

From: [Jomha, Robin FIN:EX](#)
To: [DeMott, Rachel FIN:EX](#)
Subject: FW: Letter to Incapsula re bingocanada.com *Grey Market Letter Response*
Date: Wednesday, March 29, 2017 4:16:30 PM
Attachments: Mr. Green warning letter.docx
image001.png

I found this, looking for others. This seems like we sent a second letter with the new address but got no response to it.

From: Kang, David FIN:EX
Sent: Wednesday, September 14, 2016 12:36 PM
To: Swan, Angela FIN:EX
Cc: Vear, Maureen FIN:EX; Jomha, Robin FIN:EX
Subject: RE: Letter to Incapsula re bingocanada.com *Grey Market Letter Response*

Hello Angela,

As requested the updated letter is attached. The correct address is as follows:

Mr. Green & Co AB
Tagliaferro Business Centre
Level 7, High Street
Sliema SLM 1549
Malta
David

From: Swan, Angela FIN:EX
Sent: Wednesday, September 14, 2016 12:04 PM
To: Lefler, Stephen C FIN:EX; Kang, David FIN:EX
Subject: RE: Letter to Incapsula re bingocanada.com *Grey Market Letter Response*

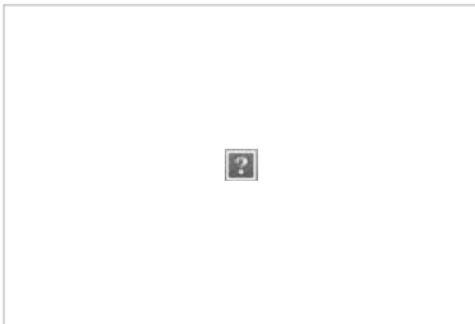
Thanks Steve.

David – can you have this letter updated and reissued as well? Thanks.

Ang

From: Lefler, Stephen C FIN:EX
Sent: Wednesday, September 14, 2016 11:50 AM
To: Swan, Angela FIN:EX; Kang, David FIN:EX
Subject: RE: Letter to Incapsula re bingocanada.com *Grey Market Letter Response*

Here is the details for Mr. Green.



Steve Lefler
Director/Deputy Registrar
Certification and Game Integrity
Gaming Policy and Enforcement Branch
Phone 250 356-6166
Fax 250 356-0782

If you believe that you have received this email in error, please notify the sender and delete the email from your mailbox.

From: Swan, Angela FIN:EX

Sent: Wednesday, September 14, 2016 9:51 AM

To: Lefler, Stephen C FIN:EX; Kang, David FIN:EX

Subject: RE: Letter to Incapsula re bingocanada.com *Grey Market Letter Response*

Thanks Steve. I'm embarrassed that we didn't catch that with either the first or the second searches. I (completely incorrectly) assumed that the website did not have useable contact information when I took a quick look after we received the response letter.

David – can we please send a new letter to this company using the information that Steve has provided below?

Ang

From: Lefler, Stephen C FIN:EX

Sent: Wednesday, September 14, 2016 9:45 AM

To: Swan, Angela FIN:EX; Kang, David FIN:EX

Subject: RE: Letter to Incapsula re bingocanada.com *Grey Market Letter Response*

Thanks Just looked at their site, footer claims:

This website is owned and operated by Digital Entertainment Services Ltd. Digital Entertainment Services Ltd operates from PB 234 Cooks Street, Numbatu, Port Vila, Vanuatu, is licensed by the Government of Curacao, is regulated by the Curacao Gaming Commissioner and operates under Gaming License No. CEG-IP/2014-1511.

Steve Lefler

Director/Deputy Registrar

Certification and Game Integrity

Gaming Policy and Enforcement Branch

Phone 250 356-6166

Fax 250 356-0782

If you believe that you have received this email in error, please notify the sender and delete the email from your mailbox.

