



Protecting the Lottery Ecosystem from Illegal Gambling



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LEVEL I PARTNERS



LEVEL II PARTNER





Illegal lotteries and gambling are **growing threat** to industry, consumers, online infrastructure

Will and tools exist to **combat the threat and safeguard** integrity of the sector

What can be done: expert perspective, European Lottery pilot, how illegal operators promote / engage

€80.6 billion in online revenue in EU generated by illegal operators

€33.6 billion by licensed operators

71% of EU gambling revenue from black market

EU governments lost €20 billion in tax revenue

For every €1 generated by regulated sector, €2.4 generated offshore

European Casino Association 2025

About White Bullet

We identify risky online content and take action

- Multiple risk types
- All ecosystems + ads, globally
- Expertise + evidence

Since 2013, we work with all stakeholders

- Operators, regulators + infrastructure
- Financial, infrastructure, marketing



+ many more

How?

1

ENFORCEMENT

Illegal operators

- Criminal, tax referrals
- ISP site blocking actions
- Domain seizures
- Fake ads

2

DISRUPTION

Supporting infrastructure

- Automated takedowns: *social, search*
- Direct outreach: *adtech, payment processors, domain registrars*

3

EDUCATION

Consumers, policymakers

- PR for awareness
- Data for MoUs + regulation

Familiar Battle?

Copyright protection

Content streaming, sports...

Face same issues

Inequality and challenges



Unfair 'Competition'



Imbalance vs illegal operators

Financial:	NO fees or taxes
Infrastructure:	NO KYC or DD
Marketing:	NO limits, compliance
Duty of care:	NO KYC, support, reporting, safeguards



€€€, rogue support, money laundering, organised crime



Doing business, while fighting the bad guys, with arms tied...

There is Hope!

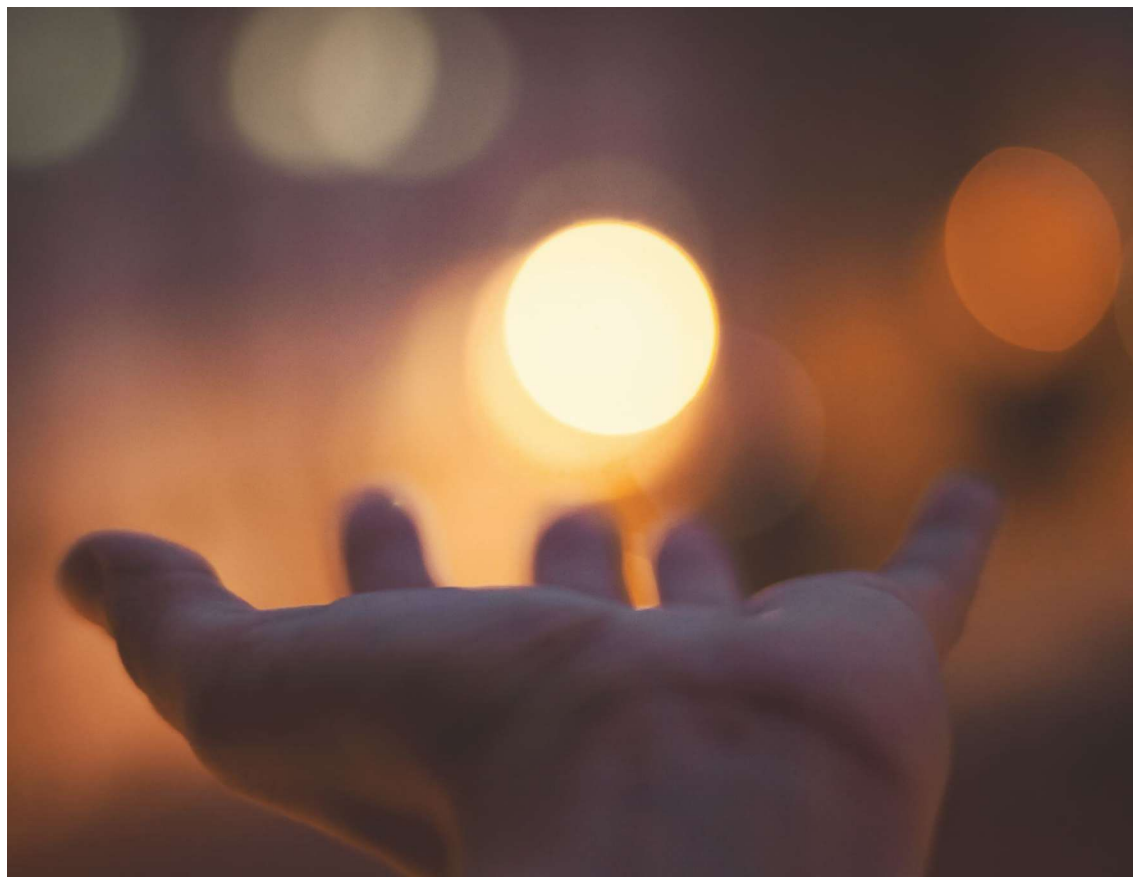
Tested tools, approaches

Centralised infrastructure

Regulated intermediaries

Enhanced tools AI, scale

Laws, DSA, Trusted Flaggers



Challenges

Landscape:

Compliance:

Evidence:

Enforcement:

ROI:

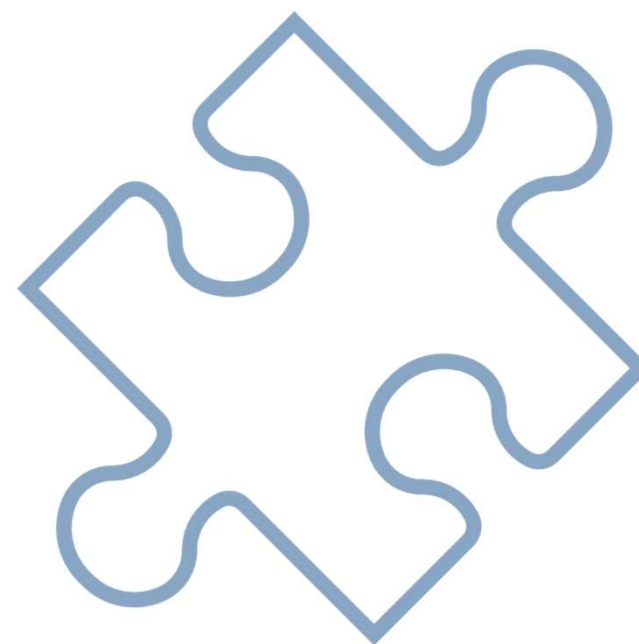
Size of problem?

Definition of illegal?

What to capture?

What is meaningful?

