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On 16 July 2014 the Presidency submitted a proposal to the Law Enforcement Working Party in relation to the identification of best practices in the fight against illegal gambling and betting as well as related crimes (11468/14). This issue nowadays concerns all Member States and is particularly relevant to EU citizens' security and safety due to its economic, social and health-related effects.

In view of the danger that criminal organisations may pose if they control even a small part of the tens of billions of euros in this sector, and based on the Member States' feedback to the questionnaire set out in doc. 11468/14 of 10 July 2014¹, the Presidency prepared certain guidelines intended to support law enforcement authorities in finding appropriate responses to combat and curb the threat posed by illegal gambling and betting as well as illegal practices which may be related to gambling and betting activities, as well as by the linked criminal infiltration, which were submitted to the LEWP on 12 September 2014, on 16 October 2014 and on 6 November 2014.

¹ By 10 October 2014, 15 Member States had sent their replies to the questionnaire (BE, DK, DE, EE, EL, FR, CY, LV, LT, HU, MT, NL, PL, SI, FI).

Following discussions at the LEWP and based on the observations subsequently expressed by some delegations, the initial document was reviewed. The revised document also takes into account the international and EU legal bases related to police cooperation and effective information exchange as well as the relevant documents on gambling, organised crime and money laundering. The revised parts of the text are underlined.

The Presidency would like to stress once again that this initiative is not focused on gambling regulations, including internal market issues, but only on the law enforcement aspects of gambling.

In order to dispel all doubts about the focus of this initiative, the Chair of the LEWP informed the Online Gambling Expert Group² about the proposed guidelines during its 8th meeting held in Brussels on 7 October 2014. On this occasion, the Chair of this expert group considered that the proposed guidelines submitted to the LEWP are complementary and not overlapping with the initiatives of the Online Gambling Expert Group.

The suggestions set out in the Annex are intended as non-binding guidelines for Member States and could be considered by the Member States in compliance with their national legislation and institutional set up in this field. For this reason, the term "*guidelines*" is proposed since it corresponds better to the orientation character of this document.

The guidelines were submitted for agreement by the LEWP by written procedure which ended on 28 November 2014. One minor modification on page 4 (underlined) was proposed within the given deadline.

The LEWP is now deemed to have agreed to the proposed guidelines set out in the Annex.

² Set up at the European Commission (DG Market).

Guidelines intended to support law enforcement authorities in preventing and combating illegal gambling and betting and related crimes

Introduction

Illegal gambling and betting have now become a large-scale problem across all European countries: between 2008 and 2011 offline gambling increased by almost 8.3%³.

Even higher is the yearly growth rate of online gambling, which at about 15%⁴ is the highest percentage increase in the gambling industry and represents about 6.8 million consumers/users. The main reason is the presence of thousands of often non-regulated internet sites which offer various types of gambling and can be used by organised crime groups to launder and reemploy the illicit proceeds from other criminal activities.

In order to better understand the aims of this document it is useful to recall the existing definitions of gambling provided in various documents at EU level.

The Commission proposal for a Directive of the European Parliament and of the Council on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing (the 4th Anti Money Laundering Directive⁵) states that: "*gambling services*" means any service which involves wagering a stake with monetary value in games of chance including those with an element of skill such as lotteries, casino games, poker games and betting transactions that are provided at a physical location, or by any means at a distance, by electronic means or any other technology for facilitating communication, and at the individual request of a recipient of services".

³ See Communication of the Commission of 23.10.2012 – COM(2012) 596 final "Towards a comprehensive framework for online gambling".

⁴ See the European Commission's Green Book on online gambling – SEC(2011) 321 final.

⁵ See doc. 10970/14.

A definition of gambling activities can also be found in the Directive on Electronic Commerce⁶, in the Service Directive⁷ and in the Consumer Rights Directive⁸.

On the contrary, at this stage there is not a shared definition of illegal gambling at EU level; therefore, only the domestic legislation of each Member State can establish whether gambling and betting are illegal or not in its jurisdiction, subject however to the requirements of the Treaty including the internal market freedom as appropriate in the field of gambling.

Indeed, the fight against illegal gambling and betting is not only under the responsibility of law enforcement authorities, but also of other independent and administrative bodies; this leads to a different approach of each Member State in this sector.