From: Swan, Angela FIN:EX

Sent: Wednesday, September 14, 2016 9:30 AM

To: Lefler, Stephen C FIN:EX; Kang, David FIN:EX

Subject: FW: Letter to Incapsula re bingocanada.com *Grey Market Letter Response*

Ang

From: Swan, Angela FIN:EX

Sent: Friday, September 2, 2016 9:37 AM

To: Jomha, Robin FIN:EX

Subject: RE: Letter to Incapsula re bingocanada.com *Grey Market Letter Response*

Yes, I am familiar with Imperva. As it turns out, bingocanada.com is registered through a company that handles all web registration and domain issues for it:

Domain Name: BINGOCANADA.COM

Registrar: SAFENAMES LTD

Sponsoring Registrar IANA ID: 447

Whois Server: whois.safenames.net

Referral URL: <http://www.safenames.net>

Updated Date: 03-feb-2015

Creation Date: 25-apr-1998

Expiration Date: 24-apr-2017

They seem to be set up in a way that is extremely difficult to find or contact. I am guessing we will run across a number of these.

Ang

From: Jomha, Robin FIN:EX

Sent: Friday, September 2, 2016 9:31 AM

To: Swan, Angela FIN:EX

Subject: FW: Letter to Incapsula re bingoanada.com *Grey Market Letter Response*

From: Mary Keller [<mailto:mary.keller@imperva.com>]

Sent: Thursday, September 1, 2016 8:35 PM

To: Jomha, Robin FIN:EX

Subject: Letter to Incapsula re bingoanada.com

Dear Mr. Jomha,

We have received the letter from John Mazure dated August 23, 2016 regarding bingoanada.com. We understand from this letter that it is the Gaming Policy and Enforcement Branch's position that this website is offering opportunities in British Columbia in violation of the law.

Imperva's wholly-owned subsidiary, Incapsula, Inc., offers an enterprise-grade Web Application Firewall service to provide security for its customers' websites. Traffic to and from the websites of Incapsula's customers is routed through Incapsula's network of servers, profiled and compressed and web threats are blocked. Incapsula does not operate gaming websites, host customer websites or offer a service which stores the content of its customers' websites on the Incapsula system or network. Therefore, the website bingoanada.com is operated and hosted by third parties who are unrelated to Imperva and Incapsula.

Incapsula and Imperva intend to comply with applicable law in all respects and respect the purpose and mission of the GPEB. We do protect the confidentiality of information Incapsula receives from its customers in accordance with the company's privacy policy, but will provide information in response to a subpoena or other enforceable order.

Sincerely,

Mary Keller

Deputy General Counsel

mary.keller@imperva.com

Imperva, Inc.

+1 650-832-6061



Know your limit, play within it.

September 14, 2016

352035

Mr. Green & Co AB
Tagliaferro Business Centre
Level 7, High Street
Sliema SLM 1549
Malta

To whom it may concern,

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or licence issued by GPEB. The offence provisions of the Act also apply to these activities.

**Ministry of
Finance**

Gaming Policy and
Enforcement Branch
Office of the Assistant
Deputy Minister and
General Manager

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC

Web: www.gaming.gov.bc.ca

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering to British Columbia residents fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



September 9, 2016

Gaming Policy and Enforcement Branch
Ministry of Finance
**3rd Floor, 910 Government Street,
Victoria, British Columbia
V8W 1X3**

ATTN: Robin Jomha, Director and Deputy Registrar

Dear Mr. Jomha:

Re: Letter dated August 23, 2016

I am writing in reference to the letter from Mr. John Mazure to Mr. Rafi Ashkenazi dated August 23, 2016, which we received on September 1, 2016 (the "**Letter**"). Mr. Ashkenazi has referred this matter to me.

Integrity, social responsibility, transparency and good business practice are core principles of Amaya's operating philosophy. Amaya recognizes that legislative and regulatory compliance, and good governance are critical to the legitimate, safe and successful operation of any gaming business. As such, Amaya has consistently sought to meet or exceed both its obligations as a corporate enterprise and the best practices of the gaming industry.

