



MASTER COMPLIANCE INTELLIGENCE REPORT

SOFTON LTD

AND THE BETZTER CLUSTER

Corporate, Financial and Network Forensic Compliance Intelligence Report

Field	Value
Title	Softon Ltd and the Betzter Cluster — Corporate, Financial and Network Forensic Compliance Intelligence Report
Version	3.0 (consolidated master)
Date	June 2026
Publisher	FinTelegram News GmbH
Classification	CONFIDENTIAL — JOURNALISTIC PRIVILEGE
Subject	Softon Ltd (HE 463977) and associated Cyprus–Estonia–Germany cluster
Overall risk rating	HIGH
Audit boundary	Passive OSINT only — no login, no registration, no payment flow, no authenticated-endpoint testing
Intended use	Internal editorial review · PDF export for regulatory submission · redacted web publication

Evidentiary weighting: **PRIMARY** (official registry / forensic network evidence) · **SECONDARY** (two+ independent non-official sources) · **LEAD / LEAD SINGLE SOURCE** (single-source / OSINT, unverified) · **BACKGROUND** (public contextual information). Confirmed multi-source findings are marked **VERIFIED**; gaps are marked **VERIFICATION PENDING**.



Contents

MODULE 1 — CORPORATE AND FINANCIAL INTELLIGENCE	3
1.1 Executive Summary	3
1.2 Methodology and Source Base	3
1.3 Compliance Snapshot — Key Risk Indicators	4
1.4 Softon Ltd — Corporate Profile and Formal Structure	4
1.5 The Cyprus Legal and Corporate Layer	5
1.6 Casino Operations and the Offshore Licensing Narrative	6
1.7 Payment Flows and EU Risk Exposure	6
1.8 Kaspela Labyrinth OÜ — Cross-Border Network Indicator	6
1.9 Persons of Interest and Unresolved Identity Questions	7
1.10 EU Regulatory Questions — Why Is This Tolerated?	8
MODULE 2 — NETWORK FORENSIC ANALYSIS	9
2.1 DNS Chain, IP and Project Marker	9
2.2 HTTP Behaviour and the 403/404 Discrepancy	9
2.3 SSL Certificate Data	9
2.4 Traceroute Analysis	10
2.5 Supporting Application-Layer Markers (Betzter Public JavaScript)	10
2.6 NovaFlick and Cross-Brand Operational Pattern	11
MODULE 3 — PAYMENT INFRASTRUCTURE AND CONSUMER HARM	12
3.1 Functional Role Assessment	12
3.2 Cashier Black Box	12
3.3 Regulatory Red Flags	12
3.4 AML Risk Assessment (FATF Methodology)	12
MODULE 4 — REGULATORY REFERRALS & EVIDENTIARY INVENTORY	14
4.1 Regulatory Referral Recommendations	14
4.2 Evidentiary Inventory	14
4.3 Source Protection Statement	15
4.6 Source Bibliography	15
4.7 Appendices	17
Appendix A — Passive OSINT methodology	18
Appendix B — Evidence package inventory	18
Appendix C — Network infrastructure snapshot	18
Appendix D — Cross-brand operational pattern	18
Appendix E — False-positive controls (cashier scan)	19
Appendix F — Glossary and evidentiary weighting key	19
Appendix G — Technical Review Addendum (Blue Additions)	20



MODULE 1 — CORPORATE AND FINANCIAL INTELLIGENCE

1.1 Executive Summary

Softon Ltd, a private Cyprus company incorporated on 9 August 2024 with a share capital of EUR 2,000, is publicly named on **Betzter.com** as the owner and operator of an online casino that claims a licence from the Autonomous Island of Anjouan, Union of the Comoro. Whistleblower material and open-source intelligence further connect **Softon Ltd** to the KingdomCasino domain cluster, including Dutch-, Italian- and Austrian-facing mirror domains, with deposits reportedly initiated through Tink open-banking infrastructure and routed via an intermediary identified as **Transferop**.

A single individual, **Christiana Paraskeva**, is recorded as director, secretary and sole shareholder of Softon Ltd and as sole management-board member of the Estonian entity Kaspela Labyrinth OÜ, whose registry filing carries Cyprus contact details. At the network layer, the sportsbook-infrastructure endpoint `api.sptpub.com` was observed to resolve to Hetzner-hosted IP space in Germany and Betzter's public application layer was found to expose a realtime player-account architecture together with behavioural and session telemetry.

