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Athens, 8-9 November 2016

KCOOS (2016) 20

“Keep Crime Out Of Sport”

Regional Seminar 5

Dates and working hours

Tuesday 8 November 2016 14:00 – 17:45

Wednesday 9 November 2016 09:00 – 17:45

Athens, Greece

Host: Ministry of Culture and Sports, General Secretariat of Sports

Location: Airotel Stratos Vassilikos, Athens, Greece

FINAL REPORT





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Introduction

This was the fifth and last regional seminar for the project. The main aim was to unite all relevant actors from the different participating countries, encourage networking, animate sessions to start tackling the challenges that have already been identified and to end with some new outputs and aims for the upcoming months.

Principal stakeholders from Cyprus, France, Greece, Italy and Montenegro, as well as international actors including European Lotteries and Sportradar were present at this seminar. The Danish National platform was also specially invited to present another national platform model, as this strategy worked well with the visiting Belgian national platform at the 4th regional seminar in Bucharest.

Overall feedback:

- The smaller working groups- given the feedback from participants- allowed for broader discussions and a real conscience of the practical side of the theoretical hypotheses.
- France's national platform example in action from Euro 2016 and Rio 2016 was well received.
- Countries appreciated the opportunity to meet and discuss with stakeholders from their own country.
- Much exchange of practical situational experience took place.

Questionnaire Analysis

At the moment of the regional seminar, there were 19 out of a possible 25 possible replies from the five participating country relevant actors. Only one country has a national platform. 1 country has set up an official National Platform. Another has a National Platform appearance. 2 countries in particular have focused a lot on betting- related match-fixing. Another country (Italy) has a structure in place around which the Convention National Platform could be developed. With regard to legislation, some have sport legislation, while most have criminal law notably that may apply to sport. There is still a gap here though. Exchange of information is often carried out via agreements and memoranda of understanding, but it is sporadic and not between all actors (Example of exchange of information which should be replicated and enlarged eventually: ARJEL and AAMS (2011)). One NP (France) has already been tested in a competition.

Identified problems included:

- ❖ Transnational cooperation and exchange of information
- ❖ Exchange of information with public authorities
- ❖ Sanctions may include imprisonment, but they are often based on general offences such as commercial bribery.
- ❖ Awareness by relevant authorities of the black market in betting is very low and this is dangerous as in some of the countries the majority of the market is controlled by the black market.
- ❖ Effectiveness of certain gambling laws is an issue.

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TUESDAY 8 NOVEMBER 2016

Roundtable of overview from participating countries

Montenegro is currently reviewing its national legislation and plans to establish a national platform based on the Finnish model. France already has a working NP in place and has tested it recently, with Football European Championship that took place in summer 2016 in France as well as during the Rio 2016 Olympic Games. France also works on betting related corruption and on actively tackling illegal betting. Just one of the countries present has not signed the convention yet (Cyprus) and they have significant issues with awareness, corruption notably in football, lack of national coordination and cooperation and a strong need for some relevant legislation. Italy has a resemblance of a national platform since 2011 and is currently working on its adherence under the convention. It is also working on developing closer coordination with other NPs. It was crucially pointed out that while implementing the convention despite it not being in force yet is the way forward; not ratifying it finds its limits, notably in the legal aspect.

Session 1: Sports Corruption: the challenges of cross-border investigation and data exchange Xuejiao Hu, INTERPOL (presentation in annex)

Interactive question session:

Information exchange: It is difficult for law enforcement to share information with private parties, due to the 'secrecy of proceedings'. If there is a police investigation, disciplinary proceedings; should they take a step back? But on the other hand, it is hard to know when the police investigation ends. Another option is that disciplinary proceedings should impose sporting fines and the criminal investigation may continue simultaneously. The information is mostly one-way, though it is admitted.

Inside the match-fixer's head: The methodology of a match-fixer is usually based on personal (often informal) contact. It must be remembered that not all manipulations are betting-related

Of particular note, a non-exhaustive list of challenges to international investigations:

Challenges for International Investigations

1. Under-estimation of the phenomenon;
2. Match Fixing: nonexistent or poor legislation;
3. Legal issues in exchanging information;
4. Difficulties in mutual assistance;
5. Data Protection Legislation;
6. Irregulated gambling market;
7. Time frame to get info;
8. Police culture.

WEDNESDAY 9 NOVEMBER 2016

Session 2: National Platforms (all presentations in annex)

I. *Danish National Platform - Martin Rostgaard, Anti Doping Danmark, seat of the Danish NP*

Notable points:

- Intelligent database for collecting and storing information, by IBM, which has 20 years of experience in the sector of law enforcement. (cost: approx.. 70,000 EUR)
- Information is collected from stakeholders (notably other ministries) and other countries
- There are joint whistleblowing systems (for doping and match-fixing) in place.
- Thus far, there are no athletes in the NP, but this is being discussed.
- Agents of ADD analyse and decide which cases get passed on or not. Their background here includes law enforcement notably.
- They have differentiated between criminal cases and match-fixing cases; the criminal case can go to court. But MSC is not necessarily criminal.

II. *French National Platform in action: case study - Corentin Segalen, ARJEL, NP coordinator*

Notable points:

- This is a concrete example of stakeholders working together.
- Errors can be made (technical errors)

III. *Group sessions based on key questions for national platforms - Council of Europe*

1. How should national platforms work together; should they work together?
2. Who should be the stakeholders essentially?
3. Who leads the platform?
4. Discussing the idea of 'contributors' to the platform
5. Should betting operators be in the NP or is a regulatory authority enough? (consider articles of the Convention discussion inclusion of ALL main stakeholders, but also that operators have a duty to report to regulatory authority).
6. What sort of representation for the sport movement?

Notes following sessions:

Legislation differs from country to country. Having contributors to a platform is not a bad idea. Platform development is low in this region so far and at best under consideration, for the most part. Education and monitoring are key identified aspects. The operational group within the national platform is a popular idea. The question on who handles data depends on the country operational system. There should be representatives for operators, although whether permanently or on an *ad hoc* basis was undecided. Athletes are a main factor; they should be involved in some way in the national platform.

Session 3 – Information exchange, addressing national problems, Improving the situation (focus on legislation and betting)

Evangelos Alexandrakis – European Lotteries (presentation in annex)

Points to note:

- This presentation provides concrete questions for each stakeholder to ask themselves
- Case examples are provided and are ideal for self-assessment

Country replies

Betting system within countries present:-

- a. Cyprus: license system, around 10 exist for bookmakers. This is offline. As for the online system, since about a month ago they accept applications for online licenses. 8 have been received. The rest have been blocked.
- b. Italy: Two types of licenses: offline and online. Two different offices manage licenses. The operators ask to approve sport, events and bets that intend to offer. The regulatory body is on the system through which all data related to bets has been registered in this software/system named "GASS". With MF, this data can be processed to have real time analysis for suspicious movement.
The analysis can relate to amounts and modes of play, the territorial distribution of the turnover, the trend of the odds, the turnover for each bet, etc. The data is divided into pre-match and live betting.
For online games, ADM (Italian betting regulator) can directly identify players. For offline games, in accordance with the rules on traceability of payments, the bookmakers are obliged to identify players for payments e winnings in excess of € 1,000.00.
The system "GASS" is an integral part of the national platform. All analyses and information obtained are shared with judicial e sporting authorities to investigate suspected cases of MF.
- c. France: conflict of interests. They must allow since 2010 the opening of markets for online betting (offline FDJ has the monopoly). They have article 10 on conflict of interests. For ex: the director of OM had to quit as operator to be a director. For online betting, there are 4, including ARJEL and PMU (horseracing)
- d. Montenegro: Montenegro: System is offline with possibility for those organizers having a concession for land base games of chance to operate those games online after obtaining approval from Games of Chance Administration. Online system of monitoring all operators of games of chance is in progress and it is expected that start working by the end of 2017. Illegal betting is inspected by the Administration for Inspection Affairs.

Criminal Code provisions:- (Article 15 Macolin Convention)

- a. Italy: 2014: new criminal code, under the Macolin Convention. There are stronger sanctions.

- b. Greece: There is also a specific criminal offence; misdemeanor can be escalated; since 1999, it has been a criminal offence. There have been some large cases, currently under criminal investigation.
- c. Montenegro: article 244a: criminalized. Active and passive corruption, for material winning, up to 10000 (6months). Higher amounts can go to 10 years.
- d. France: specific criminal offence since Feb 2012. It has not been used very much yet. The handball scandal will see a decision in Dec 2016.

Whistleblowing

- a. France: there is a coordination group within the NP on this preparing to go to the National parliament.
- b. Montenegro: There is an article on WB: if you file a suit or complaint, there is a mismanagement in the field of public interest, therefore sport is in this. An opportunity to advance.

Article 12: sharing of information. Providing and receiving information:-

- a. Regulatory authorities
 - France: they get all the information. They need information from abroad as well, thus also asked ESSA. From sports authorities, information is very important. They need to have more. Since the NP, the sport movement has been more convinced to share. All information received by the NP is given to the police.
- b. Police
 - Italy: Information from betting operators is going well because of good relationships. They look for information from the sport world, from Federations, from athletes, from the NOC, etc. They information to provide depends on the stage of investigation.
- c. Public authority:
 - Receive information from players.

On what basis can law enforcement start an investigation?

- a. Italy: The most relevant cases did not start directly from MF, but from other investigations. Others were derived from reporting of anomalies in betting fluxes. In other cases, the reporting of anomalies in betting fluxes have enriched elements already at the disposal of LEAs.
- b. Cyprus: There is no special law
- c. UEFA Reports perhaps
- d. Regulatory authorities are often asked to report to the prosecution office. A NP would be helpful because they would be able to report it directly to the NP
- e. Within the sport movement, they often proceed as follows: rapidly inform the sport public authority and then the ministry of interior.

From case study exercises, the following points were raised:

- Stakeholders need to be clear on their respective responsibilities within the NP.
- Public awareness campaigns are needed.
- Need to introduce a system to receive, analyse and distribute information (like the Danish NP)
- A secure line is needed to exchange information.
- Website information system
- Research should be undertaken to find out where you stand and what the public perceives.
- Software-mass media-research is required too
- Method of functioning of the NP can vary; in France there is no fixed budget, it is simply organizational.
- There is a need to be efficient with sharing of information.
- There could be the option to have academics; Chairs in universities for research.

Session 4: Rules, legislation and evidence

Alex Inglot, Sportradar (presentation in annex)

Main note

- Feelings on presumed MF: federation changed their wording to create a criminal MF offence. The proof needs to be specified: what does a lower burden actually mean?

The end of the presentation also presents key questions for stakeholders to evaluate their situation.

Session 5: What next?

- a) Working methods, best practices, new tendencies etc.
- b) Next steps
- c) Creating a 'handbook tool'
 - A tool with guidelines on establishing the national platforms would be useful
 - The exchange of information between countries as well as national platforms from other regions (in this case, Denmark) is a great idea and should be continued.
 - Such activities should be continued within project format, as it allows the opportunity for frank exchange and the start of tackling issues.
 - Applications for study visits.

