



WEEK 04

FRIDAY 27 JAN 2023

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IN THIS WEEK'S ISSUE:
MORE INDUSTRY-CHANGING M&A?

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WEEK 04

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THIS WEEK

• **MOVERS & SHAKERS**

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Felix Faulkner



CAMELOT ANNOUNCES EXECUTIVE RESHUFFLE AMID ALLWYN ACQUISITION

MGM, ENTAIN & FANATICS: GAME- CHANGING M&A?



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With MGM Resorts once again linked to an Entain takeover – and Fanatics reportedly considering buying BetParx – will 2023 see the industry transform once more?

▶ This week, news broke that MGM Resorts was once again weighing up a bid for Entain – with whom it shares a joint sportsbook venture in BetMGM.

Reports in the UK surfaced that the US gambling giant has held internal discussions over tabling a bid for the FTSE-100 European company, currently valued at around £8.9bn (\$11bn).

Of course, MGM attempted to buy Entain back in 2021, with an £8.1bn offer – though this was roundly rejected by the company.

MGM is not expected to formally make a proposal to Entain until the UK's long-delayed White Paper is published, because the result of the UK Government's new review into the gambling industry could have a significant effect on Entain's valuation.

“This is where Fanatics, the first sports merchandiser to enter the sports betting market, may fare better than media companies. It has access to the same kinds of data points that DFS operators do – it knows a customer's favourite team and where they're from”

The publication of the White Paper isn't expected until later this year, so any bid from MGM could come soon after.

What makes the story even more extraordinary is that DraftKings also attempted to acquire Entain in 2021, trying to tempt the operator's hand with a mammoth bid of over \$20bn. But, again, Entain did not budge – declining the offer.

Entain's unwillingness to sell the company may stand in the way of any attempt by MGM to buy it, evident in its complete rejection of any offers less than two years ago.

However, times may have changed somewhat for the company. Entain reached a settlement with the Gambling Commission last year to pay £17m for substantial regulatory failings, and while the company was keen to stress this wasn't a fine, the payment amounted to a record fee for a gambling business in the UK.

Though there is a risk that MGM's compliance team may take a closer look at Entain's business practices, it is unlikely to be a significant issue that would derail any possible deal.

The pressures of the forthcoming White Paper and the extra scrutiny brought about by the record settlement could force Entain's hand in any new negotiation with MGM – which

may now feel that its own position is stronger than it was back in 2021.

Fanatics finally entering the fray?

MGM's mega move is not the only activity in the acquisitions sphere, with Fanatics in talks to acquire BetParx.

A sports merchandise company, Fanatics' transition into sports betting has long been touted. However, the company has written a letter of intent to purchase BetParx – skyrocketing its plans for a sportsbook launch.

It has already hired Jason White as CMO of its sports betting division – so the prospect of it launching sports betting operations is more an inevitability than a possibility. It's just a question of – when?

Its target BetParx, a sportsbook app created by Greenwood Gaming & Entertainment (which also owns the Parx casino in Pennsylvania), would provide Fanatics with an immediate platform from which to initiate sports betting operations.

However, despite CNBC News reporting that talks are in place for the acquisition of the sportsbook, it hasn't been agreed yet. Although a letter of intent to purchase has been signed by Fanatics, this comes with no guarantees.

The sports merchandiser was in talks to acquire operator Tipico in 2021, but this never amounted to an eventual sale. With this in mind, observers are right to express caution regarding the success of Fanatics' acquisition plans.

The hold-up so far appears to be around a price agreement for the acquisition, a sticking point that will only grow should neither side budge on their valuations. But should Fanatics follow through with its BetParx acquisition plans – it's clear it will be entering a highly competitive marketplace, dominated by just a handful of big-hitting operators.

The biggest of these are daily fantasy sports (DFS) operators-turned sportsbooks – FanDuel and DraftKings the pack-leaders in this regard. Media companies, too, have dipped their toes in sports betting – but to nowhere near the same success as the aforementioned FanDuel and DraftKings.