Amaya understands gaming must be provided in Canada in ways that ensure delivery with integrity and transparency and by creating sustainable growth by investing and developing the gaming business. Moreover, Amaya advocates regulatory oversight and to that end works closely with regulators and governments proactively and transparently in order to understand both the current and future anticipated policies, laws, regulations, standards and values that inform its business. In fact, consistent with its proactive approach, prior to and following Amaya's acquisition of the Rational Group in 2014, which resulted in Amaya becoming the world's largest publicly traded online gaming company and a global leader in iGaming, Amaya has met, and continues to have, active discussions, with many regulators in North America, including the British Columbia Gaming Policy and Enforcement Branch (GPEB).

You will recall that on two occasions last year Amaya met with GPEB. Specifically, on June 11, 2015 Dave Gadhia, Amaya's current board chair and I met with you and other GPEB officials to discuss a number of matters, including Amaya's status in British Columbia and our interest in responding to a Request

for Proposal to provide i-Poker services to the British Columbia Lottery Corporation (BCLC). GPEB was very helpful in providing advice in terms of its expectations related to the registration of Amaya. In addition to the June 2015 meeting, I once again met with GPEB officials on October 15, 2015 to deliver comprehensive documents related to Amaya's operational model, approach to meeting or exceeding technical and other regulatory standards in British Columbia, and our proposal to engage BCLC. The basis of these discussions from Amaya's perspective was to ensure Amaya proactively communicated its intentions with clarity and transparency to GPEB officials.

Amaya has also met with BCLC officials, including the CEO, on several occasions over the last year to communicate these same intentions and to indicate its complete commitment to respond to an RFP for i-Poker services in British Columbia and other provinces, as well as to provide its insight and business experience related to the poker segment on a global basis, with a particular focus on the critical importance of greater liquidity, player retention and the size of the player pool, in ensuring the commercial success of online poker.

As suggested by GPEB in the Letter, we would welcome the opportunity to discuss the contents and subject matter of the Letter. We would be pleased to attend an in person meeting in Victoria or elsewhere that would be convenient for you and your team. In the coming days, I will reach out to you directly to set a mutually convenient date and time.

Sincerely,



George Sweny

VP Compliance, Amaya

cc. *Mr. John Mazure, Assistant Deputy Minister and General Manager, GPEB*
Mr. Rafi Ashkenazi, CEO, Amaya Inc





RECEIVED FEB 23 2017

January 19, 2017

John Mazure
Assistant Deputy Minister
and General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia

PO Box 9202 STN
PROV GOVT
Victoria, British Columbia
V8W 9J1

Dear Mr. Mazure:

This letter is in response to your letter of September 23, 2016 to Mr. Jason Robins, the Chief Executive Officer of DraftKings, Inc. In your letter, you state that the Gaming Policy and Enforcement Branch, Ministry of Finance, British Columbia ("GPEB") is of the view that "gambling and betting opportunities [DraftKings] is offering to British Columbia residents fall outside of the legal framework that applies in the province."

It is the policy of DraftKings to comply with all applicable legislation in every jurisdiction in which we do business. We therefore took your letter very seriously, particularly given the allegations it contained. We have spent the intervening period of time considering the issues raised in your letter and consulting with Canadian legal counsel. We have considered the matter very carefully after taking advice from trusted and impartial advisors and have the following comments.

We have been advised that the details in your letter concerning the gambling regulation and enforcement structure and regime in British Columbia are accurate. We respect the authority of GPEB to enforce the laws of British Columbia pertaining to gambling and betting.

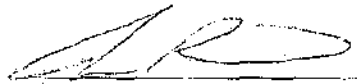
You state in the first paragraph of your letter that GPEB has reason to believe DraftKings is conducting and managing a lottery scheme which facilitates online betting in British Columbia. We have carefully reviewed all aspects of our operations that involve British Columbia residents and are confident that neither the constituent parts nor the whole of those operations constitutes a

lottery scheme. Further, DraftKings does not conduct, manage or operate gambling activities or aid, abet or assist others in such activities. Given those facts, it appears that GPEB would have no reason to regulate the activities of DraftKings in British Columbia.