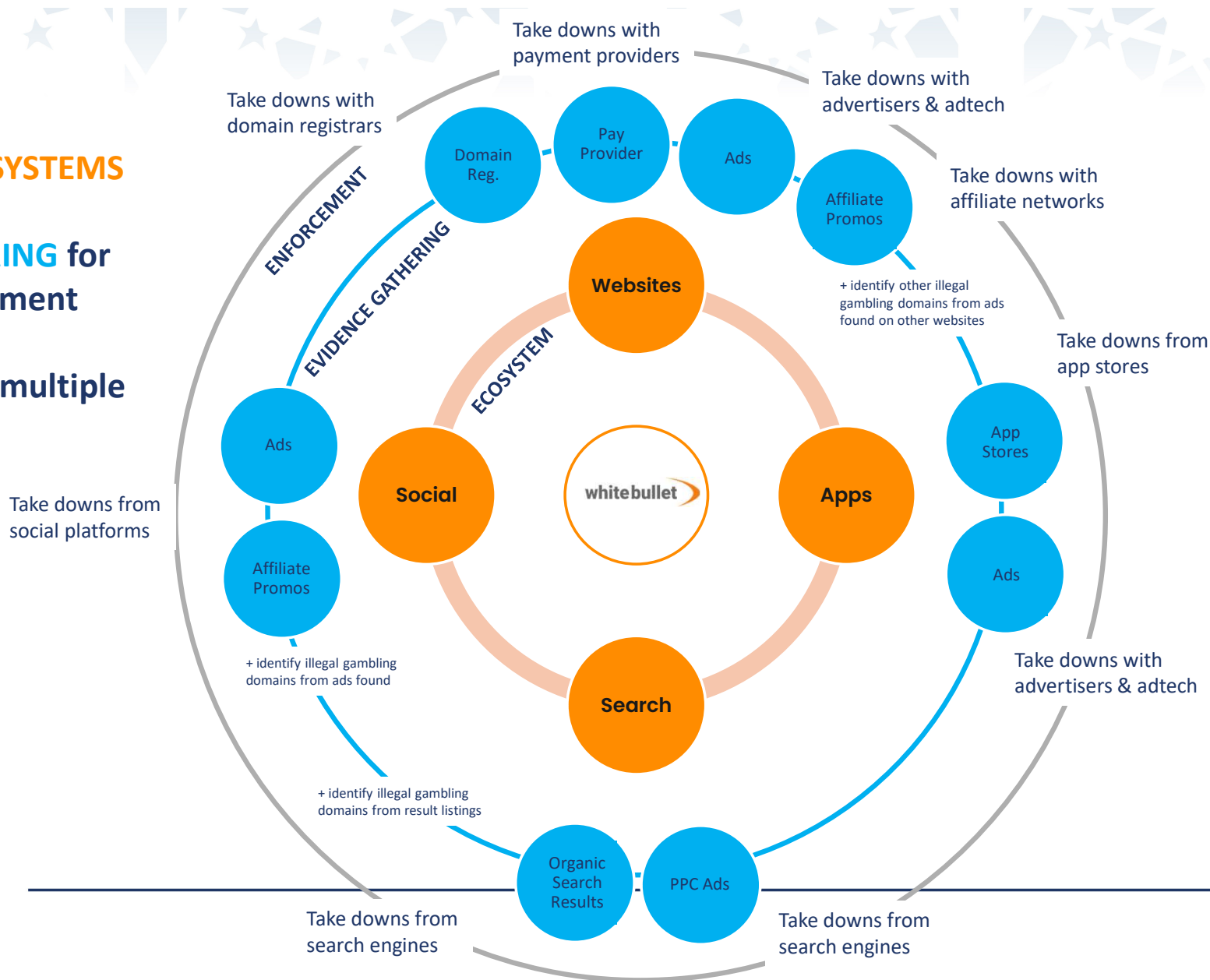
How track impact?



Track various ECOSYSTEMS

EVIDENCE GATHERING for policy and enforcement

ENFORCEMENT at multiple levels



Pilot Project



**Leverage risk intelligence,
expertise, key learnings**

**Map landscape, take action:
disrupt + enforce**

**3 countries x 3 months
(FR, GR, PL)**

Dedicated Taskforce

Pilot: 4 Phase Approach



Phase 1: **Legitimate Landscape Assessment**

Phase 2: **Discovery**

Phase 3: **Compliance Analysis & Operator Investigation**

Phase 4: **Enforcement**

Phase 1: Legitimate Landscape Assessment

Baseline: which operators are **licensed** across EU?

Comprehensive list of licensed online operators

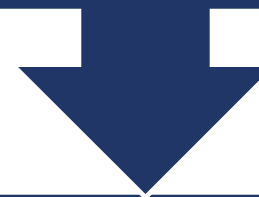
Helps **identify** non-compliant and illegal operators

Phase 2: Discovery

Monitoring and harvesting
data at scale

Various ecosystems

Identify **potentially
illegal operators in
multiple ecosystems**



Tracking **promotions + ads:**

Third party
websites

Social media

Search engine
sponsored links +
ads

Data Capture Process

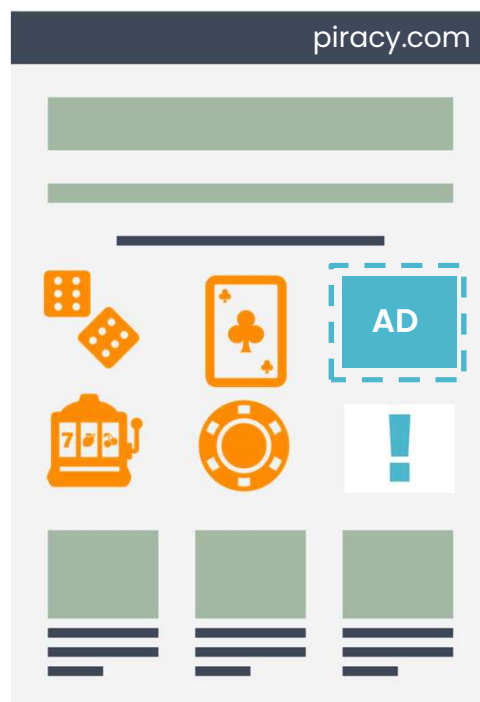


White Bullet Tracking Technology

Data Capture: Web

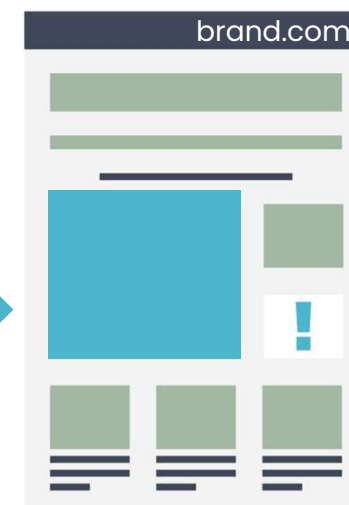
All ecosystems
Custom websites
Proxies
Profiling
Humanisation

PUBLISHER PAGE DATA

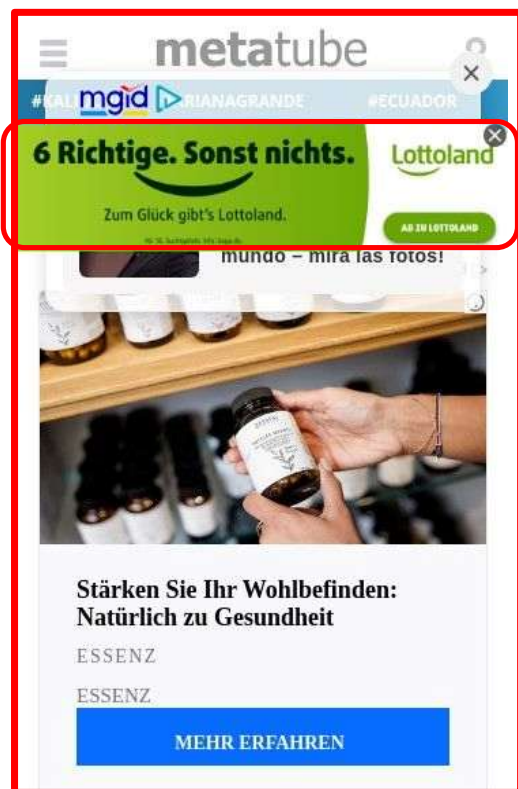


REFERRAL PATH METADATA

CLICK-THRU DATA



All ad placement + revenue formats
All ad media types
All formats



Adtech: eu.sportradarserving.com

Visit landing page and assess availability of services locally

Data Capture: Web

Data Capture: Social

The screenshot shows the Meta Ad Library interface. At the top, there's a search bar with 'Belgium' selected, 'All ads' filter, and 'lotto' search term. Below the search bar, there are tabs for 'Ad Library', 'Ad Library Report', 'Ad Library API', and 'Branded Content'. A 'Filters' button and 'Save search' option are visible. The main content area displays a grid of ads. The second ad in the first row is highlighted with a red box. It is a 'Lotto American' sponsored ad. A blue box highlights the 'Report ad' button, with a tooltip that says 'Mark this ad as offensive or inappropriate'. A blue arrow points from the search bar to the right, and another blue arrow points from the filters to the right. A third blue arrow points from the 'Report ad' button to the right.

Meta

Belgium All ads lotto

Launched November 2025

Active

Library ID: 767232532960927

Started running on Nov 1, 2025

Platforms

EU transparency

See ad details

New Espace Danse Sponsored

Masterclass à ne pas rater!

@malikzaryaty débarque au Ned pour une masterclass exceptionnelle!

Le 8 novembre de 17h à 18h30.

Active

Library ID: 803720188925501

Started running on Oct 31, 2025

Platforms

4 ads use this creative and text

Report ad

Mark this ad as offensive or inappropriate

Copy ad link

Get an Ad Library URL for this ad

Lotto American Sponsored

The MegaMillions lottery is announcing a record prize of \$1.1 BILLION. For the first time, participants from everywhere can join this historic opportunity. Your ticket could be the beginning of a brand-new life.

Historic Jackpot \$1.1 Billion

Final week to change your life!

