

STATE MONOPOLY ON GAMBLING GAMES:

HOW RUSSIAN ILLEGAL OFFSHORE COMPANIES MAKE MONEY ON THE IMPERFECT LEGISLATION OF THE REPUBLIC OF MOLDOVA

May 2022

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5. **INTRODUCTION**

**1. Purpose of study**

Since the end of 2016, a state monopoly on gambling games has been introduced in the Republic of Moldova. The only legitimate organizer of such activities is the state-owned enterprise "National Lottery of Moldova" and its partners within the framework of the public-private partnership (PPP) project. Contrary to the terms of the contract of the PPP, signed in 2018, during the project, the state has repeatedly revised the tax policy and laws affecting the organization of gambling games.

**The purpose of this study:**

- to find out what is the share of illegal offshore companies in the field of online gambling games on the Moldavian market and the dynamics of the volume of money transfers of players from Moldova to the shadow sector;

- to determine the prerequisites, consequences and risks of the existence of a black market of online gambling games in Moldova;

- to establish the origin of companies in the shadow sector;

- to give recommendations on the withdrawal of this sector from the shadows and increase the income of the state and legitimate business.

**For the sake of completeness of the analysis in the study, consider:**

- stages of implementation of the PPP project;

- causes and effects of changes in gambling law;

- financial results of the state enterprise "National Lottery of Moldova";

- the volume of money transfers to the shadow sector of online gambling, as well as the loss of the state and legal business;

- the structure of illegal bookmakers popular among players from Moldova.

**1.1 Gambling in Moldova, reasons for the introduction of a state monopoly**

The joint-stock company "National Lottery of Moldova" was established[[1]](#footnote-1) in 2011 by the decision of the government. According to the Licensing Chamber[[2]](#footnote-2), as of July 1, 2016, 65 economic entities were licensed in the field of gambling in Moldova. In total, they owned 72 licenses for gambling activities (four licenses for casino maintenance, one license for organizing and conducting lotteries, 54 licenses for operating slot machines with cash winnings, 13 for betting on sports) at 400 addresses. Periodically, law enforcement agencies have identified unlicensed, underground gambling activities.   
 The analysis carried out by the authorities at that time revealed the following main problems in this area:

*- extremely low level of social responsibility among economic entities - operators in the field of gambling: chaotic placement of gaming halls near objects of social significance, including educational institutions. This phenomenon actively involved teenagers in gambling and negatively affects the education process.*

*- lack of adequate state control and regulation of activities. This entailed the inequality of the participants in the process - both the organizers and the players.*

*- lack of transparency of financial activities. This stimulated the evasion of taxes and fees to local and national budgets.*

*- lack of developed infrastructure in this area. This had a negative impact on tourism and leisure activities of citizens and tourists visiting the Republic of Moldova.*

**In 2016, almost all licenses were suspended after inspections organized by law enforcement agencies**. Then it turned out[[3]](#footnote-3) that all licenses were issued illegally using the electronic system *e-licentiere*. According to the National Center for Combating Corruption (NCCC), the fraudulent **scheme caused damage to the state in the amount of 15 million lei**. At the same time, the NCCC arrested senior employees of the Licensing Chamber on suspicion of "manipulations to conceal income and reduce tax revenues*"*.

It is noteworthy that until 2016, revenues[[4]](#footnote-4) to the state budget due to the activities of the state enterprise "National Lottery of Moldova" amounted to:

2012 - 460 144 lei

2013 - 416 174 lei

2014 - 787 490 lei

2015 - 423 941 lei

The scale and, in many ways, uncontrolled activity in this area led to the fact that by the end of 2016, **the Moldavian parliament introduced a state monopoly on all gambling games, with the exception of casinos**. The authors of the relevant bill referred[[5]](#footnote-5) to the experience of EU countries, in half of which a monopoly operated in the field of gambling *(Austria, Denmark, Sweden, Hungary, Finland, etc.).*

The proposed changes were aimed at ensuring proper control in the field of gambling, reducing the antisocial influence of this industry, excluding unauthorized activities of operators, reducing tax evasion and increasing budget revenues from gambling, protecting consumer rights.

Thus, **the state enterprise "National Lottery of Moldova" became the sole organizer of such gambling games as lottery, slot machines with cash winnings, betting, gambling using electronic communication systems**. It was obliged to comply with the requirements established by law (regarding the age of participants, placements, etc.). The bill prescribed a minimum winning fund for each type of gambling, introduced a requirement for the mandatory use of electronic devices when gambling. They should be connected to a centralized online platform through which the state regulator, represented by the Ministry of Finance and its subordinate structures, will be able to monitor. At the same time, the tax authority must provide an interface for permanent connection to the centralized system.

So, the organizers of betting (sweepstakes or bookmakers) should accept bets only through electronic devices. They must be connected to an online monitoring system, have tax memory, software and connection to a centralized system. Terminals should perform the function of cash registers. Gambling with the use of communication systems can be carried out through a website with a Moldavian domain and a server located on the territory of Moldova.

There is a norm for halls with slot machines within the municipality - at least 20 machines with cash winnings, in other localities – at least 10 machines. All electronic devices used in gambling must comply with ISO27001 quality certificates.

**1.2 Public-private partnership – results of the competition**

In 2017, it was decided[[6]](#footnote-6) to launch a public-private partnership project "Services in an area that is a state monopoly managed by the “National Lottery of Moldova” JSC. Its goal was to develop gambling activities by attracting investments, best practices and know-how, ensuring the reduction of social risks and increasing budget revenues. The Public Property Agency acted as a public partner. In the period from 10.10.2017 to 20.03.2018, the Commission for the Selection of Private Partners[[7]](#footnote-7), which included the Ministry of Economy and Infrastructure, the Ministry of Justice, the Ministry of Finance, the Public Services Agency, the State Tax Service, the Public Property Agency and the National Lottery of Moldova, held a public competition.

**The winners were:**

- Novo Gaming M Technologies GmbH, Novomatic Gaming Industries GmbH, Novomatic AG (Austria) - for the project "Public-private partnership for the development of the activities of the "National Lottery of Moldova" in the field of slot machines with cash winnings, including by means of electronic communications".