There can also be cases when authorised operators in a Member State are infiltrated in the business management by organised crime; therefore, the final goal of their activity will not be the legitimate achievement of financial profits in a legal and competitive market, but that of laundering illicit proceeds, obtaining illegal profits (for example, lending money on usury rates), or altering game rules, thus defrauding players and the State and eluding controls by the competent authorities.

In any case, considering the difficulties to establish a general definition of illegal gambling and betting applicable in all Member States, **these guidelines intend to provide Member States' law enforcement authorities with suggestions to counter activities that, according to their national legislation, are referred to as illegal gambling and betting and related crimes.**

⁶ Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market ('Directive on electronic commerce')

⁷ Directive 2006/123/EC of 12 December 2006 on services in the internal market.

⁸ Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights.

Indeed, investigative experience⁹ has highlighted that online and land based gambling¹⁰ is strongly exposed to the risk of money laundering, to the danger of computer and sports fraud, and also to other crimes linked to the granting of state licenses and authorisations for public or regulated gambling (e.g. corruption and crimes against public administration and justice).

Money laundering is also detected in online games within the legal circuit. Though often legal gambling operators are not involved, law enforcement authorities are not exempted from investigating into these cases. It is to be recalled that presently and in terms of the current Anti-money laundering Directive only casinos are subject to the obligations under this Directive, and as a result, both online and offline gambling are excluded at the moment. A revision of the proposed Directive is currently under discussion in order to extend its scope.

A number of online games taking the form of direct competition between two or more players (such as online poker) may lead to illicit behaviour such as illegal agreements between the participants to influence, condition and/or manipulate the event to obtain an unfair profit and/or transfer huge sums of money. This behaviour is facilitated by the widespread use of online communication tools (such as mobile phones and the internet) enabling one or more of the participants to communicate while playing, in order to exchange important information to help players and affect the outcome of the event.

Therefore, it is clear that money laundering could be taking place if the aim of players who conclude an illegal agreement is to transfer money from one person to another in the form of manipulated winnings which are then declared on asset/income assessments.

⁹ Including Italian experience, primarily the investigations carried out by the *Guardia di Finanza*.

¹⁰ In particular, if inappropriately regulated;

Relevant examples can include the following:

- chip dumping, i.e. when a player passes game chips to another player, usually by making a considerably higher bid and then folding, to give the other player the chance to win without risk;
- chargeback (which is possible for all credit-card transactions), i.e. refusing to acknowledge the relevant gambling operation and asking for the money to be returned (generally, the justification for refusing to acknowledge a gambling operation is that the credit card has been stolen or cloned).

Sometimes it may happen that an authorised operator does not report the operation as suspicious either because the operator erroneously considers it a normal operation or because the operator is infiltrated by organised crime and has no interest in revealing the illicit behaviour. At worst, any reporting of an operation as suspicious is unconceivable when gaming operators are not authorised.

At international level, the vulnerabilities of money-laundering prevention in gaming were highlighted in a 2009 report by the Financial Action Task Force (FATF)¹¹ and in a 2013 MONEYVAL Research Report on “The Use of online gambling for money laundering and terrorist financing purposes”¹².

These illicit activities are usually perpetrated by organised criminal groups operating at transnational level in consideration of the huge profits involved.

Therefore guidelines in this particular area of strategic-operational interest may be useful to law enforcement authorities in strengthening their cooperation and countering the illegal provision of gambling and betting.

¹¹ FATF is an inter-governmental body established in 1989 by the Ministers of its Member jurisdictions. The report is available on the FATF website and can be consulted at the following address: <http://www.fatf-gafi.org/media/fatf/documents/reports/Vulnerabilities%20of%20Casinos%20and%20Gaming%20Sector.pdf>

¹² Ref. MONEYVAL(2013)9, dated 11 April 2013, adopted by the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) at its 41st plenary meeting (8-12 April 2013) - Council of Europe.

The list of guidelines intended to support law enforcement authorities in preventing and combating illegal gambling and betting set out below is the first attempt at European level to improve international law enforcement cooperation in this field and enhance information exchange in both prevention and suppression activities.

