

G3-247 Report

SERBIA - ONLINE GAMING

Making the grade

The opening of its online gaming market heralds the next evolution of Serbia's gaming industry. This report features all the technical details pertaining to the new legislation

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By passing the Gambling Law in 2011 and by recent passing of two subsidiary regulations by the Ministry of Finance (Rules on the method of determining whether conditions have been fulfilled for receiving of approval to organize games of chance through means of electronic communication and Rules on the information characteristics of equipment for organization of games of chance through means of electronic communication, conditions of their satisfaction and methods of their testing) in August 2013, Serbia became one of the countries that have regulated organization of the internet games of chance. The Law itself represented a revolution in the field of Internet gaming and the recently passed rules have made the realization of the revolution possible and are long-term incentives for further development of Internet gaming in Serbia. By all means, Serbia has given itself a chance to make a huge progress in the development of Internet gaming and to attract numerous renowned companies dealing in the games of chance. This, again, is a big chance for Serbia to employ a large number of young and qualified people in the IT sector and to provide the state budget with steady and substantial income.

The objective of this paper is to represent the governing

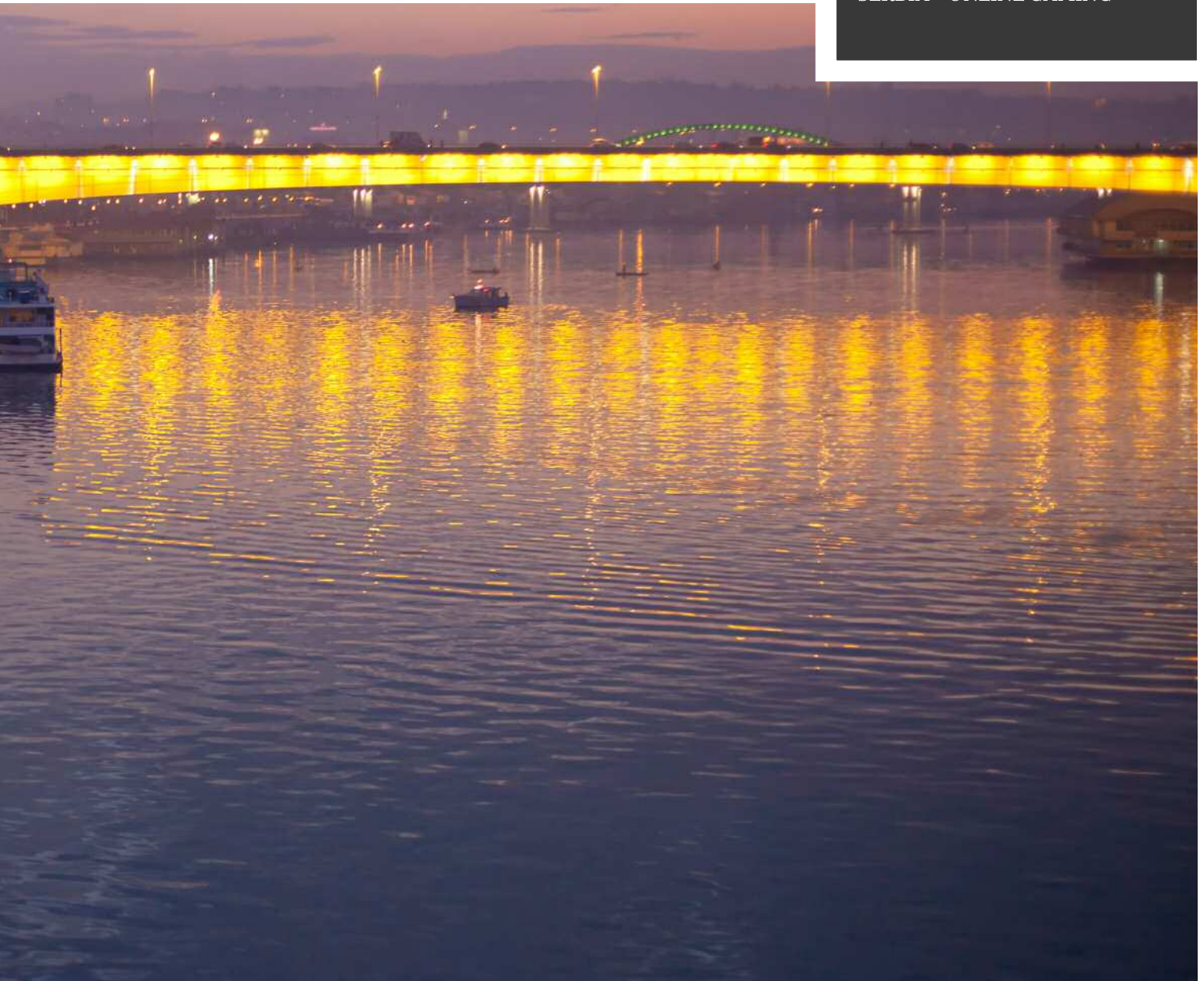
rules in this field in Serbia, the advantages and the drawbacks of the passed rules and to help those who read this paper to possibly come to the idea to invest money in development of this business on the territory of Serbia.