Conclusions

Common consensus that National Platforms are essential for:

- Cooperation at national level
- Cooperation at international level
- Operational analysis of data

Other points:

- Development of databases to keep and analyse data (IBase, IBM)
- Handling of instances and suspicions right from the beginning all together among stakeholders (Euro 2016, OG 2016)
- Tackling exchange of data
- Unified method of promoting the importance of this phenomenon (criminal aspects, etc.) towards more skeptic/less aware entities.
- How should national platforms work together; should they work together?
- Who should be the stakeholders essentially?
- Who leads the platform?
- What is a good format? (for example, the general and operational levels is popular)
- Discussing the idea of 'contributors' to the platform
- Should betting operators be in the NP or is a regulatory authority enough? (consider articles of the Convention discussion inclusion of ALL main stakeholders, but also that operators have a duty to report to regulatory authority).
- What sort of representation for the sport movement?

Global overview

- Betting operators, following the last two regional seminars are establishing themselves as a key actor, because they are not only interested in their private interests but definitely in the integrity of sport. Keeping sports competitions free of manipulation is also beneficial to the private sector.
- Exchange of concrete operations of different national platforms is a crucially successful aspect of the seminars.
- Political support is needed in countries to further their operational activities and the Council of Europe is perfectly placed to undertake this task.
- Learning how to establish national platforms with limited human and financial resources is the aim and the CoE Secretariat has been requested to assist and encouraged for the efforts it has begun, engaging in communication with country actors.
- The group of Copenhagen is seen as a great tool for developing coordination.
- A continuation of such a project has been strongly recommended by countries.
- Raising awareness in this region of the links with other areas (financial crimes, organized crime, etc.) would be an objective to consider for the roadmap to be developed.

ANNEXES

Annex I: Country reports

Cyprus

Cyprus has not yet signed the convention. In late October, Min of justice circulated the relevant legislation. It will take over a year to finalise. Then they will sign the Convention. Regarding the situation in Cyprus: In September 2016, the secretary of Fifpro stated that the Cypriot league is the dirtiest league in the world. The Federation is not doing much but it has limited responsibilities. There is a lot of match-fixing in Cyprus at a high level. The FA has taken administrative measures. They give clubs strict fines but it is hard for the FA to fight alone with this problem. There is no law. Most of the betting is from the Asian market. The opinion of the Cypriot Ministry is that the football federation should decrease the number of teams in the first division and have larger fines.

They forward the files from UEFA to the police. The police often cites lack of substantial evidence on convictions etc. as a reason. At the Strasbourg conference, Cyprus suggested banning Cypriot football clubs from all UEFA competitions. This way, they focus internally on cleaning up the sport, in order to come back stronger. Recent meetings have taken place with UEFA and the Cypriot police but no tools exist as yet.

Education from a young age is very important; the situation in Cyprus is very difficult. International cooperation in illegal betting is also very necessary but difficult.

There is a problem with national exchange of information, there is no single point of contact, therefore this is why a NP is necessary.

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France

There is no need to wait for the ratification to implement its principles. So the platform was set up in 2016 January in collaboration between ARJEL (one of the online gaming regulatory authorities in France)), the Ministry of budget in charge of the state owned monopoly for offline betting FDJ and the Ministry of Sport.

The Ministry of Sport has the chairmanship of the NP. The missions correspond to article 13 of the Convention. The sport movement is a very important actor. There are 2 boards: 1. Coordination and prevention chaired by the Sports Direction in the Ministry and 2. A monitoring board chaired by ARJEL.

French Specificity: there is a sports list on placing bets: the role of the betting regulator is to ensure the fairness of the betting offer. Bets should not be taken illegally in France. The rationale: MSC is like a market, there is a demand and an offer. Benefits by competition organisers remain lower than what we can use. There is a number of criteria on limiting bets. Risk analysis also takes place within the platform. The risk analysis guides the NP: sports list and also organizing resources nationally pre-competition.

Another specificity: betting rights. There are also obligations to report, as envisaged by the convention.

A special unit of the ministry of justice, also police affairs, national financial intelligence unit all handle sanctions. Since 2012, active and passive corruption of sport competitions exists as an offence = the ministry of justice is working on these as a branch of corruption. There are 2 levels, criminal and disciplinary.

Opinion on sponsorship of events: definition of competition stakeholders (look at the glossary on the convention website). The definition of sports competitions is more restricted nationally.

A Dedicated service within ARJEL deals with unauthorized online gambling. They have civil and administrative procedures to find illegal provision on gambling services.

French National Platform

France – Current status of the fight against match-fixing

KCOOS – Regional Seminar 5
Athens – 8 November 2016



- France signed the Council of Europe Convention on the manipulation of sports competitions in 2014.
- Position of the French authorities: **no need to wait for the ratification of the Convention to implement it**
- **French national platform** against the manipulation of sports competitions settled in January 2016

- **Agreement by the Minister for Sports and ARJEL** (French Online Gaming Regulatory Authority)
- **Chairmanship** of the national platform: **Minister for Sports**
- **Missions** of the platform = **article 13 of the Convention**
- **Members**
 - Ministries for Justice, Home Affairs, Finances, Budget, Sports
 - ARJEL
 - La Française des Jeux (FDJ) - the State owned-monopoly for land-based sports betting
 - French National Olympic Committee
 - Professional sport movement (permanent invitation of the athletes representatives)
- **2 Boards**
 - Directorate for Sports chairs the **Coordination and prevention Board** of the platform
 - ARJEL chairs the **Monitoring Board** of the platform

The role of the sports betting regulator in the fight against manipulation of sports competitions

- As a regulatory authority, **one of ARJEL missions is to ensure the integrity of online sports betting operations** which can be altered by manipulations of sports competitions.
- The mission of the regulator is **not to fight directly against the manipulations** because such a fight is primarily of the responsibility of the sports' authorities.
- Not all manipulations are linked to sports betting. **Good governance of sports is a key factor.**
- ARJEL works closely with the French Ministry for sports and the French sports movement (federations, competitions organizers).

The French regulatory framework: prevention, detection and sanction of manipulations of sports competitions

- The **French regulatory framework** comprises several **measures aiming at preventing, detecting and sanctioning manipulations of sports competitions.**
- **Prevention** measures relate to conflicts of interest, risk analysis and betting right (I)
- **Detection:** betting related manipulation of sports competitions (ARJEL + FDJ)/all manipulations of sports competitions (monitoring Board of the national platform) (II)
- **Sanction:** criminal and disciplinary (III)

I. Prevention: Conflicts of interest and insider information

ARJEL ensures that **no conflicts of interests** exist between the licensed sports betting operators and the sports competitions' organizers (namely in case of capitalistic links between the operators and the

organizers of the competitions on which those operators offer bets and in case of partnership/sponsorship agreements between operators and competition organizers).

French regulation also **prohibits licensed operators'** owners, managers, corporate officers and staffs to **place** for themselves, directly or through a third party, **stakes on the betting products they offer**.

Since the entry into force of Law No 2012-158 dated 1st February 2012, **French sports federations** shall enact rules aiming at **prohibiting competition stakeholders from offering services of sports forecasts** on those competitions with regards to which they have contractual links with sports betting operators or where those services are provided within programs sponsored by those operators.

Competitions' stakeholders shall not hold financial shares in the capital of a sports betting operator which offers bets on their sport neither **place, directly or indirectly, stakes on bets offered on the competition they participate in** nor communicate insider information (i.e.: not publicly known information which they have access to through their profession or functions).

I. Prevention: Risk Analysis – the sport risk

A **risk assessment perspective of match-fixing** entails the evaluation of the vulnerabilities of the competitions on which authorized sports bets can be taken.

Bets should not be taken on those competitions that entail vulnerabilities in terms of manipulation.

The rationale is to **ensure that benefits which could be found by the competition organizers or stakeholders in betting related match-fixing remain lower than what they could lose** while manipulating the competition. **Idea = manipulation of sports competitions is a market.**

As a gambling regulatory authority, **ARJEL can prevent bets to be placed on competitions the organization of which entails higher match-fixing risks.**

The **drafting by ARJEL of a sport list** in concertation the relevant sports federations and the Ministry for Sports, aims at characterizing a fair sports betting offer on which licensed operators can propose bets, while ensuring prior information of competition organizers.

ARJEL is currently **reviewing the selection process of the listed competitions to shape selection criteria mostly of economic nature**, such as media coverage of the competition or financial interest of the athletes.

Characterizing a fair sports betting offer has **no real consequences on the economy of the sector because the majority of bets are placed on the biggest sporting events**: in France, notwithstanding the limitation of the offer, there are extended possibilities to bet and the online sports betting sector is booming (+ 30% in turnover in 2015 compared to 2014, i.e. +19% in GGR),

I. Prevention: Risk Analysis – A prerequisite to the platform's action

National sports betting market risk analysis upstream of the competition > **guidance of the French platform action**

2 levels

- a. **Sports list** drafted by the regulator (French specificity)
- b. Analysis of the **potential risks of the competition at stake** (matches at risk)
 - i. For EURO 2016: analysis ran by the national platform with the sport movement
 - ii. Enables to organize monitoring: permanent staff mobilization
 - iii. Works with UEFA began in July 2015, risks analysis as of December 2015
 - iv. **Prior risk analysis = good management and good policy tool**

I. Prevention: Ownership rights of the sports competition organisers

- According to the ownership right of the sports competition organizer, also called betting right, the **sport betting operators shall obtain the organizers' authorization before proposing bets on their competitions**. The betting right pursues a double objective:
 - creating a **dialogue between operators and competitions organisers** in order to detect and deter potential betting related manipulations;
 - **financing initiatives** namely aiming at combatting manipulations.
- The betting right contract specifies the **operators' obligations with regards to detection and deterring** of betting related manipulations of sports competitions
 - real-time monitoring of suspicious betting activity – volume, spreading and level of stakes – by the operators,
 - real-time information of ARJEL in case of suspicious betting pattern
 - detection measures
 - information of the competition organizer on any dereferencing of betting products implemented by the operators

This mechanism has helped to **raise awareness amongst competition organizers on the risks of betting related manipulations** and to **enhance the implementation by the sport movement of prevention and detection measures**:

- late appointment of referees to avoid approaches,
- ban on betting in sporting premises,
- education measures of competition stakeholders,
- availability of matches sheets for ex-post analysis,
- increased monitoring or alerts procedures

II. Detection: Betting-related manipulation of sports competitions

ARJEL monitors the French online sports betting market to detect anomalies and deter betting related match-fixing attempts on competitions of the sport list

The **French technical online gambling regulation** enables ARJEL to **access real time all elementary betting operations** occurring on the French sports betting operators' gambling platforms.

ARJEL has also developed its own **odds analysing tool** (software)

Raw data used by ARJEL in order to detect anomalies are

- a. the sport competition on which bets are placed,
- b. amount of stakes,
- c. date, time and location of the bets,
- d. variation of the odds,
- e. bettor's identity.

