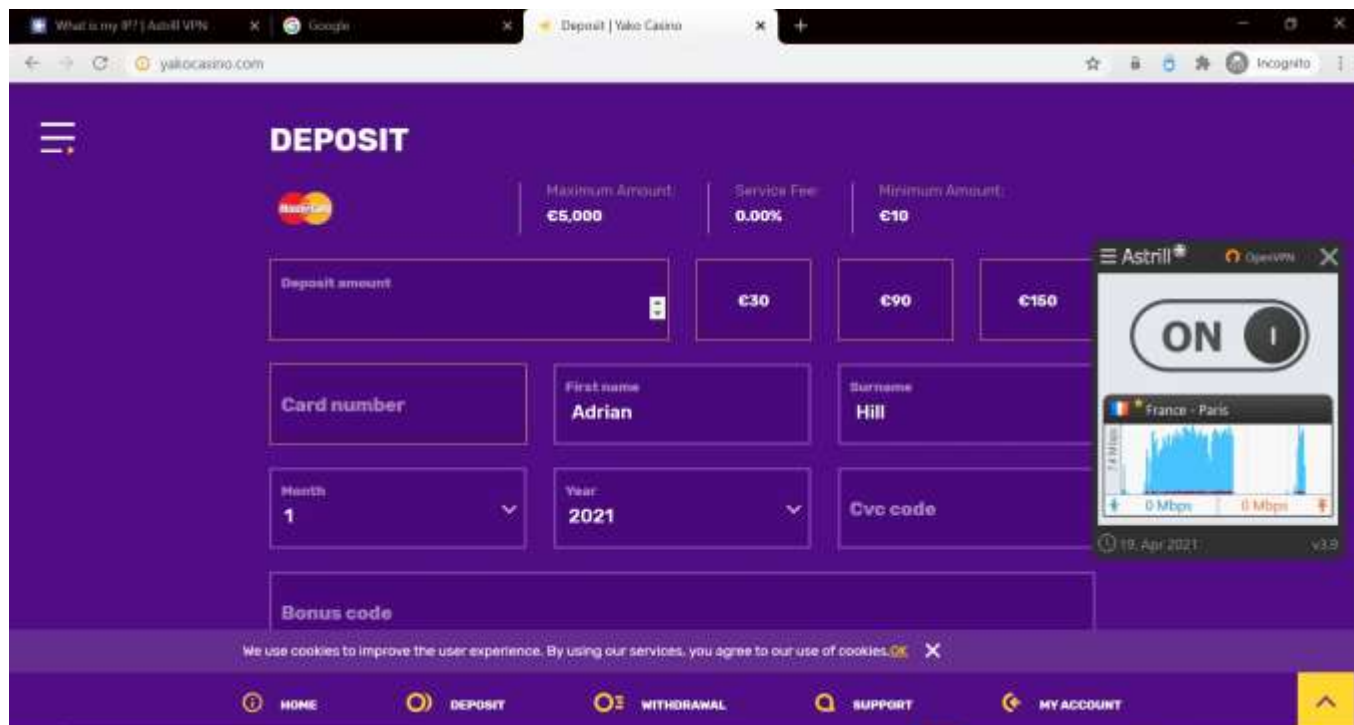
140. Step 2: He then registers and deposits money into account so that he can place bets.

Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



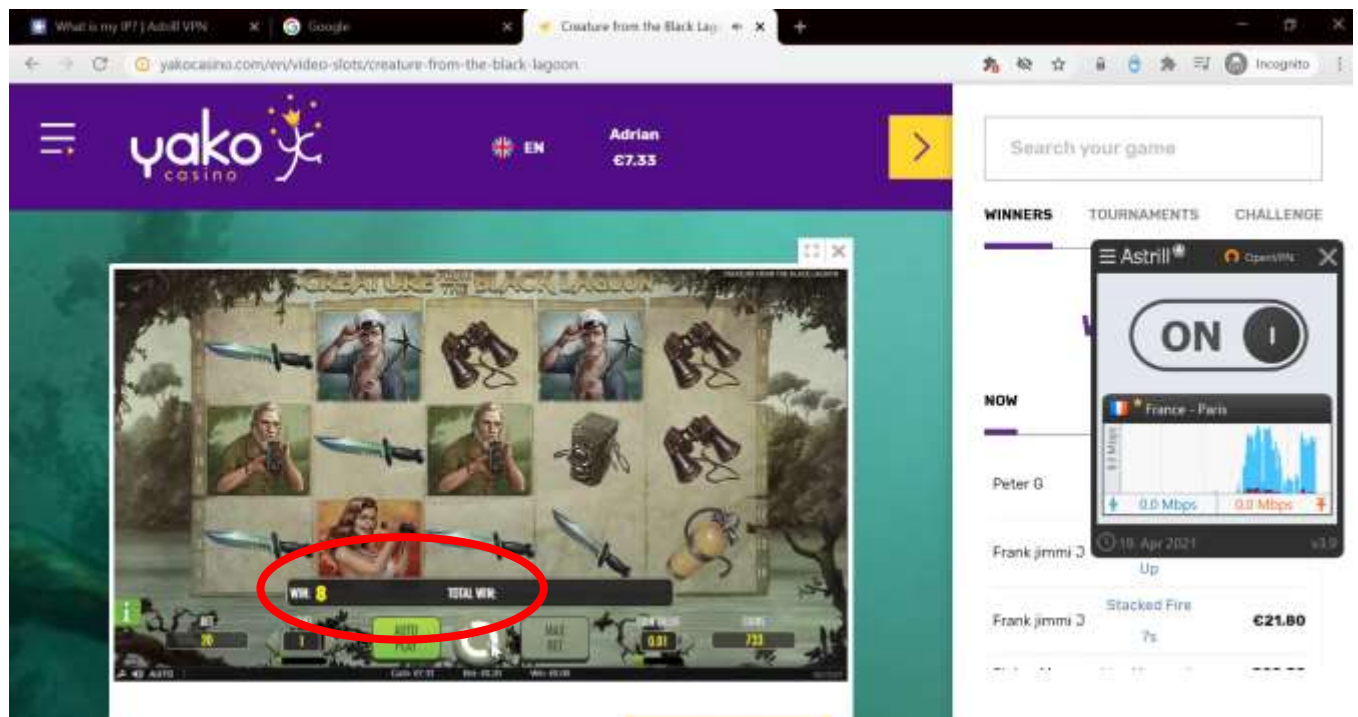
The screenshot shows the 'REGISTER ACCOUNT' page of Yako Casino. The page is purple-themed with a cityscape background. It features a registration form with the following fields: First name, Surname, Address (Rue de Rivoli), City (Paris), Post code (75001), Mobile phone (+1), Day (21), Month (9), Year (1986), and Gender (Male). A yellow button at the bottom says 'CLICK HERE TO FINALISE YOUR REGISTRATION'. The page is labeled 'STEP 1' and 'STEP 2'. A sidebar on the right shows a VPN status 'ON' and a speed test graph.

141. Step 3: The player then deposits money into his account in order to bet.



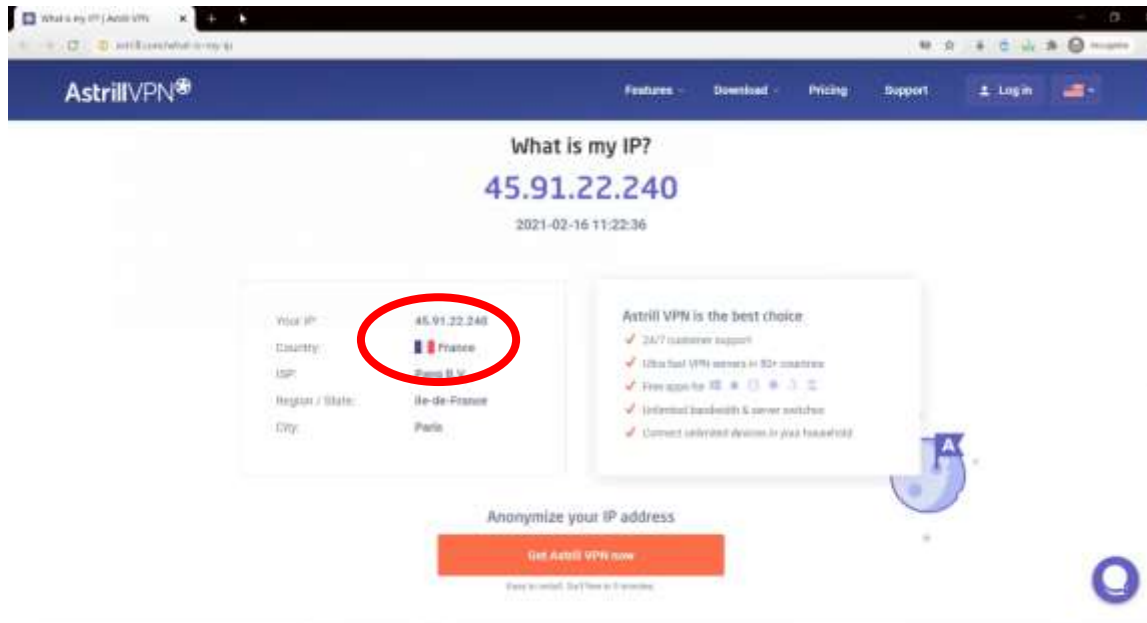
The screenshot shows the 'DEPOSIT' page of Yako Casino. The page is purple-themed with a cityscape background. It features a deposit form with the following fields: Deposit amount (€30, €90, €150), Card number, First name (Adrian), Surname (Hill), Month (1), Year (2021), Cvc code, and Bonus code. The page also displays the Maximum Amount (€5,000), Service Fee (0.00%), and Minimum Amount (€10). A sidebar on the right shows a VPN status 'ON' and a speed test graph.

142. Step 4: He successfully bets on a NetEnt branded slot game – **Creature from the Black Lagoon** and wins.

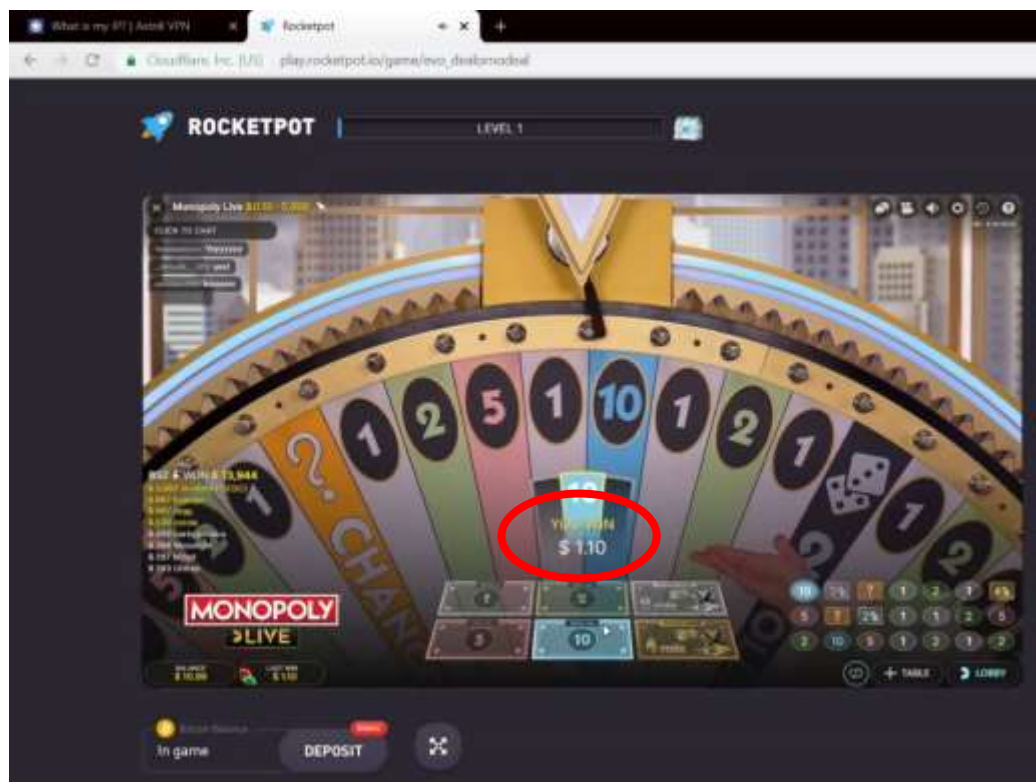


Example 4: Deal or No Deal game on Rocketpot.io via France IP address

143. Step 1: The below shows that the player enters **rocketpot.io** (the operator site offering Evolution games) via an IP address from France.



144. Step 2: He then successfully plays a live Evolution branded Endemol game – Monopoly - and wins.



Evolution Violates Regulatory Requirements in Spain

145. As part of the investigation, it is revealed that **Evolution also violates several regulatory license requirements** of its operations in Spain:

- a. Evolution's dealers - who according to the local law, are supposed to be based in Spain, are actually **located in Latvia** while offering games to end-users in Spain.
- b. Multiple non-roulette Evolution games such as **Dragon Tiger, Mega Ball**, and more, are available to Spain based players, although according to the law in Spain these games are not permitted by Spanish regulation.
- c. Evolution enables **'com' operators** such as Stake.com to offer their games to end-users in Spain, a direct violation of their license in Spain.



In Spain, a certified authorisation is required to offer state-wide online gambling services.

In Spain, Law 13/2011 requires a certified authorisation to offer certain gambling services:

- Under the law, state-wide lotteries are solely administered by Sociedad Estatal de Loterías y Apuestas del Estado (State Lottery and Gambling Company) and ONCE.
- State-wide online gambling activities which are carried out through electronic, computer, telematic or interactive means including the Internet, text message and TV require certified authorisation.
 - Electronic, computer, telematic or interactive means include the Internet, telephone, text message, TV and others.
 - Operators can only offer **regulated gambling** for which they are licensed.
 - Occasional gambling activities require prior authorisation.

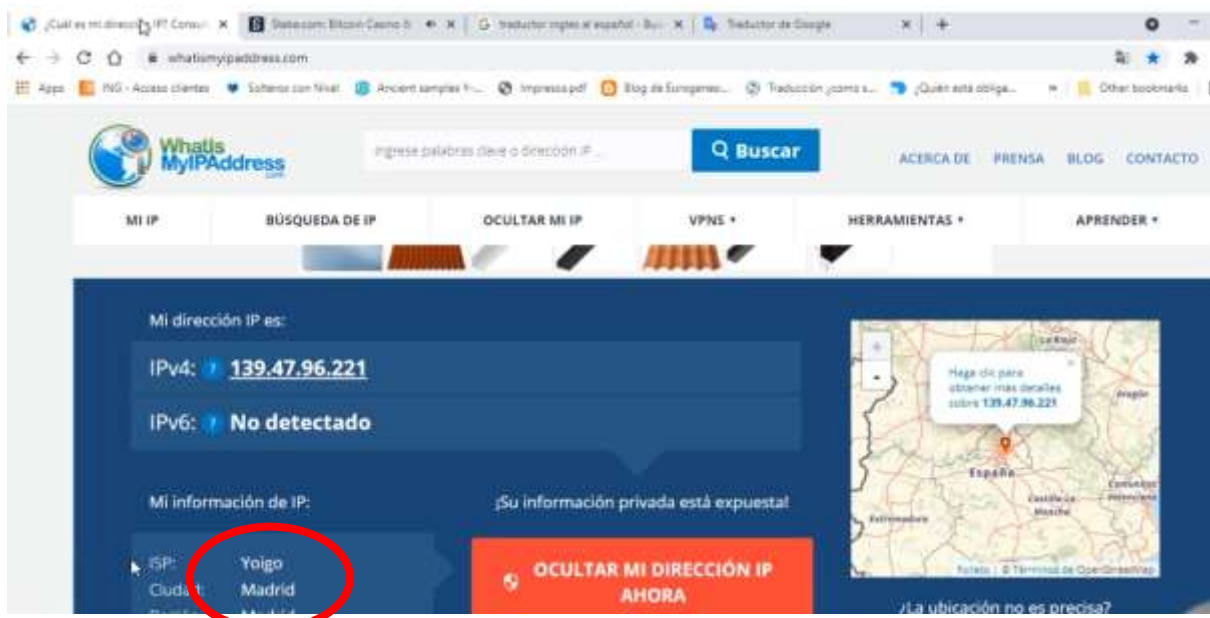
It must be noted that licences must be obtained in Spain; those issued by other states will not be valid in Spain.