Enter Now

Active

Library ID: 1388623816310831

Started running on Oct 31, 2025

Platforms

6 ads use this creative and text

See summary details

Lotto American Sponsored

The MegaMillions lottery is announcing a record prize of \$1.1 BILLION. For the first time, participants from everywhere can join this historic opportunity. Your ticket could be the beginning of a brand-new life.

Winner \$1,100,000,000.00

BUY NOW

Active

Library ID: 1236778061827589

Started running on Oct 30, 2025

Platforms

4 ads use this creative and text

See summary details

Reverze Sponsored

Discover the line-up for Friday at AFAS Dome - a night dedicated to Reverze Classics.

Reverze

On 27 & 28 February 2026, the AFAS Dome and Lotto Arena in Antwerp will transform into a world Beyond Boundaries. Step inside and experience two nights where reality blurs and energy knows no limits.

Don't miss out

Reverze 2026

Shop Now

Social media ad libraries

Country filters

Keywords by category, language, Performance, risk

Facebook sponsored ad



Targeted queries in relevant language: performance, risk

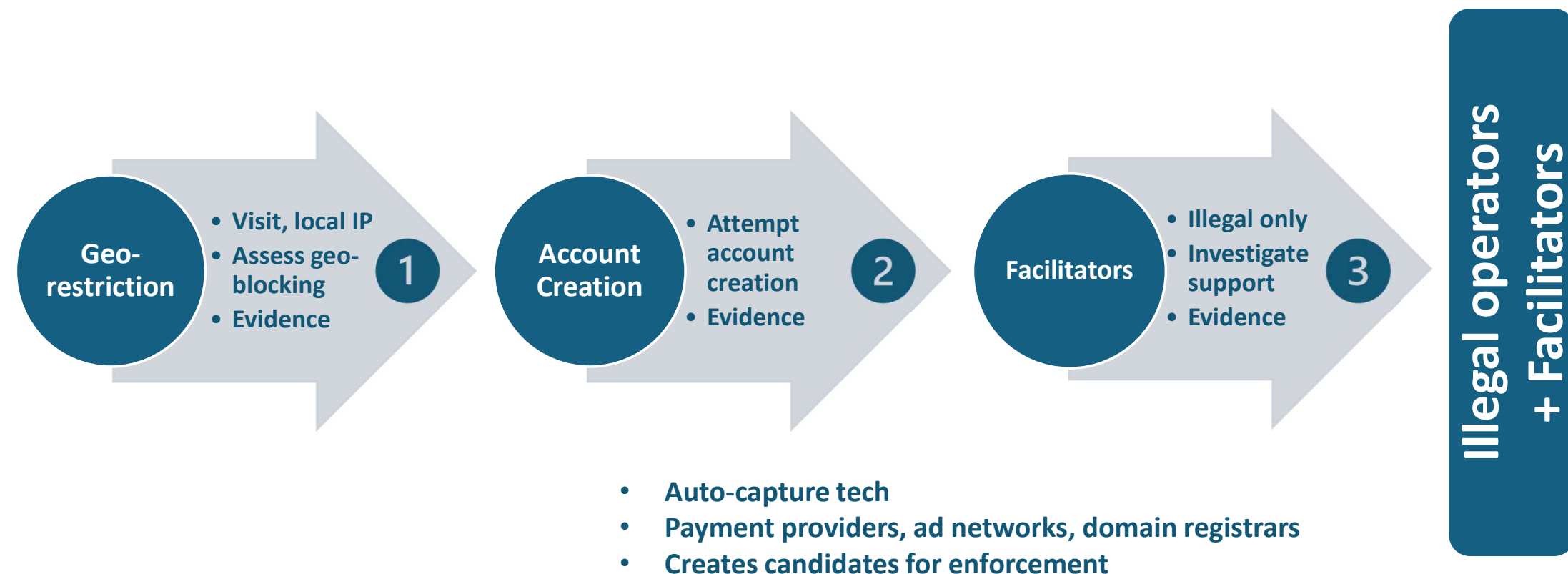
Organic search results: visited to assess availability of services

Data Capture: Search

VPN geo-location
Proxies, profiling, humanisation

PPC ad: visited to assess availability of services

Phase 3: Compliance Analysis & Operator Investigation



Phase 4: Enforcement

- **Intelligence Database:** results, evidence
- **Action Centre:** enforcement dashboard
 - Targets, enforcement taken
 - Impact for success
- Taskforce meetings
- Action taken depends on target

Targets

- Illegal operators Referrals to law enforcement, regulators
 - Payment providers
 - Adtech
 - Domain registrars
 - Social media platforms
 - Search engines
- Auto-take downs, direct notices
- ISPs & domain seizures Litigation, dynamic blocking, law enforcement

Enforcement: Payment Providers

GOAL: Cancel payment facilities

Most major players commit to industry **regulatory requirements** to prevent fraud

- Illegal lotteries and gambling included definition

Custom evidence packs to payment providers

- Dedicated contacts for illegal activity
- High evidentiary burden – few automated forms and processes
- Only legitimate providers will block
- Evidence of non-compliance to gambling or banking regulators



Response times 24-48 hours, **possible fines** by financial regulators

Enforcement: Advertisers, Adtech

GOAL: Remove operator ads and websites from inventory

- Adtech placing illegal operator ads
- Brands whose ads appear on (and fund) illegal operator websites
- Adtech placing other ads on illegal operator websites

No regulatory requirement to prevent ads on illegal publishers – **reputation issue**

Custom evidence packs to adtech and brands

- Adtech, brands not required to have abuse contact emails or reporting forms
- Research each POC for notices - White Bullet active 10+ yrs
- High evidentiary burden - adtech code, landing page data
- Only responsible players use blocklists / dynamic feeds
- Name and shame publicly



Response times 2+ months, repeat notices

Enforcement: Domain Registrars

GOAL: Cancel domains

Most major players commit to **industry regulations** to cancel illegal / abusive domains

- Specific abuse categories and broader fraud
- Illegal gambling and lotteries included

Custom evidence packs to domain registrars

- Additional steps to identify registrars (if not obfuscated)
- Dedicated contacts for abuse and illegal activity
- High evidentiary burden, complaints to 'report abuse' email – no one size fits all - some have web forms for faster processing
- Only reputable registrars suspend or cancel
- Non-compliance can be reported to gambling regulators or ICANN

Response times 24 hours to 10+ days



Enforcement: Social Media

GOAL: Block ads from feeds

Most major players remove promotions for illegal activity

- Illegal gambling / lotteries included, but each ad campaign is reported individually
- Reporting via ad libraries is efficient – only report each campaign once

Custom evidence to social media platforms

- Dedicated abuse reporting tools (see also Meta Brand Rights Protection for IP)
- Auto-reporting at point ad is found (click on-ad report feature) or via ad repository
- Only legitimate providers remove ads - Meta provides feedback
- Non-compliance can be reported gambling regulators

Response times from 24 hours to weeks



Enforcement: Search Engines

GOAL: Remove PPC ads and results

Search engines offer removal of PPC ads, sponsored and organic results violating laws

- Illegal gambling and lotteries included

Custom evidence packs to social platforms

- Dedicated abuse reporting tools for at scale action
- Non-compliance can be reported to gambling regulators

Response times 24-48+ hours



Enforcement: Operators, Site Blocking, Seizures



Operation In Our Sites Project TransAtlantic VIII

This domain name has been seized

Operation In Our Sites-Project TransAtlantic VIII is a coordinated effort by U.S., European, South American and Asian law enforcement agencies targeting websites and their operators that sell counterfeit goods.

Pilot: Data Coverage to Date

Ecosystem	Visits	Total Visits	Total Ads	% Gambling / Lottery Products	Illegal Operators
Web	465,090	1.9M	800K+	13%	26
Social	632,800				
Search (including organic results)	797,265				

* Data collected from 13 April to 27 May 2026 only

Example Web: Greece BC.Game

The screenshot displays the BC.Game website interface. At the top, a banner promotes a sign-up reward of up to \$20,000. Below this, a 'WELCOME SHIELD UP TO \$300' is featured, accompanied by a large green 'Sign Up' button and a 'Or Register With' section for Google and Telegram. To the right, two 'Sign In' buttons are visible. The main content area includes a 'Recent Big Wins' section with various game thumbnails and a list of recent winners. On the far right, a sidebar titled 'IP Address Details' provides technical information about the user's connection.