These guidelines which are not binding also aim to increase familiarity with the operational tools and best practices used by Member States, in order to identify techniques for preventing and countering illegal gambling and betting as well as illegal practices which may be related to gambling and betting activities.

It is necessary to stress that these guidelines do not relate to the different Member States' domestic law and internal procedures (that are autonomously decided upon) concerning:

- regulation and monitoring of the granting of authorisations;
- identification of the private subjects eligible to provide gambling and betting services;
- establishment of precise requirements for public or private service providers (or for the services carried out on behalf of the state authorities).

The guidelines set out below do not affect the regulatory aspects of gambling, which fall under the competence of Member States' authorities, and they are not binding.

These guidelines are a sort of tool box offered for the first time to Member States' law enforcement authorities with a view to strengthening their capacity to counter the illegal aspects of the phenomenon.

All the suggested measures listed below will have to be tailored to the respective domestic legislation, but they could be necessary to foster law enforcement cooperation in this field and comply with the international provisions and EU *acquis* relating to the protection of EU citizens. The list of international and EU legal instruments and other documents relevant in the field of combatting illegal gambling and betting by the law enforcement authorities is set out in the Annex to this document.

Proposed *guidelines*:

• **Proposal to create a list of contact points of Member States' law enforcement authorities**

In order to strengthen police cooperation in preventing and countering illegal aspects of gambling and betting and related crimes¹³, a list of national contact points of Member States' police services and the other law enforcement authorities¹⁴ could be set up at EU level.

The proposed contact points would not be expected to exchange information on gambling regulations and/or administrative rules.

Instead, they would facilitate and accelerate:

- information exchange during police investigations, also with Europol's support;
- sharing of criminal intelligence and information available to the law enforcement agencies;
- exchange operational experiences, investigation techniques, and the most effective investigative tools to combat illegal aspects of gambling and betting.

The aforesaid activities would also relate to infiltration of organised crime into legal gambling and betting operators.

Subject to relevant national legislation, these contact points could also work in close cooperation with the governance authorities on gambling and betting and with all other relevant services responsible, under national law, for preventing and combating the aforementioned phenomena.

¹³ Such as money-laundering, terrorism financing, fraud, etc.

¹⁴ Assisted by gambling regulators where it is required and/or envisaged.

- **Setting up control methods to cover the entire territory of the Member States, including to act as a deterrent**

As mentioned above, illegal gambling and betting can also mean the authorised gambling circuit which has been infiltrated by criminal organisations with illegal aims. Therefore, it could be useful for law enforcement authorities to develop, at national level and with the possible cooperation of the relevant authorities, action/operational plans for gambling and betting establishments (such as, for example, lotteries, betting centres, bingos, rooms or agencies with slot machines and video-lotteries). They should refer to operators who, though authorised, are suspected of being infiltrated and/or managed by criminal organisations, in accordance with the national legislation.

The checks do not only make it possible to confirm the involvement of criminal organisations in the management of legal/illegal activities (in order to timely start the relevant police investigations), but they also have an important deterrent effect, helping to spread the belief among illegal game operators, players and clients that checks do exist and are continually conducted, and therefore that the risk of being discovered is extremely high.

- **Carrying out police investigations into the infiltration of organised crime groups into legal gambling**

A second type of operational activities would be concerned with typical law enforcement investigations, starting with risk analysis (made on the basis of certain parameters and pre-established indicators such as the location of illegal gambling establishments, possible links with businesses or concerns which are either suspicious or headed by subjects with criminal records, irregular or suspicious transfers of money which are not consistent with the players' wealth) or ongoing intelligence/information-gathering activity so as to allow thorough investigations to be carried out.

One of the crimes linked to gambling is usury. Numerous habitual players, who want to continue to play and have no further money lent by banks or financial companies, are obliged to resort to criminals who offer loans at extremely high rates, thus obtaining additional illicit profits.

- **Introducing the possibility of undercover police operations**

A common instrument to combat the illegal phenomena linked to gambling would be so-called undercover gambling operations, which have already been successfully introduced into legislation and implemented by some countries based on the experience gained in other typical police investigations, such as drug trafficking investigations.