We are confident that DraftKings complies with all provincial and federal laws applicable to its operations in Canada, including but not limited to all consumer protection legislation. We are also acutely aware of our obligations under the applicable Canadian taxation and anti-money laundering laws and are confident that we have met and continue to meet all of our obligations in that regard.

We trust that this provides a clear view of our position with respect to the issues raised in your letter. Having said that, DraftKings remains open to a mutually productive dialogue with respect to these matters and welcomes the opportunity to provide further assurances to GPEB concerning the nature of DraftKing's products and operations.

Very truly yours,

A handwritten signature in black ink, appearing to read 'TP', is written over a horizontal line.

Tim Parilla
General Counsel
DRAFTKINGS, INC.
125 Summer St., 5th Fl.
Boston, MA 02110
tparilla@draftkings.com

Ref: 1073G

John Mazure
Gaming Policy and Enforcement Branch
Ministry of Finance,
Government of British Columbia
PO Box 9311 Stn Prov. Govt.
Victoria BC V8W9N1
Canada

BY REGISTERED MAIL AND EMAIL (robin.jomha@gov.bc.ca)

3 October 2016

Dear Mr Mazure,

Re: unibet.com

We have been instructed by our client, Unibet Group plc, to address the present to you in response to your letter dated 23 August 2016, in which the British Columbia Gaming Policy and Enforcement Branch (GPEB) notified our client of the GPEB's view that what it considers to be gambling and betting opportunities being offered by our client in British Columbia fall outside of the legal framework applicable in the province.

In light of the above, I am instructed to inform you that Unibet Group plc, a company registered in Malta, is a holding company and does not conduct any operational activity or other form of trading whatsoever. Furthermore, Unibet Group plc does not engage in the organisation or provision of gambling and betting activities, and consequently, the GPEB's claim that our client is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia is considered unfounded and misplaced. Our client does not itself conduct an online betting activity over the internet and available in Canada, or elsewhere for that matter.

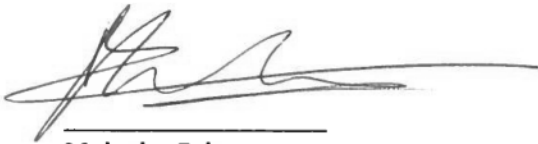
Without prejudice to the above, our client considers it pertinent to draw the GPEB's attention to the fact that the Unibet group, which comprises regulated gambling operators holding licenses in several European countries and Australia, is committed to offering and maintaining a secure and safe player environment and has a zero-tolerance approach to fraud and other criminal activity, including but not limited to money laundering and terrorism financing.

Moreover, we have been instructed to take this opportunity to inform the GPEB that our client would welcome the opportunity to receive information on possible prospective licensing opportunities in the province and that, in this respect, it remains open to further discussion with the

competent authority, and for this purpose we are copying this letter to the Director and Deputy Registrar, Corporate Registration on the email address provided.

We look forward to hearing back from you on the contents of this letter. If in need of any further clarifications, kindly do not hesitate to contact the undersigned. Meanwhile, all rights and remedies at law are hereby reserved.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Malcolm Falzon', written over a horizontal line.