IP Address Details

- IPv4: 103.187.242.220
- IPv6: Not Detected
- IP LOCATION: Athens, Attiki (GR) [Details]
- BROWSER: Chrome 147.0.0.0 [User Agent]
- ISP: Media Pro
- SCREEN SIZE: 1536px X 766px
- PROXY: Not Detected.
- JAVASCRIPT: Enabled
- PLATFORM: Windows 10
- COOKIE: Enabled

[Show more IP details](#)

[view map](#)

iplocation.net

Example Web: Greece BC.Game

The screenshot displays the BC.Game mobile application interface. The main screen shows a user profile for 'alanward0304' with ID '932317572188923'. The user is a 'BEGINNER' and has '1.00K XP to BRONZE I'. The 'Total Balance' is '\$0.00'. A red box highlights the 'Deposit' button. Below the balance, there are buttons for 'Buy', 'Swap', 'Vault Pro', 'Transaction', 'Rollover', 'Bet History', and 'Free Plays'. A 'Welcome FS' notification is visible in the bottom right corner.

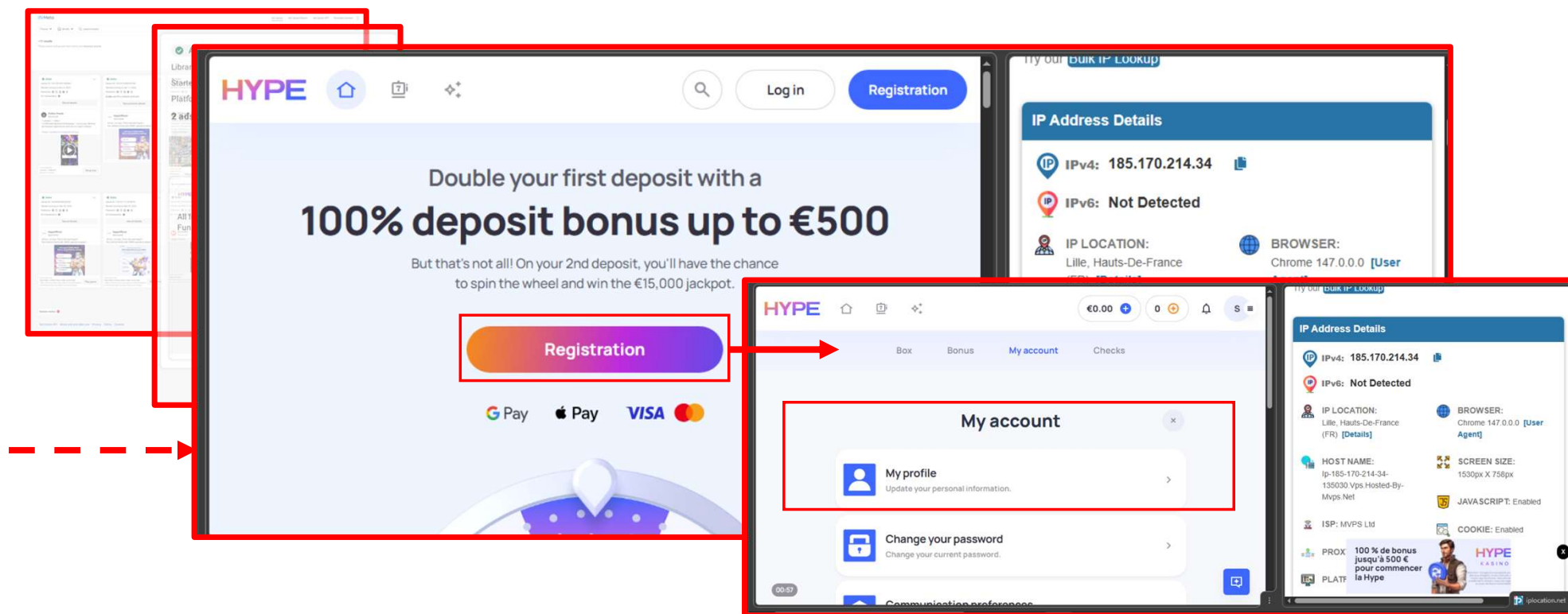
An 'IP Address Details' panel is open on the right side of the screen, showing the following information:

- IPv4: 103.187.242.220
- IPv6: Not Detected
- IP LOCATION: Athens, Attiki (GR) [Details]
- BROWSER: Chrome 147.0.0.0 [User Agent]
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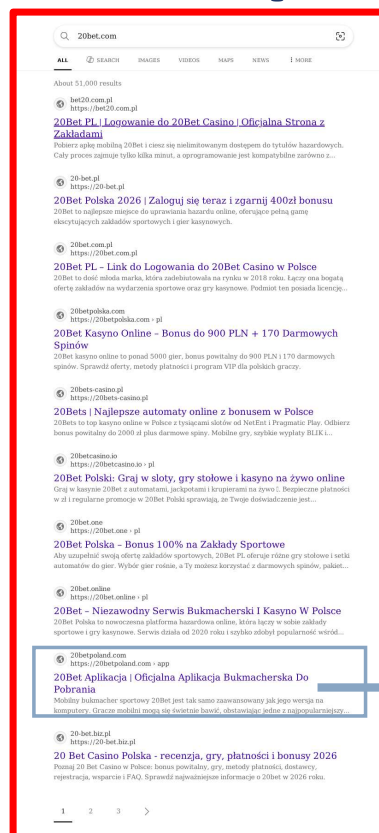
A red arrow points to the 'Sign Up' button in the top navigation bar.

EL INDUSTRY DAYS
**LOTTERIES BRIDGING
CONTINENTS**
JUNE 7-10, 2026 | MARRAKECH

Example Social: France Hype



Example Search: Poland 20Bet



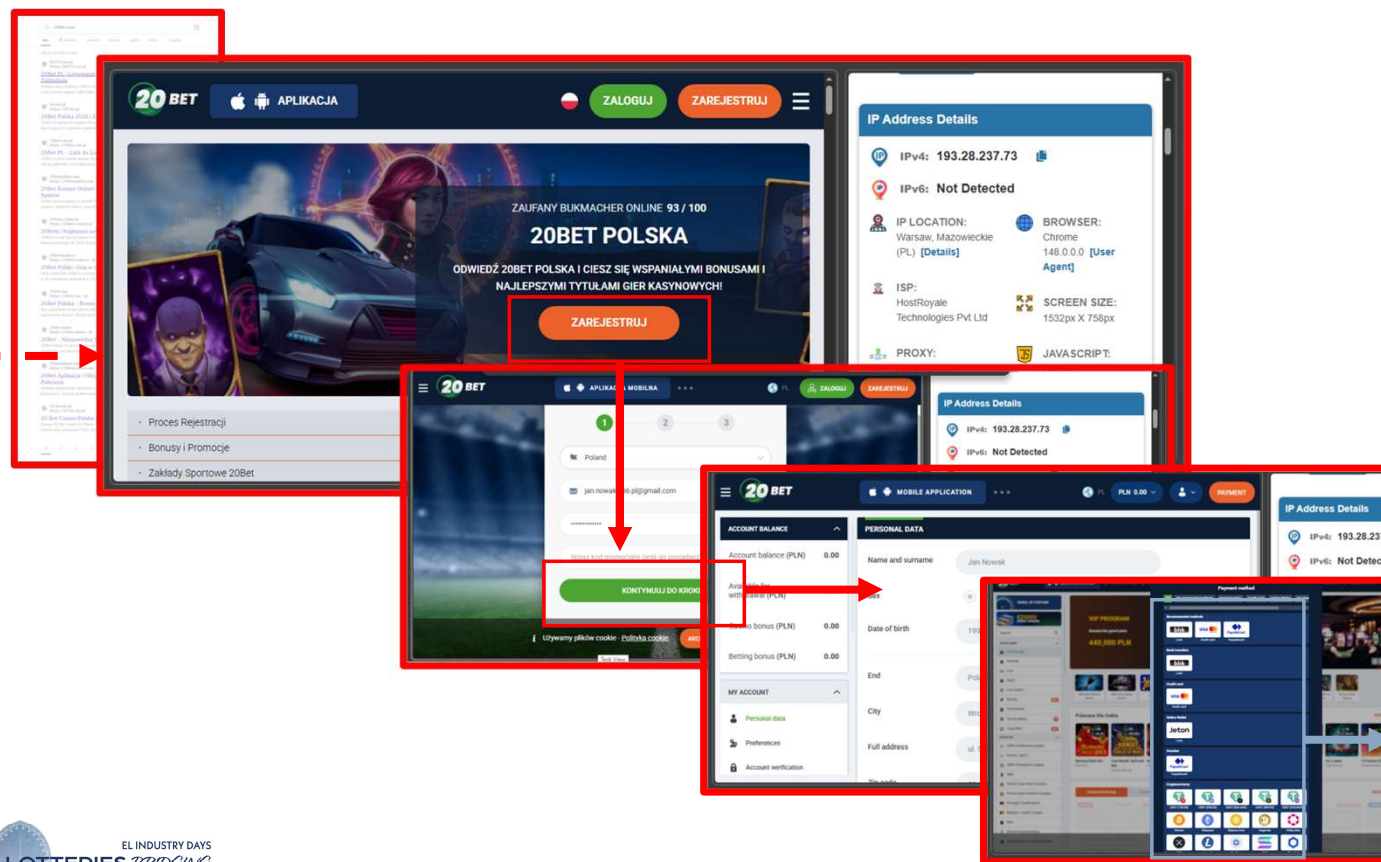
20betpoland.com

<https://20betpoland.com> > app

20Bet Aplikacja | Oficjalna Aplikacja Bukmacherska Do Pobrania

Mobilny bukmacher sportowy 20Bet jest tak samo zaawansowany jak jego wersja na komputery. Gracze mobilni mogą się świetnie bawić, obstawiając jedne z najpopularniejsze...