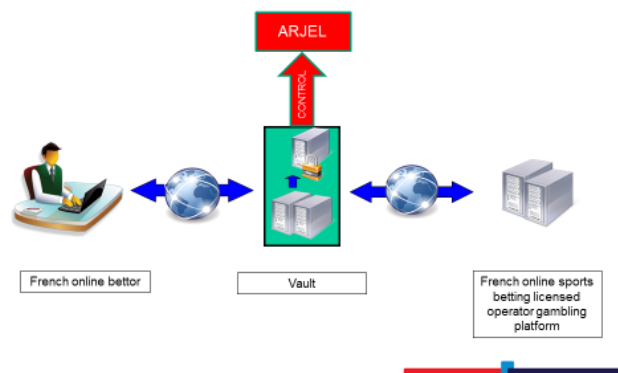
Combining those raw data, ARJEL has developed **monitoring indicators** enabling to identify attempts of betting related manipulations.

Those indicators are **combined with standard values and alert thresholds** and are **aggregated in control dashes**.

Monitoring is implemented on the basis of those control dashes on a regular basis and automatically for the main competitions.

II. Detection

French technical online gambling regulation model



- The **administrative partnership** formalised **between ARJEL and FDJ** enables real time exchanges with the offline sports betting monopoly in order to obtain an **exhaustive view on the national sports betting market**, both online and offline.
- **Information exchanges** complement the monitoring of the French sports betting market:
 - With online sports betting operators, whether licensed in France or not (ESSA),
 - With national and international sport movement
 - French National Olympic Committee organizing the network of the federations' integrity delegates namely in charge of dealing with betting related manipulations;
 - IBIS information system of the IOC
 - With foreign sports betting regulators



- Counterparts ARJEL entered cooperation agreements with;
- Members of the European Union Expert Group on Gambling Services;
- Members of the Network of National regulators of the sports betting market of EPAS;
- Members of regulators international associations (GREF, IAGR)

II. Detection: All manipulations of sports competitions

- Mission of the monitoring Board of the French National Platform
- Dealing on a wider scope than betting related manipulations of sports competitions
- Building on the cooperation networks established by ARJEL
- To be developed by Corentin Segalen, the French Platform coordinator

III. Sanction: Criminal and Disciplinary

The **Central Service for the Prevention of Corruption** (special unit of the Ministry for Justice), the **Central Service for Races and Games** (specialized police service) and the **National Financial Intelligence Unit** (Tracfin) are part of the national platform and in charge of the fight against corruption and fraud.

Active and passive corruption of sports competition stakeholders is a criminal offense in France since 2012.

On demand of the sports federations, ARJEL implements a **cross-filing mechanism**, compliant with the rules and regulations related with the **protection of personal data**, enabling to **control the prohibition for competitions' stakeholders to bet on their own competitions**.

- a. This mechanism enables the comparison of the gambling data hold by ARJEL pursuant to the French online gambling technical regulation with the data on competition stakeholders provided by the sports federations.
- b. **Positive results** in breach of the aforementioned prohibition **can ground disciplinary sanctions**.

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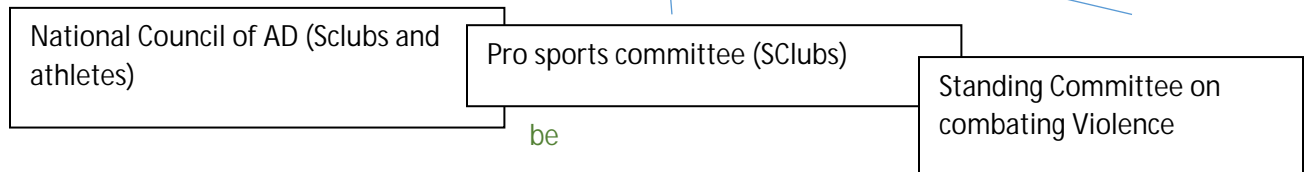


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Greece

Min of Culture and Sport (New Minister)

General Secretariat of Sport



A lot of indictments have taken place. Convicting is a lot harder. Greece is in the early stages of development.

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Italy

Italy has implemented relevant law. It signed the Convention in April 2016 and is preparing the national situation for implementation of the NP. The 2011 Italian resemblance of a platform is running well from the police perspective. This needs to become a priority in the eyes of the executive power.

There is a national point of contact to cover international police cooperation platforms.

The Italian resemblance of a National platform was set up with the department of public security and involves: A general unit (UISS – Sports betting intelligence unit) and another level as an operational group (GISS – sport betting investigative group) who meet once a month. The benefit of the operational group is that they get to dig into the information. In Italy, at national level, the platform is more or less compliant to the Macolin convention. Cooperation is foreseen with other NPs. The need to establish the platform within the Min of Interior was born of necessity. Judicial cooperation has to be grounded in legal provisions.

According to Article 4, they have set up a national point of contact. They have also started working under Article 5 risk assessment and management and article 12 on exchange of information. The Anti-Money Laundering unit is going in this way; they are stressing the concept of risk assessment. Without this in the gambling sector, it is impossible to proceed. With regard to asset recovery, in Italy there is a draft bill to allow judicial powers to attack assets from investments made from the gambling sector.

Italy is also working on the judicial cooperation (EU/Coe/T MC) and mutual recognition of sanctions.



Summary:

- National point of contact – INTERPOL / EUROPOL (international police cooperation platforms)
- Prevention and monitoring of match-fixing in Italy – **UISS** / **GISS** (national platform)
- Remarks and conclusions

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CONSEIL DE L'EUROPE

MINISTRY OF INTERIOR
DEPARTMENT OF PUBLIC SECURITY
CENTRAL DIRECTORATE FOR CRIMINAL POLICE
Italian International Police Cooperation Service



"Macolin" Convention
of the Council of Europe Treaty Series (CETS no. 215)



Chapter II - Prevention, co-operation and other measures

Article 4 - Domestic co-ordination

- 1 Each Party shall co-ordinate the policies and action of all the public authorities concerned with the fight against the manipulation of sports competitions.
- 2 Each Party, within its jurisdiction, shall encourage sports organisations, competition organisers and sports betting operators to co-operate in the fight against the manipulation of sports competitions and, where appropriate, entrust them to implement the relevant provisions of this Convention.

National Point of Contact (2012):

Use of INTERPOL (I-24/7) – EUROPOL (SIENA) – SIRENE (SIS II) channels

Supporting the National Police and Judicial Authorities:

- Collecting information
- Developing international contacts
- Preparing documents – I.L.O.R., E.A.W., I.A.W., A.R.O. requests
- Tracing of fugitives
- Assistance in extradition



Participation / preparation – operative meetings and international conferences

Sharing experiences and best practices

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MINISTRY OF INTERIOR
DEPARTMENT OF PUBLIC SECURITY
CENTRAL DIRECTORATE FOR CRIMINAL POLICE
Italian International Police Cooperation Service



"Macolin" Convention
of the Council of Europe Treaty Series (CETS no. 215)

Article 5 - Risk assessment and management

- 1 Each Party shall - where appropriate in co-operation with sports organisations, sports betting operators, competition organisers and other relevant organisations - **identify, analyse and evaluate** the risks associated with the manipulation of sports competitions.
- 2 Each Party shall encourage sports organisations, sports betting operators, competition organisers and any other relevant organisation to establish procedures and rules in order to combat manipulation of sports competitions and shall adopt, where appropriate, legislative or other measures necessary for this purpose.



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Chapter III - Exchange of information

Article 12 - Exchange of information between competent public authorities, sports organisations and sports betting operators

- 1 Without prejudice to Article 14, each Party shall facilitate, **at national and international levels** and in accordance with its domestic law, exchanges of information between the relevant public authorities, sports organisations, competition organisers, sports betting operators and national platforms. In particular, each Party shall undertake to set up mechanisms for sharing relevant information when such information might assist in the carrying out of the risk assessment referred to in Article 5 and namely the advanced provision of information about the types and object of the betting products to the competition organisers, and in initiating or carrying out investigations or proceedings concerning the manipulation of sports competitions.
- 2 Upon request, the recipient of such information shall, in accordance with domestic law and without delay, inform the organisation or the authority sharing the information of the follow-up given to this communication.
- 3 Each Party shall explore possible ways of developing or enhancing co-operation and exchange of information in the context of the fight against illegal sports betting, as set out in Article 11 of this Convention.



"Macolin" Convention

of the Council of Europe Treaty Series (CETS no. 215)

National Platform (UISS/GISS) (Article 13)

Established on 15 June 2011, within The Department of Public Security

Chaired by the Deputy General Director of Public Security – General Director of Criminal Police

Made up of representatives from:

- Law Enforcement
- Sports World
- Financial Administration (State Monopolies)
- Act through operational guidelines (under review!)

Sport Betting Investigative Group (GISS) - Tasks

- based on the information gathered by the Sports Betting Intelligence Unit (UISS)
- coordinate law enforcement activities to counter all attempts to infiltrate the sports world also by organized crime
- order in-depth analysis of relevant reports
- follow further relevant investigation



Remarks and conclusions

Match-Fixing = global problem = global response

Match-Fixing = money = financial investigations / asset recovery!

International Cooperation

Multidisciplinary approach

Any “key actor” should take initiatives within their own sector, proactively!

Short presentation of the sport system of justice

In 2014, the Italian National Olympic Committee (CONI) adopted a new Code of sport justice. In order to protect the legality of the sport system of law, the General Prosecutor of Sport (Procura generale dello sport) was established, with complete autonomy and independence, in accordance with Articles 12 ter of the Coni’s Statute.

The General Prosecutor of Sport is a judicial organ with prosecutorial duties, who coordinates and monitors prosecutorial and judicial activities carried out by the Federal Prosecutor. With the aim of guaranteeing the integrity of sport, it plays a proactive role in fighting match fixing. In particular, the institution of the General Prosecutor allowed for the improvement of the sharing of information, expertise and know-how between public actors.

Short presentation of the Italian project funded by DG HOME (European Commission)

The call for the project has a specific focus: private public cooperation. The awareness of the EC is that private public cooperation is a crucial element. The Italian project included a specific possibility in the event that this cooperation on a national level may be developed in a substantial way. The Italian system already existed before the Macolin convention and there is evidence that Italy is combating it.

Project is focused on 2 elements:

- 1) Integrated synoptic frame = developing a tool which can be a set of infographics, which has the purpose of enabling all the actors around a table so that they can all work on shared information every month, etc.
- 2) Developing a protected reporting system. The government guides the project and is developing a specific protected reporting system. It will be connected with the Ministry of Interior, etc. the Sport market has to be regulated. The distortion of the market has become a crucial point for the Chamber of Commerce. There will be a pilot in Palermo. The system will be national; the Palermo pilot will involve all local sports clubs, institutions and companies. A contra-comfort zone needs to be built up to pull athletes out of the idea of staying within their comfort zone to say nothing and therefore to remain non-targeted.

Montenegro

Montenegro has signed the convention and was involved in its drafting. It is currently a candidate country for EU membership. They are currently waiting for the new government to be in place.

Since 2012, there has been a large review of the national legislation. The results of the legislation analysis are not promising. So now they will work on the new law on sport, based on the FINCIS – Finnish Model. There should be a centralized approach, thus the Finnish model is useful. The roots of the problem surrounding sport are the same. Montenegro has the same or similar actors in place as in Finland.