Malcolm Falzon
Partner
Camilleri Preziosi

cc: **client**

Tracking of Notification Letters to Grey Market Website Operators (Cliff 352035)

Website Operator	Address	Response	GPEB Action
RESPONSE – CLAIM NOT TO BE A LOTTERY SCHEME			
DraftKings, Inc. <ul style="list-style-type: none"> www.draftkings.com 	225 Franklin Street, 26th Floor Boston MA 02110 USA	Claims not to be a lottery scheme	
RESPONSE – INTEREST IN BEING REGISTERED/LICENSED			
Unibet Group Plc <ul style="list-style-type: none"> unibet.com 	Level 2, Valletta Buildings, South Street, Valletta Malta	Claims not to conduct an online betting activity over the internet – but is interested in licensing opportunities	
Rational Group. Amaya Inc <ul style="list-style-type: none"> pokerstars.com pokerstars.eu pokerstars.net starsdraft.com 	Douglas Bay Complex King Edward Road Onchan Isle of Man	No refute of actions in BC – interested in partnering with GPEB/BCLC to offer i-Poker	
RESPONSE – NOT A GAMING COMPANY (ONLY WEB HOSTING ETC)			
Incapsula Inc <ul style="list-style-type: none"> bingocanada.com 	3400 Bridge Parkway, Suite 200 Redwood Shores, CA 94065 United States	Claims they do not operate websites - offers an “enterprise-grade Web Application Firewall service to provide security for its customers’ websites”	Sent a new letter to contact in Malta – Mr. Green & Co AB. [confirming that this is different that the Cloudflare inc. mrgreen.com website listed in san Francisco]
NO RESPONSE			
OVH Hosting <ul style="list-style-type: none"> winningpokernetwork.com; americascardroom truepoker 	1901 McGill College Ave. Suite 800 Montreal Quebec H3A 2N4 Canada		N/A
Pinnacle Sports Head Office. Ragnarok Corporation N.V. <ul style="list-style-type: none"> pinnacle.com 	Pletterijweg 43 Willemstad Curaçao		N/A
Cloudflare, Inc. <ul style="list-style-type: none"> mrgreen.com 	101 Townsend Street San Francisco, CA 94107 United States		N/A

Website Operator	Address	Response	GPEB Action
Go North Limited <ul style="list-style-type: none"> maplecasino.com crazyvegas.com 	Villa Semina 8 Sir Temi Zammit avenue Ta'Xbiex, NA 01011 Malta		N/A
LeoVegas AB ; LeoVegas Gaming Ltd. <ul style="list-style-type: none"> leovegas.com 	Sveavägen 59 113 59 Stockholm Sweden		N/A
Gaming Innovation Group Limited MT Secure Trade Limited <ul style="list-style-type: none"> guts.com 	GB Buildings, Penthouse, Water Street Ta'Xbiex XBX 1301 Malta		N/A
Fanduel Inc. <ul style="list-style-type: none"> www.fanduel.com 	1375 Broadway New York, NY 10018 USA		N/A
GVC Holdings PLC <ul style="list-style-type: none"> bwin.com 	32 Athol Street Douglas Isle of Man		N/A
Continent 8 House <ul style="list-style-type: none"> betway.com 	Pulrose Road Douglas IM2 1AL Isle of Man		N/A
Townview Trading Ltd. <ul style="list-style-type: none"> betcris.com 	Athinodorou, Dasoupoli, Strovolos 3, Nicosia P.C. 2025, Cyprus		N/A
Hillside (New Media) Limited; Hillside (Technology) Limited; Bet365 Group limited <ul style="list-style-type: none"> bet365.com 	Hillside, Festival Way Stoke-On-Trent, ST1 5SH United Kingdom		N/A
Internet Media Network <ul style="list-style-type: none"> betvictor.com 	254 W Baseline Rd #103 Tempe, AZ 85283 United States		N/A
Privacy Guardian <ul style="list-style-type: none"> allslotscasino.com nexigames.net 	1928 E. Highland Ave. Ste F104 PMB# 255 Phoenix, AZ 85016 United States		N/A
Cassava Enterprises (Gibraltar) Limited <ul style="list-style-type: none"> www.888.com 	601-701 Europort Gibraltar, GX11 1AA		N/A
Mr. Green & Co AB	Tagliaferro Business Centre	N/A	This was an additional letter sent September

Website Operator	Address	Response	GPEB Action
	Level 7, High Street Sliema SLM 1549 Malta		14 after receiving response from Incapsula Inc



Know your limit, play within it.