Subject to relevant national legislation¹⁵ police officers could be authorised using *ad hoc* state funds to carry out gambling operations at premises where bets are made or slot machines and video lotteries are located, exclusively for the purpose of acquiring evidence of illegal gambling activities that could be used in a trial against the organisers of illegal gambling activities. For an undercover police operation, advice of the gambling regulatory authority could be required, in compliance with the national legislation.

- **Developing computer tools and systems/software to carry out risk analysis of illegal gambling and to identify possible investigation targets**

Risk analysis is constantly carried out by all law enforcement authorities with the main purpose of identifying specific targets to be monitored. Also with regard to illegal gambling and betting risk analysis combines the typical ability of a law enforcement authority to search for and obtain information within the territory with the ability to match it with the data and information contained in the various data banks available to law enforcement and in so-called open sources (mainly the internet).

IT applications, software and analysis tools could therefore be developed that would collect data on bets made at the slot machines or video lotteries that are connected to the state computer network (and therefore registered) and detect potential illegal behaviour by comparing the data from the equipment located in a specific gambling establishment or owned by a specific game operator with the average bets in the area of reference (province or region).

¹⁵ This is provided for in Italian legislation. However, many legislative systems authorise undercover operations to counter transnational crime (in compliance with Article 20 of the Palermo Convention), a phenomenon which is always ascribable to or associated with gambling.

Such computer systems would identify game equipment which should be checked because they show considerable (upward or downward) variations from the average daily collection of game machines in the territorial area of reference (i.e. the region or province). This could mean, for example, that some operators infiltrated by crime has used computerised tools to fictitiously alter the amounts of bets in order to fraud the State or the players.

Similarly, for authorised online gambling (i.e. requiring a state license and regulated and monitored by the gambling authority), software could be developed which would make it possible to carry out statistical analyses on gambling accounts and detect anomalous situations and movements (top-ups, withdrawals and stakes) which are atypical and disproportionate in comparison with players' objective and subjective characteristics. This would also allow users' accounts to be selected for in-depth analysis. All these activities should be set out according to the *EU acquis* on the protection of personal data processing¹⁶.

Finally, computer programmes could be developed and improved to continually search the internet for gambling/betting sites and identify illegal/unregulated domains or sites. Such sites, which do not hold any kind of authorisation and are often unknown to the authorities, collect bets and offer games via the internet. In so doing, they deprive Member States of huge financial resources, potentially harm players/consumers by offering unsafe games, and facilitate possible infiltration by transnational organised crime groups.

The risk analysis activities as described above, to be understood as mere examples, could be implemented at national level by each law enforcement authority to prevent and detect cases of illegal gambling and betting, as well as of illegal practices which may be related to gambling and betting activities.

¹⁶ Framework Decision 2008/977/JHA.

- **Intensifying activities aimed at tracing, seizing and confiscating the illicit proceeds from gambling activities**

A further effective tool against the spread of illegal gambling and betting is the timely tracing (and subsequent seizure) of the proceeds from illegal activities, as well as of the equipment/tools that after final confiscation could be used by law enforcement authorities for institutional purposes. This can also be done by regularly making use of the network of AROs (Asset Recovery Offices) which have been set up in all Member States to conduct investigations into illegal proceeds and activities.

When law enforcement agencies identify an illegal operator on their territory or an operator infiltrated by organised crime, it should be possible to seize all the equipment used, along with the related illicit proceeds.

In this connection, the EU regulations and a number of international agreements (mentioned in the Annex hereto) signed by many European countries underline the need to use such tools in case of transnational crimes and clarify both the procedures and the relevant cases.

- **Detection of irregular behaviour and/or anomalous operations in the gambling sector**

Experience of some Member States reveals that there could be a close connection between gambling and betting and other types of crime. It is also possible to detect the recurrence of reiterated and/or widespread irregular and/or anomalous behaviours by perpetrators with regard to crimes related to gambling and betting such as money laundering, usury, corruption, fraud, extortion etc.

In light of the above, it could be useful to draw up a list of the types of anomalous gambling and betting behaviours which may indicate illegal practices and/or criminal infiltration in this area. When such behaviours - that are not included in the Proposal for the 4th Anti Money Laundering Directive - are detected, law enforcement authorities can start carrying out various targeted and detailed checks to confirm a possible irregular situation.