Fubo Gaming, an arm of FuboTV, famously launched an online sportsbook which failed within a few months of being operational; it didn't have the same data points that DFS had access to: a fan's favourite team, favourite player, etc.

This is where Fanatics, the first sports merchandiser to enter the sports betting market, may fare better than media companies.

It has access to the same kinds of data points that DFS operators do – it knows a customer's favourite team, where they're from (through home deliveries) and the multiple different sports each of its customers is a fan of.

With this in mind, the launch of a Fanatics sportsbook may shake up the sports betting landscape across the US. So too a potential MGM-Entain merger.

TAKING STOCK

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19 JANUARY TO THURSDAY
26 JANUARY (09:30AM GMT)



Las Vegas Sands
55.02 USD



1%

Caesars Entertainment
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14%

Penn Entertainment
33.96 USD



7%

Boyd Gaming
60.72 USD



4%

IGT
26.09 USD



6%

Light & Wonder
64.44 USD



5%

Bally's
19.84 USD



4%

Red Rock Resorts
44.30 USD



4%

CAMELOT ANNOUNCES EXECUTIVE RESHUFFLE AMID ALLWYN ACQUISITION

Allwyn has welcomed the decision from the Gambling Commission to clear the group's acquisition of Camelot UK Lotteries from the Ontario Teachers' Pension Plan Board, but within this acquisition, a number of changes to Camelot's Board and Management team have been announced. The changes will take effect upon completion of the acquisition.

Notably, Camelot CFO Clare Swindell and Commercial Director Neil Brocklehurst will become Co-Chief Executives, leading the group through the end of the Third Licence in January 2024.

Swindell joined Camelot in 2017 as CFO, before being appointed to the group's Board in September 2019. Previously, she served as Group CFO at dunnhumby, as well as holding various senior finance roles at Tesco, including CFO for Tesco.com.

Brocklehurst, meanwhile, has been with Camelot for 15 years, working in a variety of senior roles before becoming Commercial Director in 2018. His lottery experience includes working in the UK, Ireland and North America with Camelot Global, with his roles including that of Managing Director.

Furthermore, Camelot Chairman Sir Hugh Robertson and CEO Nigel Railton will step down from the Board, with Sir Keith Mills expected to be appointed as the new Chair. This will take place at closing of the transaction, subject to regulatory approvals.

Commenting on the changes, CEO of Allwyn Group and Interim CEO of

Allwyn UK Robert Chvátal noted: "I would like to thank Sir Hugh and Nigel for their contribution to the success of The National Lottery. I am delighted to appoint Clare and Neil as Co-Chief Executives, both of whom have enormous experience in the operation of Camelot and The National Lottery."

The acquisition has been a priority for Allwyn in recent months, having initially agreed to acquire Camelot in November 2022. As noted previously, the transaction aims to help facilitate a smooth transition as Allwyn becomes the operator of The National Lottery under the Fourth Licence from February 2024.

"Today marks an important milestone in our journey to become the operator of The National Lottery," said Robert Chvátal, CEO of Allwyn Group and Interim CEO of Allwyn UK. "Acquiring Camelot will help ensure a smooth transition from the Third to the Fourth Licence, while bringing together the collective expertise and technical know-how of two highly experienced lottery operators."

GI Verdict: Allwyn has welcomed the decision from the Gambling Commission with open arms, with the current Camelot executive reshuffle an important part of the acquisition; as the group aims to have the right people in charge as it runs down its licence with The National Lottery.

The savvy appointments allow plenty of time for those faces to oversee a smooth transition.

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MOVERS & SHAKERS



ANDY PHILLIPS

SportingRisk.com
Chief Commercial Officer

Phillips will concentrate on expanding SportingRisk's current tier-one client base and achieving the data science firm's expansion objectives.



STÉPHANE VALERI

Société des Bains de Mer
President-Delegate

A graduate of ESCP Business School in 1986, Valeri chaired the National Council of the Principality of Monaco from 2003 to 2010 and from 2018 to 2022.