146. Furthermore, Evolution offers its branded games such as Deal or No Deal, Monopoly and Jumanji to players in Spain - a direct violation of their contractual agreements with the brand owners, who have ownership over branded games such as Deal or No Deal and Monopoly. The example below shows that **Evolution violates these commercial agreements by enabling these branded games to be offered in Spain – a clear violation of the contract between them.**

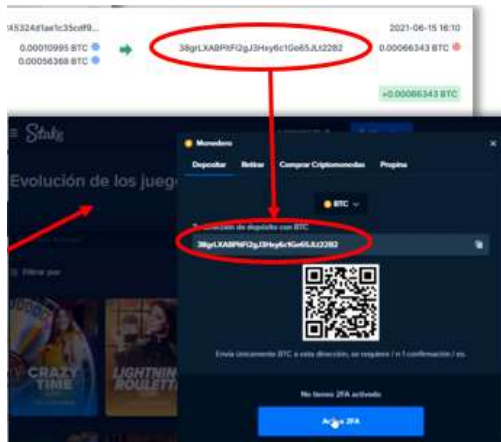
Investigative Gambling with Evolution Games in Spain

Example 1: An experimental player entering Stake.com via a Spain IP address

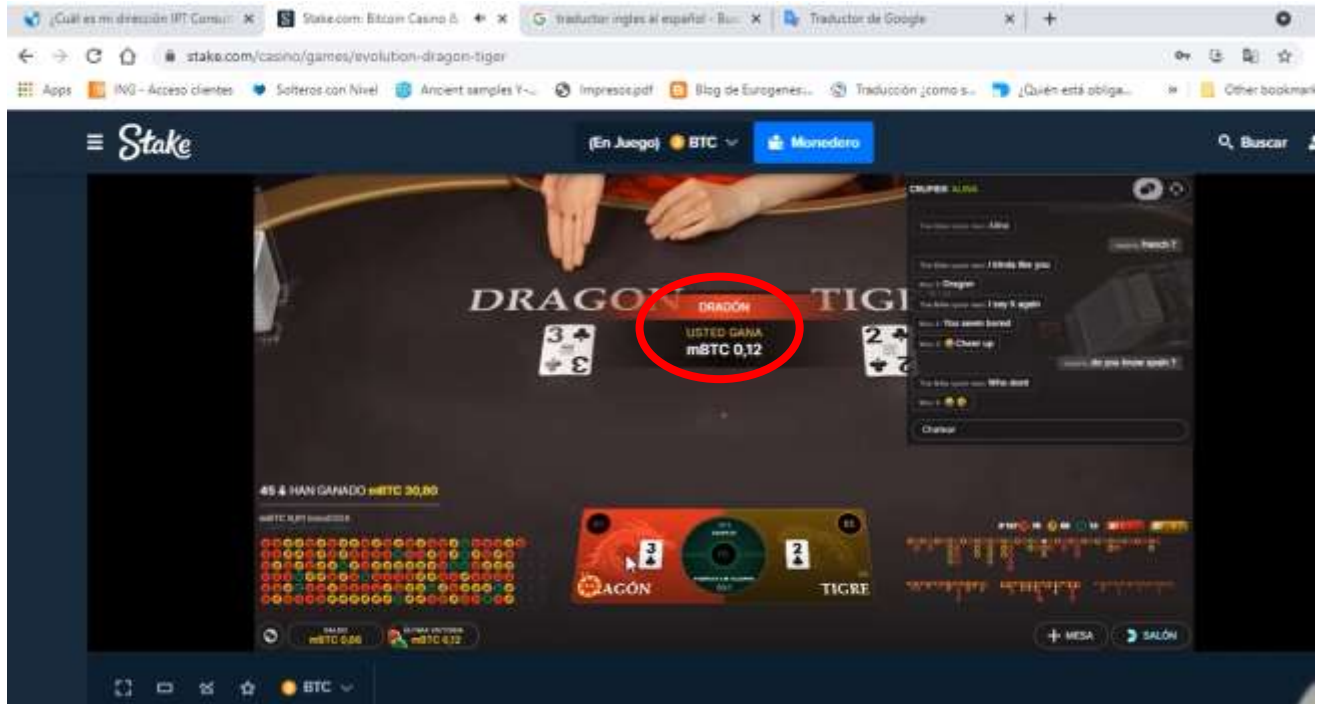
147. Step 1: Below shows the player entering **stake.com** – an unlicensed operator website offering Evolution games - via an **IP address in Spain** (notice the automatic language change).



148. Step 2: He then goes on to deposit money into the account so that he can place bets. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.

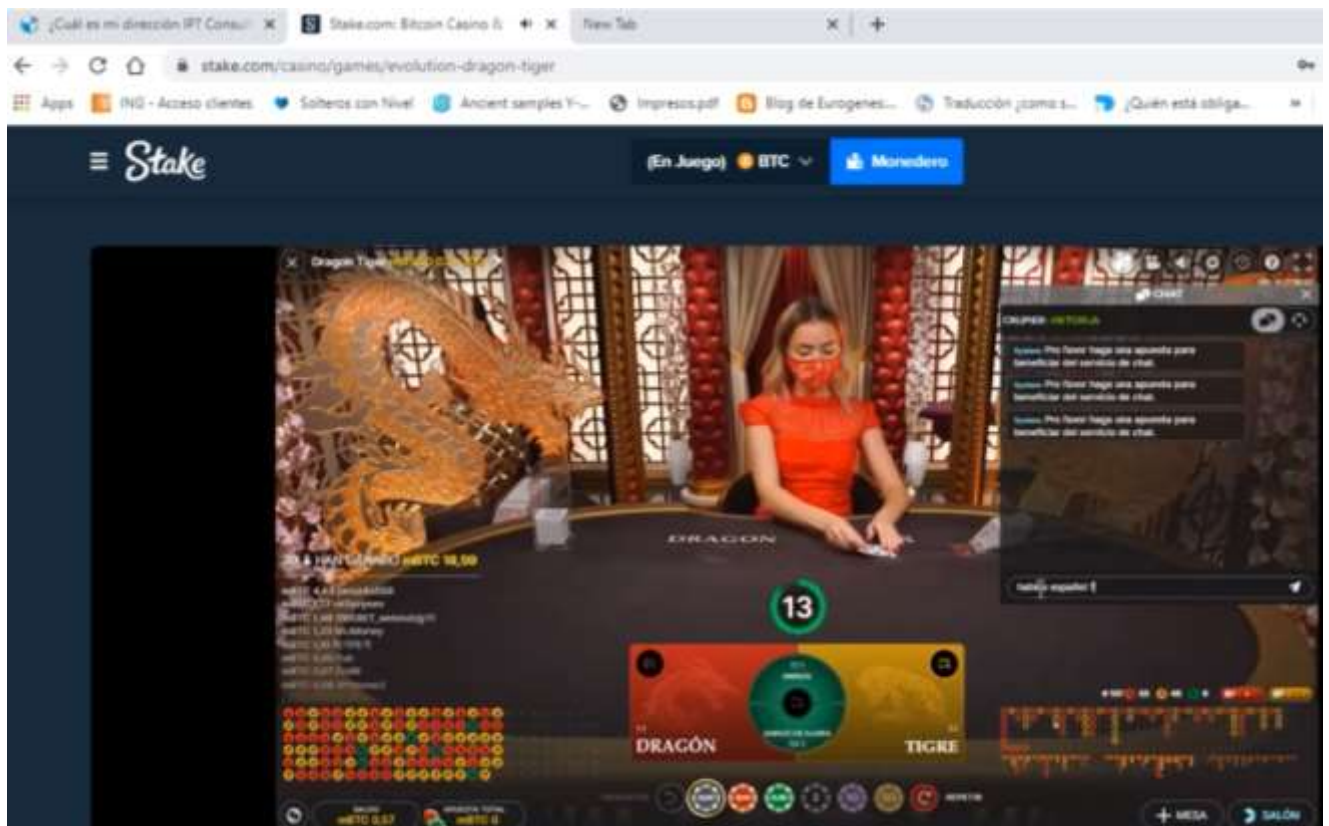


149. Step 3: The player successfully plays an **Evolution game – Dragon Tiger, which is not permitted per Spanish regulation** - and wins.



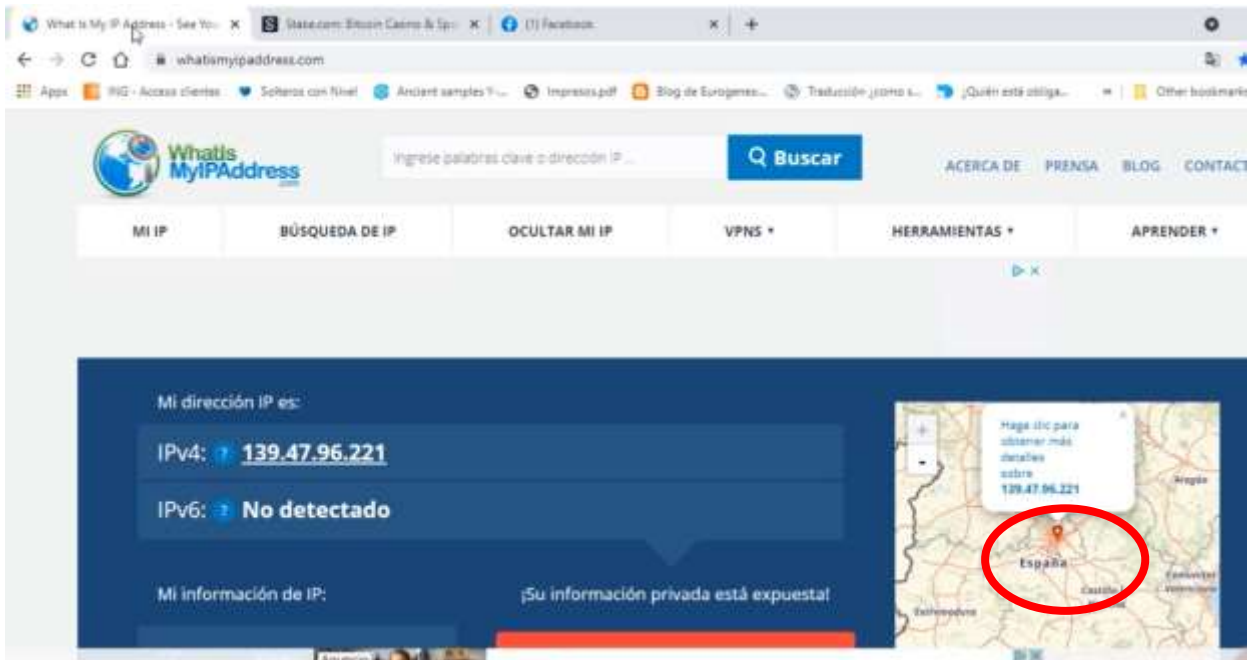
150. In a further investigative discover, Evolution’s live casino dealers for Spanish players are actually **based in Latvia**, as per their own admission, and can be seen in the below example during an experimental player’s attempt to play. Thus, Evolution violates Spain’s regulatory requirements.

“No! I am in Latvia, not Spain, unfortunately”

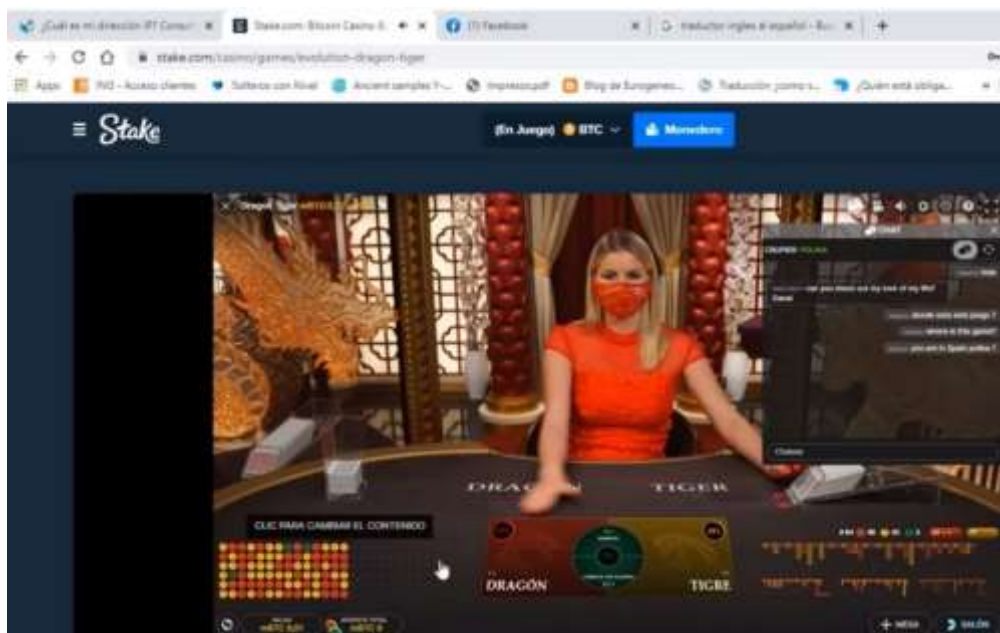


Example 2: An experimental player entering Stake.com via a Spain IP address

151. Step 1: The player enters stake.com – an unlicensed operator in Spain – via an **IP address from Spain**, to then go on and play and Evolution game – **Dragon Tiger**, an **unpermitted game by Spanish regulation**.



152. Step 2: As in the previous example, Evolution's live casino dealers for Spanish players are actually based in Latvia, as can be seen in the below example during an experimental player's attempt to play. Thus, Evolution break Spain's regulatory requirements.



153. Step 3: The player then exits stake.com whilst ensuring he is still connected via an IP address from Spain – again, notice the automatic language change.

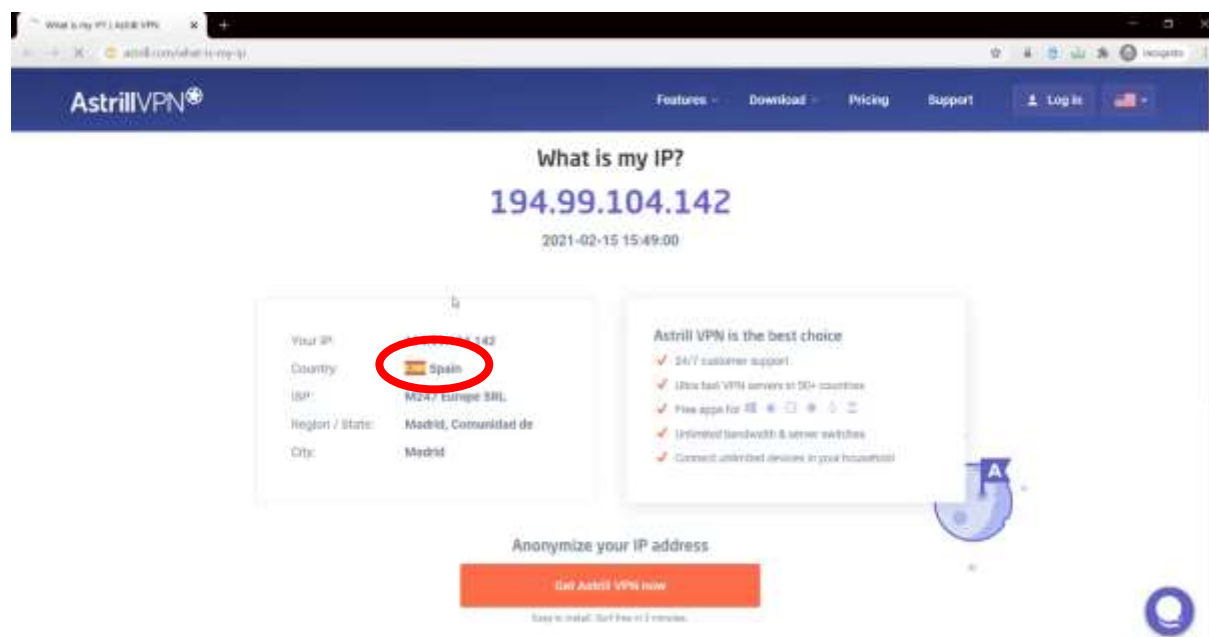
Player exits using a Spanish IP address



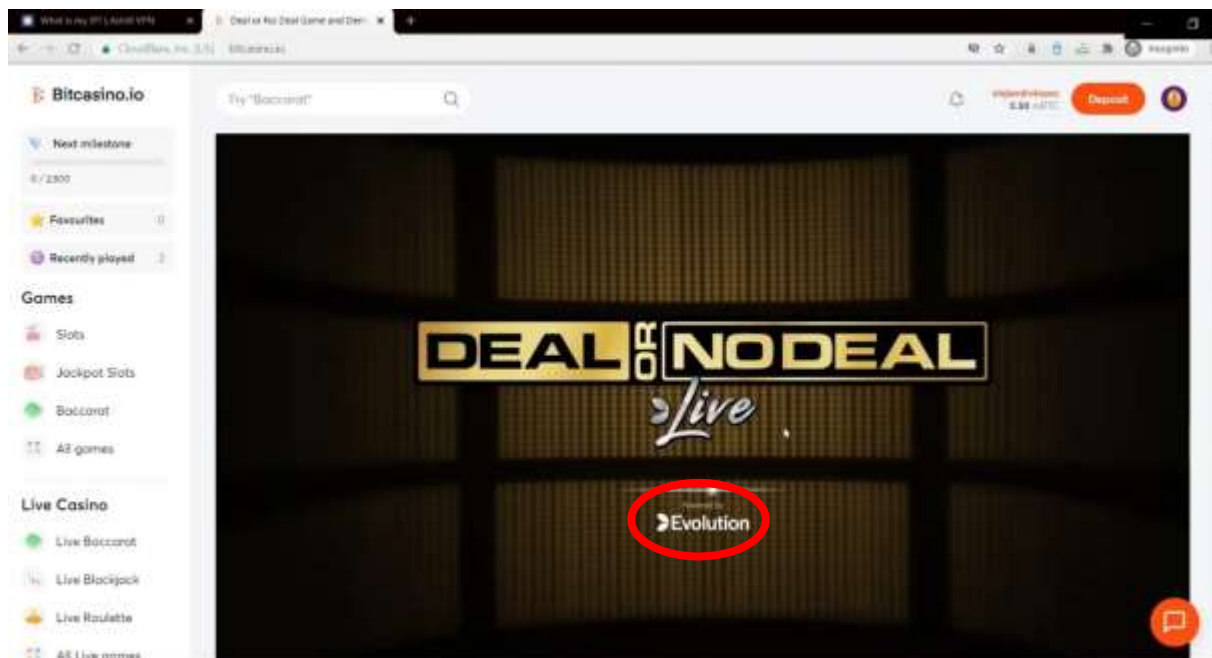
Example 3: Deal or No Deal game on Bitcasino.io via a Spain IP address

154. As an experiment, a player entered **bitcasino.io** – **an operator which is unlicensed in Spain - using an IP address from Spain** and succeeded in playing Deal or No Deal – which is powered by Evolution. The player placed bets and won. **Deal or No Deal is a game which is not permitted by Spanish regulation.** It is also **not permitted to offer Deal or No Deal in Spain per the commercial agreements** between Evolution and Endemol – the brand owner of Deal or No Deal.