They consider that the NP is an excellent manner to deal with this phenomenon and to defend sports and the values it represents, notably given that the commercialization of sport devalues all its key aspects. Sports manipulation is not seen as a primary source: care needs to be taken; For example, a club registered as an NGO but in reality a pro club/company/commercial agent. This is a problem.

Montenegro highly values the work of the CoE and EU in these aspects.

It would be useful to compare the different types of sport integrity issues, for ex in relation to doping.

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Annex II: KCOOS Update



Update:

- ❖ Month 10 of Project KCOOS
- ❖ Questionnaires –over 100 replies
- ❖ Regional Seminar 1 (June 2016): Albania-Belgium-The Netherlands-Slovenia-Spain-Switzerland-The United Kingdom
- ❖ Regional Seminar 2 (September 2016): Austria-Bosnia Herzegovina-Croatia-Germany-Hungary-Ukraine
- ❖ Regional Seminar 3 (October 2016): Denmark-Estonia-Finland-Latvia-Lithuania-Norway-Sweden
- ❖ **Regional Seminars 4 (Bucharest: Oct 2016) and 5 (Athens: Nov 2016)**
- ❖ Study Visits France (ARJEL) 14-15 Nov 2016/Apr 2017 and UK (UK GC) week of 12 Dec 2016 and March 2017)

Questionnaires

- ❖ Replies from 7 participating countries
- ❖ Ministries: 5
- ❖ Sport Movement: 10
- ❖ Betting operators: 4
- ❖ Regulatory authorities: 3
- ❖ Law enforcement: 4
- ❖ Sessions have been developed using knowledge acquired from the questionnaires
- ❖ 1 country has set up a National Platform
- ❖ 4 countries have started the process: in different ways, notably through research teams to assess the legal and practical national situation first.
- ❖ Another country has a possible structure in place around which the National Platform could be built.

- ❖ Legislation: Some have sport legislation, others have sport specific provisions and most have criminal law notably that may apply to sport.
- ❖ Exchange of information is often carried out via agreements and memoranda of understanding, but it is sporadic and not between all actors.
- ❖ Sanctions often include imprisonment

Identified problems:

- ❖ Transnational cooperation and exchange of information
- ❖ Exchange of information with public authorities
- ❖ Sanctions may include imprisonment, but they are often based on general offences such as commercial bribery.
- ❖ Awareness by relevant authorities of the black market in betting is very low and this is dangerous as in some of the countries the majority of the market is controlled by the black market.
- ❖ Effectiveness of certain gambling laws is an issue.

Mapping

- ❖ Initial mapping conducted by Council of Europe T-MC Secretariat and KCOOS Partner, Oxford Research
- ❖ Needs to be developed
- ❖ Place your institutions

Regional Seminars 1-3

- ❖ Initial mapping conducted by Council of Europe T-MC Secretariat and KCOOS Partner, Oxford Research
- ❖ Needs to be developed
- ❖ Place your institutions

Looking long-term

- ❖ Entry into force of the Convention
- ❖ Risk and legal assessments at national level
- ❖ Setting up of national platforms
- ❖ Creation of thematic and stakeholder networks of networks
- ❖ Developing the Copenhagen Group

Main ideas

- ❖ Exchange of information
- ❖ New ideas
- ❖ Group of Copenhagen
- ❖ More focus on MF issues

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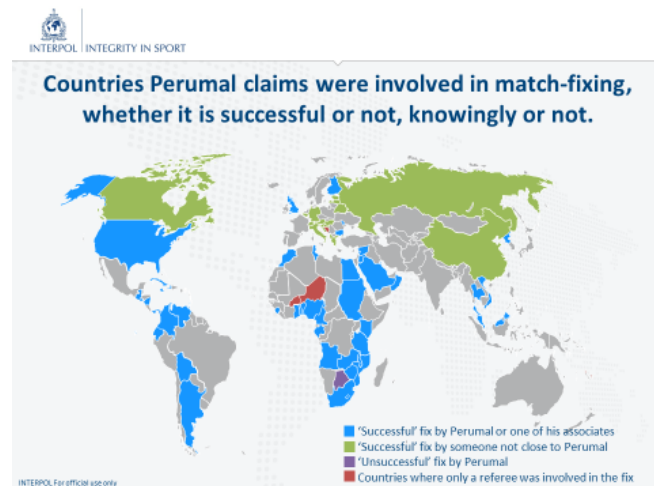


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Annex III: Sports Corruption: the challenges of cross-border investigation and data exchange (INTERPOL)



List by football confederation:

- AFC: Bahrain, China, Jordan, Kuwait, Lebanon, Malaysia, North Korea, Oman, Qatar, Saudi Arabia, Singapore, Syria, Thailand, Vietnam.
- CAF: Angola, Benin, Botswana, Burkina Faso, Cameroon, Congo, Egypt, Ghana, Kenya, Lesotho, Malawi, Morocco, Mozambique, Niger, Nigeria, Sierra Leone, South Africa, Sudan, Tanzania, Togo, Tunisia, Zambia, Zimbabwe.
- CONCACAF: Canada, Cuba, El Salvador, Grenada, Guatemala, Haiti, Jamaica, Nicaragua, Panama, Trinidad and Tobago, USA.
- CONMEBOL: Argentina, Bolivia, Colombia, Ecuador, Venezuela.
- OFC: -
- UEFA: Albania, Austria, Belarus, Belgium, Bosnia, Bulgaria, Croatia, Estonia, Finland, Germany, Greece, Hungary, Italy, Latvia, Moldova, Russia, Slovenia, Switzerland, Turkey, UK.

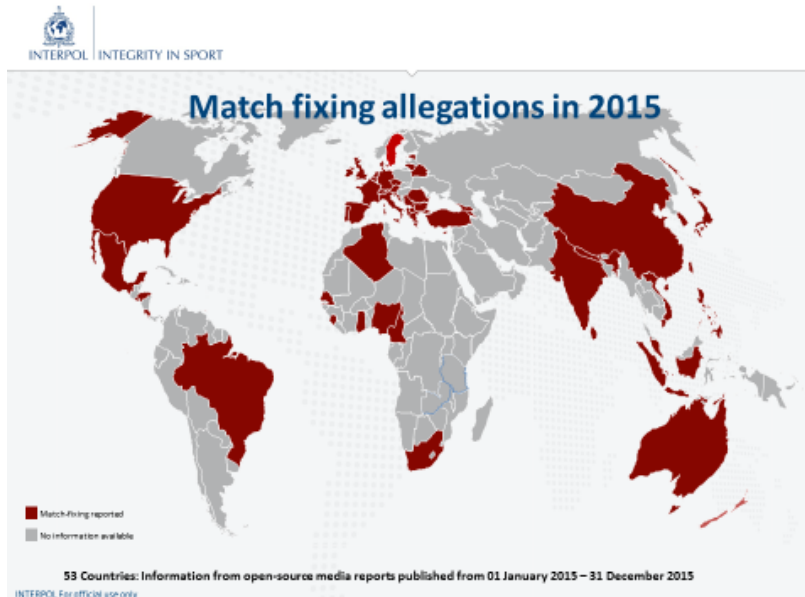
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This map represents the 53 countries named in open-source media reports as having allegations of, investigations into, or sanctions/sentences given for match-fixing in football and other sports between 01 January and 31 December 2015



Challenges for International Investigations

- Underestimation of the phenomenon;
- Match-Fixing: nonexistent or poor legislation;
- Legal issues in exchanging information;
- Difficulties in mutual assistance;
- Data Protection Legislation;
- Irregulated gambling market;
- Time frame to get info

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- Police culture.

This signifies a gap in information exchange.

Sharing Information Scenario:

Following a case of match-fixing in tennis, the TIU started a disciplinary procedure against two players.

Meanwhile a police investigation also started.

The TIU fact finder addresses the police asking the police investigator to provide him elements/proofs useful to the disciplinary procedure he/she is carrying on.

What should the police do?

Are investigators enabled to share information with them?



Annex IV: Working group session on networks and national platforms

Why a network is so important

- ❖ Other projects, including PRECRIMBET and BETMONITALERT – highlights technically specific needs, including monitoring report elaboration, etc. The needs should be in the framework of coordination of the strategy implemented by the CoE Secretariat.
- ❖ With regard to needs following various stages of project KCOOS:
 - Need for a platform within the NP to exchange sensitive information
 - Need to regularly communicate and know each other
 - Knowing each other + trust = developing further common activities, such as those proposed by Betmonitalert and Precrimbet – not just among regulators, but also in cooperation with other stakeholders
 - A network will allow for more harmonised or at least a better understanding of various obligations and rules proposed to betting operators for better exchange of information.
 - Common training and awareness-raising activities presenting a more united front can be exchanged and developed.
 - A network will help develop an informal system on exchange of information for illegal betting.
 - Regional and international networks of different stakeholders in order to enhance exchange of information.

Article 13 –National platform

117. Article 13 provides for the identification of a national platform responsible for the fight against the manipulation of sports competitions by each Party.

118. The identification of the body fulfilling the function of national platform will be made in accordance with **national law**, and at the Parties' discretion, **taking into account existing structures** and the distribution of national administrative functions. **A public authority would provide a neutral framework for co-operation between private stakeholders from different sectors and a suitable framework for the exchange of information.** Therefore, national platforms are also implicitly covered by the generic references made to "competent public authorities". However, this feature is not explicitly specified in the provisions of the convention, so as to give the Parties a margin of discretion in identifying their platform.

119. The national platform serves as an **information hub, collecting and disseminating information** relevant to the fight against manipulation of sports competitions to the relevant organisation and authorities (paragraph 1.a).

120. In particular, the national platform is responsible for **receiving, centralising and analysing information on irregular and suspicious bets placed on sports competitions** taking place on the territory of the concerned Party and, where appropriate, **issuing alerts** (paragraph 1.c) **and transmitting information to public authorities, sports organisations, and/or sports betting operators**, in connection with possible breaches of legislation or sports regulations (paragraph 1.d). The information may, for

instance, concern the placing of bets by a person involved in the competition or irregular or suspicious bets. However, this article does not involve a strict requirement to transmit specific types of information.

121. The national platform, the name and address of which must be communicated by each Party to the Secretary General of the Council of Europe (paragraph 2), is responsible for the co-ordination of the fight against the manipulation of sports competitions at national level (paragraph 1.b) and must co-operate with all organisations and relevant authorities at national and international level, including national platforms of other states (paragraph 1.e).

This may include co-ordinating the diffusion of public information. Given the transnational nature of the risks related to the manipulation of sports competitions, it is very important for information to be exchanged quickly between the Parties.

122. **When the information exchanged constitutes personal data, it should be processed subject to the relevant national and international personal data protection laws and standards**, as set out in Article 14 of the convention, in particular those defined under the Convention 108.