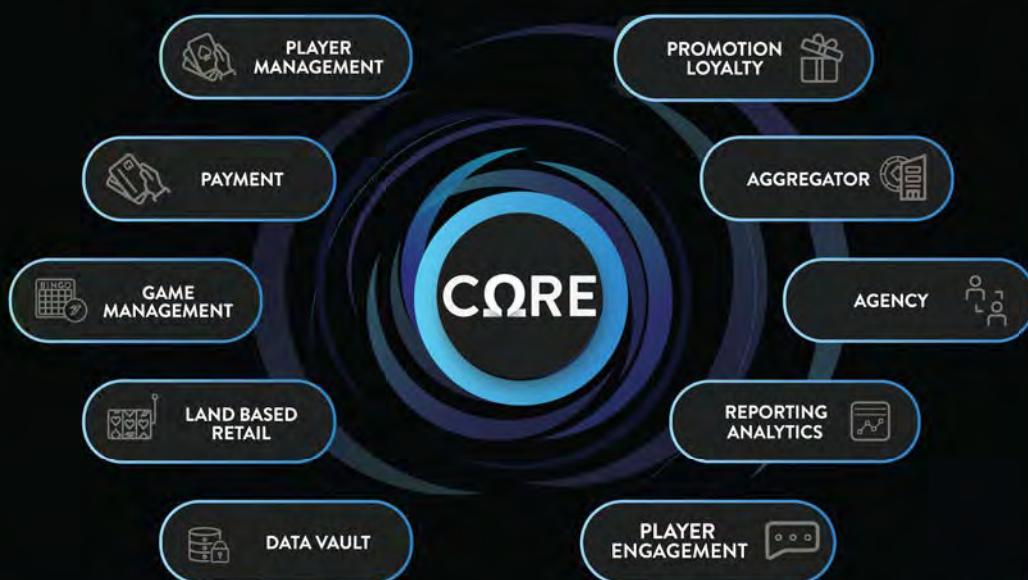


MICHAEL HOENIG

National Indian Gaming Commission (NIGC)
General Counsel

Having joined the NIGC in 2006, Hoenig took on several roles within the agency's Office of General Counsel, including serving as the General Counsel for the last seven years.

THE OMNI-CHANNEL PLATFORM POWERED BY CHALLENGE





THE

DEALMAKERS

COMPANY	NEW PARTNER	VERTICAL
Swintt	Bragg Gaming Group	iGaming
XB Net	Media System Technologies	Sports betting
GGPoker	Triton Poker	Poker
SCCG Management	Xite Holdings	Lottery
Gaming1	Maxima Compliance	iGaming
SciPlay	Jerry O'Connell	iGaming
Caesars Entertainment	Raynham Park	Sports betting
NuxGame	LSports	Sports betting
AstroPay	Tebca Perú	Payments
Premier Greyhound Racing	Entain, William Hill, Paddy Power & Betfred	iGaming



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THE WEEK IN QUOTES

“Considering this operator’s history of failings, we expected to see significant improvement when we carried out our planned compliance assessment. Disappointingly, although many improvements had been made, there was still more to do.”

Gambling Commission Executive Director of Operations Kay Roberts commenting on the £6.1m (\$7.5m) fine handed to Intouch Games for social responsibility and anti-money laundering (AML) failures

“Looking ahead, we expect to see more and more companies taking concrete actions towards becoming more sustainable, and we believe that reporting such efforts contributes positively to implementing change within the sector and improving its overall perception, while also addressing the increasing demand for transparency and accountability in the industry.”

The Malta Gaming Authority (MGA) on its exploration of the development of a voluntary Environmental, Social and Governance (ESG) Code of Good Practice for the remote gaming sector

SPORTS BETTING ROUND-UP: NBA, FA AND BGC

The **National Basketball Association** (NBA) is joining the American Gaming Association’s (AGA) Have A Game Plan. Bet Responsibly. public service campaign.

Per the deal, the NBA and AGA will educate basketball fans on responsible sports wagering practices by providing turnkey solutions to the basketball league’s 30 teams.

Campaign content provided to the NBA by the AGA will include in-venue, broadcast, digital and social media activations.