155. Step 1: The player uses an IP address from Spain – notice the automatic language change.

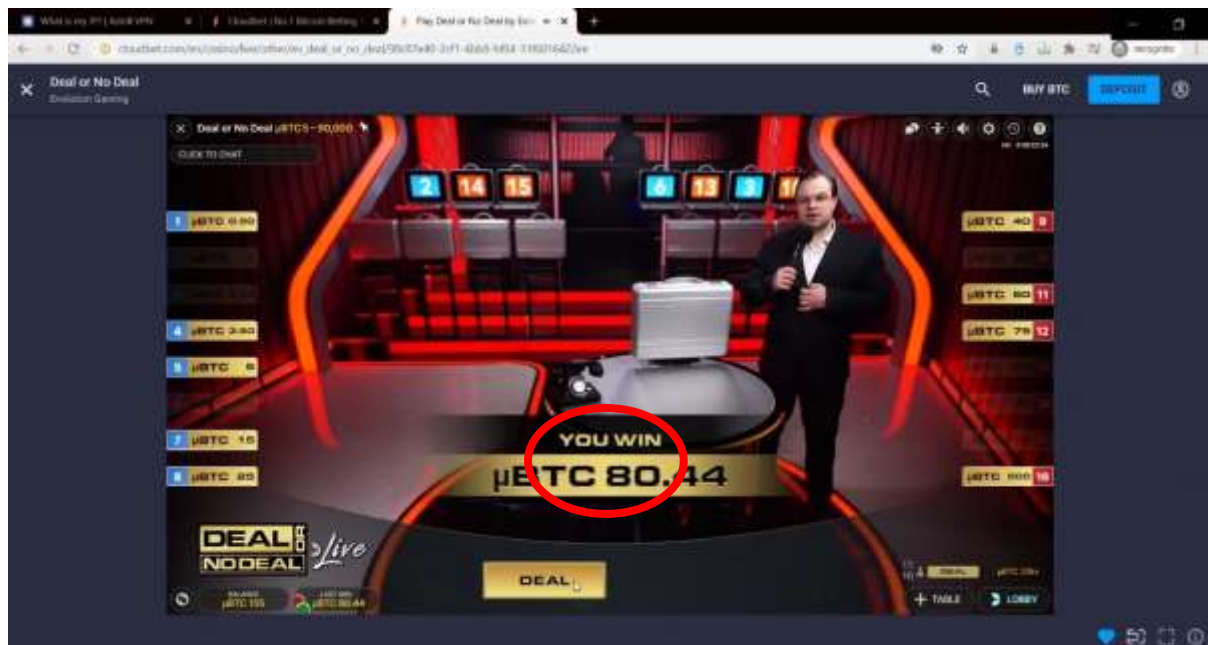


156. Step 2: The player enters **bitcasino.io** – the operator site offering Evolution games, and chooses to play Evolution's **Deal or No Deal Live**.

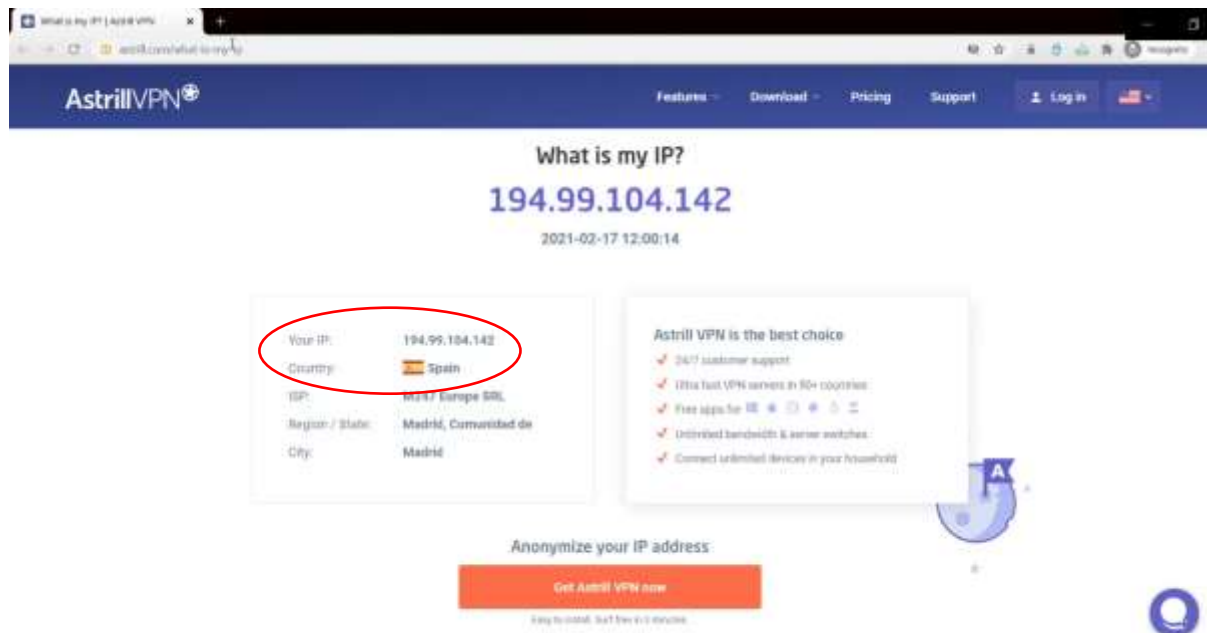


157. Step 3: The player then successfully places bets and wins.





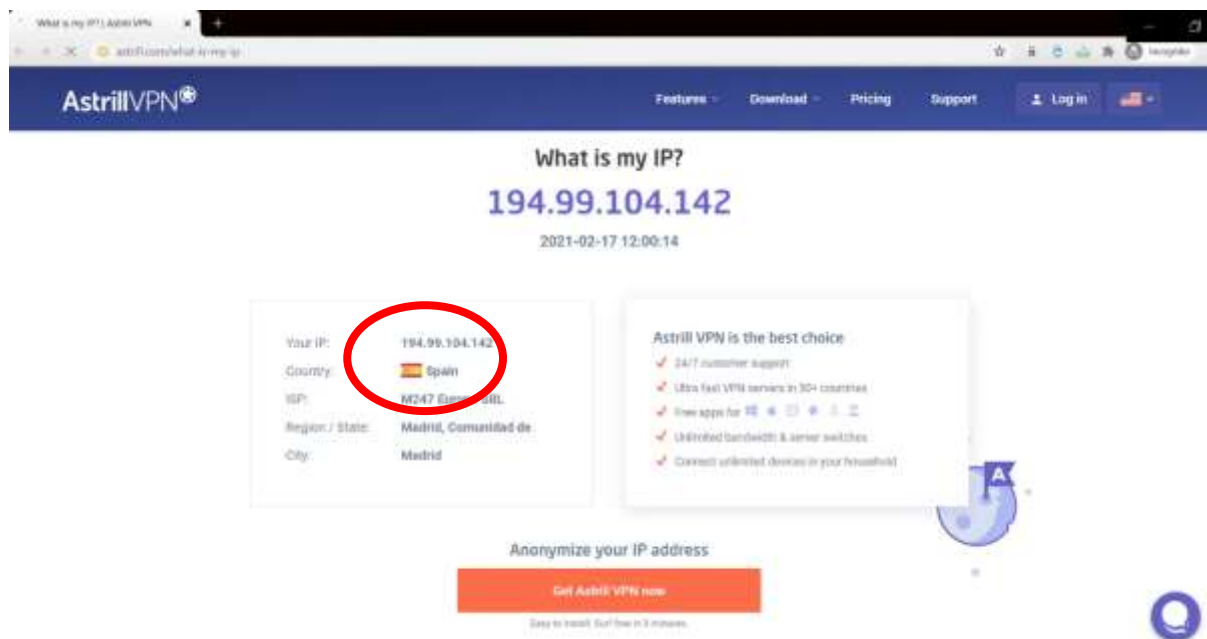
158. Step 4: The player exits the operator platform whilst ensuring he is still via the Spain IP address.



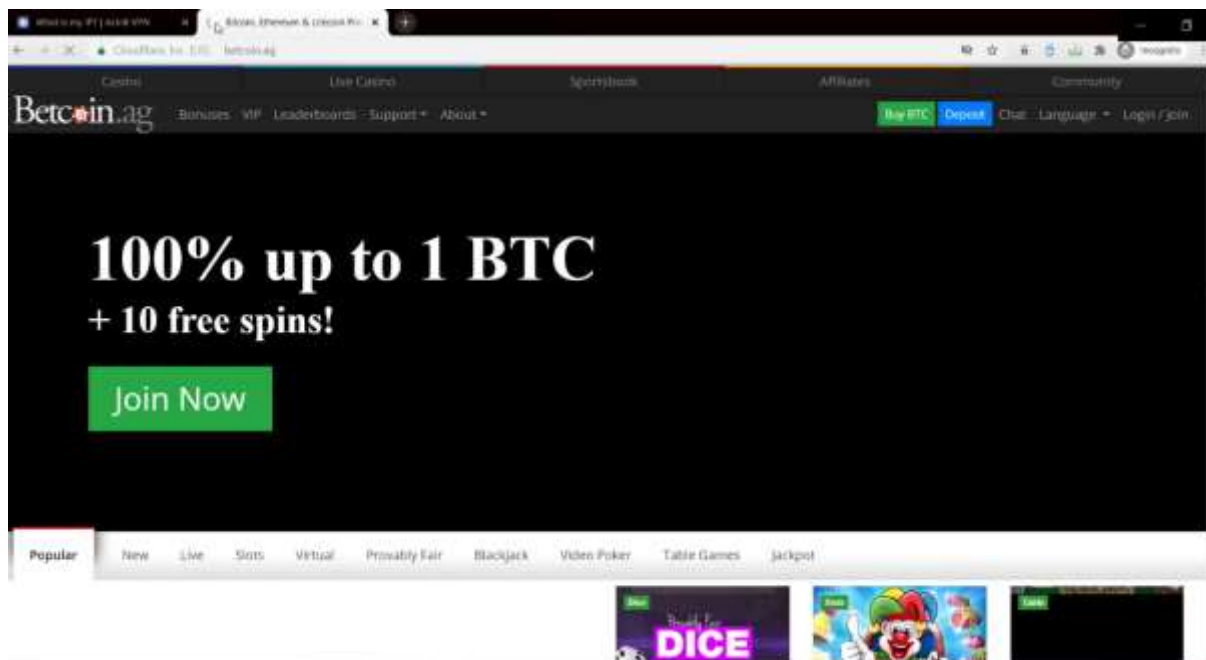
Example 4: Deal or No Deal game on Betcoin.ag via a Spain IP address

159. Similar to the above example, another experimental player entered **betcoin.ag** – an **unlicensed operator in Spain** – using an IP address from Spain and succeeded in playing Deal or No Deal – a game powered by Evolution. As mentioned, **Deal or No Deal is not permitted by Spanish regulation**. It is also **not permitted to offer Deal or No Deal in Spain per the commercial agreements** between Evolution and Endemol – the brand owner of Deal or No Deal.

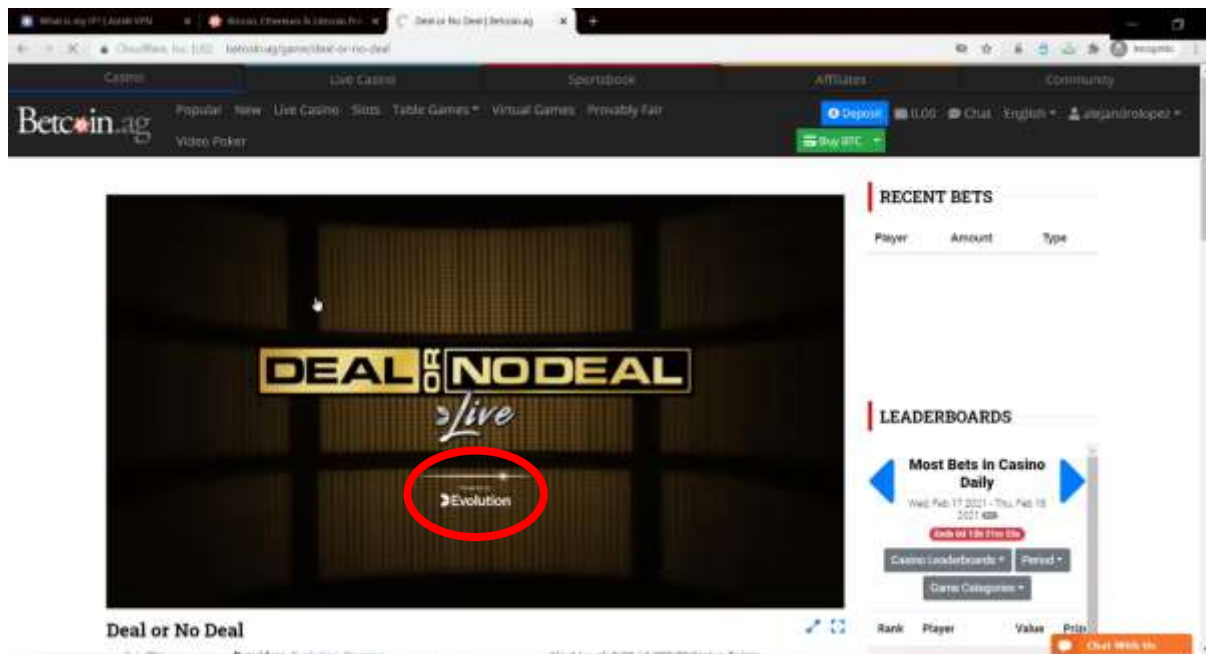
160. Step 1: The player ensures he is on a Spain IP address.