OPERATORS

The right to operate the games of chance through means of electronic communication in Serbia belongs to the State Lottery of Serbia and the operators to which the Games of Chance Administration of the Serbian Ministry of Finance has by approval granted the right to operate the special games of chance through means of electronic communication. Here, we have to make certain things clear so that a possible operator will know exactly his rights. By the Gambling Law, and then the Rules on the types of games of chance, Republic of Serbia has categorized the games of chance as follows: 1) classic games of chance, 2) special games of chance, 3) games of chance in goods and services. The first category of games of chance can be operated only by the State Lottery of Serbia and in this field Republic of Serbia, through its public company, has a monopoly. These are the games of the lottery character: 1) lottery, instant lottery and other similar games based on lottery,

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2) sport betting (predicting of results of football and other sport competitions), 3) lotto, keno and similar games, 4) tombola, bingo and other similar games based on tombola. Beside them, the category of classic games of chance includes: 1) telephone lottery games and 2) SMS lottery. The above games may only be operated by the State Lottery of Serbia.



As for the special games of chance, these are the games that may be organized by private operators and those who intend to offer their games via the Internet on the territory of Republic of Serbia. These games include: 1) blackjack, 2) American roulette, 3) French roulette, 4) baccarat, 5) craps, 6) draw poker, 7) Texas hold'em poker, 8) ultimate Texas hold'em, 9) Caribbean stud poker, 10) casino poker, 11) Caribbean 7-card stud poker, 12) Omaha poker, 13) three-card poker, 14) let it ride poker, 15) sic bo, 16) money wheel, 17) punto banco and 18) Serbian-Russian roulette. Besides, special games of chance include the slot machine games as well as sport betting, which is probably the most interesting for the largest number of potential operators of the games of chance. They can offer all these games through means of electronic communication with previously acquired approval of the Games of Chance Administration. It is not possible without the approval of the Games of Chance Administration. It is important to point out that the Gambling Law defined the Games of Chance Administration. However, by the Tax Administration Law it was later cancelled and its authority was transferred to the Tax Administration i.e. the Department for Exchange and Foreign Currency Matters and the Games of Chance (hereinafter referred to as: the

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Administration), to which the authority of the former Games of Chance Administration has been transferred.

CONDITIONS FOR OPERATORS

The conditions imposed to the candidates for receiving of approval for operation of the games of chance through means of electronic communication are not naive at all. It is obvious that the starting point of the legislator was to prevent potential frauds that is to prevent those who got the capital in the grey zone by criminal activities and whose business backgrounds are suspicious. The first thing that awaits the potential candidate is the fact that he must have the basic capital of

250,000 euro in RSD counter value counted at official average exchange rate of the National Bank of Serbia. However, it is not sufficient to only effect payment of this amount. The candidate is additionally obliged to obtain the approval to maintain the basic capital at the value level of 250,000 euro. Also, in order to insure payments of winning to the players and settlement of tax obligations, during the period for which he is approved for work, the operator of games of chance through means of electronic communication must keep a dedicated deposit of 150,000 euro in RSD counter value in a bank with official seat on the territory of Serbia or possess a bank guaranty for that amount, in addition to his obligation to provide on daily basis a risk deposit in the cash register of at least 10,000 euro in RSD counter value. The approval fee that is paid on monthly basis is not small. Namely, each operator who obtains the approval to organize internet games of chance shall pay the monthly fee of 2,500 euro for the approval. This is not the end of payments: the amount of the operation fee is 15 % of the basis which is the difference between totally realized deposits and totally realized credits to the players, for sport betting, and 5 % for other games, the total amount of the fee not being less than the RSD counter value of 7,500 euro monthly.



There has been numerous objections to the legislator because of the amounts of the fees. However, the obvious intention was to open the market exclusively for the operators with serious worldwide reputation whose creditworthiness is undisputable.

The Gambling Law has laid down what the application for receiving of approval shall contain :

- 1) name and official seat of the legal person – the applicant;
- 2) method of identification and registration of players;
- 3) procedure in case of interrupted communication with the player;
- 4) description of the backup system;
- 5) description of the system for return to the last saved status.