August 23, 2016

352035

Incapsula Inc
3400 Bridge Parkway, Suite 200
Redwood Shores, CA 94065
United States

To whom it may concern;

RE: bingocanada.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

GVC Holdings PLC

32 Athol Street

Douglas

Isle of Man

IM1 1JB

ATTN: Simon Duffy, Chairman; Jim Ryan, co-CEO; Norbert Teufelberger, co-CEO

Dear Mr. Simon Duffy, Mr. Jim Ryan and Mr. Norbert Teufelberger;

RE: bwin.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

John Anderson, CEO
Cassava Enterprises (Gibraltar) Limited
601-701 Europort
Gibraltar, GX11 1AA

Dear Mr. Anderson;

RE: www.888.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.. /2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Internet Media Network
254 W Baseline Rd #103
Tempe, AZ 85283
United States

To whom it may concern;

RE: betvictor.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Hillside (New Media) Limited; Hillside (Technology) Limited; Bet365 Group limited
Hillside, Festival Way
Stoke-On-Trent, ST1 5SH
United Kingdom
ATTN: John Coates, Joint Chief Executive; Denise Coates, CEO; Peter Coates, Director

Dear Mr. John Coates, Ms. Denise Coates & Mr. Peter Coates;

RE: bet365.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Jason Robins, CEO
DraftKings, Inc.
225 Franklin Street, 26th Floor
Boston MA 02110 USA

Dear Mr. Robins;

RE: www.draftkings.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Nigel Eccles, CEO
Fanduel Inc.
1375 Broadway
New York, NY 10018 USA

Dear Mr. Eccles;

RE: www.fanduel.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Gaming Innovation Group Limited
MT Secure Trade Limited
GB Buildings, Penthouse, Water Street
Ta'Xbiex XBX 1301
Malta
ATTN: Robin Reed, Founder & Director; Frode Fagerli, Founder

Dear Mr. Robin Reed and Mr. Frode Fagerli;

RE: guts.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

LeoVegas AB ; LeoVegas Gaming Ltd.

Sveavägen 59

113 59 Stockholm, Sweden

ATTN: Gustav Hagman, Group CEO & Co- Founder; Robin Ram Ericson, Board Chairman & Co- Founder

Dear Mr. Gustav Hagman and Mr. Robin Ram Ericson;

RE: leovegas.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Go North Limited
Villa Seminia 8 Sir Temi Zammit avenue
Ta'xbiex, NA 01011
Malta

To whom this may concern;

RE: maplecasinocom; crazyvegas.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Cloudflare, Inc.
101 Townsend Street
San Francisco, CA 94107
United States

To whom it may concern;

RE: mrgreen.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Pinnacle Sports Head Office
Ragnarok Corporation N.V.
Pletterijweg 43
Willemstad, Curaçao
ATTN: Jessica Davis (Paris Smith), Chief Executive

Dear Ms. Jessica Davis (Ms. Paris Smith),

RE: pinnacle.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Rational Group.
Amaya Inc
Douglas Bay Complex
King Edward Road
Onchan
Isle of Man, IM3 1DZ
ATTN: CEO Rafi Ashkenazi;

Dear Mr. Rafi Ashkenazi;

RE: pokerstars.com; pokerstars.eu; pokerstars.net; starsdraft.com;

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia

August 23, 2016

352035

Gaming Innovation Group Limited

Betit Group Ltd.