161. Step 2: The player enters **betcoin.ag**, the operator site offering Evolution games to end users.

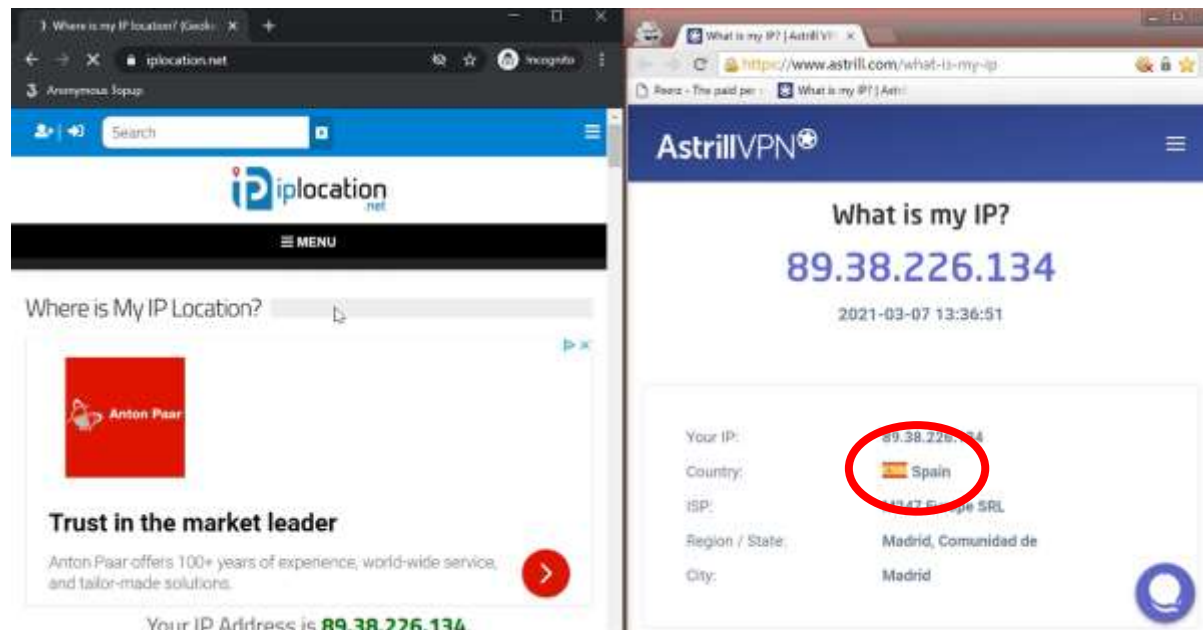


162. Step 3: The player plays Evolution's **Deal Or No Deal**.

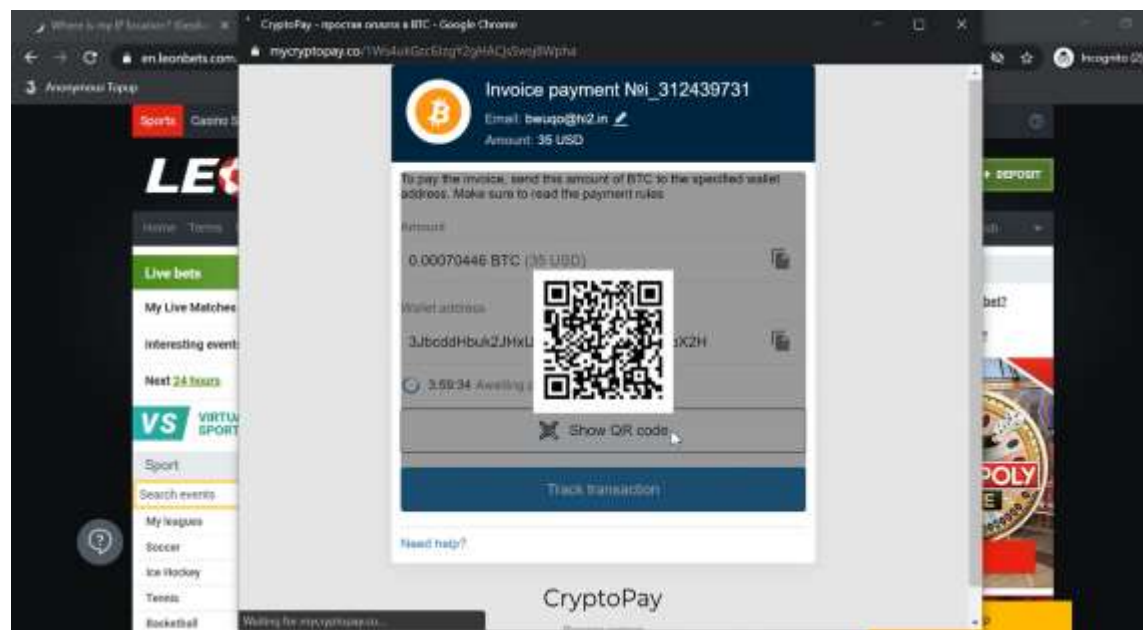


Example 5: Jumanji game on Leon.bet via a Spain IP address

163. Step 1: The below shows how can experimental player entered **Leon.bet – an unlicensed operator in Spain** - via an **IP address from Spain**.



164. Step 2: The player then successfully deposited money into his account in order to place bets on the Evolution game. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



165. Step 3: The player then played Netent's brand slot machine game Jumanji, and wins.

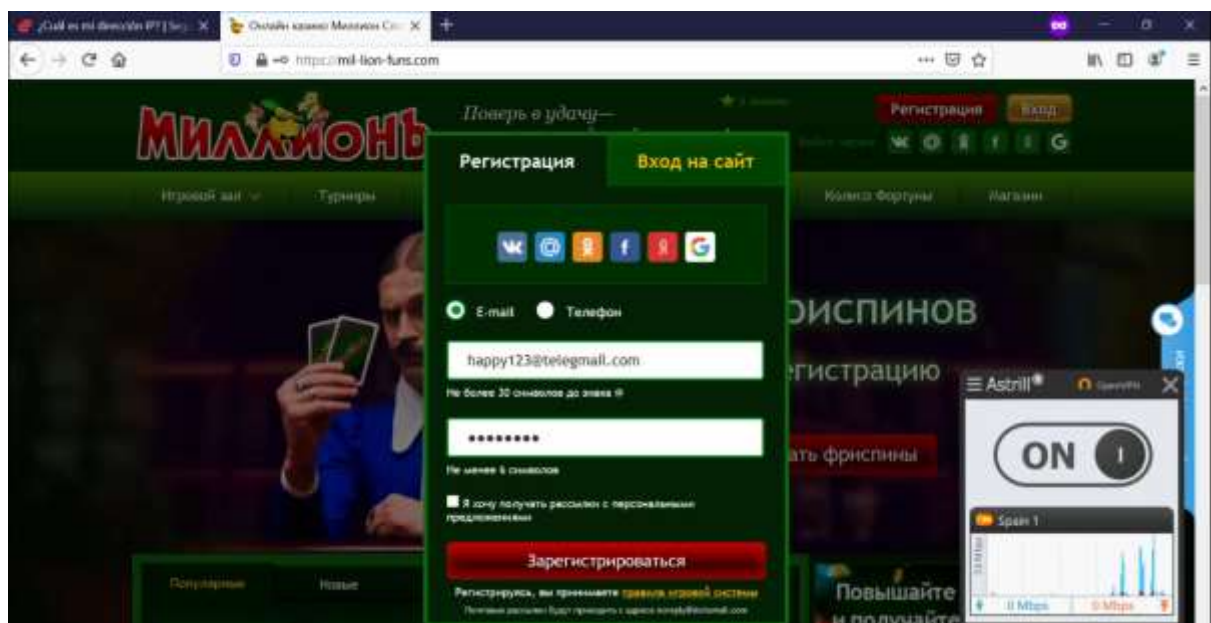


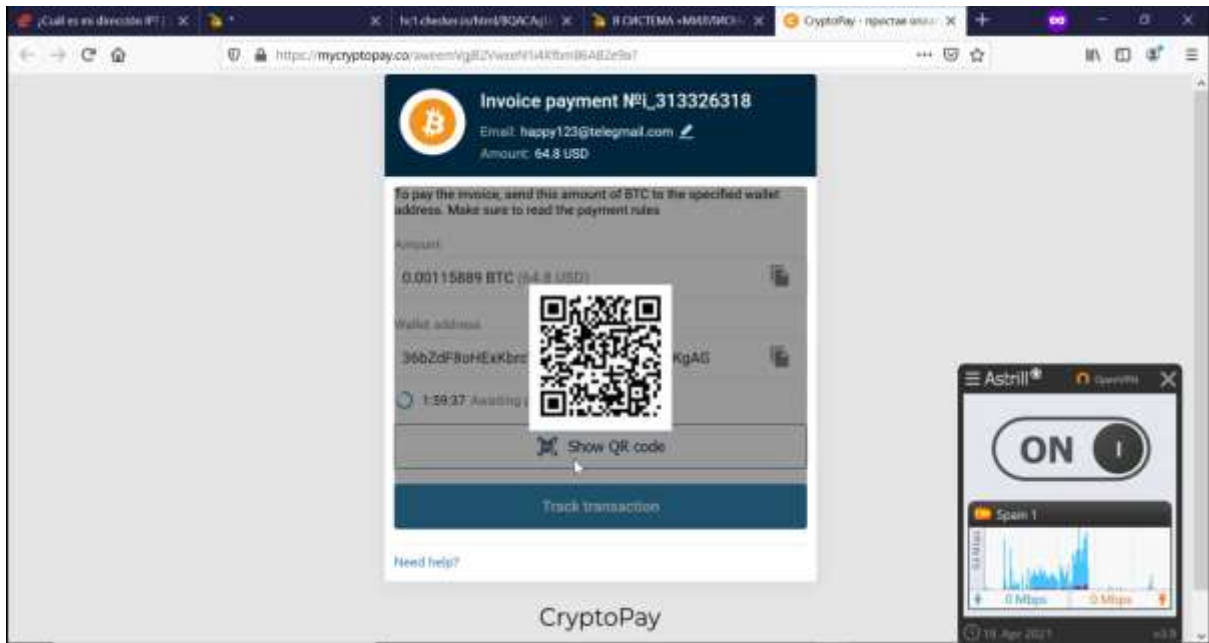
Example 6: Emoji Planet game on mil-lion-funs.com via Spain IP address

166. Step 1: In the below example it can be seen that the experimental player firstly ensures that he is on a **Spain IP address**.

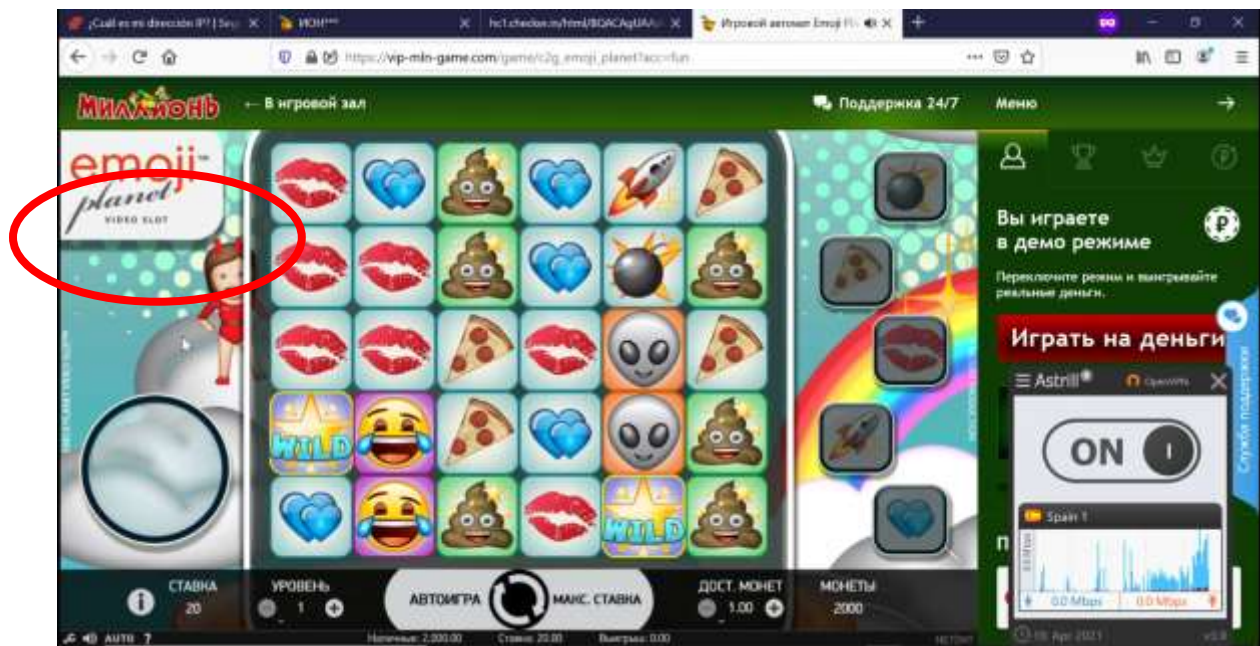


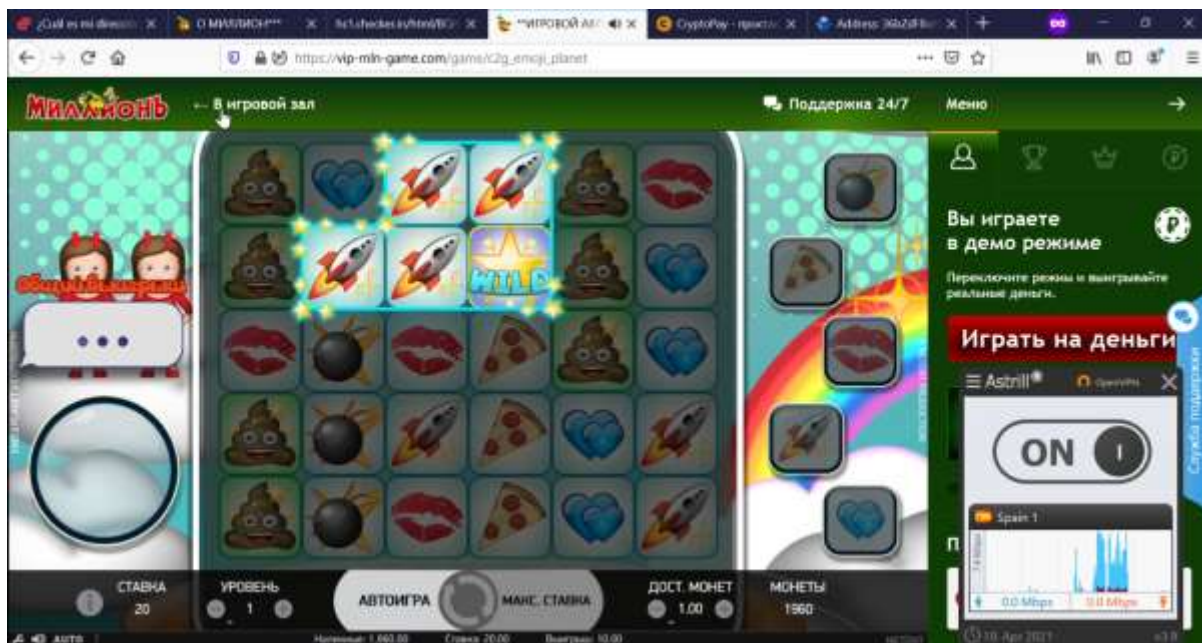
167. Step 2: He then enters and signs in **mil-lion-funs.com** - the operator website which offers NetEnt branded games of Evolution, and deposits money into his account in order to place bets.





168. Step 3: Following his deposit, and whilst still being on a Spain IP address, the player then chooses NetEnt's branded slot machine game **Emoji Planet**, successfully plays, and wins.





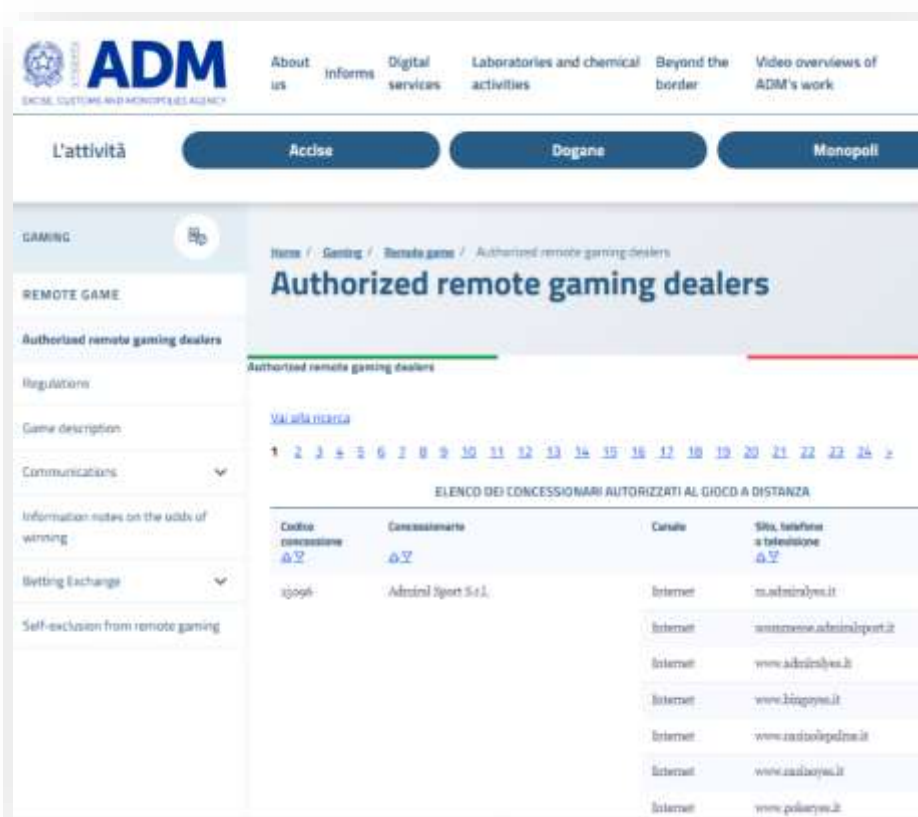
169. Step 4: Finally, the player then exits the operator site, whilst ensuring he is still on the Spain IP address.



