

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: BetIndex Limited - Account 43061  
**Date:** 16 September 2019 09:43:26  
**Attachments:** [image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image001.jpg](#)

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Dear all,

Licensing could contact the operator to ask about the withdrawn application, but I have to say that we don't normally chase up applications that have been withdrawn and I'm not sure what it would achieve.

In regard to the complaint, I would imagine that Contact Centre have closed the complaint, but should we be considering whether there are marketing/advertising implications?

Regards

[REDACTED]  
**GAMBLING COMMISSION**

Victoria Square House

Victoria Square

Birmingham B2 4BP

Tel: [REDACTED]

Email: [REDACTED]

We have introduced a dedicated message service for licence holders. It enables us to investigate your query, and provide a more relevant and accurate response. We guarantee to return your call within three working days – the same promise we make for email. So when you call us please make sure you leave your name, account number, contact details and a brief description of your query.

 **Think of the environment before printing out this message**

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**From:** [REDACTED]  
**Sent:** Friday, September 13, 2019 4:23 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** BetIndex Limited - Account 43061

Hi everyone

I think we can finally move this enquiry on which started some 6 months ago. By way of recap;

1. Concerns existed about the appropriateness of the licence held for the products offered.
2. In March, we engaged with the licensee. They communicated their view that the current offer was fixed odds but they **intended** to vary the offer in a way that would also require an intermediary licence (as consumers would be able to trade 'bets' with one another).

3. Linked to 2, a subsidiary of BetIndex previously applied for an intermediary licence. We rejected it because they had submitted it under the wrong name (BetIndex). The expectation was that they would re-submit very quickly but to date this hasn't happened - not sure if that's still the case post [REDACTED] update in July.
4. Based upon known information and the detail provided by the licensee, I am satisfied that appropriate licences are in place for the current offer and that an intermediary licence would be required for the proposed future offer.
5. We contacted the FCA to enquire as to whether the information held suggested BetIndex were offering FCA regulated product. The FCA have not indicated that this is the case and thus we should continue with our own considerations.

Next steps – and I think these now fall to licensing and compliance to consider

1. We may wish to quickly catch up with the licensee to confirm the current position/product offer and future intentions (what happening with the previous application?)
2. Does the attached complaint require any further action? It raises concern around the fair and open provisions. Contact Centre have acknowledged receipt and advised we will handle in line with usual process. I personally don't believe any further action is required – the complainant isn't telling us anything we don't already know and I am not sure any evidence of a LCCP breach has been provided. Appreciate other may think differently.

Thanks

[REDACTED]

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

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[REDACTED]