The actual payment cashier, merchant identifiers and beneficial ownership were not identified in any public capture and remain a documented gap. Taken together, the evidence describes a multi-layer compliance perimeter in which a minimally capitalised EU company fronts offshore-licensed casino brands reaching consumers in regulated member-state markets, supported by EU payment rails and foreign-hosted infrastructure. No finding in this report should be read as an allegation of proven criminal conduct by any named natural or legal person.

Overall risk rating: **HIGH**. Regulatory referral is recommended to the Cyprus National Betting Authority, the Central Bank of Cyprus, the German Gemeinsame Glücksspielbehörde der Länder (GGL), the Dutch Kansspelautoriteit (KSA), the European Banking Authority (EBA), Europol EC3, the Estonian Financial Intelligence Unit, the Cyprus Bar Association, and Hetzner Online GmbH (abuse/legal).

1.2 Methodology and Source Base

The investigation draws on: extracts from the Cyprus Department of Registrar of Companies for Softon Ltd (HE 463977); the Form HE1 statutory declaration of compliance filed at incorporation; the 2025 annual report of Kaspela Labyrinth OÜ filed with the Estonian e-Business Register; public-facing statements captured from Betzter.com and KingdomCasino domains; a publicly available law-firm team profile; multiple independent whistleblower submissions received via Whistle42; and a modular passive-OSINT collection executed through PowerShell forensic scripts (DNS and mail records, HTTP and redirect chains, TLS/RDAP/certificate-transparency, geolocation/ASN/traceroute, and HTML/JavaScript keyword capture), hashed into an evidence package.

The audit boundary is passive OSINT only: no login, no registration, no deposit or payment flow, no authenticated-endpoint testing and no port scanning were performed. Registry extracts establish formal roles, not operational control; website footers establish public attribution, not adjudicated fact; whistleblower accounts are evidentiary leads requiring corroboration. Established



facts, strong indicators, reasonable hypotheses and unresolved questions are distinguished throughout, and cautious language is used accordingly.

1.3 Compliance Snapshot — Key Risk Indicators

Area	Key data / indicator	Weight	Compliance relevance
Cyprus corporate vehicle	Softon Ltd, HE 463977, incorporated 9 Aug 2024, EUR 2,000 share capital	PRIMARY	Minimal-substance EU company publicly linked to real-money casino operations
Corporate control	Christiana Paraskeva as director, secretary and sole shareholder	PRIMARY	One-person governance; nominee/fronting question
Casino operations	Betzter.com names Softon Ltd as owner/operator; OSINT/whistleblower connect Softon to KingdomCasino domains	VERIFIED / LEAD	EU-facing offshore casino brand cluster
Offshore licence	Anjouan licence ALSI-202409012-F11 narrative	VERIFIED (claim)	Anjouan licence confers no EU market access
Geo-targeted domains	KingdomCasino6.io (NL), KingdomCasino16.io (IT), KingdomCasino4.io (AT)	LEAD	Jurisdictional segmentation; enforcement adaptation
Payment rail	Reported Tink open-banking initiation; Transferop/Payop layer	LEAD SINGLE SOURCE	PIS deposits may reduce chargeback options and obscure ultimate merchant
Dutch market / CRUKS	Reported Dutch player, Dutch localisation, CRUKS registration	LEAD SINGLE SOURCE	Operating outside Dutch player-protection perimeter
Estonia link	Kaspela Labyrinth OÜ, code 16837533; signed by C. Paraskeva; Cyprus phone/email	PRIMARY	Cross-border indicator; unusual revenue pattern
Network infrastructure	api.sptpub.com → 159.69.41.140/.141, Hetzner AS24940, Germany	PRIMARY	Direct non-Cloudflare API infrastructure lead
Telemetry / privacy	FullStory + Sentry Replay with masking disabled; player UUID/email mapping	PRIMARY	Behavioural-profiling and data-protection risk surface
Cashier black box	No MID/gatewayId/connectorId/routeUuid/acquirer/Apple Pay found in 1,020 path checks	MISSING NUCLEAR	Ultimate merchant route undisclosed
Legal-services layer	Incorporation by Alexandros Siamaris; “job done upon incorporation” position	PRIMARY / LEAD	Gap between formation services and downstream activity
Identity question	“Christiana” in filings vs “Christina” in law-firm profile	LEAD	Possible but unverified identity overlap