- New Games AD, National Lottery AD and NGM SPC Limited (Bulgaria) for the project "Public-Private partnership for the development of the activities of the National Lottery of Moldova in the field of lotteries and betting on competitions/sporting events, including through electronic communications».

According to the certificate of the Public Property Agency of Moldova, Novomatic AG, Austria is one of the world's largest companies in the field of gambling games technologies, with an annual turnover of about 2.3 billion euros. Founded in 1980. **The amount of planned investments in the project was estimated at about 32 million euros in the first 3 years with the perspective of increasing this figure to 70 million euros during the implementation of the project.**

National Lottery AD, Bulgaria is the largest licensed gambling operator in Bulgaria with the fastest economic growth in Central and Eastern Europe, recognized as the most innovative lottery in the Southeast of Europe. In 2017, National Lottery AD became a permanent member of the World Lottery Association. Over the past 3 years (according to the PPA in 2018), the turnover of the National Lottery AD company exceeded 650 million euros. The amount of winnings awarded exceeded 600 million euros in a country with a population of 7.1 million citizens.

**According to the development strategy in the field of lotteries and betting, the company planned investments in a public-private partnership project in Moldova - around 6 million euros at the first stage with the prospect of a turnover of 40 million euros for the fifth year after the implementation of the project.**

As a result of the public tender **on 23.04.2018, two public-private partnership contracts were concluded. And in the middle of 2019, the state website was launched 7777.md for the organization of electronic activities in the field of lotteries and betting, meeting the requirements of the current law.**

1. **THE ONLY AUTHORIZED LOTTERY AND SPORTS BETTING WEBSITE IN MOLDOVA**

**2. Introduction and suspension of the state lottery and betting website**

In June 2019, the first gambling games were launched[[8]](#footnote-8) on the only site authorized in Moldova 7777.md , with the help of which the state enterprise "National Lottery of Moldova" carries out its activities in this area.

In the period of **June 25 - December 31, 2019**, revenues from online gambling amounted to **33.05 million lei, including**:

- electronic lottery tickets - **9.25 million lei;**

- bids - **23.80 million lei.**

Thus, the state monopolist "National Lottery of Moldova" during this period received **28.36 million lei due to the activities of the only website authorized in Moldova**:

- electronic lottery tickets - **6.94 million lei;**

- bids - **21.42 million lei**.

Nevertheless, together with organizational expenses, the activity of the only gambling site authorized in Moldova 7777.md turned out to be unprofitable for the state monopolist in the reporting period. **Losses of a state-owned enterprise in the segment of an authorized website 7777.md in this period amounted to 1.54 million lei**.

In its annual report for 2019, the Public Property Agency (PPA) explained this phenomenon by the **unhindered activity of unauthorized gambling sites in Moldova**:

*«We note that since the introduction of the state monopoly (December 2016) to the present, the online gambling business continues to develop illegally on the territory of the Republic of Moldova. To gambling (betting) sites, such as: https://md.1xbet.com/ru/; https://www. parimatch.com/; https://betwinner.com/ru/, https://www.marathonbet.com/su/ etc. you can easily log in from the territory of our country from any device. Most often, participants of such gambling games, the organizers of which are located abroad, prefer such sites, since it is impossible to track their income and expenses there. This entails the risk of tax evasion and money laundering. As a result, players migrate to illegal sites. This is the main reason why the state enterprise "National Lottery of Moldova" incurs losses in the field of online gambling».*

In the same report, the PPA notes **numerous appeals of the state enterprise "National Lottery of Moldova" to the competent state authorities demanding to limit the activities of illegal betting websites on the territory of the Republic of Moldova**, as well as to limit the ability of participants **to replenish their gaming accounts with funds to participate in such bets**. These appeals were unsuccessful, *the Public Services Agency stated in 2019.*

In parallel, in August 2019, the Parliament adopted amendments[[9]](#footnote-9) to the Tax Code, introducing a **tax on lottery winnings and sports betting**, which came into force on 01.01.2020. According to these amendments, winnings of more than 240 lei in sports betting were taxed at 12%. **However, winning lotteries and sports betting by law was not considered a net win, but the total amount of money received by the player after winning the bet.**

*«Winnings are the gross income received from gambling games, lotteries and advertising campaigns in both monetary and non–monetary form. For the purposes of applying this concept, winnings from gambling in casinos or slot machines represent a documented positive difference between the amount of winnings and the amount of bets. In other cases, the winnings represent the total amount of the winnings - TAX CODE No. 1163 of 24-04-1997, art.12 p.14»*

**For example**, having made a successful bet of 1000 lei with a coefficient of 1.07, the player received 1070 lei. According to the law, 240 lei of this amount was not taxed (1% of the amount of personal exemption according to the law). However, from the remaining amount - 830 lei (1070 – 240), a tax of 12% was automatically withheld, although only the amount of 70 lei was directly won. **As a result, winning on the bet, in the end the player received 970 lei**, i.e. less than he had bet on the game. Such a taxation system made the only sports betting site authorized in Moldova less attractive than foreign illegal sites that continued to operate outside the legal field of the Republic of Moldova and, accordingly, did not withhold taxes on winnings at all.

Considering these factors (*the availability of illegal offshore websites, the unhindered possibility of depositing and withdrawing funds from illegal offshore gambling sites and illogical tax policy affecting only the state website 7777.md* ) **On December 23, 2019, during a meeting of the Commission for Monitoring Public-Private Partnership Contracts, it was decided[[10]](#footnote-10) to suspend betting on the only authorized website in Republic of Moldova 7777.md for up to 12 months.**

It is noteworthy that by this time the activities of the state enterprise "National Lottery of Moldova" for the first time since its creation began to bring substantial profits[[11]](#footnote-11), and revenues to the state budget increased many times – from 2,344,622 lei in 2016 to 25,751,479 lei in 2019. (see Table No. 1)

*Table No. 1, source "National Lottery of Moldova»*

* 1. **The reopening of the state lottery and betting website and the efforts of the state in the fight against violators**

In May 2020, amendments[[12]](#footnote-12) to the Tax Code[[13]](#footnote-13) of the Republic of Moldova entered into force, including the concept of winnings.