Example Search: Poland 20Bet



EL INDUSTRY DAYS
**LOTTERIES BRIDGING
CONTINENTS**
JUNE 7-10, 2026 | MARRAKECH

Example Search: France RedFoxLotto

The image is a collage of screenshots from the RedFoxLotto website, illustrating a search for France RedFoxLotto. The screenshots are arranged in a layered fashion, with red arrows indicating the flow of the search process.

- Top Left:** A small browser window showing a search for "RedFoxLotto".
- Top Center:** The main website header with navigation links: Home, Play Lotteries, Lottery Info, Results, Play Keno. The main content area displays three lottery games:
 - Megamillions:** €284.252.870,00, Fri May 29 2026, Play Now.
 - Superenalotto:** €170.800.000,00, Thu May 28 2026, Play Now.
 - Powerball US:** €132.250.580,00, Wed May 27 2026, Play Now.
- Top Right:** A sidebar showing "IP Address Details":
 - IPv4: 178.170.16.180
 - IPv6: Not Detected
 - IP LOCATION: Reims, Grand-Est (FR) [Details]
 - BROWSER: Chrome 148.0.0.0 [User Agent]
 - HOST NAME: Cantouches.Pizza
- Bottom Left:** A sidebar menu with links: Play Now, Dashboard, My Tickets, My Profile, Support Requests, All Transactions, Logout.
- Bottom Center:** A "MY PROFILE" section showing:
 - Current Balance: 0,00 €
 - Available Free Tickets
 - Make A Deposit:** SEND MONEY INTO YOUR REDFOXLOTTO WALLET. Amount: [input field] Deposit.
 - Make A Withdrawal:** Withdrawal (20 to 40 days)
- Bottom Right:** A "Choose A Deposit Method" section with various options:
 - Credit Card Option 1:** Supports Credit cards, Instant bank transfer, Klarna, Alipay, and WeChat (Country specific).
 - NETELLER:** Deposit with Neteller.
 - Cryptocurrency Option 1:** Supports multiple cryptocurrencies.
 - Deposit via Instant bank transfer:** Deposit via Instant bank transfer. Works with 2000+ banks in 20+ EU countries.
 - Skrill:** Deposit with Skrill.
 - PaysafeCard:** Deposit with Paysafecard.
 - RAPID by Skrill:** Rapid bank transfer. Deposit with Rapid bank transfer.

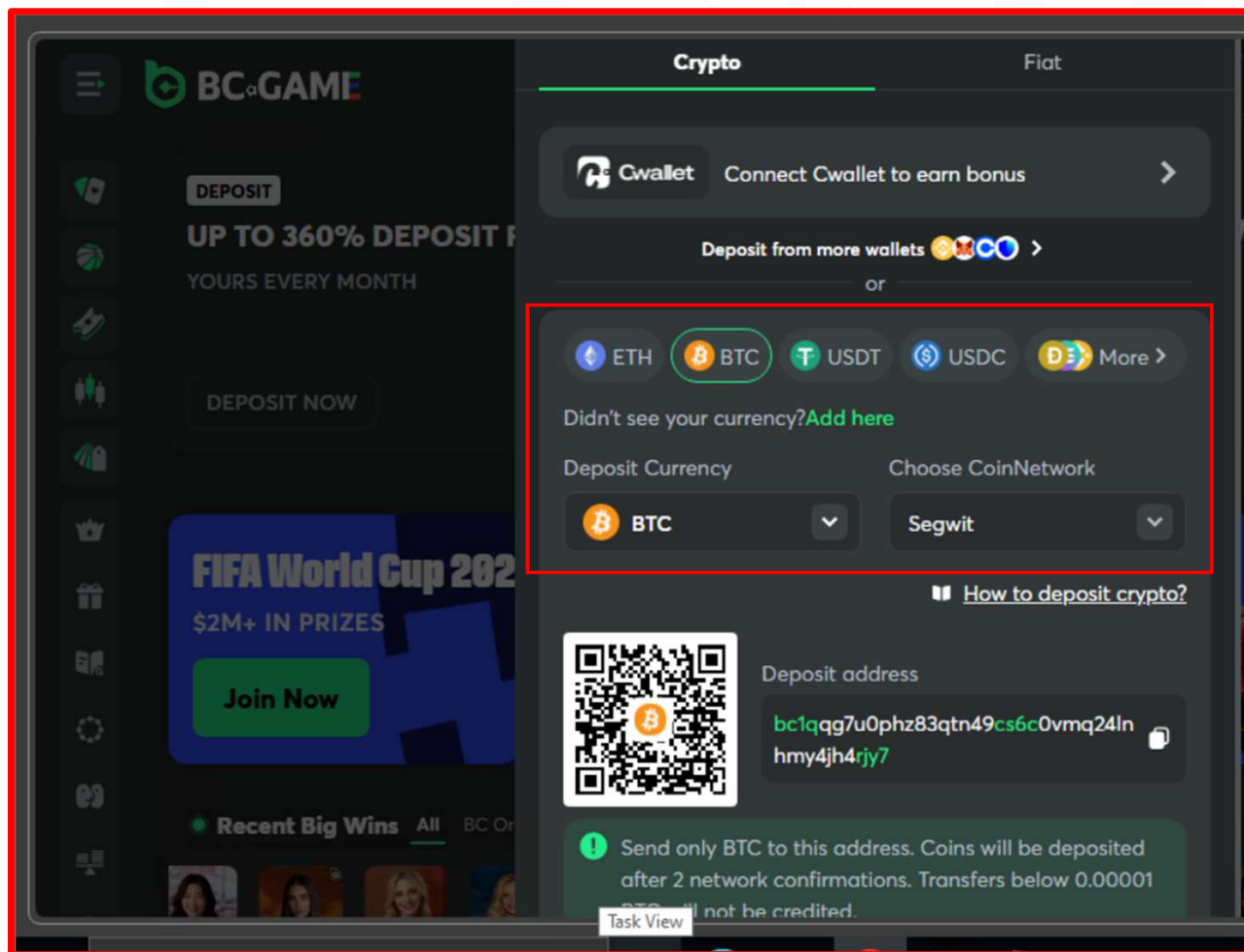
Risk: Crypto

Allowing cryptocurrency deposits viewed as higher risk

More difficult to identify customers, trace funds, enforce responsible controls

Risk depends on operator's controls and cryptocurrency

80% of illegal operators allow crypto deposits



Risk: Crypto

Money laundering risk

- Harder to verify source of funds, passes multiple wallets, obfuscation services

Sanctions, compliance risk

- Harder to identify funds originating from sanctioned individuals, entities or high-risk jurisdictions

Cross-border risk

- Facilitates access for customers in countries where gambling is restricted or operator unlicensed

Reduced transaction transparency

- Lacks third-party oversight

Responsible gambling concerns

- Speed, accessibility, volatility of crypto assets contribute to riskier gambling behaviour