With the application, the applicant shall also submit the following :

- 1) study on prevention of unwanted impact on the games of chance through means of electronic communication;
- 2) proof of the proprietary rights or the right of use of

The hardware and the software by which the players participate in games of chance must enable automatic exchange of data with the Administration's server.

- the premises in which the equipment for special games of chance through means of electronic communications will be situated;
- 3) proofs of fulfilled conditions laid down in Article 100 of the Gambling Law;
- 4) rules of the games that will be organized.

As for the proof of fulfillment of conditions from Article 100 of the Gambling Law, they refer to technical requirements that the legislator has prescribed for the applicant. First, complete IT equipment must be on the territory of Serbia, which further means the prohibition of presence on the Serbian interactive skies for the operators with offers placed via servers situated abroad. The hardware and the software by which the players participate in the games of chance must enable

automatic exchange of data with the Administration's server. In this segment, the legislator laid down an obligatory norm towards the applicant referring to his responsibility for initiating the communication between the equipment and the Administration's server as well as for the accuracy, updating, protection and correct exchange of data. Before he puts the equipment in operation, the operator is obliged to submit the certification to the Administration about fulfillment of IT characteristics of the equipment and if there are any changes of the IT characteristics, the operator shall timely submit the certification on fulfillment of the IT characteristics of the equipment. Also, before he has put the equipment in operation, the operator must receive from the Administration the number of the certification i.e. of the appendix to the certification, on the IT characteristics of the equipment and the certification is issued by the laboratory authorized by the Ministry of Finance .

Of course, this is not the end of prescribed conditions. As a matter of fact, prescribed conditions are in detail laid down by the Rules on the method of determining whether conditions have been fulfilled for receiving of approval to organize games of chance through means of electronic communication, which added some new con-



01 Technical requirements prescribed by Article 100 of the Gambling Law are given in detail in Rules on the information characteristics of equipment for organization of games of chance through means of electronic communication, conditions of their satisfaction and methods of their testing. These Rules are very demanding and are laid down in detail, which again points out that the state wants exclusively renowned companies in this field capable of satisfying proposed requirements.

ditions. Namely, besides conditions laid down by the Law, the Rules also prescribe the condition referring to absence of the criminal records for certain criminal deeds determined in accordance with the Decree on determination of criminal deeds for which the certification on absence of criminal records of certain persons is submitted for receiving of the licence that is the approval for organization of the games of chance. The certification shall be submitted by the founder or the member of the legal person – the applicant and the per-

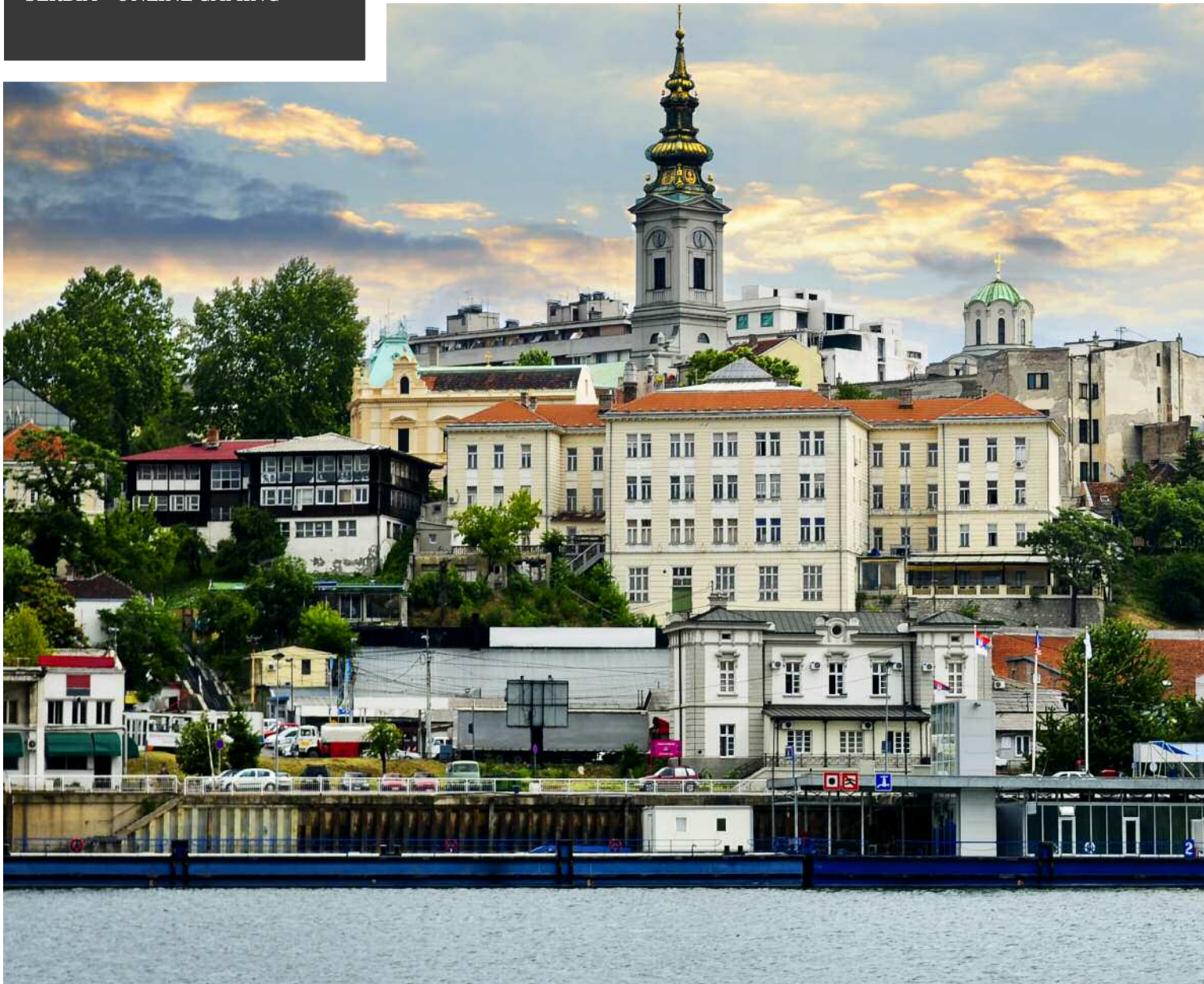
sons obliged to pay tax on personal income and company profits who are in the status of persons related to the applicant, his founder or member. These persons must submit a certification on absence of criminal records for criminal deeds laid down by the Decree for the period of five years preceding the application. This article of the Rules even more strongly points out the intention on the part of the Ministry to repel the persons with suspicious background from applying for approval for operation of internet games of chance. Thus the state has made it clear that they want an absolutely legal market on which a sound competition will develop untainted with suspicion of the grey zone or the underworld activities.