**The list of international and EU legal instruments and other documents
relevant in the field of combatting illegal gambling and betting
by the law enforcement authorities**

The 2000 Palermo Convention

The international common instrument of reference defining the general principles for the fight against this phenomenon is the 2000 Palermo Convention against transnational organised crime (*The United Nations Convention against Transnational Organized Crime, adopted by General Assembly resolution 55/25 of 15 November 2000*).

The Palermo Convention is an important step forward in the fight against organised crime and shows that the signatory states formally recognise the seriousness of transnational organised crime, as well as the need to promote and strengthen international police cooperation in this field. Thus the states that ratified the Convention committed themselves to undertaking a number of measures against transnational organised crime, including the implementation of provisions on various crimes, such as participation in an organised criminal group, money laundering, corruption, and obstruction of justice¹⁷.

It is worth reiterating that the Palermo Convention, which has so far been ratified by 147 countries, binds the contracting parties to:

- **ensure** that all administrative, regulatory, law enforcement and other authorities dedicated to combating money laundering (including, where appropriate under domestic law, judicial authorities) have the ability to cooperate and exchange information at the national and international levels within the conditions prescribed by their domestic law (Article 7 – Measures to combat money laundering);

¹⁷ The Palermo Convention also provides for new measures on extradition, judicial assistance and cooperation, as well as on training and professional refresher courses in order to improve the skills of the law enforcement authority staff in the various countries.

- **endeavour to develop and promote** global, regional, sub-regional and bilateral cooperation among judicial, law enforcement and financial regulatory authorities in order to combat money laundering (Article 7 – Measures to combat money laundering);
- **adopt** measures to enable the identification, tracing, freezing or seizure of any item, such as proceeds of crime, for the purpose of eventual confiscation (Article 12 - Confiscation and seizure, paragraph 1);
- **cooperate** closely with one another, consistent with their respective domestic legal and administrative systems, to enhance the effectiveness of law enforcement action to combat the offences covered by the Convention (Article 27 - Law enforcement cooperation);
- **exchange** information and coordinate administrative and other measures taken as appropriate for the purpose of early identification of the offences covered by the Convention (Article 27 - Law enforcement cooperation, point (f) of paragraph 1).

Given its broad practical scope and in order to make its content more effective, the Convention envisages that, failing bilateral/multilateral agreements or understandings on direct cooperation between law enforcement authorities, the States Parties may refer to the Convention as the legal basis for cooperation between law enforcement authorities, thus indicating the relevant basic criteria that they should always guarantee in order to combat transnational organised crime, money laundering and other related serious crimes.

Considering the transnational nature of illegal gambling and betting, the degree of danger is generally linked to two concomitant factors: infiltration of the legal economy (through partnerships with local businessmen) and the capacity to do business by means of the huge capital available.

Other relevant documents

The European Council in its conclusions of 26 and 27 June 2014¹⁸ underlined that it is essential to guarantee a genuine area of security for European citizens through operational police cooperation and by preventing and combating serious and organised crime and to reinforce exchanges of information between the authorities of the Member States.

The Commission in its Recommendation of 14 July 2014 on principles for the protection of consumers and players of online gambling services and for the prevention of minors from gambling online (OJ L 214, 19.7.2014, p. 38) envisaged guidelines for online gambling, including the identification and publication of information concerning online gambling operators¹⁹ and the strengthening of identification procedures²⁰ for gambling account holders.

EU legislation related to law enforcement cooperation and effective information exchange:

- ✓ Council Framework Decision 2001/500/JHA of 26 June 2001 on money laundering, the identification, tracing, freezing, seizing and confiscation of instrumentalities and the proceeds of crime²¹;
- ✓ Council Framework Decision 2003/577/JHA of 22 July 2003 on the execution in the European Union of orders freezing property or evidence²²;
- ✓ Council Framework Decision 2003/568/JHA of 22 July 2003 on combating corruption in the private sector²³ and the Report from the Commission to the Council based on Article 9 of the above-mentioned Framework Decision (COM(2007) 328);

¹⁸ EUCO 79/14.