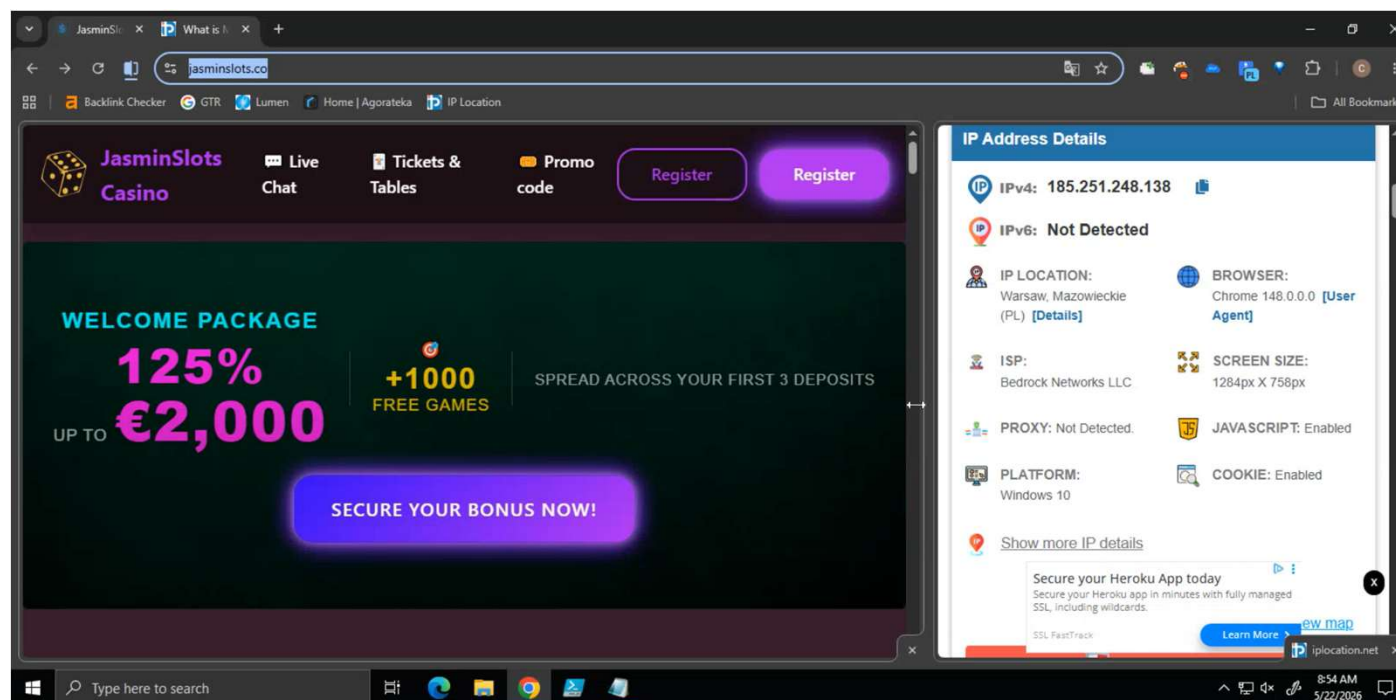
Enhanced controls required

- Robust KYC, AML, sanctions screening, blockchain analytics source-of-funds verification

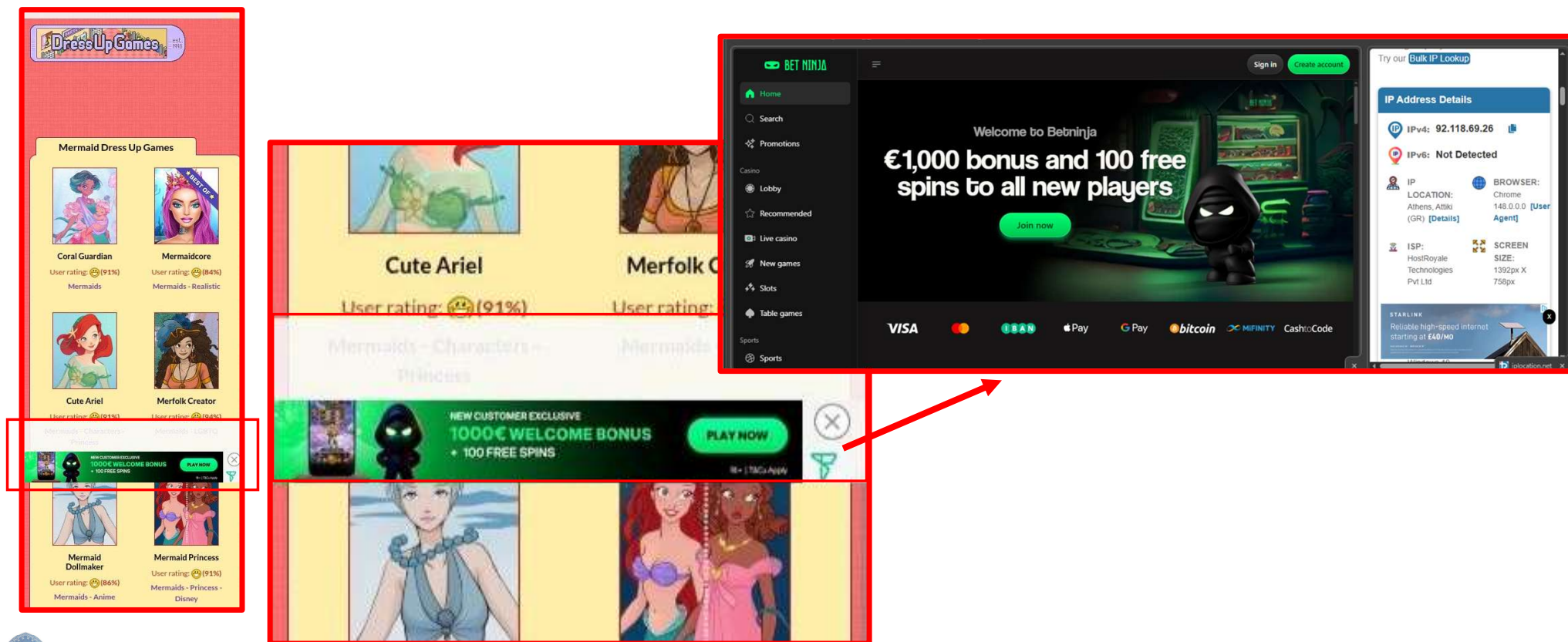
Risk: Dynamic Redirection by Affiliates

Affiliate partner webpage dynamically redirects to various **illegal and/or legal** gambling operators

Based on internal user tracking heuristics, e.g. IP, cookies, traffic referral



Risk: Children's Content Website



Risk: Malware

The image shows a screenshot of a sports website (XOILAC TV) displaying various football matches. A red box highlights a VSbet advertisement for the World Cup 2024. An arrow points from this advertisement to a NordVPN link checker interface. The link checker shows a warning message: "vsbet30.com was identified as a phishing site. It could trick you into revealing your personal information, like login credentials and credit card details." The interface also includes buttons for "Check another link" and "Incorrect detection? Report it", and a note about agreeing to terms of service and privacy policy.

XOILAC TV | TRỰC TIẾP BÓNG ĐÁ HD - XEM XÔI LẠC MIỄN PHÍ 2025

Trang chủ | Lịch thi đấu | Bảng xếp hạng | Kết quả bóng đá | Nhân định | Tin tức | Cuộc chơi | Liên hệ KM

Tất cả 300 | Đang Live 0 | Hôm Nay 40 | Ngày Mai 60

Giải bóng đá hạng nhất... CHƯA BẮT ĐẦU 07:00 - 24/04

Dalian Ying... 0 - 0 Changchun ...

BLV 7UP XEM NGAY

Giải bóng đá hạng nhất... CHƯA BẮT ĐẦU 07:30 - 24/04

Otago Nugg... 0 - 0 Tauranga W...

BLV Cozy XEM NGAY

Giải bóng đá hạng nhất... CHƯA BẮT ĐẦU 07:30 - 24/04

Shanghai Se... 0 - 0 Dalian Kewei

BLV RỒNG ĐỎ XEM NGAY

Giải bóng đá hạng nhất... CHƯA BẮT ĐẦU 08:30 - 24/04

Persipap Jep... 0 - 0 PSBS Biak N...

BLV BÍ ĐÀO XEM NGAY

AFF Championship U17 09:30 - 24/04

Laos U17 vs Avondale FC

Giải vô địch quốc gia Úc CHƯA BẮT ĐẦU 09:35 - 24/04

Macarthur 0 - 0 Wellington P...

BLV DR THANH | BLV GIÀ LẠNG XEM NGAY

Giải vô địch quốc gia Úc CHƯA BẮT ĐẦU 10:00 - 24/04

Kashiwa Re... 0 - 0 Kashima An...

BLV Cozy XEM NGAY

Giải vô địch quốc gia Úc CHƯA BẮT ĐẦU 10:00 - 24/04

Tokyo 0 - 0 Mito Hollyh...