Also, one of the important issues of the Rules, harmonized with Article 101 of the Gambling Law is that the operator must submit a proof on the proprietary rights or the right of use of the premises in which the IT equipment for the game operation is situated. This is a very important provision because no one will be able to obtain the approval to initiate the internet gaming before the address where the IT equipment is situated is registered. By this, the government strengthens the obligation that both the software and the hardware must be on the territory of Serbia and obtains an exact list of

addresses and locations where the equipment of the operator is situated. This again does not mean that others cannot initiate operation and the state has the right to confiscate the equipment and block the domain.

Technical requirements prescribed by Article 100 of the Gambling Law are given in detail in Rules on the information characteristics of equipment for organization of games of chance through means of electronic communication, conditions of their satisfaction and methods of their testing. These Rules are very demanding and are laid down in detail, which again points out that the state wants exclusively renowned companies in this field capable of satisfying proposed requirements.

As soon as the defined characteristics of the IT system are seen, it is clear that the Rules are defined so as to prevent any fraud. Namely, the IT system shall fulfill the following conditions: 1) legally purchased hardware, operational system and applications of appropriate performance for offering quality service to users, 2) algorithms, listing of random numbers or an appropriate certification confirming the correct operation of the random number generator, 3) communication system that enables appropriate capacity – speed of response and



availability of the system to end users, 4) communication system enabling direct and secure exchange of data with the server, 5) system of protection from unauthorized use of the information system and data loss and 6) at least one internet domain registered within the national internet domain of the Republic of Serbia.

This is a very big step in the development of the internet games of chance. There are no doubts concerning the advancement of technology and Serbia has, by such conditions defined in the Rules, set really high standards that could, regardless of further technological advances, remain valid for a number of years. It can be noticed that for example in the third point there is a term "appropriate capacity" and that it can be broadly interpreted. This has been purposely done because of the constant technology advancement as the capacity required today may be outdated tomorrow. Also, the first point requires the purchase of original software, meaning that any one who operates by the pirate software will be denied immediately.

In order to test the technical characteristics as better as possible, the Gaming Law in its Article 100 determines the obligation of forming of a laboratory on the part of

When the laboratory has determined by control that the IT characteristics fulfill the standards, it will issue a certification on fulfilled conditions which the operator is obliged to submit to the Administration.

the Ministry of Finance. The laboratory will be authorized to grant approvals of conformity of the applications on the IT characteristics with the expected standards. The Rules have defined the activities of the laboratory in performing the control of the IT characteristics and set out what shall be controlled: 1) operational system (platform-licence), 2) application software used by the operator (platform, licence, standard), 3) network and communication infrastructures (software, hardware), 4) databases (updating process, databases characteristics, databases protection, measures of protection

against unauthorized use of the IT system and data loss), 5) details about authorized persons defined by the Rules, 6) algorithms of random numbers and winnings for each game separately which uses this mechanism for determination of results.