1.4 Softon Ltd — Corporate Profile and Formal Structure

The Cyprus registry extract reviewed records the following:

Field	Recorded value
Name / number	Softon Ltd, HE 463977 — private limited company
Status	Active
Registration date	9 August 2024



Field	Recorded value
Stated objects	General Trade (Γενικό Εμπόριο)
Registered office	Arch. Makariou III 64, Kaimakli 1021, Nicosia, Cyprus
Share capital	EUR 2,000 authorised and issued (2,000 ordinary shares of EUR 1)
Officers	Christiana Paraskeva — director, secretary and sole shareholder; address identical to registered office
Extract footer	Dated 10 May 2026; accessed via efilings.drcor.mcit.gov.cy

Two features are recorded. First, the formal structure is as thin as Cyprus law permits: one person in every governance role, nominal capital and a generic trading object. Second, Softon Ltd is not, on the available evidence, a passive shell — Betzter.com expressly states that the site is owned and operated by Softon Ltd under this registration number and address. A company that publicly assumes operator responsibility for a real-money gambling site while exhibiting no visible substance raises questions about where actual operations, staff, funds and decision-making reside.

1.5 The Cyprus Legal and Corporate Layer

The Form HE1 statutory declaration filed under the Companies Law, Cap. 113, art. 17(2), names **Alexandros Siamaris** (alternative transliteration Shiamaris) of Nicosia as the lawyer responsible for the incorporation, sworn on 30 July 2024 before the District Court Registrar, with correspondence details pointing to **Christiana Paraskeva** at the same Kaimakli address. There is nothing irregular about a lawyer incorporating a company; this is routine professional work, and no impropriety is alleged against the named lawyer. The compliance question is systemic rather than personal: company-formation services, one-person officer arrangements and registered-office addresses are the building blocks through which offshore gambling operations typically acquire an EU-facing corporate identity.

When the incorporating lawyer was reportedly confronted by a whistleblower with the company's apparent casino activity, his written response — reviewed in short excerpt — is said to have asserted that no lawyer is liable for the actions of a company he has incorporated, that his AML/KYC obligation extended only to checking the individual founder, and that his role was complete upon incorporation. That position broadly reflects the formal scope of an incorporating lawyer's duties under Cypriot law. It also illustrates the structural gap addressed by this report: if every professional in the chain is responsible only for a narrow formal step, no actor in Cyprus is accountable for what the resulting vehicle does to consumers elsewhere in the EU.

FinTelegram's research in the Cyprus Registrar has identified another connection. **GIOCO LIBERO INTERNET CLUB LTD** (HE 239745), a Cypriot limited company active since October 13, 2008, with an address at 11 Kleisthenous Street, Κάψαλος, Limassol, lists ΧΡΙΣΤΙΑΝΑ ΠΑΡΑΣΚΕΥΑ (Christiana Paraskeva) as secretary and ΡΗΓΙΝΟΣ ΠΑΡΑΣΚΕΥΑ (Riginos Paraskeva) as director. Gioco Libero has operated a physical internet gaming club in Limassol since 2008 with over 3,000 members. The connection of the same surname via the director (Riginos) and secretary (Christiana) indicates a family background in the gambling sector—the founding of **Softon LTD** in 2024 as an online casino vehicle thus appears to be a planned expansion from physical to online gambling by the same family circle. Evidentiary weight: SECONDARY — VERIFIED (publicly available from the Cyprus Registrar).



1.6 Casino Operations and the Offshore Licensing Narrative

Betzter.com is recorded as stating that it is owned and operated by Softon Ltd (HE 463977, Arch. Makariou III 64, Kaimakli, Nicosia) and that it is licensed and regulated by the Government of the Autonomous Island of Anjouan, Union of the Comoros, under licence No. **ALSI-202409012-FI1**, with a public seal UUID **3976f2dc-10ef-4980-9c28-00cb25fd74cc** served from anjouangaming.org. KingdomCasino16.io was observed to present generic terms stating only that “The Company is licensed,” without identifying a regulator on the page reviewed.