*«Winnings are the gross income received from gambling games, lotteries and advertising campaigns in both monetary and non–monetary form. For the purposes of applying this concept, winnings from gambling in casinos, slot machines, betting on sports competitions/events or gambling organized through electronic communication networks* ***represent a documented positive difference between the amount of winnings and the amount of bets****. In other cases, the winnings represent the total amount of winnings – Art. 12, par. 14 of the Tax Code of the Republic of Moldova, 01.05.2020».*

That is, unlike the previous provisions of the law, now the tax on all types of gambling, including lottery and sports betting, **began to be levied directly on the actual amount of winnings.**

And since August 1, 2020, changes to some terms of the public-private partnership contract have come into force, according to which the private partner of the "National Lottery of Moldova" in the field of lotteries and sports betting guaranteed a minimum income to a state-owned enterprise. This created favorable conditions for the state monopoly in the field of gambling (*taking into account the negative trend at the end of 2019, which was reflected in the report of the Public Property Agency*). So at the beginning of September 2020, the only authorized lottery and sports betting site in Moldova 7777.md with the help of which the state enterprise "National Lottery of Moldova" carries out its activities in this area, **reopened[[14]](#footnote-14) the "Sports" section and resumed the acceptance of sports betting.**

However, illegal foreign online betting shops were still available in Moldova. And already in 2021, the next amendments to the Tax Code of Moldova[[15]](#footnote-15) came into force, affecting the mechanism of taxation of lottery winnings and sports betting:

*«Winnings are the gross income received from gambling, lotteries and advertising campaigns in both monetary and non–monetary form. The winnings received through electronic communication networks* ***represent the total amount withdrawn from the gaming account****. For the purposes of applying this concept, winnings from gambling in casinos, slot machines, sports betting/events represent a documented positive difference between the amount of winnings and the amount of bets. In other cases, the winnings represent the total amount of winnings».*

In other words, according to the new mechanism, even if a player replenished the account with 1000 lei, placed a bet of 100 lei, won nothing and decided to withdraw the remaining amount of his deposit from the account, the player was automatically withheld a tax of 12% - 108 lei: ((1000 – 100) \*12%) = 108 lei. Thus, **of any amount (from 2021) withdrawn from the gaming account, regardless of whether it is a winning one or a direct deposit, the player lost 12%**. Such a system of taxation contradicted international practice and made an authorized website of a state monopolist 7777.md less attractive than illegal similar sites of offshore companies, where taxes were not withheld from winnings or even more so from deposit withdrawals.

Only on 16.12.2020, within the framework of the draft Fiscal Policy 2021, amendments[[16]](#footnote-16) were made to the law "On the organization and conduct of gambling" prohibiting access to such sites in the Republic of Moldova. The initiator of the amendments explained then that they would help "*more clearly regulate the prohibition and blocking of illegal sites provided for by law».*

On the basis of amendments to the law "On the organization and conduct of gambling", **Moldavian Internet service providers[[17]](#footnote-17) for the first time began to block access to the websites of foreign illegal bookmakers from the end of January 2021**. This was preceded by the decision of the National Agency for Regulation in the Field of Electronic Communications[[18]](#footnote-18) and Information Technologies, which demanded to block access to the sites of foreign betting shops, and also referred to the list of the websites[[19]](#footnote-19) themselves compiled by the Agency for Public Services. The list at that time included 229 portals, most of which belonged to the **1xbet** bookmaker. We are talking about the official website of 1xbet and its "mirrors" — domain sites with a slightly modified name, which allowed to get to the main site. At the same time, the press noted[[20]](#footnote-20) that the "mirrors" of the 1xbet portal were still available to users from Moldova, as well as the sites of some well-known foreign bookmakers, which are simply not on the list of the Public Services Agency. *As of 04.04.2022, the list already includes 766 sites.*

In addition, amendments to the Criminal Code of Moldova[[21]](#footnote-21) on punishment for violation of the law on the organization and conduct of gambling, which is a state monopoly, came into force in January 2021. **This article prescribed, in particular, criminal liability for unauthorized persons not only for organizing gambling, but also for any kind of mediation, including the provision of payment services or electronic payment in favor of persons who are not authorized to conduct or organize gambling in the Republic of Moldova.**

However, these changes in the law did not immediately bring the desired effect. In March 2021, the state-owned enterprise "National Lottery of Moldova" stated[[22]](#footnote-22) that some payment systems continue to ignore the law, acting as intermediaries for unauthorized gambling service providers. At the same time, they receive commissions for replenishing gaming accounts, as well as for issuing cash received from gambling.

*«During the inspections, it was revealed that in more than 1,000 commercial points throughout the country, which are serviced by payment systems, it is still possible to replenish gaming accounts on websites banned in the Republic of Moldova. We are also concerned about the possibility of transferring money to sports betting cashiers, unauthorized in our country, directly from bank cards. Most of these payments go to the betting shops https://md.1xbet.com/ru/; https://www.parimatch.com/ ; https://betwinner.com/ru /, https://www.marathonbet.com/su who do not have the right to operate in the Republic of Moldova and have no relation to the state budget of the country",* - it was stated in the press release of the "National Lottery of Moldova ».

It also followed from the official message that commercial banks of the Republic of Moldova continue to carry out such transactions, contrary to the law. According to the state enterprise, the volume of such annual transactions was estimated at **millions of lei**, causing significant damage to the state budget.

The confrontation in this process is confirmed by the repeated press release[[23]](#footnote-23) of the state enterprise "National Lottery of Moldova" in March of the same year: "PAYMASTER" SRL (RunPay) remains a payment operator that does not follow the current legislation, thus risking sanctions for its actions*".*

The press release stated that the state enterprise had notified the competent state authorities about this.

*"Appeals were sent to commercial banks of our country about the termination of money transfers carried out at the request of cardholders issued by these banking institutions. The purpose of such transfers is the accounts of the organizers of unauthorized gambling",* - it follows from the press release.