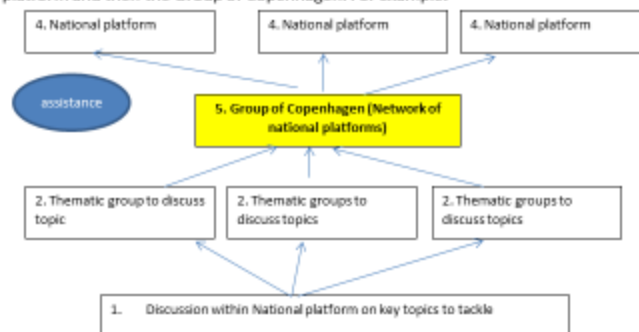
123. Paragraph 2 requires the Parties to communicate to the Secretary General the names and addresses of the national platform. According to the practice on such notifications, Parties are expected to notify this information, by means of a declaration addressed to the Secretary General of the Council of Europe, at the time of signature or when depositing its instrument of ratification, acceptance or approval. **They subsequently may, at any time and in the same manner, change the terms of their declaration.**

Group of Copenhagen

- 1st Meeting: July 2016
- 2nd Meeting: December 2016
- Network of National Platforms to enhance international cooperation and put in place concrete action plans for projects, work programmes and accompanying new and upcoming NPs.

THE NETWORK

There has been general support for the idea of regional networks; these regional networks would not reunite national platforms as this risks creating a confusion and too many subnetworks of national platforms. Rather, the regional networks would reunite based on themes to be discussed and planned. And then put towards each national platform and then the Group of Copenhagen. For example:



Annex V: Example of a national platform: Denmark, by Martin Rostgaard, Intelligence Manager, ADD

Denmark National Platform



The National Platform against Matchfixing.

"- an insight to the Danish Model"



"Keep Crime Out Of Sport"
Regional Seminar 5
Athens, Greece
Ministry of Culture and Sports

- A National Platform anchored at The Anti Doping Unit, why?
- *Legal foundation & Sports rules*
- Participants in the National Platform
- Cooperation agreements – a basis for exchanging information
- Tools, systems and best practice
- Case
- Q & A

The National Platform anchored at the Anti-Doping Unit – why?

- Fight against match-fixing placed at The Ministry of Culture (and Sports).
- Government decision to place Secretariat under the Ministry of Culture.
- Anti Doping Denmark already worked with:
 - Integrity in sport
 - Investigations and intelligence
 - Handling sensitive and private information
- All in all - a VERY cost-effective solution.

Legal Foundation and sports rules

LEGISLATION

- Criminal Code (Rules regarding Fraud, extortion, embezzlement etc.)

Supplement to The Criminal code:

- Law for promotion of integrity in sport

(Bribery in sport prohibited from 1st July 2015, up to two year imprisonment)

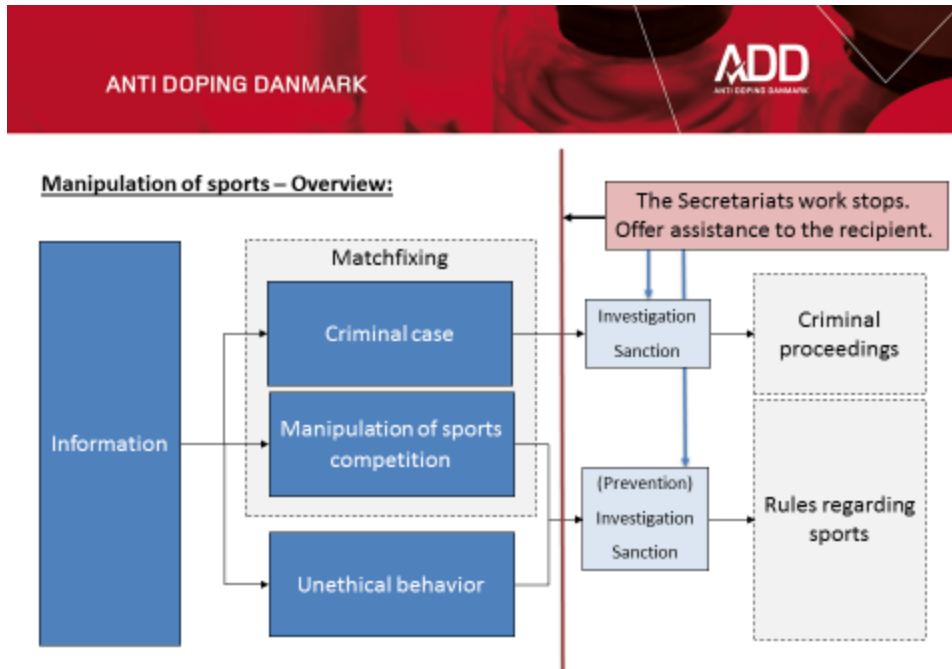
SPORTS RULES

- Match fixing regulations of NOC and Sports Confederation for Sport (The same set of rules governs all 61 National Federations)
- International Federations rules
- Status as public authority – gives us access to public records etc.

Participation in the National Platform

Strategic forum:

- Ministry of Culture
- Danish Gaming Commission
- Ministry of Justice
- Danish National Police
- DOGA (Danish Online Gambling Association)
- Danske Spil (Danish State Lottery)
- NOC and Sports Confederation of Denmark
- Danish Football Association
- Anti Doping Denmark (Secretariat)



Cooperation agreements – a basis for exchanging information

Why? – To ensure flow on intelligence and information between various stakeholders.

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Benefits gained from cooperation agreements?

- Single point of contact
- Mutual trust and extended personal relations
- Improved access to *and* the exchange of information, etc.

Who have we made cooperation agreements?

- Secretariat/National Police
- Secretariat/Gambling Commission
- Secretariat/Customs and Tax
- More to come...



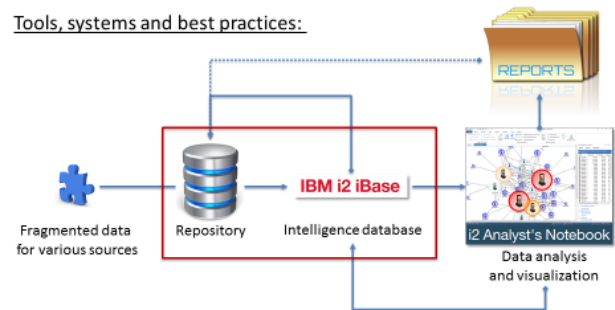
Tools, systems and best practices:



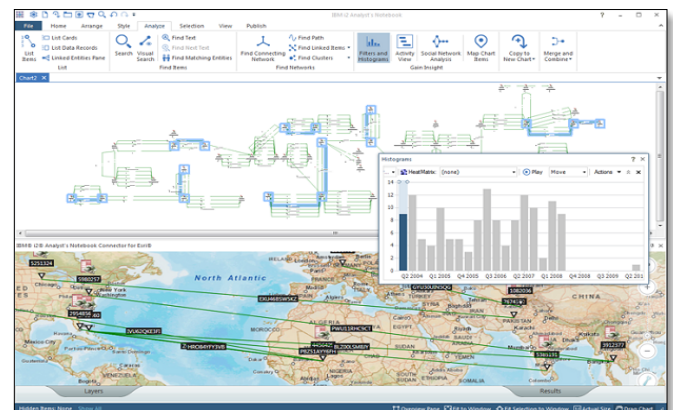
"All personnel is cleared by national intelligence and security authority"



Tools, systems and best practices:



ID	FULL_NAME	FIRST_NAME	LAST_NAME	CALLING_NBR	CALLER_NBR	START_DATE	END_DATE	DURATION	CITY	STATE	ADDRESS	CELL_SITE
1	RalphJordan	Ralph	Jordan	8-1921364-8315	2-(230)472-4011	1418197491	1418198397	806	Fair Oaks	CA	27834 Glend	88
2	PamelaPowell	Pamela	Powell	2-(270)359-8113	2-(833)444-8281	1418290807	1418292942	2115	West Sacram	CA	35593 Portag	53
3	AnnaGibson	Anna	Gibson	3-(307)801-5521	3-(490)378-2330	1417817803	1417820157	2354	Sacramento	CA	1323 El Cami	102
4	BeverlyKelly	Beverly	Kelly	7-(423)821-7199	2-(307)444-8281	1417220166	1417222469	3303	Folsom	CA	28473 Hanso	81
5	RobertBowman	Robert	Bowman	7-(443)366-2890	2-(833)444-8281	1415288003	1415289004	1001	Sacramento	CA	4 Waubesa P	32
6	WalterWright	Walter	Wright	9-(375)425-6362	8-(818)141-5320	1414689052	1414691454	2402	Orangevale	CA	97 Briar Cres	79
7	WalterWright	Walter	Wright	9-(375)425-6362	3-(812)536-3510	1419461129	1419462362	1233	Sacramento	CA	11746 Moose	59
8	AnnaGibson	Anna	Gibson	3-(307)801-5521	5-(606)804-8887	1418418016	1418421169	1153	Sacramento	CA	088 Spohn Di	67
9	ArthurWest	Arthur	West	8-(396)221-0695	5-(923)984-7542	1415671824	1415673017	1193	Sacramento	CA	4 Declarati	45
10	EricMczoy	Eric	Mczoy	4-(195)345-0796	2-(018)291-3145	1414817602	1414822092	4490	Sacramento	CA	2 Bedeau Poi	19
11	FredCarpenter	Fred	Carpenter	0-(512)900-7007	4-(300)048-0339	1415207223	1415208636	1413	Clarksburg	CA	920 Thomps	49
12	IreneWood	Irene	Wood	4-(854)454-5378	5-(461)543-0594	1417390459	1417391574	1115	Antelope	CA	3 Union Lane	7
13	AmandalJordan	Amanda	Jordan	0-(169)877-8366	4-(864)125-9623	1415196725	1415197499	774	Sacramento	CA	3966 SpaiG	29
14	AlanLittle	Alan	Little	0-(887)375-3438	8-(009)658-1839	1417318095	1417316818	4813	Sacramento	CA	14 Golf View	106
15	AdamLynch	Adam	Lynch	3-(946)780-1280	8-(618)141-5320	1417303280	1417307598	4218	Sacramento	CA	367 Kenwoo	66
16	KathyWard	Kathy	Ward	4-(934)540-2989	8-(170)153-7171	1414230633	1414234846	4213	Sacramento	CA	612 Clove Tri	39
17	ElizabethRamirez	Elizabeth	Ramirez	7-(138)030-2131	8-(618)141-5320	1418520935	1418521317	382	Sacramento	CA	9055 Meadoi	68
18	AlanFields	Alan	Fields	3-(436)356-0022	0-(189)877-8366	1414528885	1414530483	1598	Citrus Heigh	CA	524 Manufac	81
19	PamelaPowell	Pamela	Powell	2-(270)359-8113	3-(631)805-3020	1415652313	1415652568	255	Sacramento	CA	24 Arapahoe	9
20	AmandalJordan	Amanda	Jordan	0-(169)877-8366	9-(768)493-4919	1415664451	1415667634	3183	North Highla	CA	47400 Dayto	37
21	RobinGonzalez	Robin	Gonzalez	2-(018)291-3145	6-(045)502-0137	1419088494	1419090809	2315	Sacramento	CA	056 Del Mar	42
22	HeatherFox	Heather	Fox	2-(013)834-5844	8-(618)141-5320	1417966877	1417971563	4686	Carmichael	CA	40161 Cardin	98