Whistleblower and OSINT material associates a domain cluster with the operation, including mirror domains reportedly segmented by market — KingdomCasino6.io for the Netherlands, KingdomCasino16.io observed for Italy and KingdomCasino4.io observed for Austria — alongside a broader brand set named by a former-insider submission (dracula.casino, madcasino.io, aphrodite.casino, tucancasino.com, kingdomcasino.io, tenobet.io, wino.casino, smash.casino). Anjouan licences are inexpensive, quickly issued and subject to limited supervisory capacity; such a licence confers no right to offer gambling services to consumers in EU member states operating national regimes, including the Netherlands, where remote gambling requires a KSA licence. The available materials suggest that the offshore licence functions principally as a narrative of legality directed at players and payment counterparties, while the corporate and operational reality is recorded inside the EU, in Cyprus. Whether that narrative withstands regulatory scrutiny is a central open question.

1.7 Payment Flows and EU Risk Exposure

Whistleblower material concerning KingdomCasino describes a deposit chain that, if confirmed, would concern every PSD2-regulated institution in Europe: a Dutch player initiates a payment through the Tink open-banking interface; funds are routed to an intermediary identified as Transferop Payment Gateway Ltd; and the economic beneficiary behind the casino layer is recorded as Softon Ltd in Cyprus, fronting an Anjouan-licensed operation. Cashier captures associated with the cluster show a Dutch-language deposit interface offering Open Banking (marked “Popular”), iDEAL, Bancontact and Sofort, with deposit limits of EUR 10–EUR 4,000.

The same material describes indicators that the structure may have operated as a compliance buffer rather than a payments convenience: mirror-domain redirection and full Dutch localisation suggesting deliberate market targeting; acceptance of deposits from a player reportedly registered in the Dutch CRUKS self-exclusion register, indicating absent or non-functioning player-protection integration; refund denial on the stated ground that Dutch players are not allowed, despite the Dutch-language interface; and reliance on open banking, which reduces operator chargeback exposure and shifts dispute risk onto the consumer. These elements are evidentiary leads, not adjudicated findings, but they map onto a known typology in which open-banking initiation lends mainstream credibility to the deposit moment, an intermediary gateway separates the bank from the merchant, and a Cyprus company provides an EU face for an offshore brand.

1.8 Kaspela Labyrinth OÜ — Cross-Border Network Indicator

Kaspela Labyrinth OÜ (Estonian registry code **16837533**, Vesivärava tn 50-301, Tallinn) is recorded in its 2025 annual report as a web-based, self-paced education platform (EMTAK 85599), signed on 12 February 2026 by Christiana Paraskeva as sole management-board member. A



second registry code, 14758547, has been cited in related source material for this entity; 16837533 is used here as the primary number and the discrepancy is flagged against the Estonian Business Register before publication.

The financials are recorded as follows: revenue of EUR 134,959 (2024) rising to EUR 320,844 (2025); cost of goods and services of EUR 355,579 producing a net loss of EUR 39,795 (2025), against a EUR 42,141 profit in 2024; cash collapsing from EUR 44,071 to EUR 2,411 year-on-year; and no reported employees. High pass-through turnover with negative margin and no staff is not, in itself, proof of anything, but it is a pattern that compliance teams associate with conduit or processing activity rather than organic platform growth. Whether the education narrative is commercially genuine, and whether Kaspela has any transactional relationship with the Softon casino network, are precisely the questions on which insider evidence is sought; at minimum, the shared person of interest and the Cyprus contact details make Kaspela a relevant cross-border indicator.

The filing lists contact details of christianaparaskeva3@gmail.com and +357 99140671. **Redaction note:** these personal contact details are retained for the internal-review and regulatory-submission builds because they appear on a public registry filing; they are to be redacted in the web-publication build.

1.9 Persons of Interest and Unresolved Identity Questions

Christiana Paraskeva is the documented bridge in this structure: director, secretary and sole shareholder of Softon Ltd in Cyprus, and sole management-board member of Kaspela Labyrinth OÜ in Estonia, with the Estonian filing's contact details reinforcing the Cyprus link. These registry-level connections are established by the documents themselves.