GB Buildings, Penthouse, Water Street

Ta'Xbiex XBX 1301

Malta

ATTN: Robin Reed, Founder & Director; Frode Fagerli, Founder

Dear Mr. Robin Reed and Mr. Frode Fagerli;

RE: superlenny.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Unibet Group Plc
Level 2, Valletta Buildings,
South Street, Valletta
Malta

ATTN: Henrik Tjärnström, CEO; Anders Stroem, Founder, Unibet Board Chairman

Dear Mr. Henrik Tjärnström and Mr. Anders Stroem;

RE: unibet.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Privacy Guardian
1928 E. Highland Ave. Ste F104 PMB# 255
Phoenix, AZ 85016
United States

To whom it may concern;

RE: allslotscasino.com, nexigames.net

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Townview Trading Ltd.
Athinodorou, Dasoupoli, Strovolos 3, Nicosia P.C. 2025,
Cyprus

ATTN: Fernando Hernandez, Director

Dear Mr. Hernandez,

RE: betcris.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

Continent 8 House
Pulrose Road
Douglas
IM2 1AL
Isle of Man

To whom it may concern;

RE: betway.com

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia



Know your limit, play within it.

August 23, 2016

352035

OVH Hosting
1901 McGill College Avenue
Suite 800
Montreal Quebec H3A 2N4
Canada

To whom it may concern;

RE: winningpokernetwork.com; americascardroom; truepoker

The British Columbia Gaming Policy and Enforcement Branch (GPEB), acting through GPEB's general manager, regulates all lawful gambling in the Province of British Columbia, Canada, ensures the integrity of gambling industry companies, people and equipment, investigates contraventions to the *Gaming Control Act* (the Act), and assists police with the investigation of gaming-related *Criminal Code of Canada* contraventions. GPEB's authority is set out in the Act.

GPEB has reason to believe that your company is conducting and managing a lottery scheme which facilitates online betting within the Province of British Columbia, Canada.

In Canada, Part VII of the *Criminal Code of Canada* outlines prohibitions, offences and some limited exceptions in relation to betting, lotteries, games of chance, and permitted lottery schemes. Section 207 of the *Criminal Code of Canada* states that lottery schemes in Canada may only be lawfully conducted and managed by the government of a province or territory or by a limited number of other types of licensed organizations (eligible charitable and religious organizations). In British Columbia, the provincial government conducts and manages lottery schemes through the Province's statutory agent, the British Columbia Lottery Corporation (BCLC). BCLC's authority is set out in the Act.

No person, other than BCLC or a licensee, may conduct, manage or operate a lottery scheme in British Columbia; and no person may offer gaming services in British Columbia unless they are authorized by GPEB to do so. GPEB must caution that any gambling conducted, managed or operated by a company or individual in British Columbia is likely to be contrary to both the *Criminal Code of Canada* and the Act unless the company or individual has been authorized to do so under the Act.

Unauthorized gambling conducted, managed or operated by corporations or individuals is subject to the offense provisions under the Act. The Act provides for fines of up to \$100,000 on a first conviction.

.../2

Ministry of Finance

Gaming Policy and
Enforcement Branch
Assistant Deputy Minister's
Office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: (250) 387-1301
Facsimile: (250) 387-1818

Location:
Third Floor, 910 Government Street
Victoria, BC
Web: www.gaming.gov.bc.ca

Similarly, it is not permitted for any organization or individual to provide gaming supplies or services in British Columbia without a valid certificate of registration or license issued by GPEB. The offence provisions of the Act also apply to these activities.

GPEB officials will be meeting with major North American and European gambling regulators to discuss the framework for legal gaming in British Columbia and to share a list of companies that GPEB has reason to believe are offering gambling opportunities in this province without lawful authorization.

Please consider this letter to be notification of GPEB's view that the gambling and betting opportunities your company is offering in British Columbia fall outside of the legal framework that applies in the province. It is not permitted for your company to provide these opportunities to residents of the province without being registered by GPEB and working under contract to BCLC.

If you would like to discuss the contents of this letter or British Columbia's legal framework for gambling, please contact Robin Jomha, Director and Deputy Registrar, Corporate Registration at robin.jomha@gov.bc.ca.

Yours sincerely,

John Mazure
Assistant Deputy Minister and
General Manager
Gaming Policy and Enforcement Branch
Ministry of Finance
Government of British Columbia