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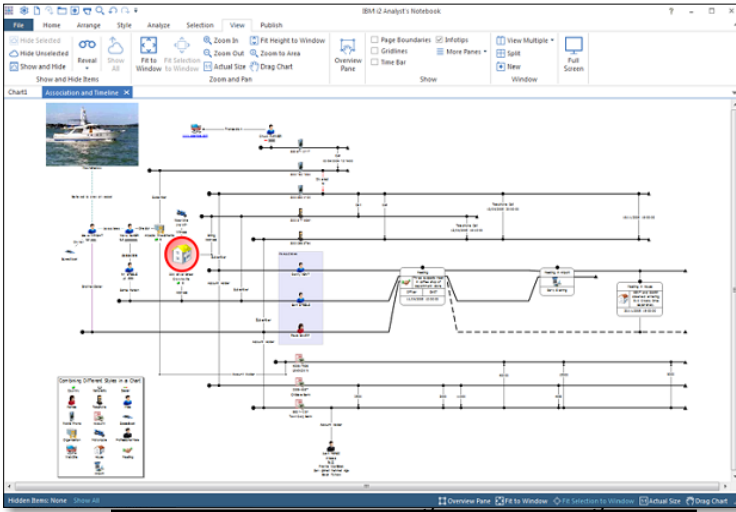


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CONSEIL DE L'EUROPE



Intel-database and visualization software, status:

Past:

- Process to uncover and describe:
 - ✓ general needs
 - ✓ overall purpose
- Finding suitable providers
- Initial testing of various solutions

Present:

- Working with IBM regarding development of database (i2 portfolio: Analyst's notebook, Ibase, i2 Weeder etc.).

Near future:

- Final finetuning of database with Weeder function (Data Protection Act)
- Implementation
- Description of workflow



The report will be sent to: Anti Doping Denmark

Please describe your suspicion or knowledge as detailed as possible:

I want to open a secure mail box and provide further information, if necessary. Below, you must choose a password which will be used to log in to the mail box, as well as the case number you will be given when you click on "Send".
Enter your password: Repeat the password:

When did the incident occur?

Upload possible documentation*
 Ingen fil valgt.

* If you wish to remain anonymous, please remove any meta data that can reveal your identity.

Please state your contact details if we may contact you:

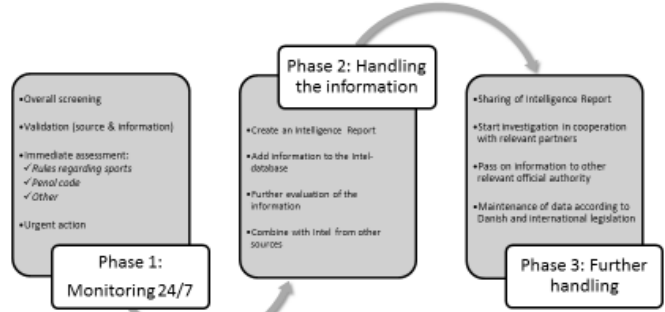
Name:

E-mail:

Telephone number:



Workflow when receiving information:

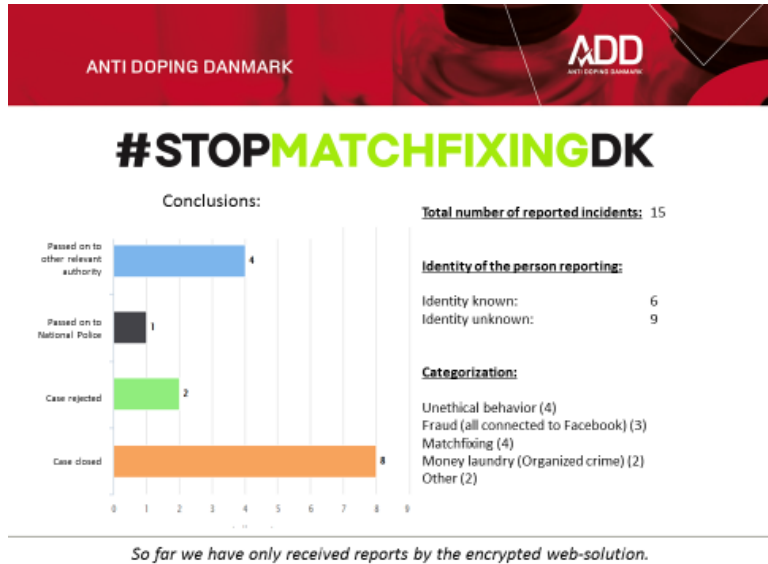


Central national "clearing house" for matchfixing-related data



Idrættens Hus
Brøndby Stadion 20
2605 Brøndby
Tel. +45 4320 2560
Fax +45 4320 2546
kontakt@addoping.dk
www.addoping.dk

Efterretningsrapport			
Indberettet af:	Martin Rosgaard	Kontakt:	mro@addoping.dk
Dato: 03-05-2016			
Evaluering af risiko (Udfyldes af indberetteren)			
Evaluering af risiko:	<input type="checkbox"/> A) Trusling - eller historisk påstået <input type="checkbox"/> B) Økonomisk påstået <input type="checkbox"/> C) Økonomisk påstået	<input type="checkbox"/> D) Økonomisk påstået <input type="checkbox"/> E) Økonomisk påstået	<input type="checkbox"/> F) Økonomisk påstået <input type="checkbox"/> G) Økonomisk påstået
Evaluering af information:	<input type="checkbox"/> 1) Ingen tvivl <input type="checkbox"/> 2) Info kerne af liden <input type="checkbox"/> 3) Usået info	<input type="checkbox"/> 4) Kan ikke bekræftes <input type="checkbox"/> 5) Kan ikke bekræftes	<input type="checkbox"/> 6) Kan ikke bekræftes <input type="checkbox"/> 7) Kan ikke bekræftes
Efterretningen omhandler			
Dejning:	<input type="checkbox"/> Matchfixing <input type="checkbox"/> Andet:	<input type="checkbox"/> Andet:	<input type="checkbox"/> Andet:
Spørgsmål:	<input type="checkbox"/> Fødsel <input type="checkbox"/> Andet:	<input type="checkbox"/> Andet:	<input type="checkbox"/> Andet:
Detaljeret information			
ADD har via partens Retsmæssig af matchger nedenslende henholdsvis:			
Mulig forseg på matchfixing			
Jeg er adm. direktør for Green Entertainment A/S, selskabet bag BK Avants.			
Jeg har nu modtaget et opkald fra Hong Kong. Begge med ulovligt nummer. Første gang var 28. april 2016 kl. 09:28 og her svarede jeg ikke. Anden gang 3. maj 2016 kl. 16:00 og jeg den egen dame begynder at snakke. Hun spørger efter "Steffen Lehn" og "Per Thomsen". Hun blev ved med at forsøge at "attractive business solution" for mig synes det ikke jeg kunne høre hvem hun var. Hun sagde det ikke havde interesse og tog straks på.			
Ved ikke om det var matchfixing - men kombinationen af et opkald fra Hong Kong og hendes tilfældige at jeg ikke var interesseret. Samtidig kan det være et forsøg på at sælge på Avants's placering samt at i næsten ikke har noget at sige for hvorfor et netværk ikke ville betyde det store.			
Avants tager stor afstand fra dette, hvorfor vi anvender dette straks! Jeg står selvfølgelig til rådighed, såfremt jeg kan være behjælpelig med andet.			
DBU/Divisionen må gerne informeres herom.			
Mvh, Steffen Lehn Adm. direktør Green Entertainment A/S BK Avants Telefon: 26224263 mail:lehn@addoping.dk			
Udfyldes af Efterretningsenheden			
Modtaget ved:	Martin Rosgaard	Dato:	03-05-2016
ADD af:		Vurdering godkendt:	<input type="checkbox"/> Ja <input type="checkbox"/> Nej
Retligbeholdning (Hæderings kode):		Kan ikke afleveres:	<input type="checkbox"/> Ja <input type="checkbox"/> Nej
Efterretningen behandles af:	SRD	Idnummer:	ID 2016-24
Tidligere:	Særligt relevante samarbejds partnere:	Delt med:	-

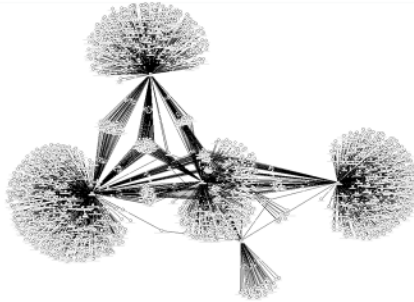


Case: Kim "Goldenboy"

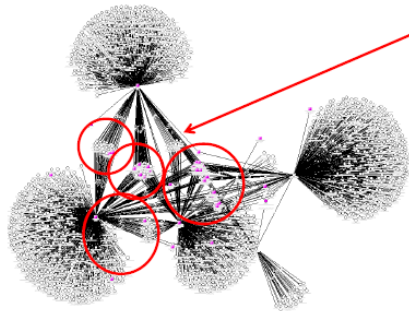
- Information via #stopmatchfixing.dk
- No proof of "real" matchfixing. Based on initial search and sharing of information with GLMS and DBU (Danish FA):
 - Fraud and tax evasion
- Collection of further information (OSINT)
- Create hypothesis - apply relevant analysis (SNA)
- Complete report with all relevant information passed on to SKAT (tax authority)



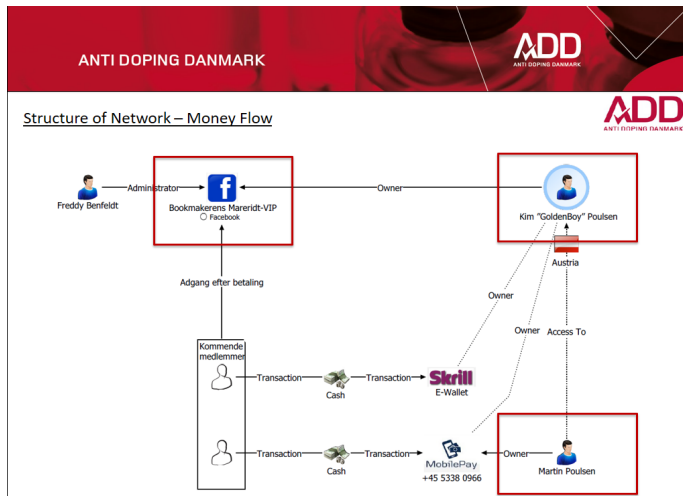
Case: Kim "Goldenboy", Facebook



- Data:**
- 7 profiles on Facebook.
 - 1638 entities in the network
- Goal:**
- Find real identity on the persons behind network - and how money flows.