At the same time, the National Lottery of Moldova thanked the country's largest bank Moldova-Agroindbank, which stopped replenishing gaming accounts on **1xbet.com and parimatch.com** via VISA cards, as well as Victoriabank, which stopped depositing accounts on parimatch.com. **It is noteworthy that there are 11 commercial banks[[24]](#footnote-24) in Moldova, and 5 companies[[25]](#footnote-25) have a license from the National Bank of Moldova to issue electronic money (payment systems).**

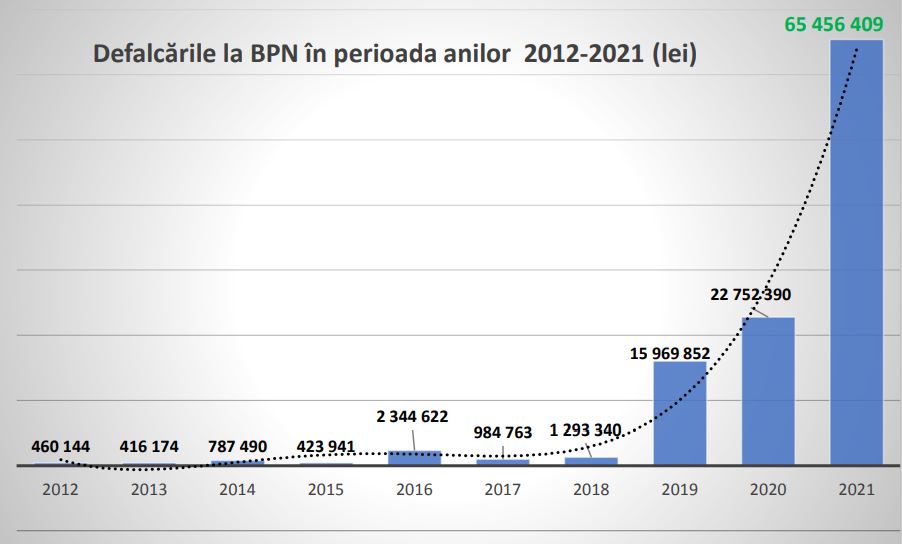
In 2019, an information portal about business and advocacy Bizlaw.md created with the support of the US Embassy in Moldova, wrote[[26]](#footnote-26) with reference to the country's online payment systems **that the volume of money transfers received by illegal bookmakers from the Republic of Moldova exceeds 2 billion lei annually.**

The State Tax Service (STS), in turn, began to identify[[27]](#footnote-27) players of foreign sites that are illegal in Moldova and send them letters[[28]](#footnote-28) calling on them to voluntarily pay taxes on winnings.

Based on the above, it can be stated that since the beginning of 2021, the process of blocking the activities of unauthorized online gambling providers has begun in Moldova for the first time. State structures in practice began to regulate the gambling market of Moldova, which is a state monopoly. On the one hand, the legislation has tightened, which previously did not prescribed criminal liability for mediation in the organization of illegal gambling. On the other hand, only since the beginning of 2021 in Moldova for the first time began to block access to unauthorized gambling sites. In parallel, the State Tax Service began to monitor winnings on illegal websites and an attempt to evade taxes from them. And although the process of blocking money transfers to unauthorized gaming accounts and withdrawing funds to Moldovan bank cards faced opposition from some payment systems and most representatives of the banking sector, and the taxation mechanism remained imperfect, **the efforts of the state as a whole brought results**.

**2.2 Financial indicators of the "National Lottery of Moldova"**

The efforts made by the state to combat illegal foreign bookmakers in 2021 brought tangible results for the state budget. By the end of 2021, the profit[[29]](#footnote-29) of the state-owned company amounted to almost 120 million lei (in 2020, the National Lottery of Moldova suffered losses of 10.3 million lei, in 2019 - losses of 1.07 million lei). **At the same time, the total amount of revenues to the state budget due to the activities of the "National Lottery of Moldova" by the end of 2021 for the first time in the entire existence of the state enterprise exceeded 65 million lei. This is almost 3 times more than in 2020** (22.7 million lei)**, and more than 4 times more than in 2019 (15.9 million lei) –** *see the Graph №1*



***Deduction to BPN in the period 2012-2021 (lei)***

*Graph №1,* ***Source: National Lottery of Moldova***

According to the information certificate of the Ministry of Finance[[30]](#footnote-30), which was attached to the draft law on the budget for 2022, the state enterprise **"National Lottery of Moldova" recorded the best dynamics of sales revenue in comparison with other state-owned enterprises. In the first semesters of the period 2016-2021, the amount of sales revenue increased from 0 lei to 1 billion 385 3 million lei.** *(see the Table №2)*

*Table No. 2 - Analysis of the dynamics of income from sales of some state-owned* *enterprises and commercial companies in semester I, period 2016-2021 (million lei),* ***source: Ministry of Finance***

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Nr. d/o** | **Company name** | **Semester I 2016** | **Semester I 2017** | **Semester I 2018** | **Semester I 2019** | **Semester I 2020** | **Semester I 2021** |
| 1 | S.E. “Moldelectrica” | 278,2 | 278,9 | 297,1 | 301,7 | 287,6 | 313,6 |
| 2 | S.E “Fabrica de sticla dinChisinau” | 126,0 | 36,1 | 153,8 | 159,2 | 157,6 | 178,3 |
| 3 | S.E. “ Calea Ferata din Moldova” | 404,8 | 467,2 | 435,4 | 498,0 | 344,7 | 220,3 |
| 4 | S.E. Administratia de stat a drumurilor” | 19,9 | 21,6 | 28,1 | 27,2 | 26,5 | 30,4 |
| 5 | S.E. “Posta Moldovei” | 190,4 | 192,0 | 201,8 | 251,8 | 194,2 | 209,0 |
| 6 | S.E. “Combinatul de Vinuri de calitate”Milestii Mici” | 10,5 | 15,3 | 18,0 | 20,6 | 8,5 | 13,6 |
| 7 | S.E. “Portul Fluvial Ungheni” | 1,5 | 2,5 | 1,7 | 1,7 | 1,8 | 5,9 |
|  | | | | | | | |
| 1 | JSC “Moldtelecom” | 1141,2 | 894,4 | 863,2 | 835,4 | 794,1 | 813,9 |
| 2 | JSC “Termoelectrica” | 1361,3 | 1441,2 | 1562,5 | 1508,1 | 1327,4 | 1544,9 |
| 3 | JSC “Red Nord” | -\* | -\* | 334,0 | 378,1 | 337,0 | 371,7 |
| 4 | JSC “ CET-Nord” | 131,3 | 136,4 | 181,8 | 158,0 | 190,7 | 224,0 |
| 5 | JSC” Combinatul de vinuri Cricova” | 65,8 | 73,1 | 92,8 | 94,9 | 64,7 | 86,8 |
| 6 | JSC “ Metalferos” | 397,5 | 565,5 | 693,1 | 702,6 | 479,5 | 1340,5 |
| 7 | JSC “Loteria Nationala a Moldovei” | - | 1,8 | 1,6 | 343,8 | 203,7 | 1385,3 |