Giải bóng rổ nam Hàn CHƯA BẮT ĐẦU 10:00 - 24/04

Anyang KGC 0 - 0 KCC Egis

NordVPN Pricing Features Download VPN Learn For Business Products Log In Support Center Get NordVPN

Link Checker File Checker Scam Text Checker

Is this link safe?

Scan a URL you want to visit to detect malware, fake websites, and phishing attacks.

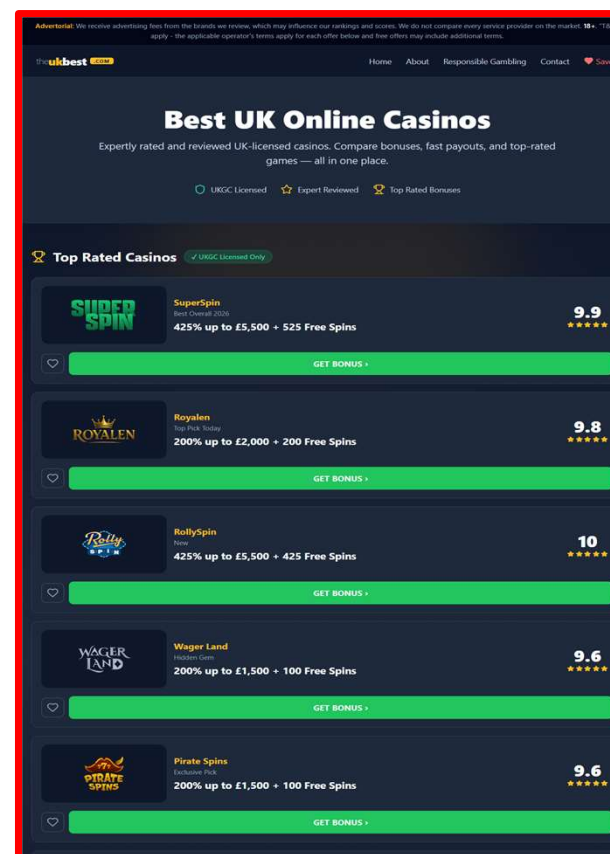
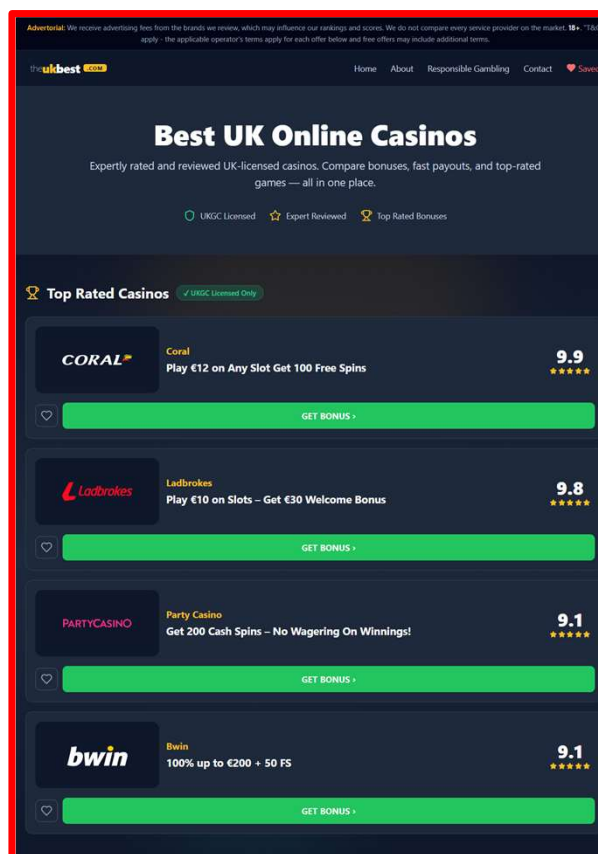
⚠ vsbet30.com was identified as a phishing site. It could trick you into revealing your personal information, like login credentials and credit card details.

Check another link Incorrect detection? Report it

By entering a URL you agree to our [terms of service](#) and [privacy policy](#).

Risk: Search Obfuscation

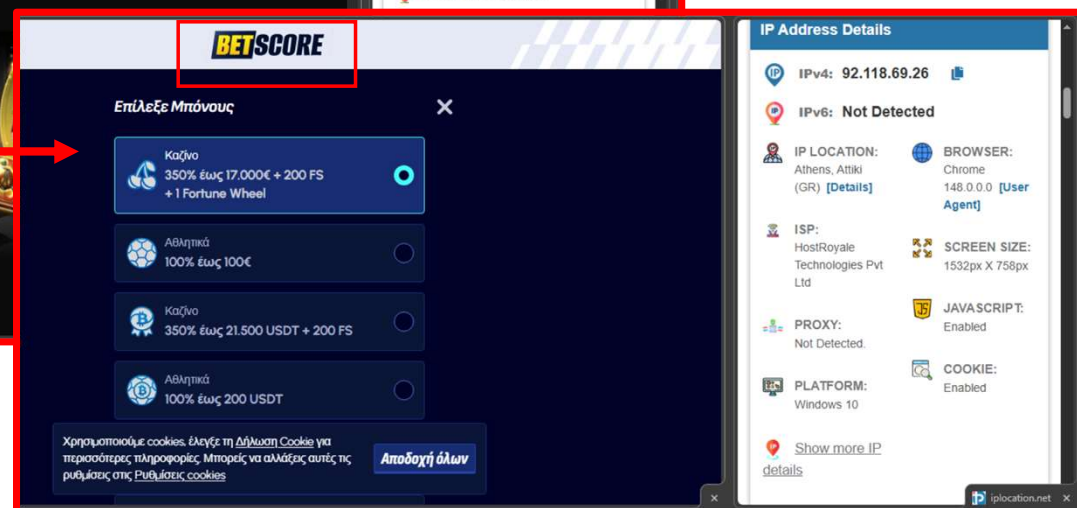
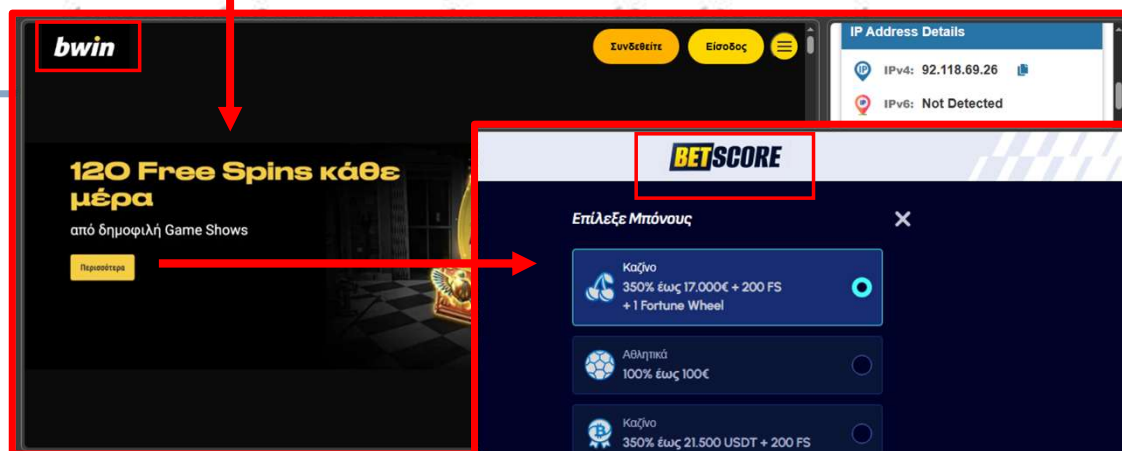
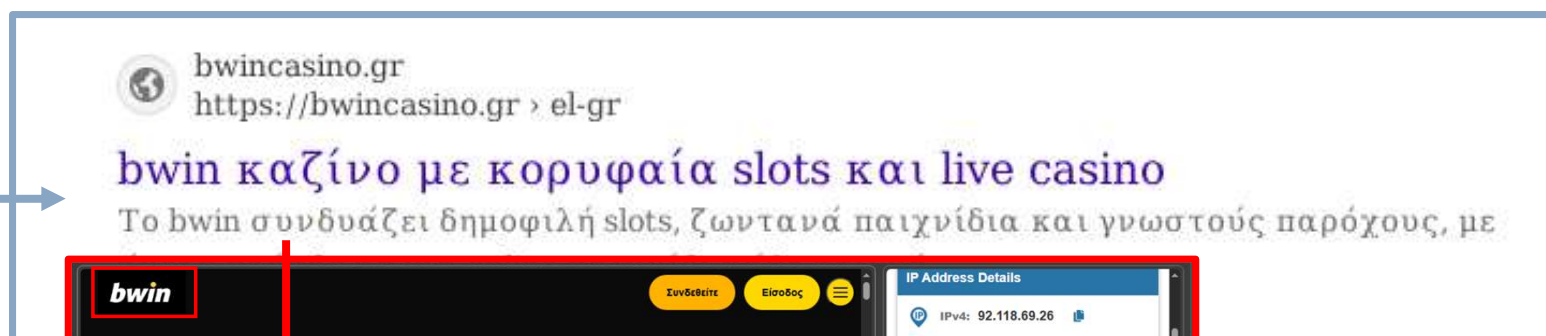
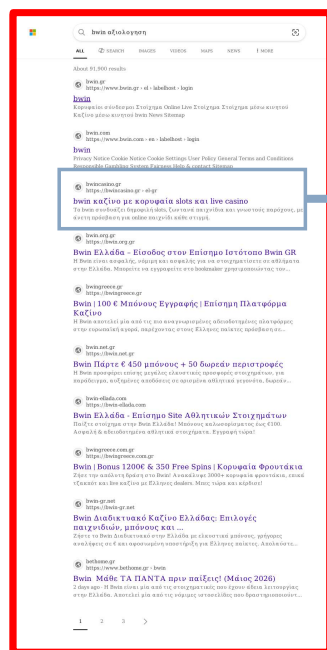
Legal operators
displayed when
visiting
gambling
aggregator
website
DIRECTLY