When the laboratory has determined by control that the IT characteristics fulfill the standards, it will issue a certification on fulfilled conditions which the operator is obliged to submit to the Administration before starting the operation of the equipment he has intended for the operation of the games of chance.

DATABASES

Very strict rules that the operator must fulfill are prescribed for the databases. Large investments are needed, which additionally strengthens the intention on the part of the Republic of Serbia to bring this sector in the legally clean business environment. However, the Rules prescribe the obligation of the operator to enable the identification of all electronic transactions and recorded accounts within its information system and they are obligatory contents of the databases. The Rules have defined what is meant by the electronic transaction and this is each particular deposit and credit in a game of



01 When it comes to the unauthorised use of an account, the Rules define it as the use of the account in the information system on the part of a person who is not the owner of the account . Such a person shall be denied the access by the operator, because the operator is obliged by the Rules to provide the confidentiality of the information system and the denial of access is performed by authentication that is by the check-up and confirmation of the user's identity upon the use of the account in the system . This can be performed by a password or in some other manner.

chance that is recorded electronically within the operator's information system . Each particular transaction shall be sent to the server. Also, it is determined by the Rules that the recorded account is the unique account of each user and the operator shall open it in his information system upon successful registration of a player . The account records all transactions of the player (collections and payments) regardless of the method of payment (cash, payment cards, e-banking, etc.).

Each particular electronic transaction is recorded through the recording account and the operator may assign only one recording account to a player . The player may at each moment have access to the information about the transactions on his account for the last three months and if he wants to review earlier transactions, at his request they shall be sent to him five days from his application .

In order for each transaction to be recorded and additionally protected, the Rules prescribe the obligation that for each transaction a special designation of two groups of alphanumeric signs separated by the symbol for minus must be determined. The first group of signs is assigned to the operator by the Administration and it

may not have more than three signs and it denotes a unique mark of the operator. The second group of signs, after the symbol for minus, is automatically generated by the information system of the operator, but this group of signs must be different for each particular transaction .

The operator is obliged to possess the IT system which in the process of registration of a player and the creation of the account enables precise recording on each deposit and credit performed on the account. The process of the account registration and the accuracy of entered data is completed by confirmation of the player that he is an adult and accepts the conditions of the use of the account in the information system .

When it comes to the unauthorized use of an account, the Rules define it as the use of the account in the information system on the part of a person who is not the owner of the account . Such a person shall be denied the access by the operator, because the operator is obliged by the Rules to provide the confidentiality of the information system and the denial of access is performed by authentication that is by the check-up and confirmation of the user's identity upon the use of the account in the

system . This can be performed by a password or in some other manner.

The operator is obliged to keep the databases for at least five years beginning from the first next year after the year in which they were created and three months from the moment of creation they have to be available in their original form after which the operator may archive them and, if the Administration requires it, the operator shall submit them in original within five days from the date of receipt of the requirement. Also, the operator shall enable the Administration continual insight in data referring to the kind of transaction, the time of its performance and its amount in real time for the purpose of determination and recording of taxes laid down in the Gambling Law, Articles 106 and 107.

TECHNICAL AND SECURITY CONDITIONS

The Rules have defined the obligations on the part of the operators concerning the technical and security conditions that must be fulfilled in order for the communication between the operator and the Administration to carry out as secure as possible. On the basis of these conditions, the Laboratory is obliged to estimate whether the operator fulfills the conditions laid down in Article 100 of the Gambling Law i.e. whether the requirements concerning the IT system characteristics are fulfilled.

The Rules have defined that the communication between the operator and the Administration should be carried out via a cable broadband connection, of copper or optical technology.

The obligations laid down by the Rules are as follows :

- 1) provision of connection on one side of the IP address from which only exchange of data with the server is performed, whose transmission speed satisfies the needs of expected traffic and shall not be less than 4Mb/s;
- 2) provision of necessary devices (routers) and organization and maintenance of a virtual private network (VPN) for the exchange of data with the server;
- 3) protection of the computer and the local area network equipment from unauthorised use of third parties;
- 4) organization of anti-virus protection of data – data transferred to the Administration shall be checked and cleaned from viruses;
- 5) authorization and registration with to the Administration of two persons responsible for reporting to the Administration.