Evolution Violates Regulatory Requirements in Italy

170. This inquiry also exposes Evolution regulatory violations in Italy. Evidence points that despite operators being unlicensed – meaning they are unauthorized to offer online and live casino games in Italy, Evolution allows its games to be played on these unlicensed platforms in Italy, as demonstrated below with end-users playing Evolution games from Italy.

171. The ADM (Excise, Customs and Monopolies Agency) is the regulatory body which grants licenses according to applicable Italian law. The ADM has a published list of licensed remote gaming operators. **Those who are not on this list are by default considered unauthorized operators:**



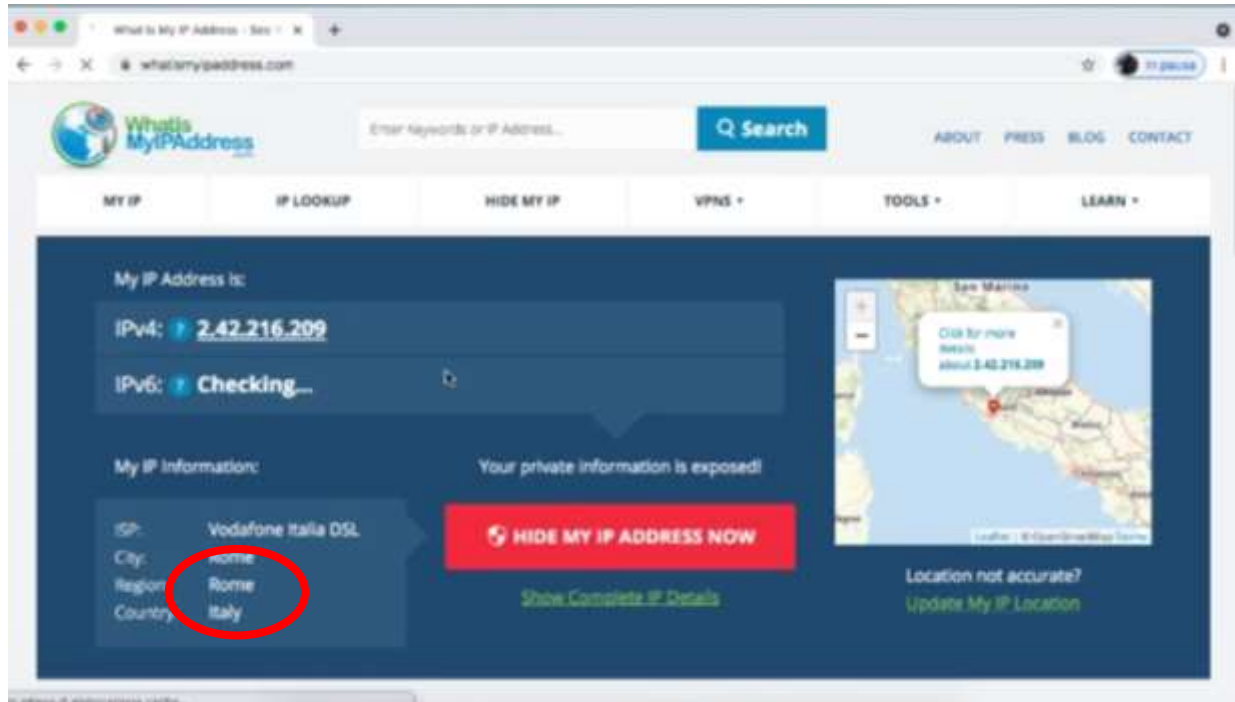
The screenshot shows the ADM website's 'Authorized remote gaming dealers' page. The page header includes the ADM logo and navigation links. The main content area displays a table of authorized dealers. The table has four columns: 'Codice concessione', 'Concessionario', 'Canale', and 'Sito, telefono o teleselezione'. The first row shows the concession code '03096' and the concessionaire 'Admiral Sport S.p.A.'. The table lists several channels and their corresponding websites, including 'Internet' with websites like 'm.admiralys.it', 'www.admiralys.it', 'www.bingoyes.it', 'www.radiopolis.it', 'www.sadiboyes.it', and 'www.poliaryes.it'.

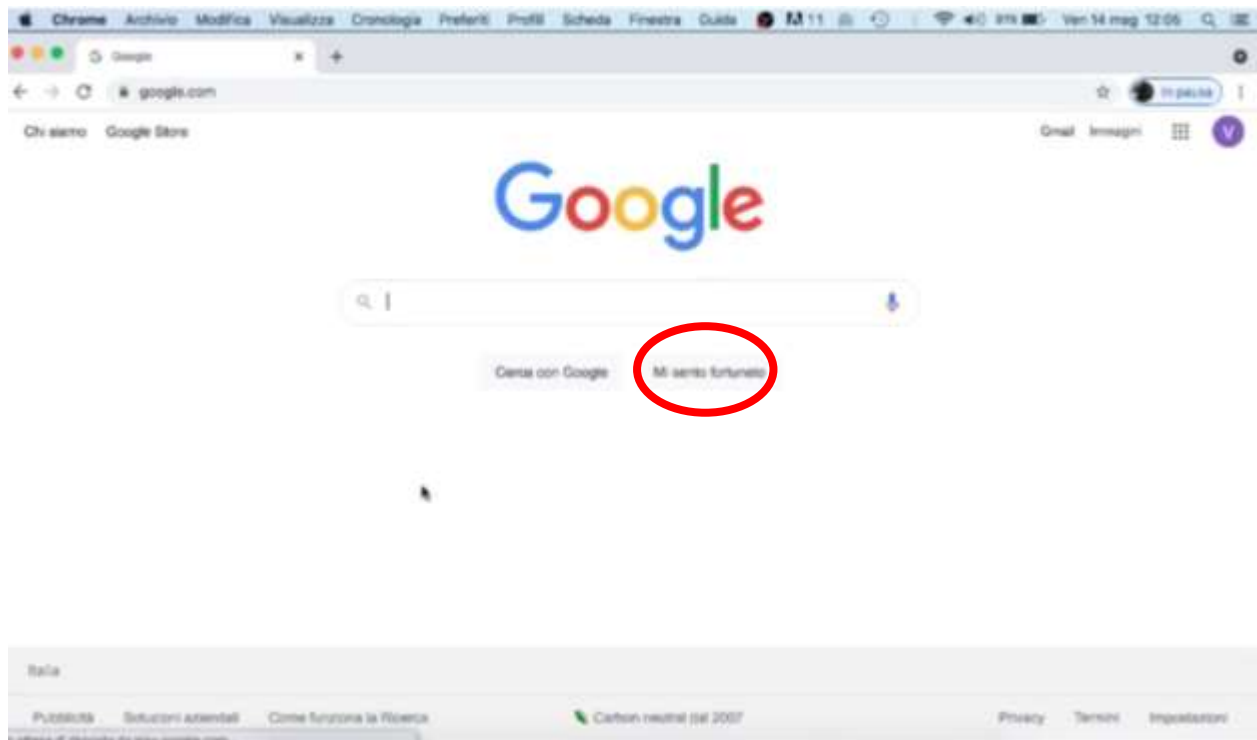
Codice concessione	Concessionario	Canale	Sito, telefono o teleselezione
03096	Admiral Sport S.p.A.	Internet	m.admiralys.it
		Internet	www.admiralys.it
		Internet	www.bingoyes.it
		Internet	www.radiopolis.it
		Internet	www.sadiboyes.it
		Internet	www.poliaryes.it

Investigative Gambling with Evolution Games in Italy

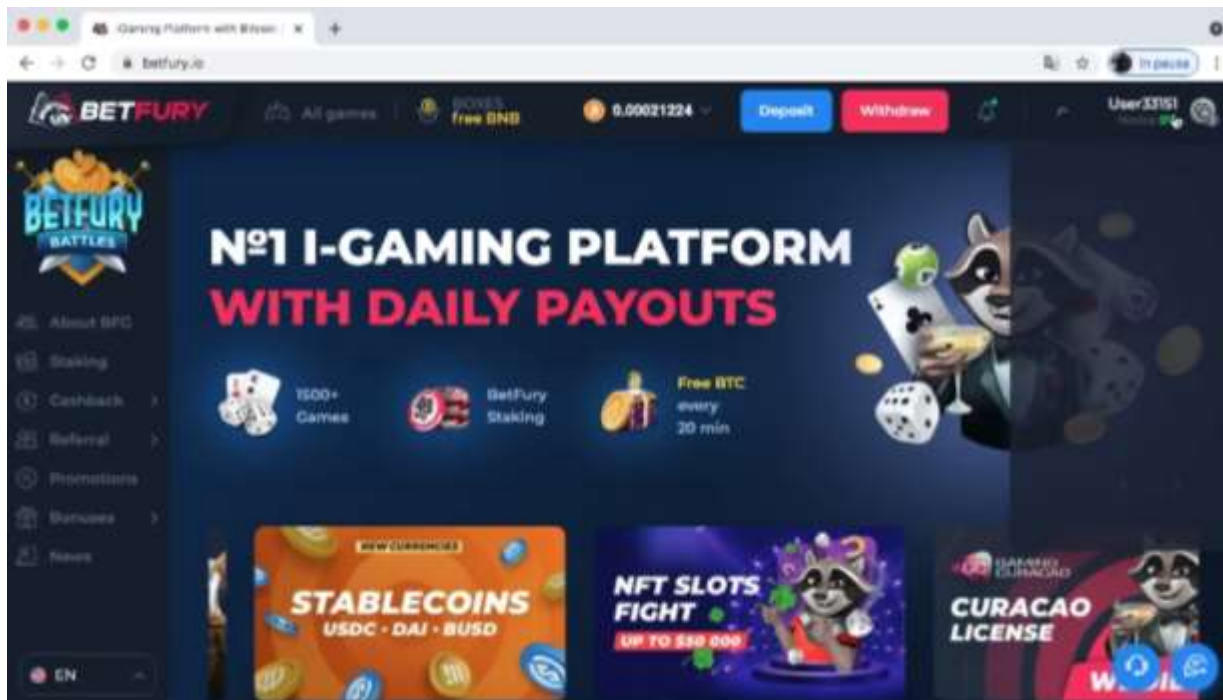
Example: An experimental player entering betfury.com via an Italian IP address

172. Step 1: The player ensures that he is on an **IP address from Italy** – notice the automatic language change on Google.

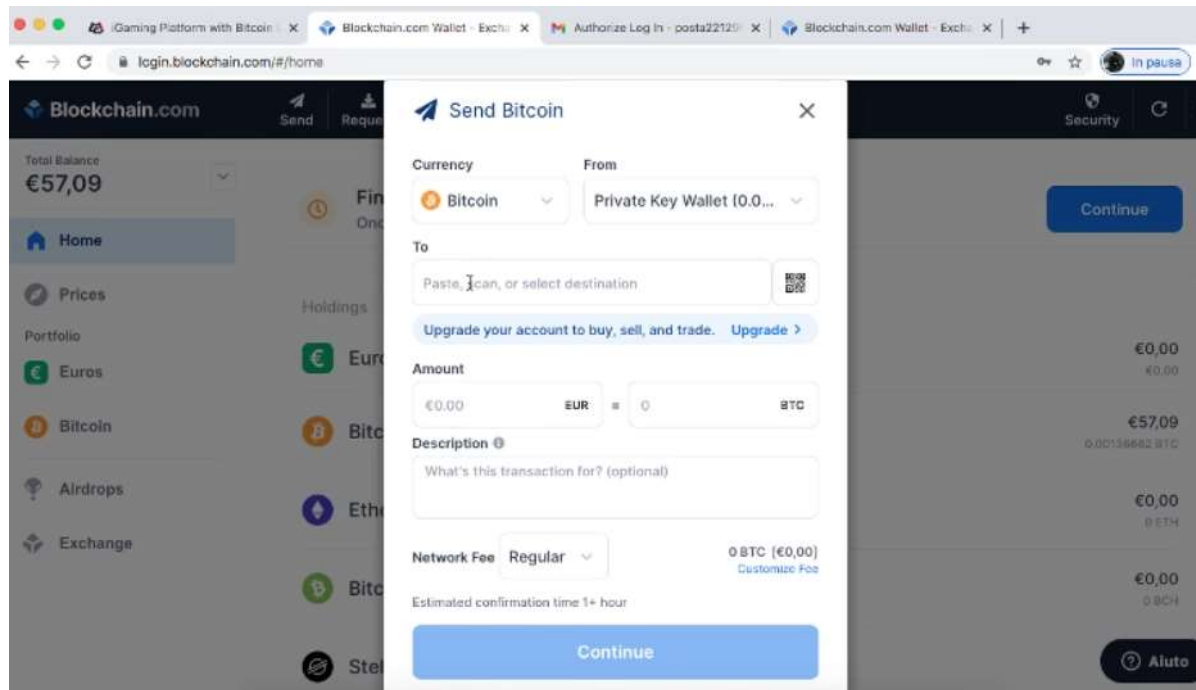
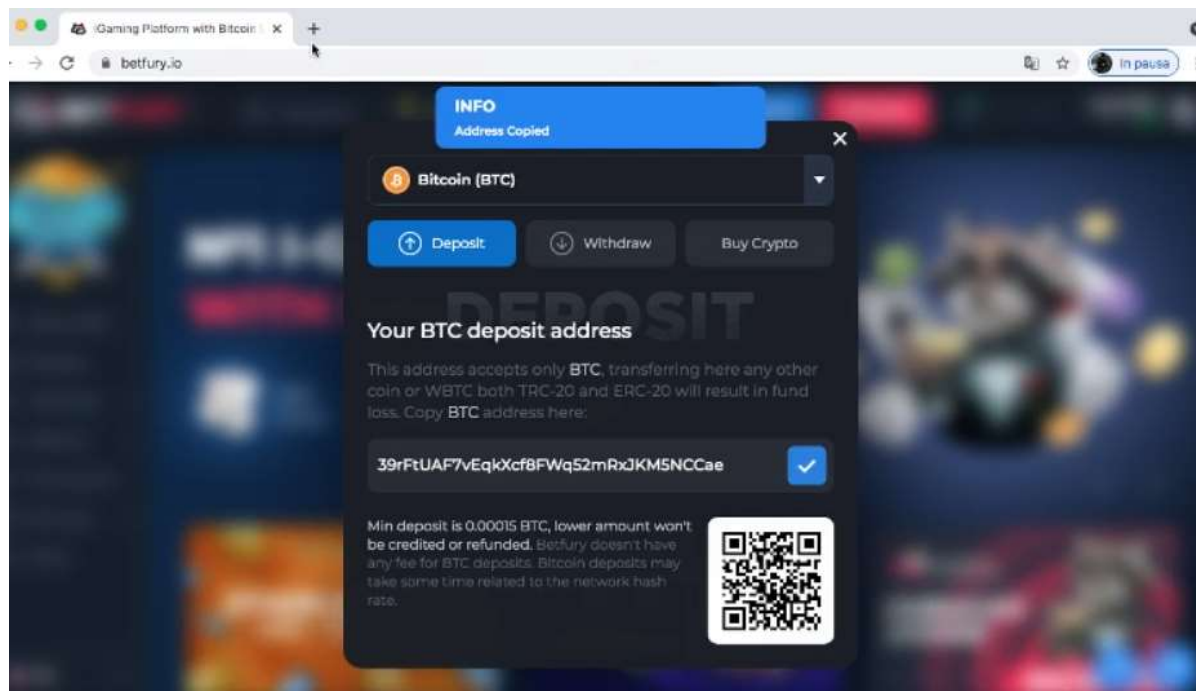