The comparison of money transfers from Moldova via online payment systems in the category "Games and entertainment" is also indicative. *(see Table №3 - 4)*

**The number and amount of payments received by users of payment services in the category "games and entertainment"**

|  |  |  |
| --- | --- | --- |
| **Year** | **Number** (million operations) | **Value**  (million lei) |
| 2018 | 1,23 | 280,64 |
| 2019 | 1,8 | 386,97 |
| 2020 | 2,32 | 520,47 |
| 2021 | 3,15 | 691,6 |

***Source: NBM****Table №3*

|  |  |  |
| --- | --- | --- |
| **Year** | **Number of operations** | **Value**  (million lei) |
| 2019 | 29 677 | 5,43 |
| 2020 | 52 439 | 8,7 |
| 2021 | 241 652 | 536 |

**The number and amount of payments paid for 7777.md through payment services*****Source: NGM*** *Table №4*

According to statistics[[31]](#footnote-31) provided to Legal Business Monitor by the National Bank of Moldova and NGM Company, the volume of the gambling black market of the Republic of Moldova has been steadily growing in recent years. In 2020, it reached the highest level, exceeding 500 million lei (and this is excluding transfers via bank cards). But if in 2019 transfers to the only authorized website amounted to 5.43 million lei, and in 2020 8.7 million lei, then in 2021 the volume of online transfers to the state website 7777.md increased to 536 million lei. *(see Graph №2)*

*Graph No. 2 - Volume of money transfers via online payment systems, 2018-2021, source NBM and NGM Company*

Based on the dynamics and geometric progression of income growth, it can be noted that the state-owned enterprise "National Lottery of Moldova" did not have such high incomes before the implementation of the public-private partnership project. And since 2021, online money transfers have largely been transferred from the shadow sector of online gambling to the only state website. Thus, even despite the changes introduced to the mechanism of taxation of gambling winnings, the remaining efforts of the state made to combat illegal foreign bookmakers significantly affected both the income of the state enterprise "National Lottery of Moldova" and the revenues to the state budget due to its activities.

1. **AMENDMENT OF THE GAMBLING LAW**

**3. An increase in the tax on winnings and a ban on advertising**

From January 1, 2022, the tax on gambling winnings[[32]](#footnote-32), including lottery and sports betting, **was increased to 18%, which is 50% more than last year's tax rate**. At the same time, the mechanism of taxation in the electronic space has remained unchanged – the amount of withdrawal is taxed, regardless of whether it is a player's deposit or directly the amount of winnings.

Moreover, despite the warnings of the Ministry of Finance about the risks provided for by the public-private partnership contract, **on November 25, 2021, the Moldavian Parliament adopted amendments to the Gambling Law**[[33]](#footnote-33), which entered into force on January 1, 2022. The new law prohibits any form of direct or indirect advertising (promotion) of gambling (including online), sports betting and any other gambling-related activity, including on television, radio, mass media and together with any outdoor advertising, service providers, public and private transport, and postal services, with the exception of advertising placed on the office of the gaming service provider; prohibition of any non-commercial activities (such as charity, sponsorship, etc. d.), which may lead to the publication (publication) of information about gambling, sports betting and other gambling-related activities*.*

According to an analysis[[34]](#footnote-34) made in September 2021 by the author of the draft amendments to the law, Chairman of the parliamentary commission on Economy, Budget and Finance, **Dumitru Alaiba**, the basis for the changes in the law was "**the emergence of gambling addiction**" and "**the increase in the number of dependent people**." The purpose of the law was to "**reduce the number of people addicted to gambling**." However, the analysis did not contain specific data, studies, opinion polls, etc., confirming the author's statement about the "**increase in the number of gambling addicts**" and the existence of this problem in Moldova as a whole. The list of goals also included "**reducing the number of gambling participants**" and "**reducing the income of operators and, subsequently, revenues to the state budget**"***.***

We emphasize that the first of its kind such a sociological survey[[35]](#footnote-35) was conducted only in April 2022 by iData company commissioned by Legal Business Monitor. The study showed that more than 80% of respondents have never played gambling games, such as lottery and sports betting. Only 1.3% said they play every week. Almost a quarter of respondents are willing to spend no more than 100 lei per month *(± €5*) on this entertainment, and only 0.8% are willing to spend more than 5,000 lei per month *(± €250*). At the same time, it is impossible to assess the dynamics in Moldova. Since such studies have not been conducted before, there is no reason to assert that there is an increase in the number of gambling addicts and in general any indicators in this regard.

The author of the draft amendments to the law Dumitru Alaiba also argued that these changes affect only:

- the state enterprise "National Lottery of Moldova" and its private partners within the framework of the public-private partnership contract;

- advertising agencies - about 50;

- advertising distributors - about 20.

At the same time, the analysis claims that the state monopolist (the National Lottery of Moldova) will suffer ***"insignificant losses"***, and ***"income from taxes and fees from advertising distributors"*** will fall only ***"slightly"***. Accordingly, ***"the negative effect on the budget will be symbolic,"*** it was stated in the analysis of the author of the amendments without providing any economic calculations.