Besides these obligations, the operator is additionally obliged to ensure the integrity of the information system, protection of data, information and processes from unauthorized persons and changes by denying privileged access to the information system.

In order to organize this, obviously the operator must have a very well-trained IT staff. Taking into account the seriousness of the business, it can be supposed that each operator will seek the best qualified individuals

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available on the market and this takes a lot of money. So, this is yet another indicator that such a job can only be done by a company with integrity in the world of games of chance. It is unthinkable that these conditions should be fulfilled by someone who tries to make easy money by fraudulent business practices.

The conditions stated above are not the only ones. In the practice, it must be counted on electricity blackouts or interruption of connection between the Server and the operator's equipment. The Rules lay out the obligation on the part of the operator to restore connection with the Server within six hours, except in unpredictable situations caused by the major force. The terms „unpredictable situation“ and „major force“ are not defined but it is assumed that they are natural disasters, wars, etc.

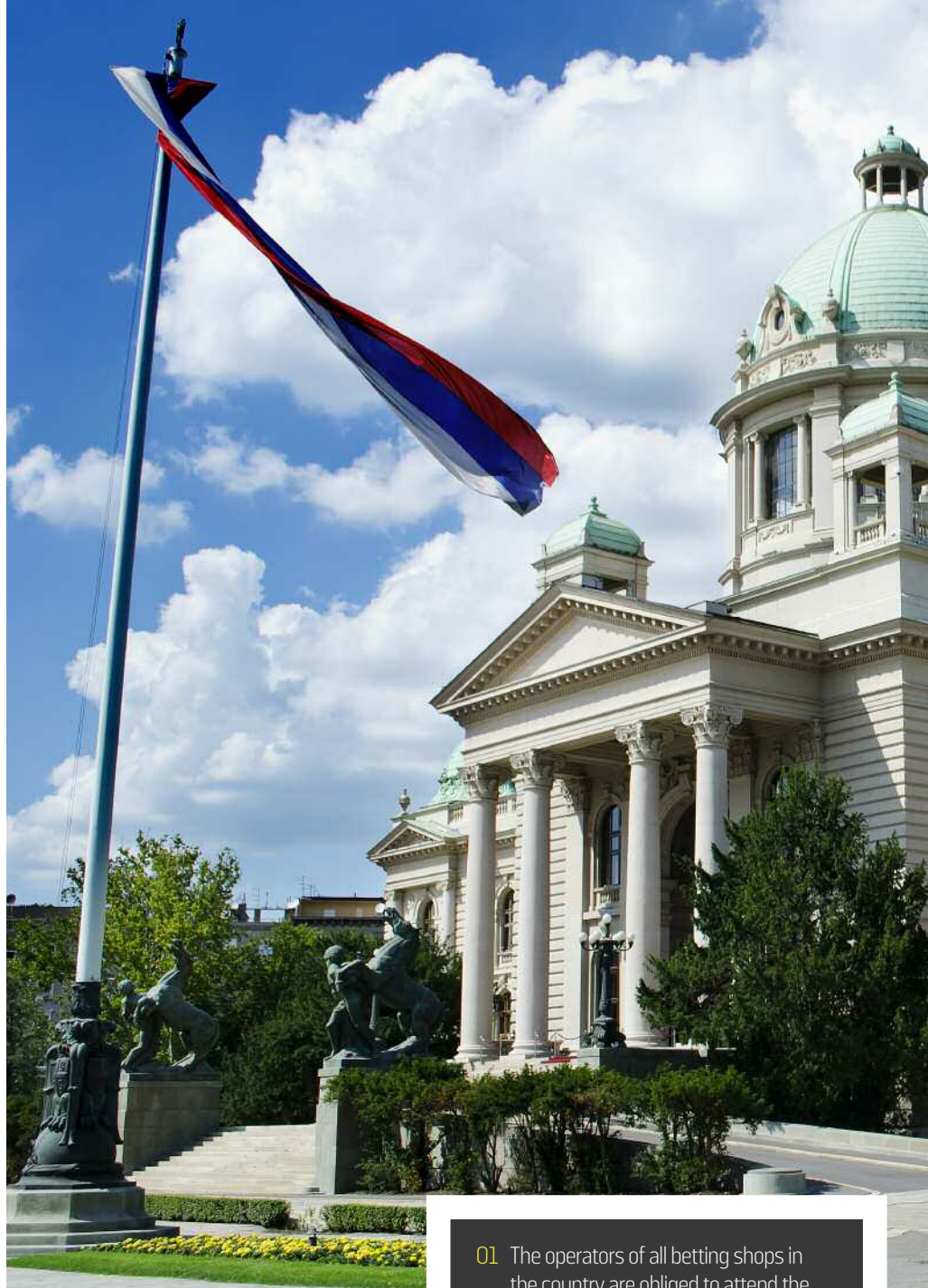
The operator's maintenance staff must be very efficient and fix any failure or connection degradation that occurs during the working hours within less than 24 that is within twice as much if it occurs after the working hours. The term „connection degradation“ is defined and it assumes the decrease of the connection speed below 4 Mb/s, packet loss of 1%, average delay of 100 ms, incorrect function on DNS and other important services or instances if unwanted contents like viruses. At the moment of disconnection, the operator is obliged to provide storage of data and immediately after the connection is restored their sending to the Administration.