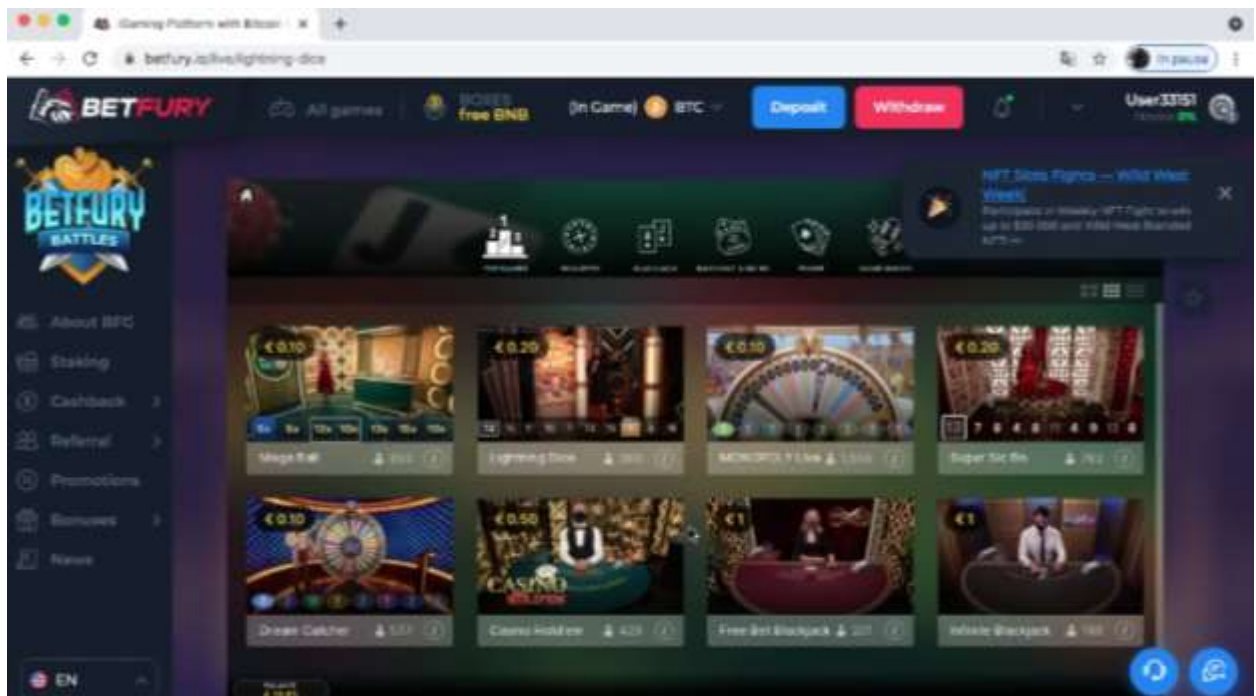
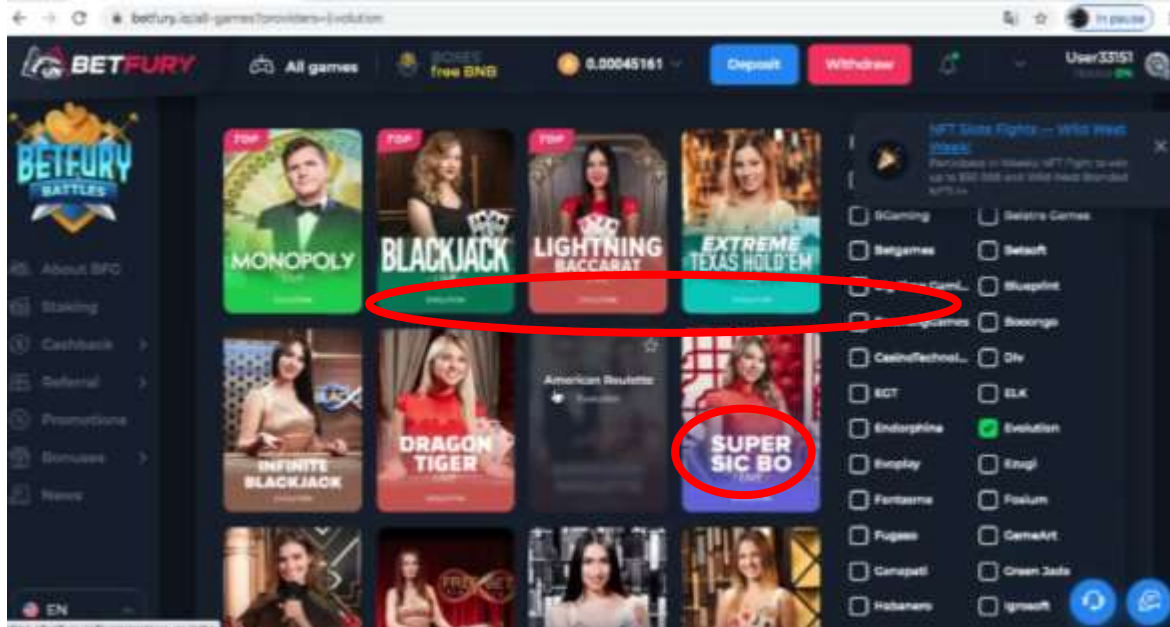
173. Step 2: The player enters **betfury.com**, an unlicensed operator in Italy offering Evolution games.



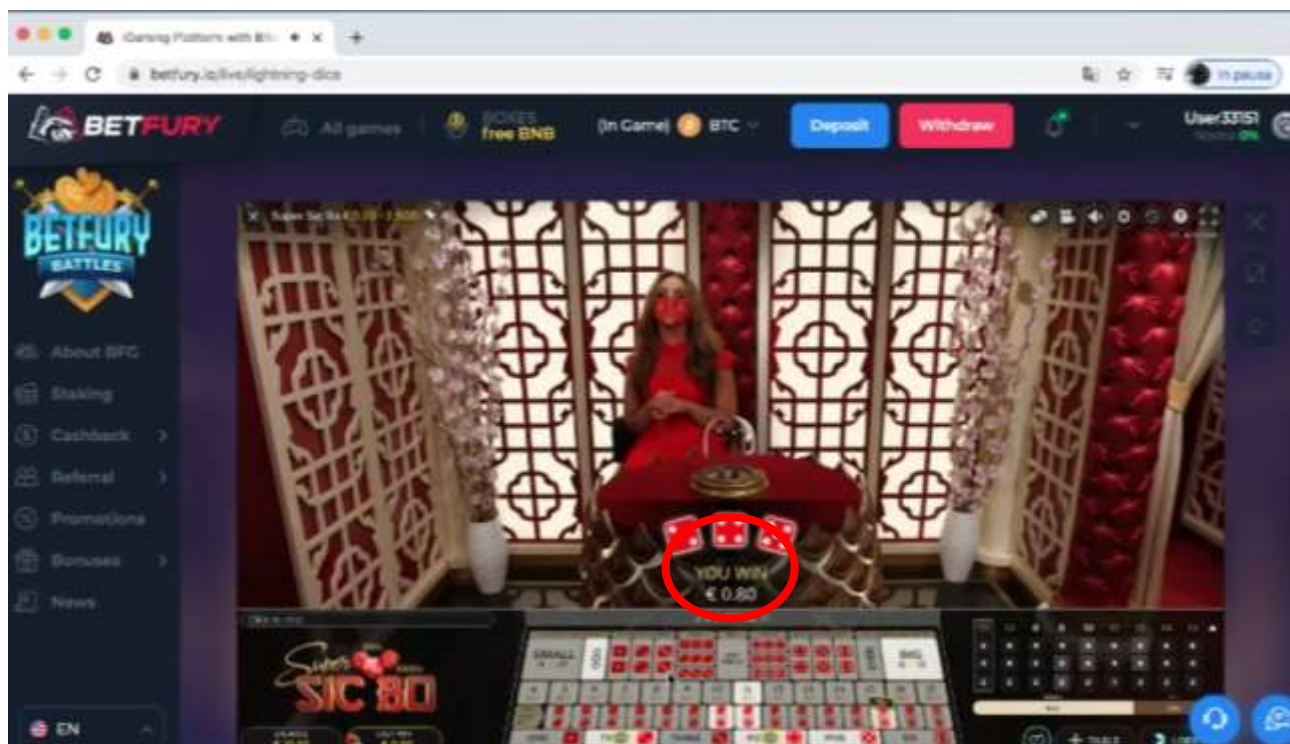
174. Step 3: The player then goes on to deposit money into his BTC wallet so that he is able to place bets. Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



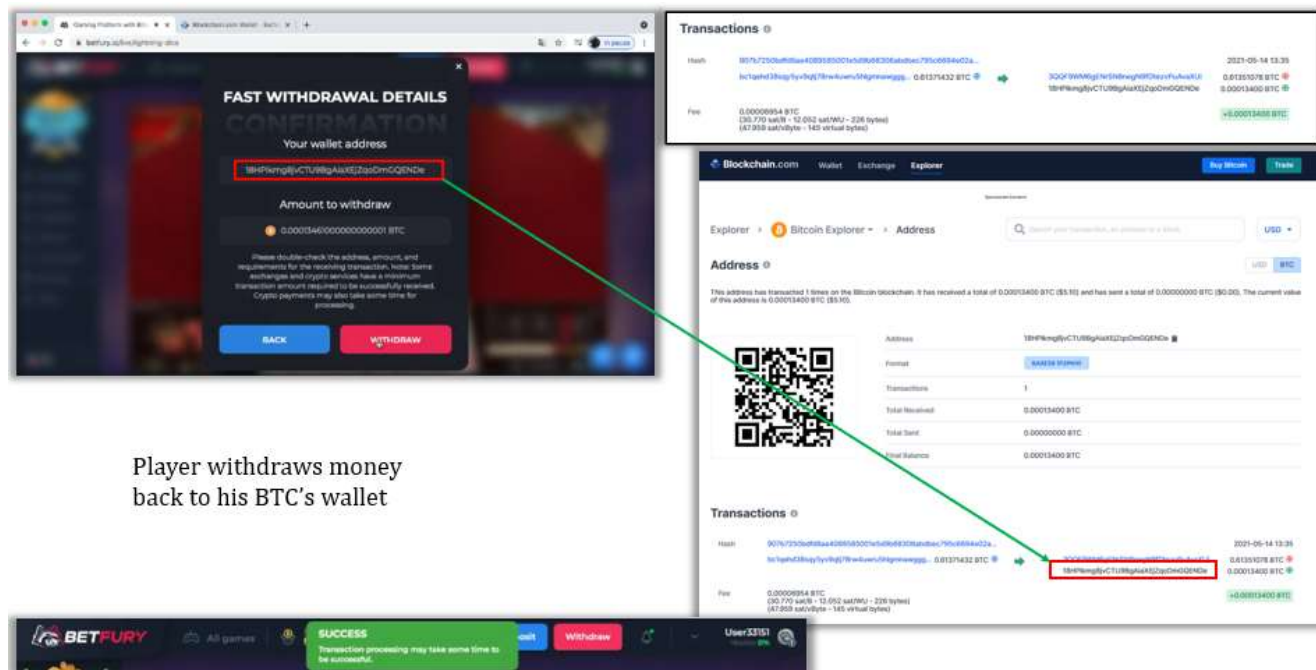
175. Step 4: The player now chooses an Evolution game – **Super Sic Bo**.



176. Step 5: The player successfully places bets and wins.

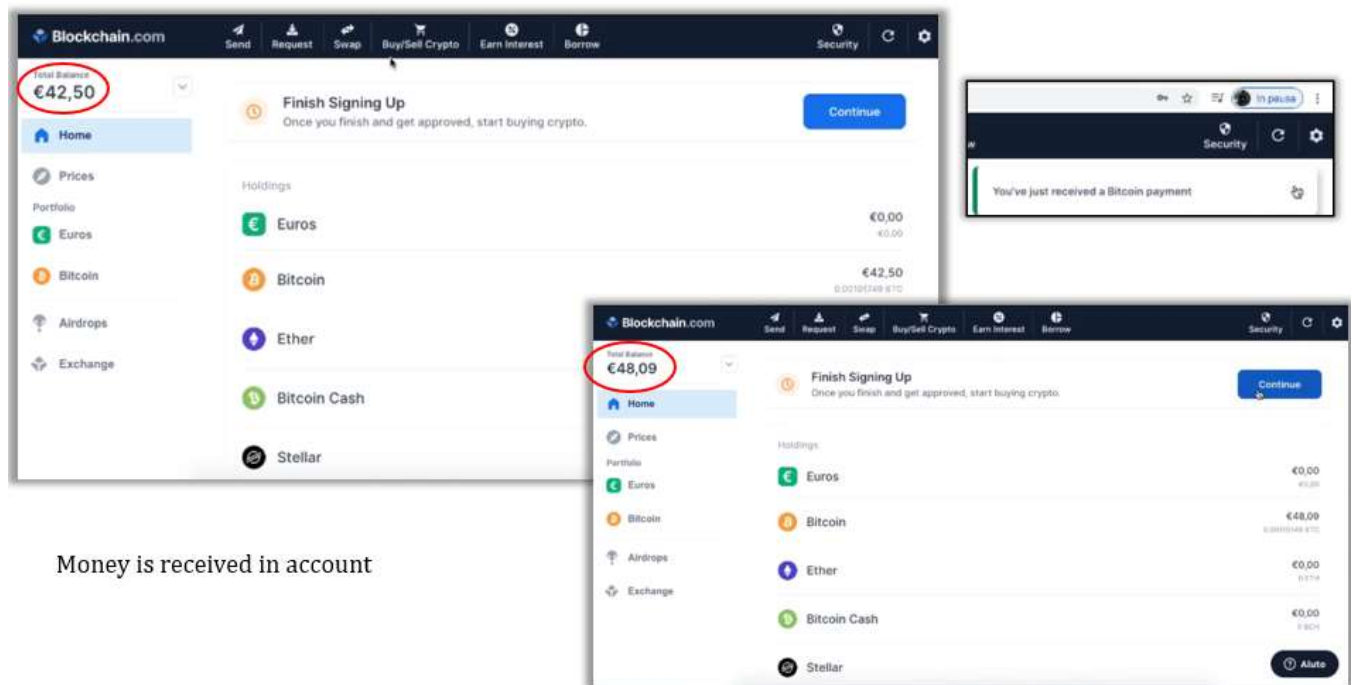


177. Step 6: The player then goes on to withdraw his winnings, which can be viewed in the successful transaction below.



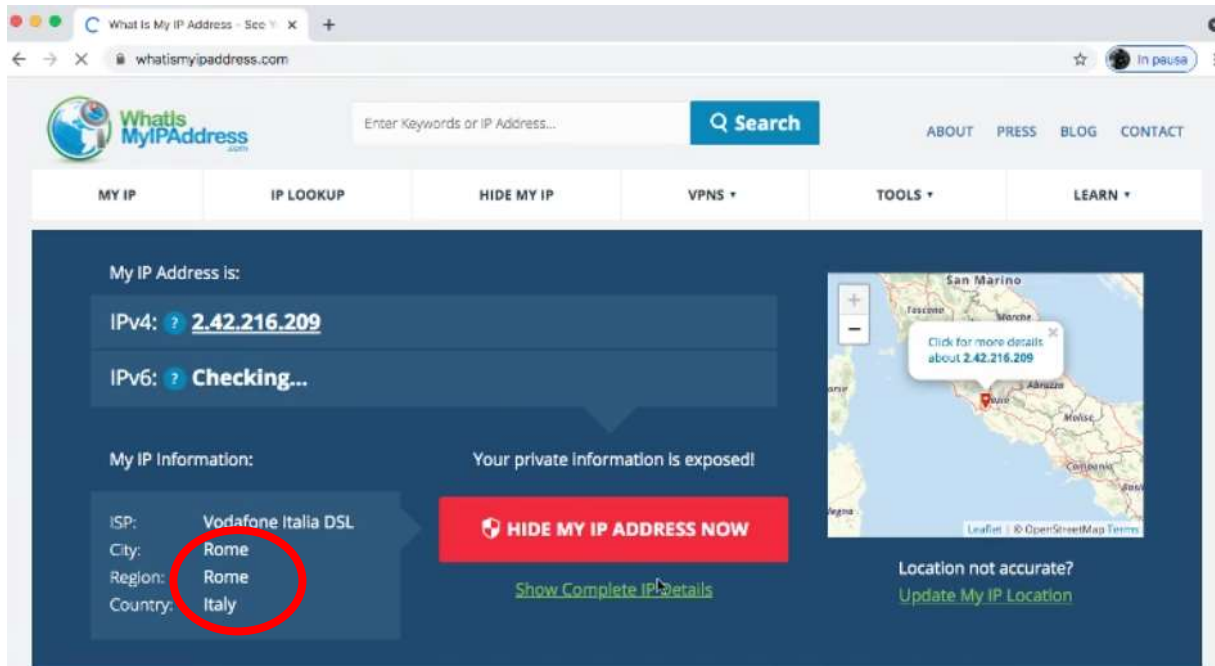
Player withdraws money
back to his BTC's wallet