An appeal board has suspended Chris Maguire from all football activities for six weeks after being found guilty of breaching the **Football Association’s** (FA) betting rules.

The League One striker from Lincoln City had partially denied the charges and requested a personal hearing on the matter.

Following the hearing, the FA withdrew several charges, and an

independent Regulatory Commission imposed a £750 (\$925) fine and warning, which the FA appealed.

New data from the **Betting and Gaming Council** (BGC) shows that the number of UK bettors visiting unregulated online black market gambling sites tripled during the 2022 World Cup.

Referencing research from Yield Sec, the BGC noted that 250,000 people visited black market sites in December alone, compared to 80,000 during the same month in 2021. The analysis aimed to assess the scale of black market gambling during 2022, which included last month’s World Cup.

The research also found online traffic to sites advertising services to problem gamblers who had self-excluded from UK operators climbed by 83%, while peaks in traffic to black market sites occurred in March and June, during which major horseracing events took place at Cheltenham and Ascot respectively.

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"Rob Davies has no idea what is in this White Paper. He'll speak to some people who will have an idea of what they might like to be in the White Paper, and what might be being considered, so that's legitimate reporting. But let's not be fooled by saying 'we know what's going to be in the White Paper,' because I don't, and they definitely don't."

A dismissive Michael Dugher, Betting & Gaming Council CEO, on the upcoming status of the Gambling Review White Paper

"I'm aware of how important the entertainment sector is in boosting the economy of a local area. The entertainment sector is a massive part of this, creating jobs and attracting tourism."

MP Paul Scully speaking at the Betting & Gaming Council AGM

LEGAL & REGULATORY ROUND-UP: PHILIPPINE SENATOR, BOLDPLAY & MORE

There should be a separate regulator for casinos and the **Philippine Amusement and Gaming Corporation (PAGCOR)**, according to Senator Win Gatchalian.

Gatchalian has proposed a separate regulator amid issues with the agency allowing operators potentially involved in criminal activity to continue operating in the Philippines.

He criticised the body at a Senate hearing, calling out its lack of sense of urgency regarding this matter.

Gatchalian, noted: "In my view, it's much cleaner to establish a separate gaming regulator regulating all gaming corporations including PAGCOR itself.

Software provider **Boldplay** has been granted approval from the Gibraltar Licensing Authority to offer its services to all online casino platforms regulated by the British overseas territory.

The group has already received game certification for the UK, Portugal, Malta and the Isle of Man, with the Gibraltar licence representing Boldplay's first

fully-fledged market licence, which allows it to distribute its games among operators.

Oklahoma Governor Kevin Stitt has reiterated his intention to legalise sports betting in the Sooner State, setting out a new timeline to do so. Last Friday, Stitt said he wants state lawmakers to sign off on sports betting during the four-month legislative session that begins February 6.

Stitt added: "If we're going to do it, I'm the kind of person that says, 'hey, let's get it done now.'" The Governor said he wants to see mobile sports gaming so people can easily place wagers on their phones.

The Rincon Tribe of San Diego, California has become the first Native American Nation in the Golden State to opt out of its state-Tribal pact, turning instead to federal supervision. This move by the Rincon Band of Luiseño Indians ends almost two decades of legal contention regarding the way California assesses regulatory costs.



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Fast Track CEO and Co-Founder Simon Lidzén speaking after the supplier released a new autoregressive language AI model

"I am truly excited to have Fortune Coins as our partner! We are confident that our partnership will be mutually beneficial and create great opportunities for both parties. With our combined resources and expertise, we are sure to achieve great results in a quick time! Thank you for trusting Mascot Gaming!"

Nikolay Lobov, Head of Sales at Mascot Gaming, commenting on the new partnership with FortuneCoins.com

RESPONSIBLE GAMBLING ROUND-UP: DONATIONS AND THE IBIA'S NEWEST MEMBER

This past week has seen several gambling companies begin the year with a focus on responsible gambling.

It began with **GambleAware** publishing its full list of donors and pledges, showing that **Entain** and **bet365** were its biggest donors by far – accounting for 90% of the total funds the organisation received between 1 April and 31 December 2022.