In his analysis, the author of the draft amendments to the law also claims that "they fully comply with European legislation in the field of gambling," referring to the decision of the Court of the European Union on the advertising of gambling by a state monopoly. The primary source of the document, which is partially quoted by delegate Dumitru Alaiba, is "The commission's Recommendation of July 14, 2014 on the principles of protection of consumers and users of online gambling, as well as on restrictions on minors' access to online gambling." **However, the original version of the document says the following[[36]](#footnote-36):**

*«Commercial messages should not be excessive, and their content should not be aimed directly at minors, and also should not be placed in places where there is an increased risk that they will be seen by teenagers." The advisory document also states that "Commercial communications about online gambling services can play an important role in directing consumers to an authorized offer under surveillance that includes correct gambling information, including gambling addiction risks and appropriate warning messages".*

In addition, the same document contains the following recommendation: *"It is important to improve the awareness of users and players about online gambling services, which, in accordance with EU law, are not permitted by the law of a member state. It is also important to act against this service."* That is, it is recommended to inform the public about illegal operators of online games and act against them.

In addition, the recommendation states the importance of verifying the identity and age of online gambling users and a transparent sponsorship mechanism: *"Operators are important sponsors of teams and sports events in Europe. In order to improve the assumption of responsibility for the sponsorship of online gambling providers, there should be clear requirements according to which sponsorship should be transparent and responsible».*

Thus, we can conclude that in the document to which the author of the draft amendments to the Gambling Law selectively referred in the preliminary analysis, **there are no recommendations anywhere on a complete ban on gambling advertising and sponsorship activities**. The document deals with restrictions related to minors, responsible advertising, the importance of transparent and responsible sponsorship activities and the need to combat illegal online gambling operators in favor of state-controlled bodies capable of restricting access to such sites for minors. It is noteworthy that **there was no talk at all about an instant lottery in the recommendation of the European Commission, to which delegate Dumitru Alaiba referred.**

The author did not identify any potential risks from the introduction of amendments to the law, arguing in the analysis that *"the state has enough control tools in the field of gambling”*.

* 1. **Contradictions in the procedure for changing the Gambling Law**

According to the conclusion of the General Legal Department of the Parliament [[37]](#footnote-37), **the bill has not passed economic, financial and scientific expertise**. It lacks an analysis of the consequences, argumentation of costs and benefits. In addition, the **Legal Department of the Parliament** noted the need for public consultations with the authorities, whose competence directly includes the object of regulation of this bill. This list included the **Ministry of Finance**, which submits proposals to the government on improving legislation regulating gambling activities; **The Public Services Agency**, which issues licenses for the organization of gambling and approves specific requirements for conducting gambling through electronic communications; the Council on Broadcasting, which regulates activities in this area.

Despite this, in November 2021, the Moldavian Government, represented by Prime Minister Natalia Gavrilita and Minister of Justice Sergiu Litvinenko, approved[[38]](#footnote-38) the bill for its submission to Parliament. The fact that there is no conclusion of the **Ministry of Finance, the Public Services Agency, the Public Finance Control Commission** is confirmed by the official page*[[39]](#footnote-39)* of the Parliament of the Republic of Moldova with the history of the stages of consideration of the bill*.*

However, the report of the Ministry of Finance, which accompanied the draft law on the state budget for 2022, noted that any changes in laws affecting the activities of public-private partnerships in the field of gambling is a violation of the contract and may entail its termination with the obligation to pay a substantial penalty by the state [[40]](#footnote-40).

**3.2 The effects of changing the law – the outflow of players to illegal foreign sites**

According to the website **Top100Bookmakers.com**[[41]](#footnote-41) **On December 1, 2021**, an average of **8260 people** from Moldova played daily on foreign sites illegal in Moldova, thus the sports betting market of Moldova ranked 96th out of 140. The structure of illegal bookmakers in Moldova, on whose websites Moldavians played during the specified period, looked like this:

1. Zenit Bet - 3720

2. Bet365.com - 2010

3. Зенит.win - 746

4. 1xBet.com - 622

*Another 14.1% - were represented by other illegal bookmakers.*

According to the same website, **as of April 1, 2022**, an average of **13700 people** from Moldova were already playing on illegal foreign sites in Moldova, and the sports betting market of Moldova began to occupy 101st place out of 158. The structure of popular illegal foreign bookmaker sites in Moldova began to look like this:

1. Bet365.com - 8430

2. ZenitBet - 2850

3. 1xBet.com - 1030

4. Parimatch.com - 471

5. Parimatch.ru - 283

6. Zenit.win - 171

7. Fonbet.ru - 168

So for 4 months (December 1, 2021 - April 1, 2022), the average number of Moldovian players playing daily on illegal bookmaker sites in Moldova increased by 66%.

According to the report of the **Service for the Prevention and Combating of Money Laundering of the Republic of Moldova** [[42]](#footnote-42), published in April 2022, "players from the Republic of Moldova can create accounts with international online gambling operators. There is no law prohibiting this and there are no sanctions for those who decide to play online casinos. [...] The analysis of the gambling sector has shown that **there is a relatively high risk of money laundering and terrorist financing**"*.*

**3.3 Activation of fraudsters and illegal bookmakers in the field of gambling**

Just two weeks after the ban on any advertising of gambling and sponsorship activities in this area came into force, as well as an increase in the tax on winnings by 50% (from 12% to 18%), the state enterprise "National Lottery of Moldova» paid attention [[43]](#footnote-43) on the increased number of fraud cases in this segment.

*"Fraudsters have become more active, luring players to the pages and channels of social networks, where they aggressively and excessively advertise sports betting operators whose activities are prohibited in the Republic of Moldova. The authors of these fake pages illegally use the brand and trade mark of the National Lottery of Moldova to lure players, including teenagers,"* the official statement of the state monopolist says, demanding responsible state structures to investigate these violations of the law. The state enterprise "National Lottery of Moldova" pointed out at the same time that it obeyed the requirements of the law, having stopped all advertising and sponsorship activities.