Separately, the Cyprus law firm L. Papaphilippou & Co LLC publicly lists a "Christina Paraskeva" as a Senior Associate with a litigation and public-law profile. Whistleblower submissions assert that this lawyer is the same person as the Softon/Kaspela officer and note an asserted career-history overlap of the incorporating lawyer with the same firm. This identification has not been independently verified: the names differ in spelling (Christiana vs Christina), the surname is not uncommon in Cyprus, and no document reviewed establishes the match. The overlap in name, jurisdiction and professional context creates a legitimate verification question — resolvable by bar-registration data, date-of-birth cross-referencing or a right-of-reply response — but it must currently be treated as **VERIFICATION PENDING**. If confirmed, it would raise professional-conduct and conflict questions; if disproven, that too would matter, and any correction or response from a named person will be published.

A further submission, from a self-described former customer-support employee in Cyprus, alleges that the brands alleged by the source to be part of the same cluster within a wider multi-brand network sharing affiliate infrastructure (Shark.partners; tracking/redirect domains) and a common technology stack, with possible operational links to a Cyprus-based software company (Crae Group); alleges instructions to deny withdrawals and invoke jurisdiction clauses; and references alleged prior enforcement in Sweden (Spelinspektionen) and Spain (DGOJ) against related brands. These claims are detailed and internally consistent but uncorroborated, and the underlying regulator decisions have not been retrieved. Separately, a Cyprus entity, Gadzooks Limited (HE 438503, Larnaca; director Georgia Nikoletti; secretary P.Z.T. Services Ltd), was named by a technical source as part of the same infrastructure cluster.



1.10 EU Regulatory Questions — Why Is This Tolerated?

The Softon structure is small, but it poses a large question. Gambling regulation in the EU is a national competence, while AML, payments and consumer protection are substantially harmonised; the combination creates a seam in which a member state with a permissive corporate-services industry can host the legal and payment plumbing for operations whose commercial purpose, on the available indicators, is to reach consumers in other member states that prohibit them.

- **Regulatory arbitrage inside the single market.** Whether Cyprus-incorporated vehicles, offshore licences and EU payment rails are being combined to neutralise national regimes such as the Dutch KSA framework is the central policy question. If a blocking order can be answered with a mirror domain and a new EUR 2,000 company, enforcement by other member states is structurally diluted.
- **AML supervision.** It is unclear which authority, if any, supervises the flow of EU consumer funds into an Anjouan-licensed operation via a Cyprus company. Unlicensed gambling proceeds may constitute criminal proceeds in the consumer's jurisdiction, with knock-on obligations for every regulated institution in the chain.
- **PSD2 and open-banking governance.** Open-banking platforms and account-servicing banks were not designed to be the deposit front-end of grey-market casinos. The case asks whether PIS-based merchant onboarding and ongoing monitoring are adequate when intermediary gateways obscure the ultimate beneficiary.
- **Consumer protection.** Self-excluded and otherwise protected players reportedly deposited and lost funds with no effective recourse. National protections are nullified if the operator sits one corporate layer and one offshore licence away.
- **The Cyprus circumvention thesis.** Why a member-state ecosystem in which incorporation, registered-office, legal and payment-agent services can be assembled — each step individually lawful — into structures that undermine the regulatory choices of other member states is tolerated remains unanswered. The honest answer may be that no single actor is responsible and no single supervisor is competent; that is a policy gap, not an excuse.



MODULE 2 — NETWORK FORENSIC ANALYSIS

2.1 DNS Chain, IP and Project Marker

The infrastructure picture was built from passive OSINT only. `api.sptpub.com` resolved to `159.69.41.140` and `159.69.41.141` in Hetzner Online GmbH / AS24940 address space. The preserved live route was collected through Globalping on 12 June 2026 at 19:20:16 UTC from `46.183.186.22` under probe ID `bf7402a5-b5b8-5e0f-8da0-c0e3c2e99e42`. This corrects the earlier description of the capture as a PowerShell traceroute.

Field	Observed value	Weight
Host	<code>api.sptpub.com</code>	PRIMARY
A records	<code>159.69.41.140 / 159.69.41.141</code>	PRIMARY
PTR (reverse DNS) for <code>.140</code>	Not independently verified for <code>159.69.41.140</code> . The hostname <code>11451.your-cloud.host</code> appeared at traceroute hop 11 on <code>195.201.66.233</code> .	VERIFICATION PENDING
Provider / ASN	Hetzner Online GmbH / AS24940	PRIMARY
Geolocation signal	Nuremberg, Bavaria, Germany	BACKGROUND
Capture method	Globalping traceroute, 12 June 2026, 19:20:16 UTC; probe <code>bf7402a5-b5b8-5e0f-8da0-c0e3c2e99e42</code>	PRIMARY

`11451.your-cloud.host` appeared as the responding hostname at hop 11 for `195.201.66.233`. It is not established by the preserved traceroute as the PTR of `159.69.41.140`. Separate reverse-DNS verification for `159.69.41.140` and `159.69.41.141` remains pending. The Germany/Nuremberg finding is a provider and routing-region signal only and does not identify an operator or beneficial owner.