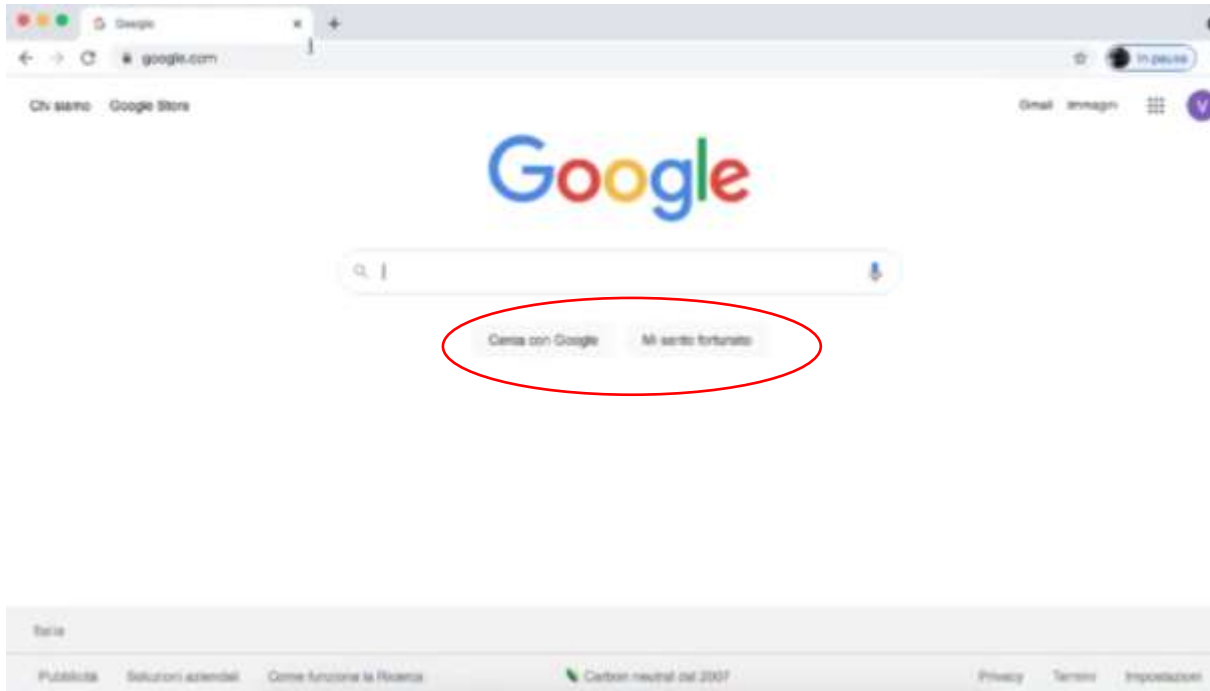
178. Step 7: Below – the successful withdrawal of the player’s winnings on the blockchain website.



Money is received in account

179. Step 8: The player then exits betfury.com whilst ensuring he is still via an IP address from Italy.





Evolution Violates Regulatory Requirements in Sweden

180. Like Italy and Spain, Evolution enables its games to be offered in unlicensed operators also in Sweden. **This is a direct violation of the Swedish regulatory requirements for obtaining a gambling license in Sweden.**

Gambling Act (2018:1138)

SFS no.: 2018:1138

Ministry/agency: Ministry of Finance

Issued: 14/06/2018

Amendment register: [SFSR \(Government Offices of Sweden\)](#)

Source: [Full text \(Government Offices of Sweden\)](#)

Chapter 7 Commercial online gambling

§ 1 A licence for commercial online gambling may be granted to provide casino games, online bingo and computer-simulated gambling machines.

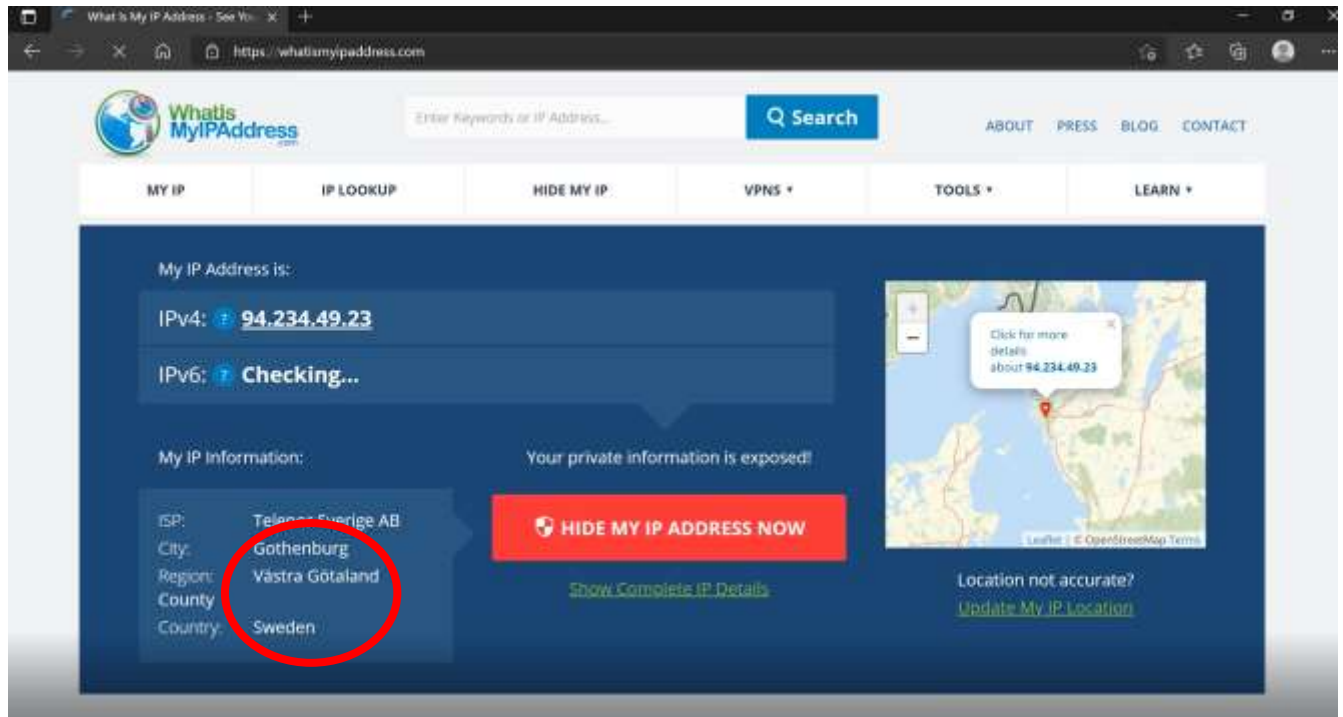
The licence may also cover other lotteries online if they are provided as side bets to a game according to the first paragraph.

§ 2 In gambling that is licensed pursuant to § 1, it is not permitted to let a player themselves place bets with the help of technical or electronic equipment that is provided by the licence holder or their gambling agent.

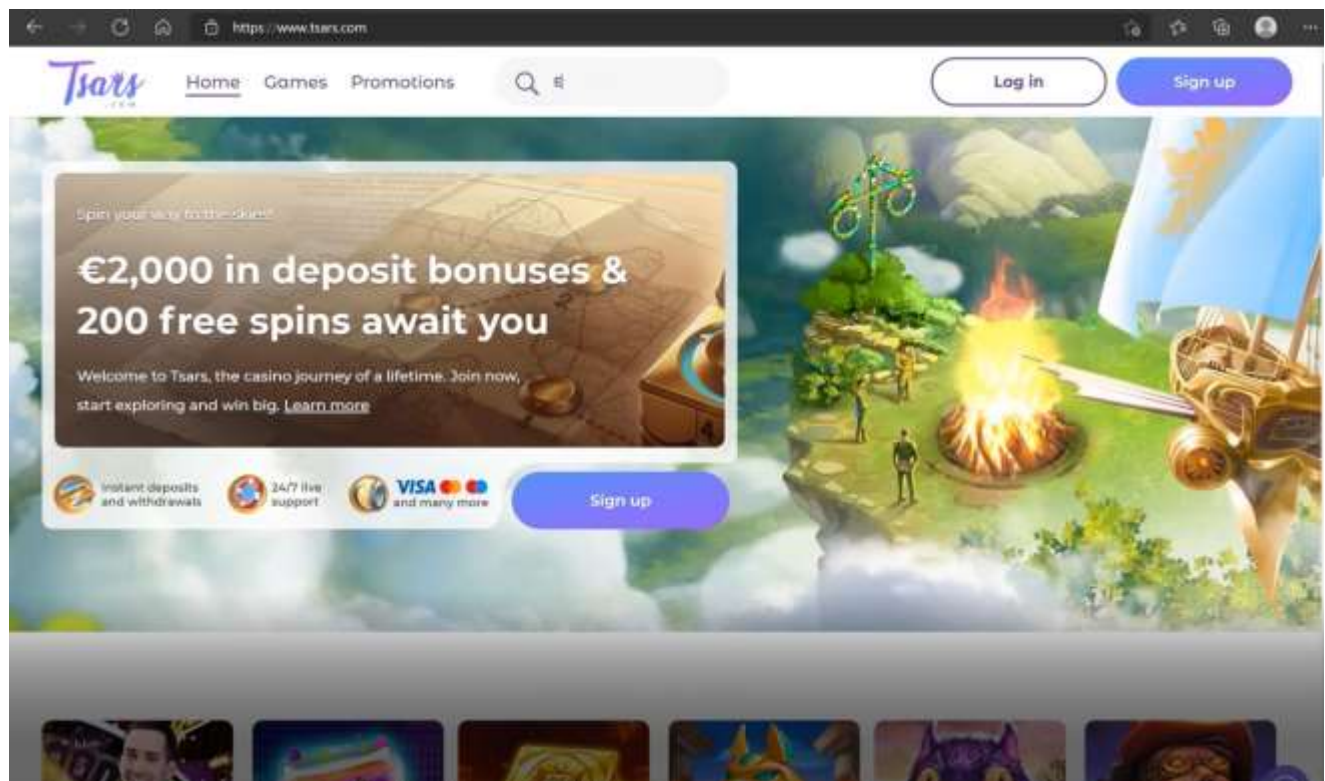
Investigative Gambling with Evolution Games in Sweden

Example: An experimental player entering Tsars.com via a Swedish IP address

181. Step 1: The player ensures he is on an **IP address from Sweden**. Notice the automatic **language change on Google**.



182. Step 2: The player enters **tsars.com** - an **unlicensed** operator in Sweden offering Evolution games.

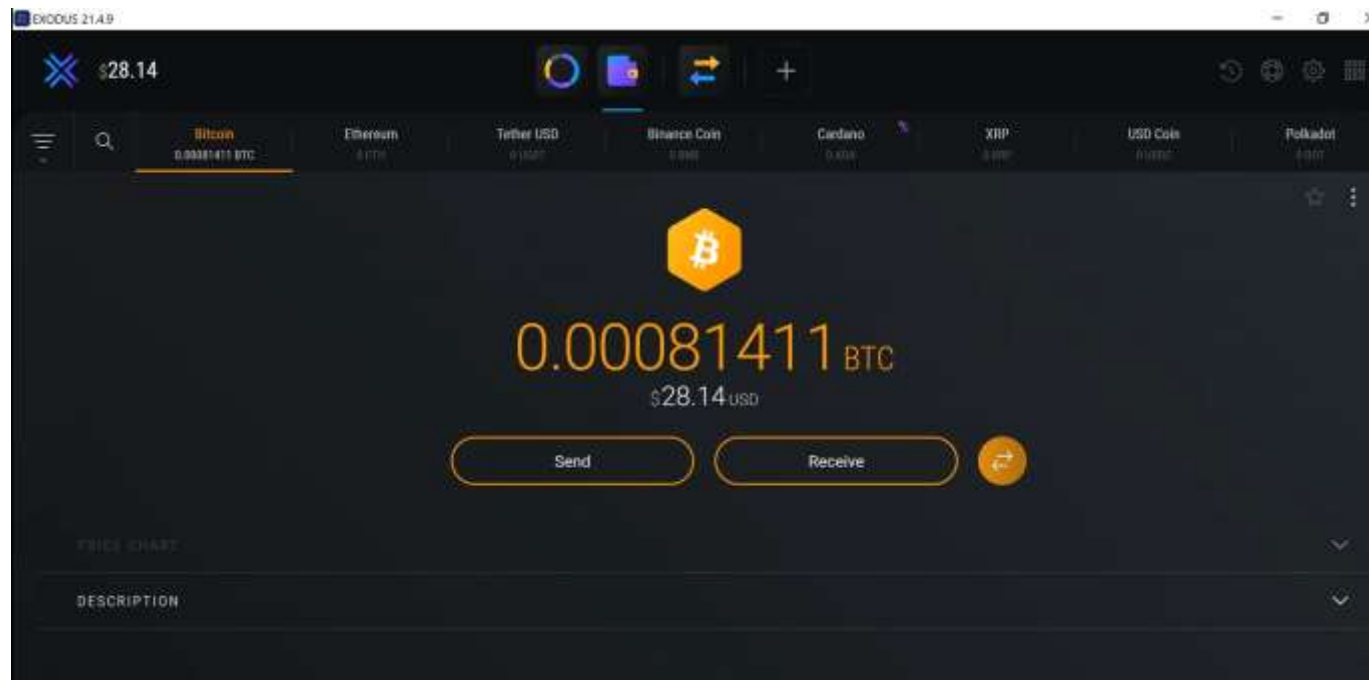


183. Step 3: The player registers on the website so that he can place bets.

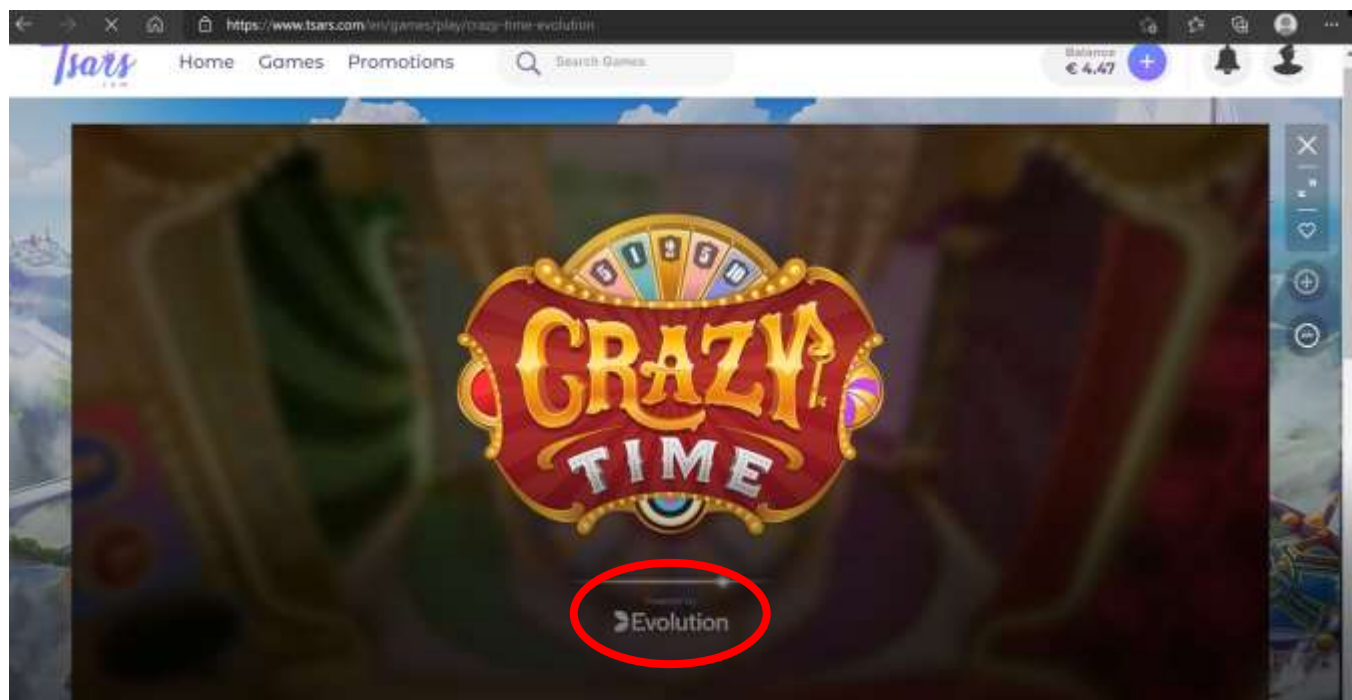
A screenshot of the Tsars.com registration form. The browser address bar shows 'https://www.tsars.com/en/account/register'. The form is titled 'Your adventure begins' with the instruction 'Please fill out all the fields'. It contains the following fields: 'E-mail address', 'Password', 'Confirm password', 'EUR' (currency dropdown), '+46' (country code dropdown), and 'Mobile number'. Below these fields are two checkboxes: 'I confirm that I am 18 years or older' and 'By creating an account I agree with tsars.com [Terms & Conditions](#)'. A 'Sign up' button is at the bottom right. The background of the form shows a fantasy illustration of a castle and a large purple flower.