It is obvious that the job has to be done by a large number of highly qualified personnel and that the organization of internet gambling requires constant investment in information technology solutions. The technological progress cannot be stopped and constant investment in innovations and updating is necessary. If the operator stagnates in this sector, he simply loses his place in the market and disappears. Consequently, the competing companies leave him behind. Therefore, this is also an indicator how serious the business of operating the games of chance is. There is no place for those who think that they can make big money in a simple and easy way. This business requires constant investment in the equipment and constant following of innovations. The price of this is extremely high.

SOCIAL RESPONSIBILITY

The Gambling Law in its Article 6 lays down general provisions regarding the social responsibility of the operators of the games of chance and they are additionally defined by the Rules on the information characteristics of equipment for organization of games of chance through means of electronic communication, conditions of their satisfaction and methods of their testing. The player is entitled to limit, in writing or electronically, the highest amount that may be deposited within a particular period of time and the highest amount that may be lost within a particular period of time. Also, the player may prohibit himself, in writing or electronically, the access to the information system (self-exclusion) for a particular period of time. The operator is obliged to immediately act according to the request of the player for the self-exclusion and to disable his access.

On the home page of the site, the operator is obliged to post a link towards documents referring to responsible operation of the games of chance, including the test for the player check-up.



The Rules on the method of determining whether conditions have been fulfilled for receiving of approval to organize games of chance through means of electronic communication defines what the study on unwanted impact of the games of chance must contain. Article 5 of the Rules precisely states that the study must contain the following :

- 1) Registration of a player, uniqueness of his account, procedure of registration and method of updating of the player's personal information that must be available to the player at any time and especially:
 - manner of the player's registration and measures of check-up of logical correctness of entered data;
 - measures enabling updating of the player's data in the course of the account use;
 - measures disabling opening of more accounts for one player;
 - description of procedures and rules that must be available to the player at any moment.

- 01 The operators of all betting shops in the country are obliged to attend the training in the Institute so that they can recognize a pathological gambler, prevent him from playing the games and send him for recovery in the Institute. Operation of the games of chance can only bring substantial income for the state and the operators and such income could be redirected for further development of responsible social engagement.
- 02 The Gambling Law has prescribed 10 validity of approval, which means that the operator has a very long period to establish and develop the business.

- 2) Database, method of data and players' protection, especially:
 - method of storage and protection of data about accounts and card numbers i.e. elimination of the possibility of their abuse;



- documents i.e. existence of proofs of all deposits and credits, of all corrections and failed depositing and crediting in accordance with law and subsidiary rules.
- 3)** Method of protection against unauthorized use of the system i.e. measure of denying access to the system to persons that are not owners of the accounts and to underage persons.
- 4)** Measures stipulated by the principles of responsible operation of the games of chance, especially:
- constant display of real time and date;
 - making it possible for the player to limit depositing on daily, weekly or monthly base;
 - constant display of clear warning of prohibited participation in the games of chance for underage persons;
 - mechanism of disabling access to underage persons i.e. method of authentication of player's age and their application concerning free games;

The Law prescribes the prohibition for the operator's employees taking part in games of chance through means of electronic communication.

- obligation to credit the player in the case of closing of the account i.e. disabling of receiving of advertisements for the games of chance in the period in which the account is closed;
 - possibility of the account closing at the request of third person – reasons, procedure and determination of the person responsible for receiving and resolving of submitted request.
- 5)** Availability of all information referring to prohibition of participation in the games of chance for underage persons, principles of responsible operation and protection of players in the language of the site and the game.

- 6)** Existence of a page about the responsible operation of the games of chance which contains links to the tools that disable playing – filtering and programs for blocking of contents on the Internet.

All these conditions are integrated in the study on prevention of undesired impact of the games of chance prescribed as obligatory for operators by Article 101 of the Gambling Law in. Based on the contents of the study, the Laboratory authorized by the Ministry of Finance issues a certification that the operator has fulfilled prescribed standards.