¹⁹ The company details or other information ensuring that the operator is identifiable and can be contacted, including the company name, place of registration and e-mail address. Such information should be displayed clearly on the landing page of the operator's gambling website and be accessible from all pages on the website.

²⁰ By using systems that allow identity to be verified, thus preventing registration with false or non-existent personal details. Where direct electronic verification is not possible or in place, Member States are encouraged to facilitate access to national registers, databases or other national official documents.

²¹ OJ L 182, 5.7.2001.

²² OJ L 196, 2.8.2003.

²³ OJ L 190, 18.7.2002.

- ✓ Council Framework Decision 2005/212/JHA of 24 February 2005 on confiscation of crime-related proceeds, instrumentalities and property²⁴, as well as Council Framework Decision 2006/783/JHA of 6 October 2006 on the application of the principle of mutual recognition to confiscation orders²⁵;
- ✓ Council Framework Decision 2006/960/JHA of 18 December 2006 on simplifying the exchange of information and intelligence between law enforcement authorities of the Member States of the European Union²⁶;
- ✓ Council Framework Decision 2007/845/JHA of 6 December 2007 concerning cooperation between Asset Recovery Offices of the Member States in the field of tracing and identification of proceeds from, or other property related to, crime²⁷;
- ✓ Council Framework Decision 2008/841/JHA of 24 October 2008 on the fight against organised crime²⁸;
- ✓ Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC²⁹;
- ✓ Directive 2014/42/EU of the European Parliament and of the Council of 3 April 2014 on the freezing and confiscation of instrumentalities and proceeds of crime in the European Union³⁰, and the relevant declaration on an analysis to be carried out by the Commission³¹.

Other relevant EU documents related to gambling, organised crime and money laundering:

- ✓ C(2014) 4630/2 – Commission Recommendation of 14 July 2014 on principles for the protection of consumers and players of online gambling services and for the prevention of minors from gambling online³²;

²⁴ OJ L 68, 15.3.2005.

²⁵ OJ L 328, 24.11.2006.

²⁶ OJ L 386, 29.12.2006.

²⁷ OJ L 332, 18.12.2007.

²⁸ OJ L 300, 11.11.2008.

²⁹ OJ L 94, 28.3.2014.

³⁰ OJ L 127, 29.4.2014, p. 39.

³¹ 16861/13 ADD 1 of 28 November 2013.

³² OJ L 214, 19.7.2014.

- ✓ COM(2014) 154 final – Communication of March 2014 from the Commission "An open and secure Europe: making it happen" in which the Commission emphasised the importance of preventing the infiltration of criminal profits into the legal economy;
- ✓ European Council Conclusion of 26-27 June 2014 (EUCO 79/14), which reiterates the need to fight against serious and organised crime by strengthening operational police cooperation and enhancing prevention, with a reinforced coordination role for Europol and Eurojust, through the improvement of cross-border information exchange, including on criminal records, and the further development of a comprehensive approach to cyber security and cybercrime;
- ✓ Note from the Italian delegation aimed at developing a European Union action against the infiltration of organised crime into the legal economy, especially in public procurement of 20 February 2014 (6730/14) containing an analysis of the results of the questionnaire in document CM 5073/13;
- ✓ A collection of good practice examples from Member States in the EU Handbook – Complementary Approaches and Actions to Prevent and Disrupt Organised Crime of 30 May 2011 (10899/11), and its Part II of 12 December 2013 (17600/13);
- ✓ European Parliament Resolution of 10 September 2013 (2012/2322(INI)) on online gambling in the internal market;
- ✓ Final Report of the European Parliament on organised crime, corruption and money laundering: guidelines on actions and initiatives to be taken of 17 September 2013 (2013/2107(INI));
- ✓ SOCTA (EU Serious and Organised Crime Threat Assessment) 2013, in which Europol underlined that, between 2011 and 2013, important investigations into illegal betting and match fixing were conducted in 13 European countries and in many third countries;

- ✓ COM(2012) 596 final – Commission Communication of 23 October 2012: "Towards a comprehensive European framework for online gambling";
 - ✓ SEC(2011) 321 final – European Commission Green Paper on online gambling of 24 March 2011;
 - ✓ Council Conclusions of 10 December 2010 on the framework for gambling and betting in the Member States of the European Union (16884/10).
-