- Applying different techniques:**
- OSINT
 - SNA
 - Intelligence from various stakeholders
- (In the relevant case: GLMS, State lottery, Danish FA)



Intelligence database (IBase, IBM)

- Enable us to validate, structure and keep data in a secure environment
- Gives us the possibility to import, handle and *and* export large amounts of data
- Let's us delete data according to rules regarding data propection (automatic weeding)

Tools for analytics and visualization (Analyst's Notebook):

- Analyze data in various ways
- Test hypotheses
- Visualize complex relations
- Visualize connections and patterns with in fragmented information
- Share information with the appropriate stakeholders

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Implemented
by the Council of Europe

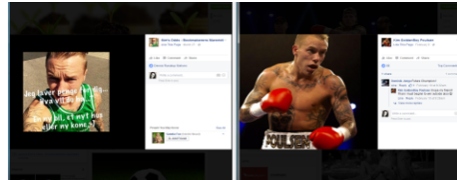
19. april 2016

Valideringsgrundlag for profiler på de sociale medier:

Profiler på de sociale medier valideres i forhold til ejerskab ud fra profilens tilgængelige kontakter, herunder fokuspersonens allerede kendte omgangskreds, ud fra kendte familiære forhold, arbejdsplads, idrætsgren mv. I det omfang det er muligt ligeledes oplysninger fra eksterne samarbejdspartnere.

Valideringsgrund for informationer udfundet på internettet:

Efterretninger indhentet via åbne kilder, søges valideret ved at sammenholde indhentet informationer med allerede kendt viden. Eksempelvis om idrætsgren og klubmæssige forhold, samt i det omfang det er muligt, oplysninger fra kilder, indberetninger, tidligere sager, samt eksterne samarbejdspartnere.



Afdækket tidligere hjemmeside ved hjælp af internet archive:

Hjemmesiden er ikke aktiv, men underbygger antagelsen om at Kim Poulsens lever af at sælge viden om spil og odds.

Telefonnummer fra:

The Wayback Machine, Internet Archive er et non-profit onlinebibliotek, der har en mission om at give "universel adgang til al viden". Biblioteket opbevarer permanent digitaliseret materiale, hvor den mest kendte indgang er [Wayback Machine](http://www.archive.org), der giver adgang til historiske udgaver af websteder.
<http://web.archive.org/web/20160211070341/http://eagenprofilkuser.com/index.php?2=ukategoriseret/2=dagens-kampe>

• Side 2

#STOPMATCHFIXINGDK Home FAQ Privacy policy Log in to mail box

Stop Matchfixing

Help us fight matchfixing and similar unethical conduct in Danish sport. Every violation report is important and helps us prevent and investigate irregularities and possible violations. With your help, we can ensure the integrity and reliability of Danish sport.

The whistleblower system must not be used to make false accusations against others, and altogether, deliberately untrue information may not be reported.

You have the opportunity to be anonymous but we encourage you to provide your name in the report. Regardless of whether you do so or not, please open an anonymous and secure mail box. This makes it safer and easier for us to communicate.

Submit your information in our encrypted webform here: [Indberetningsformular](#)

If you wish to report by telephone, please call **(+45) 70 70 70 94**

The number is an IP voicemail which gives you the opportunity to remain anonymous. We cannot trace your telephone number.

[Go to reporting](#)



Annex VI: French National Platform in action: case study presentation

“Keep Crime Out Of Sport”

Regional Seminar 5

Athens

Wednesday 9 November 2016

Exchange of experience case studies

The French national platform during
Euro 2016 and Rio 2016

corentin.segalen@arjel.fr
+33 6 30 20 04 89

Contents:

How the French national platform works?

Level of alerts

UEFA Euro 2016 alerts

Rio 2016 Olympics Games alerts

How can we improve the work of the National platform?

Organization of the French national platform

General meeting under the presidency of the Minister of Sports (at least once a year)

Coordination Board

- Ministry of Sports
- CNOSF (in charge of integrity delegates)
- ARJEL
- Française des Jeux
- Anti-corruption Agency
- Police
- Justice
- Tracfin

Operational and Monitoring Board

- ARJEL
- Police
- Sports events organizers and/or CNOSF
- Ministry of Sports
- Française des Jeux
- Also invited to the board:
- Athletes representatives
- Anti-corruption agency



Adaptive risk analysis

Operational Board



12/11/2016

12/11/2016

- Cost of manipulation**
How much for fixing this match?
- Athletes salaries.
 - Financial health of the clubs.
 - Monitoring by police, regulatory and sports authorities, as well as press.
 - Penalties for match fixing.

- Expected benefits**
How much profit can I make?
- Number of bets taken on the competition for not being traced.

- Other factors**
- Game with little at stake.
 - Players addiction to gambling.
 - Strong ties between teams or players of different teams.
 - Connections between players with organized crime.
 - Big difference of level between opponents.

5

ARJEL developed an adaptive risk analysis mechanism to target the high-risk matches with greater efficiency.

A yellow alert is launched in case when an anomaly in odds or bets, or rumor concerning match fixing are detected. The yellow alert suggests that more investigation is needed, and enables bilateral communication. If the anomaly cannot be explained, an orange alert is activated and forwarded to the National platform. Other national platforms or international partners (such as ESSA) can be alerted when needed. A red alert indicates that we are certain a manipulation has occurred or is happening. Communications with the other stakeholders focus on collecting evidence for a prosecution.

Several tabletop exercises were undertaken in order to refine our organization. Bets and odds were analyzed twice a day. Every morning, all the participants of the national platform, and representatives from the UEFA, Sportradar and Europol, exchanged data and information through a conference call. Confidential notes and files were shared on a daily basis. The UEFA set up a secured system for data exchange in order to ensure the system's efficiency.

Level of alerts



Euro 2016



12/11/2016

7



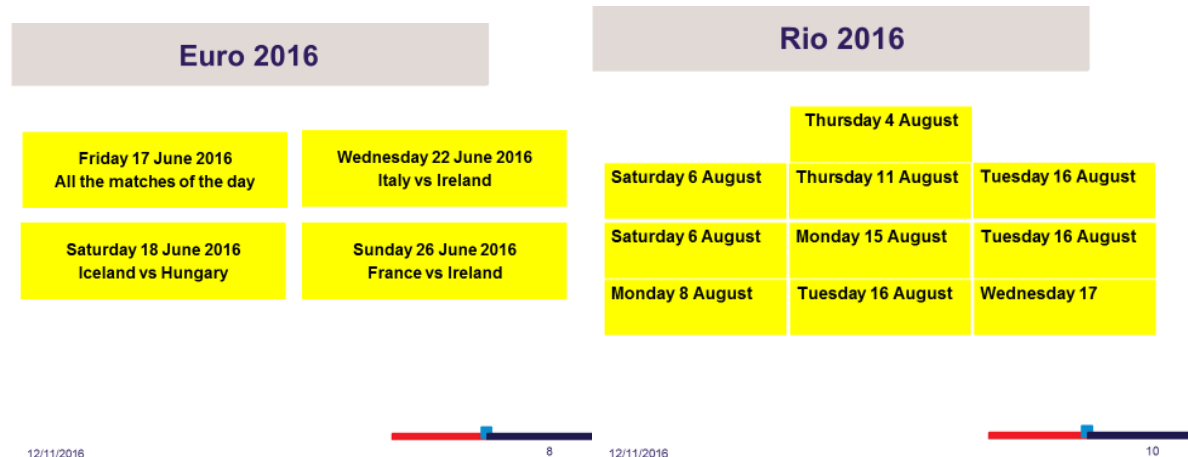
Video example: Algeria – Hungary during the Olympic Games (3-2)

1- The first concerned the matches of Friday, 17 June 2016 (Italy, Sweden, Czech Republic, Croatia, Spain, Turkey) in which atypical odds were detected before the start of the matches: the favourites had gained between 0.2 and 0.3 points in the odds since the previous evening 8:30 p.m. until 12 midday the day of the match. All of these increases were postponed on lower odds on draws, which would make three drawn matches at these encounters suspect. The results of these matches were reassuring since none of these meetings did end in a draw.

2- An operator de-listed the match at 7:41 p.m., 7 minutes before the end of the match, and 3 minutes before the Hungarian goal (at the 88th). It was a rare atypical act from this operator, which generally matches odds for as long as possible. However, investigations conducted internally revealed that it was a technical error of the set-up.

As head of the Operational board, ARJEL was the contact point between the IOC and the French National platform against match fixing.

10 Alerts were recorded during the Olympic Games.





Annex VII: Working session: Information exchange, addressing national problems, Improving the situation (focus on legislation and betting)

Keep Crime out of Sport (KCOOS)
5th Regional Seminar, Athens, Greece
8-9 November 2016

Vagelis Alexandrakis
EL Sport Executive Secretary
European Lotteries

Macolin Convention: Regulation, Criminal Law & Sharing of Information
Interactive Workshop

Content

- Sports Betting & Regulation
- Macolin Convention & Criminal Law
- Macolin Convention & Sharing of Information
- Key Questions
- Case scenarios

Your active participation is a must!

Sports Betting and Regulatory Issues

Sports Betting Regulation

3 models of regulation
Every country can adopt the regulatory system it best suits its objectives and its culture

Prohibition	Monopoly Exclusive right	Licences Limited number or not
Example: <ul style="list-style-type: none"> India Qatar USA (apart from Nevada/ Delaware) Venezuela 	Example: <ul style="list-style-type: none"> Canada China Sweden Switzerland 	Example: <ul style="list-style-type: none"> Australia Italy Mexico

Sports betting restrictions to limit risks

Certain countries have decided to have certain regulatory restrictions on sports betting

Japan: No fixed odds	Australia: No Live betting	Canada, Korea, Switzerland: No single bets
Hong-Kong: No bets on local matches	France: Pay out limited to 85%	Germany, Finland: Daily/Monthly stake limits

Illegal Sports Betting

Definition:
"Illegal sports betting" means all sports betting activity whose type or operator is not allowed under the applicable law of the jurisdiction where the consumer is located (article 3 par 5a)

Measures against illegal betting - article 11

- IP blocking
- ban on advertising
- payments blocking

Licensed does not mean legal everywhere!!!

