

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Football Index accountants  
**Date:** 23 September 2021 14:30:37  
**Attachments:** [REDACTED]

---

Hi all,

I've spoken to the journalist and explained the below.

He seemed to be struggling to understand why we couldn't say what I said to him on the record because the matter was already on Twitter.

I said that he should come back to us again if he was definitely reporting it.

Will keep you all informed.

Best regards,

[REDACTED]

[REDACTED]  
[REDACTED]

**GAMBLING COMMISSION**

Victoria Square House  
Victoria Square  
Birmingham B2 4BP

[REDACTED]  
[REDACTED]

[www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

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**From:** [REDACTED]  
**Sent:** Thursday, September 23, 2021 1:30 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Football Index accountants

Thanks all!

Best regards,

[REDACTED]

[REDACTED]

[REDACTED]  
**GAMBLING COMMISSION**  
Victoria Square House  
Victoria Square  
Birmingham B2 4BP  
[REDACTED]  
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**From:** [REDACTED]  
**Sent:** Thursday, September 23, 2021 1:16 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Football Index accountants

Thanks all!

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**From:** [REDACTED]  
**Sent:** Thursday, September 23, 2021 12:58 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Football Index accountants

Me too

---

**From:** [REDACTED]  
**Sent:** Thursday, September 23, 2021 12:57 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Football Index accountants

I'm comfortable with that

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Thursday, September 23, 2021 12:56 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Football Index accountants

Slight tweek, not sure what you all think.

Kind regards

[REDACTED]  
Gambling Commission  
Victoria Square House  
Victoria Square  
Birmingham B2 4BP

[REDACTED]  
[www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

---

**From:** [REDACTED]

**Sent:** Thursday, September 23, 2021 12:49 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Football Index accountants

Hi [REDACTED],

This is what we plan on saying over the phone and in briefing (not for quoting) to the journalist:

- Our original statement was accurate but not sufficiently reflective of the make up of the team **and their input** which included colleagues across the commission including form Lic, Compl, Enf, Policy.
- But we changed the copy on the website to reflect the much broader team [REDACTED]  
[REDACTED]  
[REDACTED]

Please shout before 130 if you have any problems with this.

Best regards,

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**From:** [REDACTED]

**Sent:** Thursday, September 23, 2021 11:33 AM

**To:** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Football Index accountants

Could we widen it out to say reference to any specific roles were removed from the website because.....and we called on a wide variety of expertise.

---

**From:** [REDACTED]

**Sent:** Thursday, September 23, 2021 11:19 AM

**To:** [REDACTED]

[REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Football Index accountants

This is a tricky one. I wonder whether an off record phone call to the journo would allow us to confirm that we did use [REDACTED] forensic accountancy experience [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Thursday, September 23, 2021 11:15 AM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

[REDACTED]

**Subject:** RE: Football Index accountants

Yes [REDACTED] – will you be putting the additional line as below the line/background info only?

Best wishes

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Thursday, September 23, 2021 11:13 AM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

[REDACTED]

**Subject:** RE: Football Index accountants

Hi all,

[REDACTED] has spotted this <https://twitter.com/FiGuide/status/1440798818560200710>

[REDACTED]

I think we should keep the below wording but do you think we should add the following line:

[REDACTED]

Best regards,

[REDACTED]

[REDACTED]

**GAMBLING COMMISSION**

Victoria Square House

Victoria Square

Birmingham B2 4BP

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, September 23, 2021 10:42 AM  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** FW: Football Index accountants

Hi [REDACTED]

We've had the below enquiry from [REDACTED] at [REDACTED]

He is drawing on an update to our website where we said:

*Following concerns about the operator we began a formal Review into the licensee under section 116 of the Gambling Act on 20 May 2020. The focus of our review was to address issues in relation to the betting aspect of the product At that stage there were no grounds to suspend their operating license.*

*During the course of the review, we utilised betting specialist expertise, a Forensic Financial accountant and specialist external QC to examine the business model, the finances of the company and the complex legal questions over the appropriate regulatory framework.*

We don't have a QA on this.

Are you happy if we simply reply with:

**You'll have to approach the Inquiry to discuss what was included in the report and why.**

**As we informed you previously, we utilised betting specialist expertise, a Forensic Financial accountant and specialist external QC to examine the business model, the finances of the company and the complex legal questions over the appropriate regulatory framework.**

[REDACTED]

Best regards,

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, September 23, 2021 9:40 AM  
**To:** [REDACTED]  
**Subject:** Football Index accountants

**CAUTION:** This email is from an external source - be careful of attachments and links

Hi [REDACTED],

I'm writing about the review into Football Index published yesterday.

The report does not appear to mention the forensic accountants which the Gambling Commission said it had brought in last year to assess FI's operations.

Please can you confirm that the GC did bring in forensic accountants to look at FI, what date they were brought in and when they completed their work?

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