However....
unlicensed
operators
displayed when
accessing via
**BING AD
CLICK
THROUGH**

Risk: Fake Promotions?

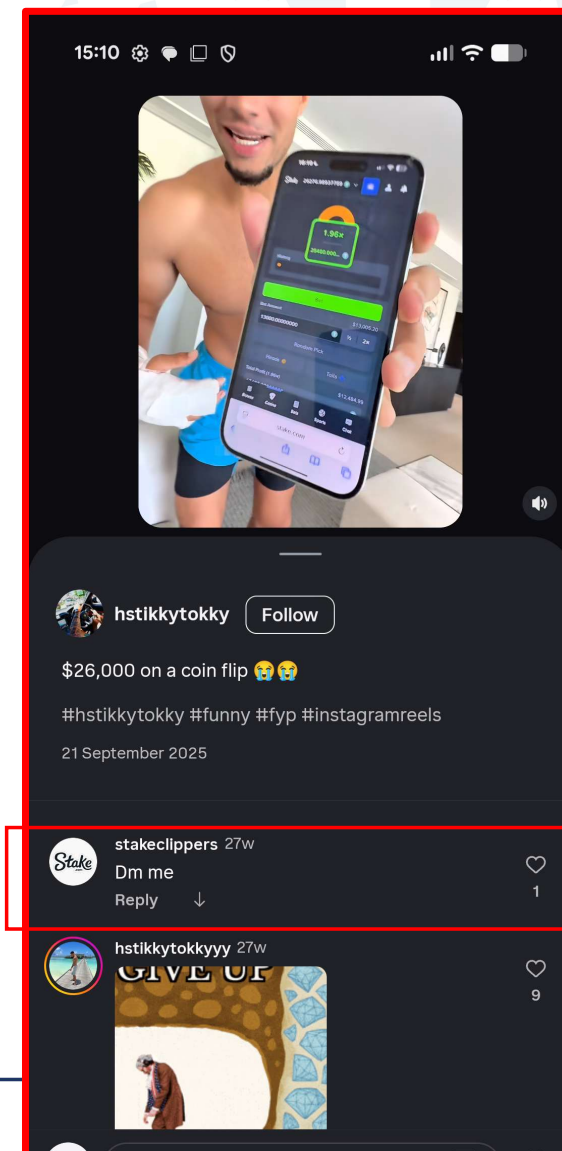
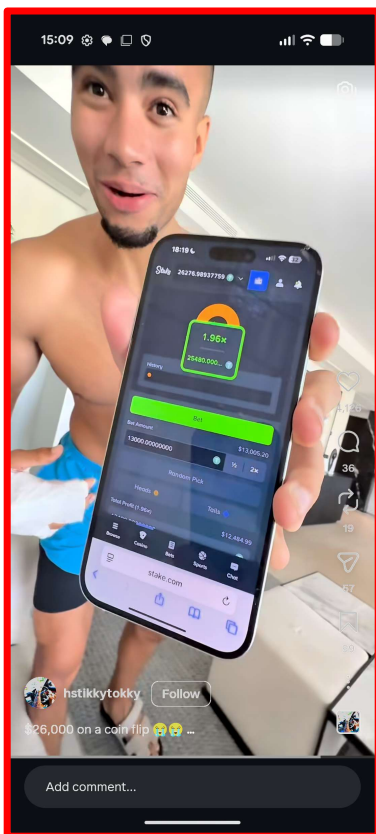
Bwincasino.gr unlicensed in Greece
using Bwin logo / name (operates legally as bwin.gr)
Redirects to unlicensed Betscore1.com



Risk: Influencers

HSTIKKYTOKKY

Controversial
popular influencers
paid commission



Risk: AI Misrepresenting Legitimacy

AI suggests unlicensed operators against queries for licensed operators

Not paid ads

Voici quelques **casinos de cryptomonnaies agréés** recommandés pour les joueurs français :

- **CoinCasino** : Offre un bonus de 200 % jusqu'à 30 000 \$ et 50 Super Spins, avec plus de 20 cryptomonnaies acceptées. [1](#)
- **Betpanda** : Propose un bonus de 100 % jusqu'à 1 BTC sur le premier dépôt, avec une large sélection de jeux et des paiements en cryptomonnaies. [1](#)
- **BC.Game** : Accepte plus de 150 cryptomonnaies et offre un bonus de 250 % et 75 spins gratuits, avec des retraits instantanés. [1](#)

Ces casinos sont reconnus pour leur sécurité, leur légalité et leur facilité d'utilisation, offrant une expérience de jeu en ligne sécurisée et agréée.

[3 Sources](#)

This summary was generated by AI from multiple online sources. Find the source links used for this summary under "Based on sources". Learn more about Bing search results [how Bing delivers search results](#)

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Facilitators: AdTech Identified

Major Players

AdForm

Adobe

Google

Magnite

Blockchain-Ads

[Industries](#)[Platform](#)[Resources](#)[Company](#)[EN](#)[Request Access](#)

Trusted by the Top Crypto & iGaming Brands

ripple

9.6X ROAS

crypto.com

24K+ New Traders

BINANCE

36K+ New Traders

coinbase

31K+ New Traders

4K+
Promo Participants

Stake.com

450%+
New Deposits

UNISWAP

250M Reach

GEMINI

5,498 New Users

Algorand

10,553
Acquired Users

dafabet

3,718
New Depositors

GALA

2.4X ROAS

Compound

3,408 New Users

Facilitators: AdTech Identified

Riskier Players

Zsky.pro ⚠ Suspicious

- Minimal public footprint, no clear business presence
- Redirect or temporary campaign infrastructure

22link.world ⚠ Suspicious

- Potential link-shortening, traffic routing or affiliate-tracking
- Commonly used in redirect chains

News-magazine2.xyz 🚩 High-risk

- Resembles disposable content, fake-news, SEO-spam, malvertising, redirect infrastructure
- Potential phishing, spam, malware campaigns

Facilitators: Domain Registrars & Payment

Domain Registrars

101domain
 123-Reg
 Amazon Registrar
 Cloudflare
 Dynadot
 Gandi
 GoDaddy
 NameCheap
 Tucows Domains
 URL Solutions

Payment Providers

Card	Crypto	Other
Skrill	Bitcoin	Klarna
Neteller	Ethereum	Alipay
PaySafeCard	USD Coin	WeChat
Rapid (by Skrill)	PolkaDot	Paypal
Visa	Dogecoin	Apple Pay
Mastercard		Blik
Maestro		

What Next?

Two months more to track, assess compliance and build landscape

Commence enforcement

Report back in late summer

Reflect on best practices and ways to overcome challenges:

- Decentralised registers of legitimate operators
- Inconsistent requirements and data formats for enforcement
- Regulator mandates
- Dynamism with domains, mirror sites
- Rogue intermediaries



Thank You!

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