The amount given to the charity overall was £13.2m (\$16.3m) from all UK operators, with bet365 giving £4.9m to GambleAware, while Entain donated \$7m – a move that comes months after Entain reached a settlement with the Gambling Commission for £17m.

Simplebet then announced it had joined the International Betting Integrity Association (**IBIA**), thereby becoming a part of the 45 companies throughout the industry that now comprise the association – which accounts for a combined \$137bn in global betting handle per year.

Melissa Davis, EVP of Business Affairs & General Counsel of Simplebet, said: "Integrity and trust are non-negotiable at Simplebet, so we are excited to be partnering with the IBIA, who are the world's leading independent integrity monitor."

Meanwhile, **Kindred Group**, along with **ATG** and **Svenska Spel**, published metrics for the Swedish gambling market – which have highlighted signs of problematic behaviour.

The key metrics, submitted to the Swedish Gambling Authority every six months, display the percentage of clients who were contacted due to suspected or confirmed problematic gambling behaviour.

Per the data, the percentage of Swedish customers who are contacted as a result of suspected or detected problematic gambling is 0.5%. Of gamers that are contacted, 77% reduced their gambling activity, with 76% reducing their deposit amounts.

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THIS WEEK IN NUMBERS



11%

Increase in revenue for Las Vegas Sands in its Q4 report

12

Online slots included in the deal between Pragmatic Play and Forbes Casino



4

Event partnership between Cage Warriors and Sycuan Casino Resort

MARKET EXPANSION ROUND-UP: RED TIGER, SCIENTIFIC GAMES AND GEOCOMPLY

The past seven days has seen several businesses launch into new markets, targeting new customers in different countries and places.

Starting with **Scientific Games**, the lottery provider won a public tender offer to become the exclusive instant game provider to Lotería Nacional de Beneficencia de El Salvador.

The supplier has been providing El Salvador's national lottery with online games since 2017 and its titles available on the El Salvador lottery include Mascotas, Safari, Dinero al Instante and Tragamonedas.

Odds On Compliance has also moved into a new region, after it launched Odds On Compliance – Europe – with Cheryl Jones appointed as the new President of the European Division.

Jones joins the group with vast experience in both online and land-based gaming, having previously been a Chief Legal and Compliance Officer for **Lady Luck Games AB**

and G Games.

Commenting on her new role, Jones said: "Odds On Compliance has been a fixture in regulatory compliance in the US. I am excited to lead this European team in bringing their expertise and technology to our clients in Europe."

Meanwhile, **Red Tiger** debuted its new jackpot games in Michigan, which will see them offered to players through four operators in the near future.

The Evolution-owned online slots company has already launched its new games in Connecticut, Ontario and Quebec, where players can play any of Red Tiger's 48 online slots.

Finally, **GeoComply** has partnered with two minority investment funds, which will support it as GeoComply grows into new markets.

Arctos Sports Partners and Norwest Venture Partners will back the geolocation business as it seeks out investment opportunities that will propel the company forward.



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GAMBLING INSIDER

**0.5%**

Of Swedish customers contacted as a result of suspected or detected problematic gambling, as noted by Kindred

2

Satellites from Americas Cardroom (ACR) offering players the chance to win the "poker experience of a lifetime"

**3**

Caribbean resorts added to PlayAwards' loyalty programme

GI THE DEBRIEF FRIDAY

REVIEW: INDUSTRY GATHERS AT BGC AGM

The Betting & Gaming Council held its Annual General Meeting this week, where a lack of progress on the much-awaited White Paper did not deter a litany of discussion and questions from keen speakers and onlookers. Keynote speaker Paul Scully MP spoke of gambling playing a 'massive' role within the entertainment sector in London, with the online sector equally providing jobs en masse. He acknowledged there have been 'too many failings' but also commended the actions taken to improve safety, stating that the UK market could become a world leader in gambling policy.

Scully, equally, emphasised the need for 'financial checks' rather than 'affordability' policies that may dictate how much an individual should spend on their gambling.