In addition to the online platforms that have appeared in Moldova, where illegal bookmakers are illegally promoted, such as **1xBet**, the public TV channel **Moldova-1** indirectly made an advertisement for this illegal bookmaker in a report[[44]](#footnote-44) about a football match, which was published in the evening news on April 5, 2022 under the heading "Sports". Throughout the entire report, the duration of which was 01:12, the advertising banners of the bookmaker 1xBet, banned in Moldova, placed on the football field, fell into the frame. *(see Image 1)*

Image No.1 – News release, Moldova-1 public TV channel, source: trm.md



These examples confirm that even 4 months after the total ban on gambling advertising in Moldova came into force, illegal bookmakers had an advantage over the state-owned enterprise "National Lottery of Moldova", continuing to advertise their brands uncontrollably.

1. **ILLEGAL OFFSHORE BOOKMAKERS**
2. **The structure of illegal offshore bookmakers**

Considering the structure of illegal websites in Moldova according to statistics **Top100Bookmakers.com** As of April 1, it can be noted that 6 out of 7 bookmakers are Russian. Moreover, according to one of the authoritative Russian economic media "RBC", 5 out of 7 bookmakers, on whose websites Moldovans played in April, entered the National Rating of Russian bookmakers in 2021[[45]](#footnote-45).

**Zenitbet.com**[[46]](#footnote-46) - It was founded in Russia in 1998. At the moment, she operates on the basis of a Curacao license.

**1xBet**[[47]](#footnote-47) — It was founded in Moscow in 2007. At the moment, the bookmaker is used by more than 400,000 regular visitors. The company is focused on players from the CIS countries, but the site has been translated and adapted into more than 50 languages. The bookmaker does not have a license in the territory of the Russian Federation, the legal address is on the island of Curacao. **In a number of countries, this bookmaker is illegal and its official website is blocked.**

**PariMatch[[48]](#footnote-48) –** It was founded in 1994 in Kiev, in 1998 it started working in Russia, in 2009 it received a license from the Federal Tax Service of Russia for bookmaking activities. In 2000, the company went online and began accepting bets under license in Curacao.

**Parimatch.ru -** officially registered in Cyprus and has a Curacao license

**Zenit.win[[49]](#footnote-49) -** the official Russian bookmaker. This website is the official website of Invest Garant LLC (Zenit Bookmaker) in the Russian Federation and is administered by the specified legal entity.

**Fonbet.ru**[[50]](#footnote-50)– the oldest Russian bookmaker. The company was founded in 1994 by chess player Anatoly Machulsky. The bookmaker is legal on the territory of the Russian Federation and includes UGR. At the end of 2020, he was recognized as the best bookmaker in Russia at the RB 2021 Award.

* 1. **Offshore and international search**

As you can see from the above structure, 4 out of 6 illegal bookmakers in Moldova, on whose websites Moldovans play daily, and the growth in popularity of which follows from portal analysis top100bookmakers.com , have Russian roots, but are registered in Curacao.

According to **Licensingaming.com**[[51]](#footnote-51), representing an offshore gambling licensing company, the Curacao gambling license is the easiest to obtain, whose validity extends to all types of gambling. This procedure is simplified and requires a minimum set of documents. For the convenience of obtaining a license, the personal presence of the beneficiary of the company is not required. When obtaining a license for online gambling activities in Curacao, minimal taxation is provided. Profit payments amount to 2 percent for companies that have chosen this jurisdiction. Another feature that the Curacao license has is the stability of the tax rate. The specified payment regime operating in the E-Zone is insured against any changes until 2026. The term of registration of a license for Curacao takes 2-3 weeks from the date of submission of all necessary documentation. In other words, only 2 out of 7 companies on whose websites Moldavians play daily are officially registered in Russia. **Another 4 Russian companies operate in offshore zones. Moreover, some companies are involved in major international scandals.**

**1xBet – offshore with Russian routes**

Tech in fusion Ltd, a company registered in Gibraltar, which manages websites **1xbet.com** and **1-x-bet.com** , back in 2016 it was recognized as carrying out activities for the organization and conduct of gambling in violation of Russian legislation, the Russian economic publication RBC wrote with reference to the press service of the Federal Tax Service[[52]](#footnote-52). Online bookmaker 1xBet is banned in many countries, and its organizers, three Russians, are on the international wanted list for illegal organization and conduct of gambling. Among them is a Russian billionaire and a former employee of the Ministry of Internal Affairs of Russia.

In 2019, 1xBet was banned in the UK for accepting illegal bets on cockfights and fights involving children, as well as for organizing an online casino with elements of pornography. The facts of rough violation of the law surfaced as a result of an investigation conducted by *The Sunday Times*[[53]](#footnote-53). The British regulator also stated that 1xBet, a company registered in Cyprus and Curacao, hides the origin of its real owner, who is a Russian citizen. At the same time, famous football clubs, including Chelsea and Liverpool, broke sponsorship contracts with 1xBet at the request of the UK Gambling Regulator.

December 29, 2021 portal Forbes.ru published an exclusive interview with the organizers of 1xBet, who were put on the wanted list. It follows from the interview that all three live in Cyprus, and the main business of the illegal bookmaker is conducted from there. According to the same publication, the global turnover of 1xBet is estimated at $ 2-3 billion**.**

It is noteworthy that despite the fact that **1xBet** is illegal in Russia, a legal entity **1xStavka** has a license to work in Russia[[54]](#footnote-54). In addition to the fact that its logo completely repeats 1xBet, in 2017 the company entered into a sponsorship agreement with the Russian football club Lokomotiv, under which the 1xBet logo was placed on the uniforms of Russian football players. Later, the Russian court found no violations in this.

**PariMatch – money laundering and business in Donetsk and Luhansk regions beyond Kiev's control**

According to the national anti-corruption portal **Antikor.com.ua**[[55]](#footnote-55), existing since 2013, the gambling company **PariMatch is included in 8 sanctions lists**, including the USA, Canada, EU countries and the UK. As of 2020, the company was listed in 97 court cases, most of which are criminal. Moreover, the same portal, with reference to numerous publications in the media, writes that **PariMatch has been actively developing a network of gambling establishments in the regions beyond Kiev's control – Donetsk and Lugansk. In addition, the article says that in 2017 the Prosecutor General's Office of Ukraine opened a criminal case against PariMatch**. According to the investigation, a group of scammers created a scheme to withdraw funds that pass through a bookmaker's office and are sent to the Russian Federation. The money was "laundered" through the Russian Alfa-Bank. According to Ukrainian law enforcement agencies, the amount of money laundered annually amounted to $350,000,000.