There is yet another interesting thing introduced by the Gambling Law that concerns the socially responsible business operation. Namely, the Law prescribes the prohibition for the operator's employees to take part in the games of chance through means of electronic communication. This prohibition is logical and good because the presumption is that the employee could misuse his position and easily gain a winning, by which he undoubtedly practices an unwanted impact on the games organized by the operator.

Creation of the study such is the study on prevention of unwanted impact on the games of chance requires engagement of a large number of professionals because the social responsibility is something insisted upon not only by the governments but by operators as well. For each renowned operator of the games of chance it is important that people do not perceive the games of chance market as the one on which money laundering is performed. They all want their companies to be observed as respectable by the society. This is where the worldwide intensive participation of well-known companies in creation of legislation in the sphere of social responsibility comes from. Such companies also take part in humanitarian activities, help sports, culture, health care, build homes for abandoned children... In Serbia, the social responsibility issue is very important for each company and all renowned operators have undertaken to cooperate with the Institute for Addiction Recovery at Dražerova Street. The cooperation is very good to mutual satisfaction and is developing by every year. The operators of all betting shops in the country are obliged to attend the training in the Institute so that they can recognize a pathological gambler, prevent him from playing the games and send him for recovery in the Institute. Operation of the games of chance can only bring substantial income for the state and the operators and such income could be redirected for further development of responsible social engagement.

VALIDITY OF APPROVAL AND END OF VALIDITY

The Gambling Law has prescribed 10 validity of approval, which means that the operator has a very long period to establish and develop the business. It is a little surprising that the legislator has accepted such a long term. It is likely that his intention was to keep certain renowned companies in Serbia as long as possible after they have obtained the approval. There is no doubt that the Rules on information characteristics will certainly be changed because it is unthinkable that within the ten-year period no significant technological advances will occur. This will probably affect certain changes and amendments of the Law itself. After the validity term has expired, the operator may apply for extension of the



approval at the latest 60 days before expiry. If the operator wishes to cancel the organization of the games of chance before time, he may do so but first he shall settle all due obligations towards the tax authorities and the players.

The approval may stop to be valid under the law if the operator ceases to fulfill conditions laid down by the law and the rules, if he does not pay the fees or does not fulfill other conditions prescribed by the law. Then the Administration may pass the resolution on confiscation of the approval. To tell the truth, such a stipulation in the Law is the indicator that after granting of the approval all operators will be under constant monitoring of the Administration. Nevertheless, the impression is that the sanctions, as well as the reasons for their imposing, had to be stricter. It is interesting that the legislator has introduced an unbelievable norm and this is that against the resolution no complaint may be made but only an administrative dispute may be initiated within 30 days from receiving of the resolution. The reason for this solution is utterly incomprehensible and it would be desirable to consider a possible change of this stipulation and to enable a complaint to every operator who consider the confiscation of his approval by

the Administration unjustified. There are numerous arguments in favor of the possibility of making a complaint and the most credible one is that resolving would be more efficient and timesaving.

CONCLUSION

By passing the subsidiary rules, Serbia has stepped into the modern world of internet gambling. After many complications and unreasonable delay, a significant breakthrough has been made in the sector of gaming. The very fact that Serbia lost an average of 400,000 euro daily that drained into the grey zone, was the biggest reason for the final disillusion and passing of the subsidiary rules in order to suppress the grey market. Of course, the Law itself and the Rules have their drawbacks but if compared to no regularity at all they are revolutionary. In further development of this field, it must be considered how to amend the defined rules and legal norms as much as possible. The aim is to attract as many as possible renowned companies because the industry of the games of chance has a future. The Internet as a medium will certainly continue to develop, the computer technology as well and so will the offering of the games of chance. So, it is necessary to follow the innovations, develop the efficient state administra-

01 The rules have been passed and the organization of games of chance has been enabled. The second part, the practical one, will be much more difficult because quality personnel that will implement the rules is needed. A brief action is necessary because any delay suppresses the development, especially in the time of fast technological progress. As we as a state are famous of very good professionals in the IT sector, this will be a great chance to employ a large number of young people by both the state administrative and the operators.

tion and suppress the grey market and tax evasion, which means a much more efficient operation of the Tax Administration. Whatever rules are passed, even the best ones, they can easily remain dead letters on the paper if they are not implemented in the practice. Hence, Serbia did a part of the job well. The rules have been passed and the organization of games of chance has been enabled. The second part, the practical one, will be much more difficult because quality personnel that will implement the rules is needed. A brief action is necessary because any delay suppresses the development, especially in the time of fast technological progress. As we as a state are famous of very good professionals in the IT sector, this will be a great chance to employ a large number of young people by both the state administrative and the operators.

The revolution in the internet gambling in Serbia has begun!