Chair Brigid Simmonds, meanwhile,

emphasised the role betting shops play on the UK high street and vehemently argued against a statutory levy for gambling firms – saying this simply would not generate additional funds.

Elsewhere, there was an exchange between GambleAware CEO Zoe Osmond and an audience member on the 'aggressively independent' nature of the charity.

It was CEO Michael Dugher, though, who closed proceedings, criticising campaigning journalists for pretending to know what will be included in the upcoming White Paper. Two of Dugher's points were particularly salient. The first related to VIPs: "We did the right thing with VIPs but have those players stopped gambling since?" (No). And, finally, Dugher referenced the UK media, who claimed an end to sport had created a 'perfect storm' for problem gambling, only to then say the end of lockdowns and the return of sport had created a.... 'perfect storm' for problem gambling. The moral of the story? While waiting for the White Paper, there will inevitably be a lot of white noise...



DELAWARE – DECEMBER REVENUE:

Fantini Research partners with *Gambling Insider* to provide weekly gaming industry data. This week, we look at December's revenue from all sources in Delaware.

December marked a disappointing month across the board, with all land-based destinations showing revenue falls. Despite posting the highest revenue of \$12.8m for the month, Delaware Park also saw the worst results year-on-year, down 9% year-on-year.

This picture is reflected in revenue generated from slots, with the \$10.3m generated by Delaware Park in December down 10% year-on-year.

And it was Harrington, which was also down year-on-year in revenue, that saw the lowest return on table games, its \$666,000 a 22% drop from December 2021.

However, there was a positive in Delaware, with revenue from sports betting up across the state's gaming destinations. Delaware Park generated revenue up 57% year-on-year, while Bally's Dover was also up 51%.

There was also some success for Delaware Park and Bally's Dover in the iGaming segment, although Harrington's December revenue was down 15% year-on-year.

ALL-SOURCES REVENUE	DECEMBER REVENUE (M)	CHANGE (%) YEAR-ON-YEAR
Harrington	\$7.728	-5.39
Bally's Dover (BALY)	\$11.057	-6.07
Delaware Park	\$12.752	-8.57
Retail	\$0.942	N/A
Total	\$32.479	-0.43

SLOTS	DECEMBER REVENUE (M)	CHANGE (%) YEAR-ON-YEAR
Harrington	\$6.725	-3.18
Bally's Dover (BALY)	\$9.344	-4.77
Delaware Park	\$10.316	-9.70
Total Slots	\$26.385	-6.38

TABLE GAMES	DECEMBER REVENUE (M)	CHANGE (%) YEAR-ON-YEAR
Delaware Park	\$1.639	-14.05
Bally's Dover (BALY)	\$1.247	-20.28
Harrington	\$0.666	-21.63
Total Table Games	\$3.552	-17.80

SPORTS BETTING	DECEMBER REVENUE (M)	CHANGE (%) YEAR-ON-YEAR	PARTNER
Delaware Park	\$228,075	+56.92	CZR
Bally's Dover (BALY)	\$114,892	+51.04	CZR
Harrington	\$82,760	+9.77	CZR
Retail	\$941,650	N/A	
Total sports betting	\$1.367m	N/A	
Total handle	\$8.158m	-35.46	

IGAMING	DECEMBER REVENUE (M)	CHANGE (%) YEAR-ON-YEAR
Delaware Park	\$569,366	+20.78
Bally's Dover (BALY)	\$351,514	+10.06
Harrington	\$253,920	-14.46
Total iGaming	\$1.175m	+8.01

ASIA

NEWS

ROUND-UP

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GI
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GUEST
COLUMN
FELIX FAULKNER,
 SOLICITOR,
 POPPLESTON ALLEN

Faulkner explores the implications of the ASA's first ruling that relates to gambling adverts using sports personalities of 'strong appeal' to children

If there was any doubt the Advertising Standards Authority (ASA) would take a hardline stance when it came to enforcing the new rules restricting the use of celebrities in gambling advertising, this is likely to have vanished with its recent ruling against Ladbrokes.