- Licensed betting operator - only operating with a licence in the jurisdiction of the consumer - **100% legal**
- Licensed operator in a certain jurisdiction, but operating in other jurisdictions without a licence - **Not 100% legal (illegal in the jurisdictions that there is no licence)**
- Unlicensed operators: **100% illegal** (e.g. websites registered in Costa Rica, but not for betting)
- Not registered betting (e.g. street betting in China): **100 % illegal**

Regulatory matters & Macolin Convention:

Article 9 - Measures regarding the **betting regulatory authority** or other responsible authority

Each Party shall identify one or more responsible authorities, which in the Party's legal order are entrusted with the implementation of sports betting regulation and with the application of relevant measures to combat the manipulation of sports competitions in relation to sports betting, including, where appropriate:

- the exchange of information, in a timely manner, with other relevant authorities or a national platform for illegal, irregular or suspicious sports betting
- the **limitation of the supply of sports betting, following consultation with the national sports organisations and sports betting operators, particularly excluding sports competitions:**
 - which are designed for those under the age of 18; or
 - where the organisational conditions and/or stakes in sporting terms are inadequate;
- c the advance provision of information about the types and the objects of sports betting products to competition organisers in support to their efforts to identify and manage risks of sports manipulation within their competition;

Conflict of interests

Article 10 - Sports betting operators

1 Each Party shall adopt such **legislative or other measures as may be necessary to prevent conflicts of interest** and misuse of inside information by natural or legal persons involved in providing sports betting products, in particular through restrictions on:

a natural or legal persons involved in providing sports betting products betting on their own products;

b the abuse of a position as sponsor or part-owner of a sports organisation to facilitate the manipulation of a sports competition or to misuse inside information;

c competition stakeholders being involved in compiling betting odds for the competition in which they are involved;

Conflict of interests

Article 10 – Sports betting operators

1 Each Party shall adopt such **legislative or other measures as may be necessary to prevent conflicts of interest** and misuse of inside information by natural or legal persons involved in providing sports betting products, in particular through restrictions on:

a natural or legal persons involved in providing sports betting products betting on their own products;

b the abuse of a position as sponsor or part-owner of a sports organisation to facilitate the manipulation of a sports competition or to misuse inside information;

c competition stakeholders being involved in compiling betting odds for the competition in which they are involved;

Macolin Convention and Criminal Provisions

Criminal Sanctions

Article 15 – Criminal offences relating to the manipulation of sports competitions
Each Party shall ensure that its domestic laws enable to criminally sanction manipulation of sports competitions when it involves either coercive, corrupt or fraudulent practices, as defined by its domestic law.

-Certain countries have developed a specific criminal offence / Others are based on traditional criminal offences (fraud , corruption, etc)

Questions

-Do you have a specific criminal offence for match-fixing in your country?

-If yes, do you think this has helped the criminal proceedings of relevant incidents?

-If no, what is the most relevant provision that could catch under its scope match-fixing incidents?

-Is there some protection for whistle-blowers under your criminal legislation?



Macolin Convention and sharing of information



Article 12 – Exchange of information between competent public authorities, sports organisations and sports betting operators

- public authorities
- sports organisations
- competition organisers
- sports betting operators
- national platforms

Re: Articles 12 and 13

Question 1:

What kind of information does one need and can one share?

Replies by

- Law Enforcement
- Betting Operators
- Sport
- Public Authorities
- Law



Question 2:

Law enforcement: Investigations & Sharing of Information

- Describe the challenges in terms of the sharing of information so far
- Describe an example that you received vital information from one of the stakeholders that facilitated your investigations
- In case you receive a report from a betting operator on suspicious betting, how you follow-up - what information you would need from other stakeholders
- What is the role of sport organisations in the investigations



Question 2 (follow-up) Law Enforcement

- On which basis are you starting an investigation?
- On which basis a case can reach the Court?
- Are cases regarding match-fixing similar to other investigations or are there differences?
- If not, what are the main differences?



Question 3: Sport Organisations

- How you ensure that your players share information, report suspicious approaches, etc?
- In case you receive some suspicious information from your players, who would you inform?
- In case you find out from a betting operator that a match might have been manipulated, how would you follow-up?



Question 4 Public Authorities

- In case you receive information from law enforcement, the betting operator or a sport organisation, how would you follow-up?

Question 5 - Betting Operators

- Briefly describe your risk management process - how you can reach the conclusion that a match might have been manipulated?
- What is the role of Monitoring Systems, like the GLMS?
- What feedback would you expect to get from sport organisations / law enforcement when you make an alert?



Case Studies:

Case Study 1

Group to be split into Sub-Groups
-betting operators
-public authorities
-sport organisations
-law enforcement

A journalist has called your organisation, informing that a Member of the Public has informed him that a certain match has been fixed.

How would you treat such a notification?



Case Study 2:

Group split into Groups per country

In your national platform, you need to deal with the following incidents. What would be your immediate actions and how would you coordinate them?

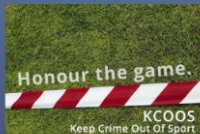
- You receive information that the entourage of a certain tennis player has deposited bets in different outlets
- The betting operator informs that an unexpectedly big amount of stakes has been punted in a 2nd league match



Case study 3:

In your national platform you have an annual budget of 1 m EUR.

What would your priorities be under this budget in order to meet the objectives of the Platform?



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by the Council of Europe

Annex VIII: Final Agenda

Strasbourg, 8 November 2016

KCOOS (2016) 13

“Keep Crime Out Of Sport”

Regional Seminar 5

Dates and working hours

Tuesday 8 November 2016	14:00 – 17:30
Wednesday 9 November 2016	09:00 – 17:00

Athens, Greece

(Hotel Stratos Vassilikos

Address: 114, Michalakopoulou Str., Ampelokipoi, 11527, Athens, Greece)

FINAL PROGRAMME





TUESDAY 8 NOVEMBER 2016

- 13:30 – 14:00 Arrival and Registration of Participants
- 14:00 – 15:00 OPENING AND INTRODUCTION
- Welcome
George Vassiliadis – Greek Minister for Sport
 - Introduction, Objective-setting and adoption of agenda Presentation of state of play (following questionnaire replies) , mapping, summary of Regional Seminars 1-4
Cassandra Fernandes, KCOOS Senior Project Officer, Council of Europe
- 15:00 – 15:30 Roundtable – part 1
Short presentations from Participant countries: 10 minutes each. Participants will discuss the current status of fighting match-fixing nationally, within the competencies of each of the stakeholders; as well as why they haven't yet ratified the convention (if applicable). Some statistics on match-fixing cases will be useful.
- 15:30 -15:45 COFFEE BREAK
- 15:45 – 16:30 Roundtable – part 2
Short presentations from participant countries: 10 minutes each. Participants will discuss the current status of fighting match-fixing nationally, within the competencies of each of the stakeholders; as well as why they haven't yet ratified the convention (if applicable). Some statistics on match-fixing cases will be useful.
- 16:30 – 16:50 Presentation of the Italian EU joint project
- 16:50 – 17:50 Session 1: Plenary – Information Exchange between Law enforcement and sport federations
Tina Xuejiao HU - Interpol
- 19:30 ORGANISED EVENING PROGRAMME – Hotel restaurant



WEDNESDAY 9 NOVEMBER 2016

- 8:30 Arrival at conference rooms
- 9:00 – 10:30 Session 2 – National Platforms
- a) Introduction by Council of Europe Secretariat;
 - b) Exchange of experience case studies: France (National Platform in action at Euro 2016) and Denmark's National Platform;
- 10:30 – 10:45 Coffee break
- 10:45 – 12:00 Session 2 - Working Group Session on setting up National Platforms
- Session Introduction by Council of Europe Secretariat and working groups based on a short number of questions.
- 12:15 – 13:15 LUNCH BREAK
- 13:30 – 14:30 Session 3 – Information exchange, addressing national problems, Improving the situation (focus on legislation and betting)
- Evangelos Alexandrakis – European Lotteries
- 14:30 – 15:30 Session 4 - Rules, legislation and evidence
- Alex Inglot - Sportradar
- 15:40 – 16:00 Coffee break
- 16:00 – 17:00 Session 5 – Plenary: What next?
- d) Working methods, best practices, new tendencies etc.
 - e) Next steps
 - f) Creating a 'handbook tool'

PRACTICAL INFORMATION

Participating countries:

Cyprus

France

Greece

Italy

Montenegro

Annex IX: FINAL LIST OF PARTICIPANTS

CYPRUS

1. Mr Costas SOLOMOU (Cyprus Sport Organisation)
2. Mr Konstantinos XANTHOU (Cyprus Police Force)
3. Ms Ioanna FIAKKOU (National Betting Authority)
4. Mr Andreas ANDREOU (National Betting Authority)
5. Mr Stavros STAVROU (Cyprus Football Association)

ESTONIA

6. Mr Margus KLAAN (Ministry of Culture)

FRANCE

7. Ms Claire PINSON (ARJEL – French Online Gaming Regulatory Authority)
8. Mr Corentin SEGALEN (ARJEL – French Online Gaming Regulatory Authority)

GREECE

9. Mr George VASSILIADIS (Ministry of Culture and Sport / General Secretariat of Sport)
10. Mr Julius SYNADINOS (Ministry of Culture and Sport / General Secretariat of Sport)
11. Mr Dionysis KARAKASIS (Ministry of Culture and Sport / General Secretariat of Sport)
12. Ms Theodora ALEXANDROPOULOU (Ministry of Culture and Sport / General Secretariat of Sport)
13. Mr Thanassis TYROGIANNIS (Ministry of Culture and Sport / General Secretariat of Sport)
14. Ms Maria KALAMARI (National Council of Antidoping)
15. Ms Magda SKOUNTZOU (National Council of Antidoping)
16. Mr Alexandros ADAMIDIS (National Council of Antidoping)
17. Ms Melina GIANNAKOPOULOU (Professional Sports Committee)
18. Mr Nikolaos DAMASKOPOULOS (Standing Committee for Combating Violence)
19. Ms Zisis BELLOS (Standing Committee for Combating Violence)
20. Ms Evdoxia KAPSALAKI (Hellenic Gaming Commission)
21. Ms Lida TSAGKARAKI (Hellenic Gaming Commission)
22. Mr Panagiotis EFSTATHOPOULOS (Hellenic Police)
23. Mr Vassilios DIAKALIS (Hellenic Police)
24. Mr Stratos KARETOS (Hellenic Olympic Committee)
25. Mr Ioannis LAZANAS (Hellenic Union of Professional Football Players)
26. Mr Emmanouil ALAFRAGKIS (Hellenic Union of Professional Football Players)
27. Mr Spyros CHIMARRAS (Organization of Football Games Forecasting, OPAP)
28. Ms Konstantina KOUVELOU (Organization of Football Games Forecasting, OPAP)
29. Mr George KOUMANTAKIS (Organization of Football Games Forecasting, OPAP)
30. Ms Katerina TZIKA (Hellenic Fair Play Code, Aristotle University of Thessaloniki Research Programme "Fix the Fixing")



ITALY

31. Mr Paolo BERTACCINI (Territoria Consulting)
32. Mr Claudio MARINELLI (Interpol Italy - Ministry of Interior)
33. Ms Flaminia IELO (CONI - Italian National Olympic Committee)
34. Mr Costanzo MATTIA (Italian Gambling Regulator)

MONTENEGRO

35. Mr Željko **DEVIĆ** (Ministry of Interior)
36. Mr Marko BEGOVIC (Directorate for Youth and Sports)
37. Ms Milena **SAVOVIĆ** BAPTISTA (Game of Chance Administration)

SLOVAK REPUBLIC

38. Mr Jakub **ČAVOJ** (Slovak Football Association)

SPEAKERS AND MODERATORS

39. Mr Evangelos ALEXANDRAKIS (The European Lotteries)
40. Mr Martin ROSTGAARD (Anti Doping Danmark)
41. Ms Tina Xuejiao HU (Interpol)
42. Mr Alex INGLOT (Sportradar UK Ltd)

KCOOS SECRETARIAT

43. Miss Cassandra Matilde FERNANDES (Council of Europe Sport Division)