In 2020, the National Commission for State Regulation in the Field of Communications and Informatization of Ukraine reported[[56]](#footnote-56), that the Pechersk Court of Kiev banned access to gambling sites, including the sites of 1xBet and PariMatch bookmakers. The decision was made in the framework of criminal proceedings in cases of money laundering, forgery of documents and illegal gambling.

In May 2022 on Ukrainian information Internet portals[[57]](#footnote-57) and in popular Telegram channels[[58]](#footnote-58) there was an investigation that the company PariMatch continues work in Russia and Belarus, despite the "fictitious" recall of its franchise in Russia. The authors of the investigation called on the Ukrainian authorities and the gambling market regulator to **"react to the facts of trade in the aggressor country. And Ukrainians should boycott the work of companies that are trying to sit on two (and sometimes three) chairs"*.***

* 1. **European practice**

According to a study by **H2 Gambling Capital**[[59]](#footnote-59), one of the most cited consulting companies in the field of gambling, the share of the offshore online gambling market in Europe in 2021 accounted for 17.3%. At the same time, there is a positive trend towards regulating this market and bringing it into the legal field. For example, in 2019, the offshore online gambling market accounted for 22.7%. According to the forecasts of H2 Gambling Capital, the efforts directed by the regulators of European countries may lead to the fact that by 2026 the share of offshore online gambling will be 11.4%.

According to another study [[60]](#footnote-60), conducted by **H2 Gambling Capital and International Betting Integrity Association (IBIA)**, The gross revenue of the regulated online and land-based betting market will grow from $74 billion (from $490 billion in turnover) in 2019 to $106 billion ($770 billion in turnover) by 2025. At the same time, international experts emphasize that "the prohibition of advertising benefits offshore operators and can make any law ineffective. The danger for those jurisdictions that severely restrict or even prohibit advertising of licensed betting products and services is that the opposite may happen very soon, as offshore operators fill the advertising void. This will be especially evident on modern alternative platforms, such as online advertising, which may be more difficult to monitor, regulate and restrict than more traditional broadcast and print formats. *Despite the different approaches, the general international practice is to allow advertising within a certain framework that takes into account the interests of consumers and licensed operators, which contributes to the development of the market. The result is partly related to taxation. Nevertheless, responsible advertising is a key component if we want to ensure the viability of the market," international experts conclude*.

1. **CONCLUSION**

The state monopoly on gambling in the Republic of Moldova was introduced to combat uncontrolled activities in this area, to reduce the antisocial influence of the industry, to protect minors, to combat tax evasion and to increase budget revenues.

To achieve these goals, the state, represented by the "National Lottery of Moldova", attracted private foreign partners with rich experience and a good reputation. Within the framework of the public-private partnership project, the state has assumed a number of obligations, including stable legislation in the field of gambling and the fight against illegal bookmakers.

The project has brought tangible financial results. Thus, revenues to the state budget due to the activities of the "National Lottery of Moldova" increased from 460 thousand lei in 2012 to 65.5 million lei (!) in 2021. The state-owned enterprise "National Lottery of Moldova" showed the best dynamics of sales revenue in comparison with other state-owned enterprises (2016-2021).

These financial indicators largely reflect the recaptured market from illegal offshore companies. However, the potential of state revenues from this area is much greater.

After all, every year Moldavian players transfer hundreds of millions of lei to offshore sites only through online payment systems, and in 2020 this figure exceeded half a billion lei (!). These amounts do not include transfers via bank cards, which means the final figures are significantly higher.

The increase in state revenues from gambling is directly proportional to the efforts of regulatory authorities in the fight against illegal bookmakers. This was especially evident in 2021. That was the first time the Republic of Moldova started blocking access to unauthorized gambling sites. In parallel, payment system operators began to restrict payments to such sites. As a result of the measures taken, the amounts received by the organizers of illegal online lotteries and sports betting decreased to 155.5 million lei (online payment systems only). At the same time, 536 million lei were transferred to the only state website in this way.

Nevertheless, contrary to its obligations, the state periodically changes the taxation of gambling winnings and laws in this area, which creates an advantage for offshore companies. And the latest changes (from January 2022), according to which the tax on winnings increased by 50%, and gambling advertising and sponsorship were completely banned, jeopardized all previous efforts of the state in this area. The number of players on illegal online gambling sites has increased by 66% in just 4 months and continues to grow. These are mainly Russian offshore companies.

**Illegal offshore gambling companies:**

- do not pay taxes to the state budget of Moldova

- do not withhold tax on winnings

- allow minors

- do not verify the identity and source of origin of players' funds

- are not responsible in front of the players

- ignore the ban on advertising

- use any means of promotion

- do not direct their income to culture, education, sports and other socially significant goals

The experience of European countries shows that the introduction of restrictions for legitimate gambling businesses can be an advantage for the shadow sector. Therefore, such actions on the part of the State should be based on an analysis of risks and consequences. As our research has shown, in the course of changing the legislation and taxation of gambling, not only did they not conduct analyses, but also ignored the recommendations of relevant government agencies. For example, the Ministry of Finance.

Moreover, the author of the latest amendments to the Law on the Organization of Gambling argued that the main goal is to reduce addiction. However, the draft law was not supported by facts proving the existence and level of this phenomenon in Moldova. And the first-of-its-kind opinion poll conducted by our order in a reputable company (after the amended law came into force) did not reveal critical indicators.

There were no programs proposed to prevent and combat addiction (following the example of European countries), as well as the targeted use of gambling income in socially important areas: culture, education, sports. **As a result, there were no fewer players, they just started switching to illegal sites**.

In this regard, we consider it appropriate to review the restrictions for the state-owned enterprise "National Lottery of Moldova" and strengthen the fight against the shadow market. The proceeds from the activities of the state-owned enterprise should be directed, among other things, to the development of socially important areas and solving problems of gambling addiction, if they are detected.

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