In a statement released on 21 December 2022, the advertising regulator ruled against the operator in a complaint it had brought itself, presumably to put down a strong early marker and ensure gambling companies abide by the new rules.

Given the regulations introduced by the Committee of Advertising Practice (CAP) in October last year restricting the use of sportspeople and celebrities of 'strong appeal' to those under 18, the content the ASA took issue with is not surprising.

It featured Premier League footballers Philippe Coutinho, Jesse Lingard and Kalidou Koulibaly, all of whom comfortably fit into the definition of "UK footballers who play for top clubs, UK national teams or in high-profile competitions;" which is included in the high-risk category in the CAP guidance published to help marketers decipher the new rules.

What may perhaps have been a little more surprising to some is the format of that content and the ASA's dismissal of Ladbrokes' defence. The players appeared in a video in a promoted tweet posted by Ladbrokes in October.

The tweet featured the text: "Can these big summer signings make the question marks over their performances go away?"

Ladbrokes argued the tweet wasn't an ad, pointing out it featured no calls to action, promotional offers or links back to the Ladbrokes site. Indeed, many not-so-different tweets appear on the social media pages of operators on a regular basis given their heavy focus on sport.

The conclusion one might perhaps draw from the ruling is that the ASA is likely to consider any social media post, where an operator pays the platform to promote that post, to fall under the banner of advertising and is not, as Ladbrokes argued, simply 'brand engagement.'

"This could certainly have a dramatic impact on operators' ability to use social media, particularly when one considers the ASA's dismissal of the other part of Ladbrokes' defence"

This chimes with the ASA and CAP advice on recognising advertising, updated at the end of last year, a major theme of which seems to be that payment being exchanged is a key factor in whether or not something is considered a form of advertising.

Confusingly, however, it doesn't necessarily chime with the ASA remit statement put out in June last year that was more specific to gambling; presumably the result of inquiries from operators after the April announcement that new rules would be introduced from October.

While acknowledging that 'editorial content' falls outside the ASA's remit, somewhat paradoxically it goes on to say: "Gambling social media accounts sometimes include editorial-style content, like commentary or opinions on recent events, or more abstract humour, such as 'memes' and other irreverent takes on current sporting news. This has been described by researchers

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as 'content marketing' where there are no direct product references, calls to action or links to operator websites."

It further states: "The vast majority of 'content marketing' is effectively deemed by the ASA to 'sell something' and is, therefore, regulated under the CAP Code."

"The conclusion one might perhaps draw from the ruling is that the ASA is likely to consider any social media post, where an operator pays the platform to promote that post, to fall under the banner of advertising and is not, as Ladbrokes argued, simply 'brand engagement'"

Such a statement could be interpreted to suggest that the ASA might consider almost anything appearing on an operator's own feed on a platform as falling under its remit, even if no payment is made by the operator to a platform to

promote that content.

This could certainly have a dramatic impact on operators' ability to use social media, particularly when one considers the ASA's dismissal of the other part of Ladbrokes' defence.

Ladbrokes acknowledged it was aware of the appeal to young people of the players featured in the post, but said it had taken steps to make sure young people did not see it.

It said the tweet had been targeted to reach only those over 25. It also provided data from Twitter showing the tweet had a total of 50,666 impressions, none to those under 20.

Indeed, it's worth noting that the CAP guidance states: "The 'strong' appeal rules are not applied in media where under-18s can, for all intents and purposes, be entirely excluded from the audience of an ad."

However, the ASA ruled that because users self-verify on Twitter – and it's worth pointing out this is the case for all of the main social media sites – it did not consider this to apply in this case.

It said the exemption would only "apply in circumstances where those who saw the ad had been robustly age-verified as being 18 or older, such as through marketing lists that had been validated by payment data or credit checking".

The Ladbrokes ruling was clearly an early warning to the industry.

But given the message it included on social media age verification and the ASA's previous statement on content marketing, it's possible it was only the first of many.

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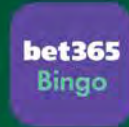
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