184. Step 4: The player deposits money into the account which will enable him to place bets.

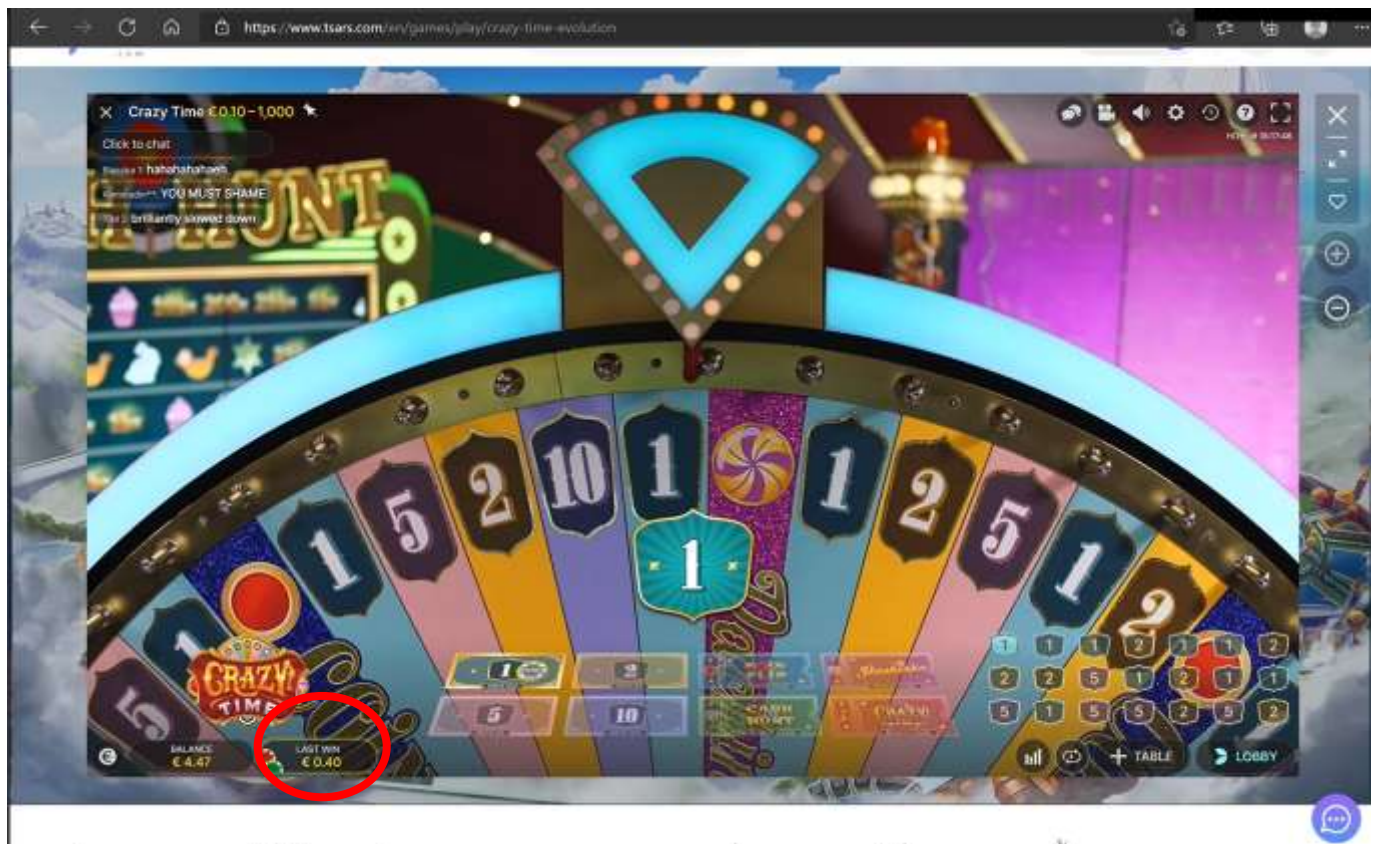
Notice that this process does not alert the player to any due diligence or KYC procedure before playing – the funds are easily accepted without monitoring.



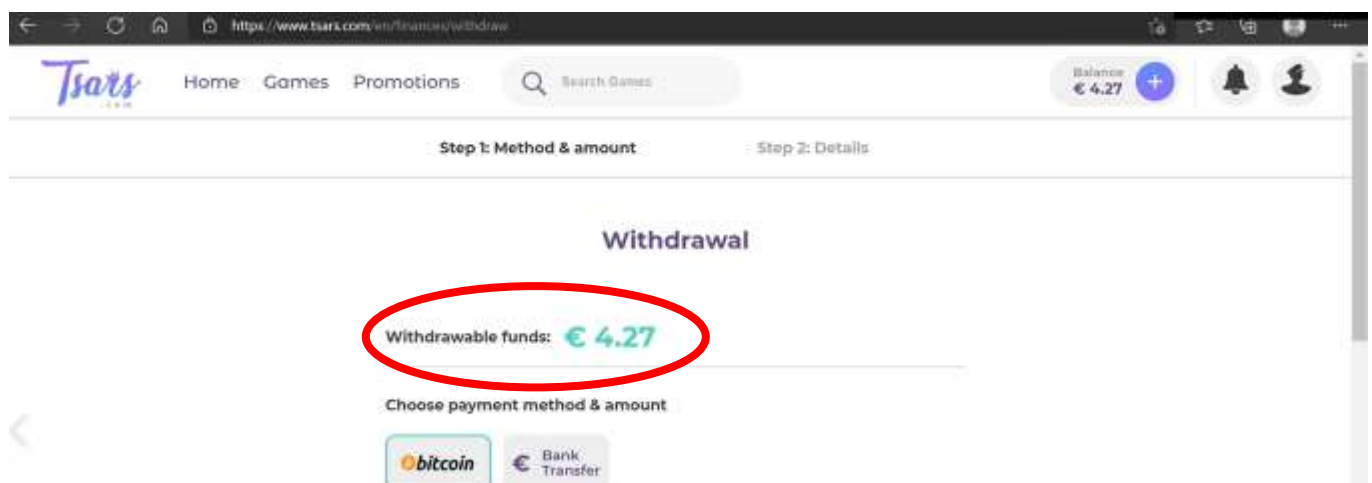
185. Step 5: The player then chooses to play Evolution game – **Crazy Time**.



186. Step 6: The player successfully bets and wins on Evolution's Crazy Time.



187. Step 7: The player then goes on to successfully withdraw his winnings.



Evolution Offers it's Games in “Black Markets” – UAE, Turkey, Tunisia and Saudi Arabia

188. In a few Islamic countries such as the UAE, Turkey and Tunisia, gambling is forbidden, where in the UAE it is completely forbidden to gamble altogether, and in Turkey online casinos are illegal.

189. In Saudi Arabia, the official law is Islamic law, as in the Islam, gambling (“Maisir”) is absolutely forbidden.

190. For example, the UAE law is very clear on prohibiting any form of gambling:

The image is a screenshot of a legal document from the United Arab Emirates. It features the UAE coat of arms and the text 'الإمارات العربية المتحدة' and 'وزارة العدل' (Ministry of Justice). The title is 'Federal Law No. 3 Issued on 8/12/1987 Corresponding to 17/4/1408 H. CONCERNING THE PENAL CODE'. A list of amendments is provided, including Federal Law no. 34/2005, Federal Law no. 52/2006, and several Federal Decree-Laws from 2016, 2018, 2019, and 2020. The document is signed by Zayed Bin Sultan Al Nahyan, President of the United Arab Emirates State. It also mentions promulgation at the Presidential Palace in Abu Dhabi on 17/4/1408 H. A note at the bottom states the law was published in the Official Gazette, issue no.182, p.7. A highlighted box at the bottom contains the text: 'Any person who gambles shall be punished by a jail sentence for not more than two years or a fine of not more than fifty thousand dirhams. The penalty shall be a jail sentence or a fine if the crime is committed in a public place or a place that is open to the public or in a gambling place or house.'

Amended by
Federal Law no. 34/2005 dated 24/12/2005, and
Federal Law no. 52/2006 dated 14/12/2006, and
Federal Decree-Law no. 7/2016 dated 18/09/2016
Federal Decree-Law no. 9/2016 dated 20/09/2016
Federal Decree-Law no. 24/2018 dated 23/09/2018
Federal Decree-Law no. 4/2019 dated 14/08/2019
Federal Decree-Law no. 14/2020 dated 27/09/2020
Federal Decree-Law no. 15/2020 dated 27/09/2020

Promulgated by U's at the Presidential
Palace in Abu Dhabi
On 17/4/1408 H
Corresponding to 8/12/1987

Zayed Bin Sultan Al Nahyan
President of the United Arab Emirates State

.This Federal Law was published in the Official Gazette, issue no.182, p.7

Any person who gambles shall be punished by a jail sentence for not more than two years or a fine of not more than fifty thousand dirhams.
The penalty shall be a jail sentence or a fine if the crime is committed in a public place or a place that is open to the public or in a gambling place or house.

GAMBLING

Article 413

Gambling games are those games in which every party agrees to pay, in case of losing, to the other party, the winner, an amount of money or anything else agreed.

Article 414

The provisions of this Article have been replaced by virtue of Article 1 of Federal Decree-Law No. 7/2016 dated 18/09/2016, and became as follows:

Any person who gambles shall be punished by a jail sentence for not more than two years or a fine of not more than fifty thousand dirhams.

The penalty shall be a jail sentence or a fine if the crime is committed in a public place or a place that is open to the public or in a gambling place or house.

Article 415

The provisions of this Article have been replaced by virtue of Article 1 of Federal Decree-Law No. 7/2016 dated 18/09/2016, and became as follows:

Any person who opens or manages a gambling place intended to receive people, as well as any person who organizes such gambling game in a public place or a place that is open to the public or in any place or house provided for such purpose shall be sentenced to imprisonment for not more than ten years and to a fine of not less than one hundred thousand dirhams.

Article 416

Under all circumstances, money and tools used in gambling shall be seized and confiscated by order of the court which shall also order the closing of the premises or place prepared for gambling which shall not be allowed to reopen unless it is to be used for a licit purpose and pursuant to the approval of the public prosecution.

191. Online gambling is forbidden in Turkey:

Article 8 of Law No. 5651



ARTICLE 8

(1) It shall be decided to remove the content and/or to block access to publications that are made on the internet medium and that has adequate reason for suspicion that the content constitutes the following crimes:

a) The crimes under the Turkish Criminal Code dated 26/9/2004 and numbered 5237;

1) Encouragement of suicide (Article 84),

2) Sexual abuse of children (Article 103, first paragraph),

3) Facilitate the use of drugs or stimulants (Article 190),

4) Hazardous substance for health (Article 194),

5) Obscenity (Article 226),

6) Prostitution (Article 227),

7) Providing space and facilities for gambling (Article 228).

b) Crimes in the Law Concerning Crimes Committed Against Atatürk dated 25/7/1951 and numbered 5816.

c) the crimes regulated under the Law on Regulation of Betting and Games of Chance in Football and Other Sports Competitions dated 29/4/1959 and numbered 7258.

Mehmet Bedii Kaya

Bilişim ve Teknoloji Hukuku - IT Law

The Turkish Internet Law - Full Translation

© 05.01.2021 00:18

The Turkish Internet Law: Full Translation of the Law no. 5651

7) Providing space and facilities for gambling (Article 228).

<https://www.mevzuat.gov.tr/mevzuat?Me>



T.C. CUMHURBAŞKANLIĞI
MEVZUAT BİLGİ SİSTEMİ

192. By allowing gambling to take place in these forbidden territories, Evolution clearly violate their own Anti-Money Laundering Policy and Anti-Money Laundering acts by receiving cash and bitcoin originated from a prohibited gambling and without knowing their origin, and moreover do not uphold any KYC processes to implement its Anti-Money Laundering Policy and to check the source of funds.

193. In a conversation with the senior Evolution Executive, it is unveiled that Evolution games are currently offered in the following illegal markets:

- a. UAE: *“We’ve got players in Dubai which are playing”*
- b. Turkey: *“Turkey is one of our biggest”*
- c. Tunisia: *“Tunisia is one of our big markets”*
- d. Saudi Arabia: *“Saudi Arabian, less, but happy to facilitate”*

194. In summary of the above, the senior Evolution Executive states that:

“I’m saying, I mean, without, you know, bragging, if you look at the back office of Evolution and Ezugi, there is really not a country where we don’t take bets from”

195. Although **Evolution is aware that gambling in the UAE is illegal**, it still offers its games there, says the senior Evolution Executive. He acknowledges that *“Dubai is still not regulated”*, and has many restrictions such as websites being blocked, and more. Moreover, he mentions that **players from Dubai are “mega players”**, and that they commonly use an IP address from India, otherwise it is from Dubai. The senior Evolution Executive **also states that when end-users play from Dubai, Evolution can see their IP address.**

“I can pull you the Dubai data, but it will probably, you know, some of it will be with IP of Dubai.”

196. Importantly, the senior Evolution Executive enlightens to the fact that **Evolution uses agents to collect money from illegal markets such as UAE and Tunisia.** In practice,

Evolution provides laptops to VIP customers of around fifty people, **who will gamble using only cash**. The winnings or losses are then collected or delivered by Evolution's agent, who may be local to either Tunisia and collect in Europe, or in India and collect in Dubai. **This is of course also in direct contradiction of anti-money laundering laws and to Evolution's anti-money laundering own policy.**

*Senior Evolution Executive: "The high-roller world is you've got 50 players, I give them VIP experience, **I send them a laptop, if they wanna play cash I accept cash, they know that they can trust me**"*

*Interviewer: "**How can you transfer cash?**"*

*Senior Evolution Executive: "**Middle**. I mean, I don't. We have play... you know, **we have agents**"*

Interviewer: "There is somebody who"

*Senior Evolution Executive: "**People that can collect cash. Yeah, we have**"*

*Interviewer: "**In the home country, yeah.**"*

*Senior Evolution Executive: "**It's not only in the home country, like, I've got people in India that collecting cash in Dubai. I've got people in Tunisia that collecting cash in Europa**"*

Summary of Findings

197. **This diligent investigation unveiled that Evolution enables a myriad of illegal activities as well as regulatory and contractual violations.** Findings include Evolution offering its games on multiple online gaming websites (operators) which enable prohibited gambling in jurisdictions where gambling is prohibited and considered as criminal offence. Additionally, Evolution receives direct cash payments from these operators, who accept cash and bitcoin payments from end-users playing Evolution games - **a heavy violation of Evolution's official anti-money laundering policy, as well as money laundering laws and acts.**
198. **A crucial part of the investigation reveals that Evolution games are being offered in banned designated terror states such as Iran, Syria and Sudan,** as determined by the U.S. Department of State and Office of Foreign Assets Control (US Department of the Treasury) – a direct violation of US sanctions on these terror states and another violation of Evolution's Counter Terrorist Financing Policy.
199. Furthermore, many examples prove that **Evolution does not carry out a KYC ("Know Your Customer") process to implement its Anti-Money Laundering Policy and laws, thus in practice it does nothing to track the source of funding used by its users.** It is also exposed that live casino games produced by Evolution are being offered to end-users - those who ultimately use their product – in territories where gambling is illegal, including in Hong Kong, Singapore, France and the UAE .
200. The investigation demonstrates that **Evolution is fully aware of its end-users' physical location within the illegal markets mentioned above,** via its direct and indirect offerings in these territories. Evolution also receives revenues, yet continues to offer its games in these very same illegal markets.
201. It is evident that **Evolution breaches local regulatory requirements in countries such as Italy, Spain and Sweden,** by offering its games by means of unlicensed operators, or by using physical studios which aren't local to the countries where they're offered, as required by local laws.