2.2 HTTP Behaviour and the 403/404 Discrepancy

Recorded discrepancy — not reconciled

Source brief capture: `api.sptpub.com / 159.69.41.140` returns HTTP 403 on direct access.

OSINT package capture: `159.69.41.140` returns HTTP 404 with `Server: openresty`; `159.69.41.141` returns a TLS handshake failure / empty reply.

Treatment: both observations are preserved. The variance is consistent with time-separated captures, host-header sensitivity, or edge configuration changes. Reconciliation requires a fresh, timestamped, hashed capture. **VERIFICATION PENDING**.

The two observations should be preserved without forcing a single conclusion. A 403 or 404 on a bare API host is consistent with a reverse-proxy or application-service envelope that declines anonymous root requests. The difference may reflect time-separated captures, host-header handling or configuration changes. It supports the presence of an active service surface, but does not by itself establish the service owner or exact commercial function. A fresh timestamped and hashed HTTP/TLS capture remains pending.

2.3 SSL Certificate Data

SSL/TLS certificate subject, issuer, validity period and Subject Alternative Names for `api.sptpub.com` and the associated IP endpoints were not captured in a publication-grade form. Certificate-transparency history should be collected separately and preserved with timestamps



and hashes. VERIFICATION PENDING — no ownership or hostname conclusion should be inferred from DNS or traceroute data alone.

2.4 Traceroute Analysis

The complete Globalping traceroute is available. The route to `api.sptpub.com / 159.69.41.140` entered Hetzner’s `nbg1` cloud infrastructure through `core12.nbg1.hetzner.com (213.239.229.165)` and `core-spine-rdev2.cloud1.nbg1.hetzner.com (213.239.239.142)`. Hop 11 responded as `11451.your-cloud.host (195.201.66.233)`; subsequent hops returned no ICMP response. The asterisks indicate filtering or non-response and do not show that the route failed. The trace supports a direct Hetzner infrastructure and preservation lead. It does not identify the customer account, physical rack, operator location, beneficial owner or payment processor.

Route element	Preserved value
Source / target	46.183.186.22 → api.sptpub.com / 159.69.41.140
Timestamp / probe	2026-06-12 19:20:16 UTC / bf7402a5-b5b8-5e0f-8da0-c0e3c2e99e42
Hetzner core hop	core12.nbg1.hetzner.com / 213.239.229.165
Hetzner cloud spine	core-spine-rdev2.cloud1.nbg1.hetzner.com / 213.239.239.142
Intermediate cloud host	11451.your-cloud.host / 195.201.66.233
Target response	No final ICMP response observed; subsequent hops returned asterisks

2.5 Supporting Application-Layer Markers (Betzter Public JavaScript)

Marker	Observed value	Weight
Frontend build	app-8c7ce140.js (Livewire/Alpine application layer)	PRIMARY
Realtime stack	Pusher / Laravel Echo; cluster eu; ws-eu.pusher.com	PRIMARY
Pusher key	057098928717a40e62b9	PRIMARY
Private channels	playerAccount.{uuid}; playerAccount.{uuid}.sessions	PRIMARY
FullStory Org ID	o-23D3EG-na1 (Player.uuid / Player.email mapped)	PRIMARY
Sentry DSN public key	7363894271784a978de7f4e11b0640bd	PRIMARY
Sentry project ID	4504971543642112	PRIMARY
Sentry replay config	maskAllInputs:false; maskAllText:false; blockAllMedia:false	PRIMARY
Sentry marker URLs	sptpub.com; ui.invisiblesport.com	PRIMARY

These identifiers were confirmed as present in Betzter’s public application layer and provide hard comparison anchors. They prove a technical configuration; they do not prove that SPTPub, InvisibleSport or NovaFlick own or control Betzter. Cross-brand reuse of the FullStory Org ID, Pusher key or Sentry DSN would be the cleanest path to a shared-operations finding and is **VERIFICATION PENDING**.

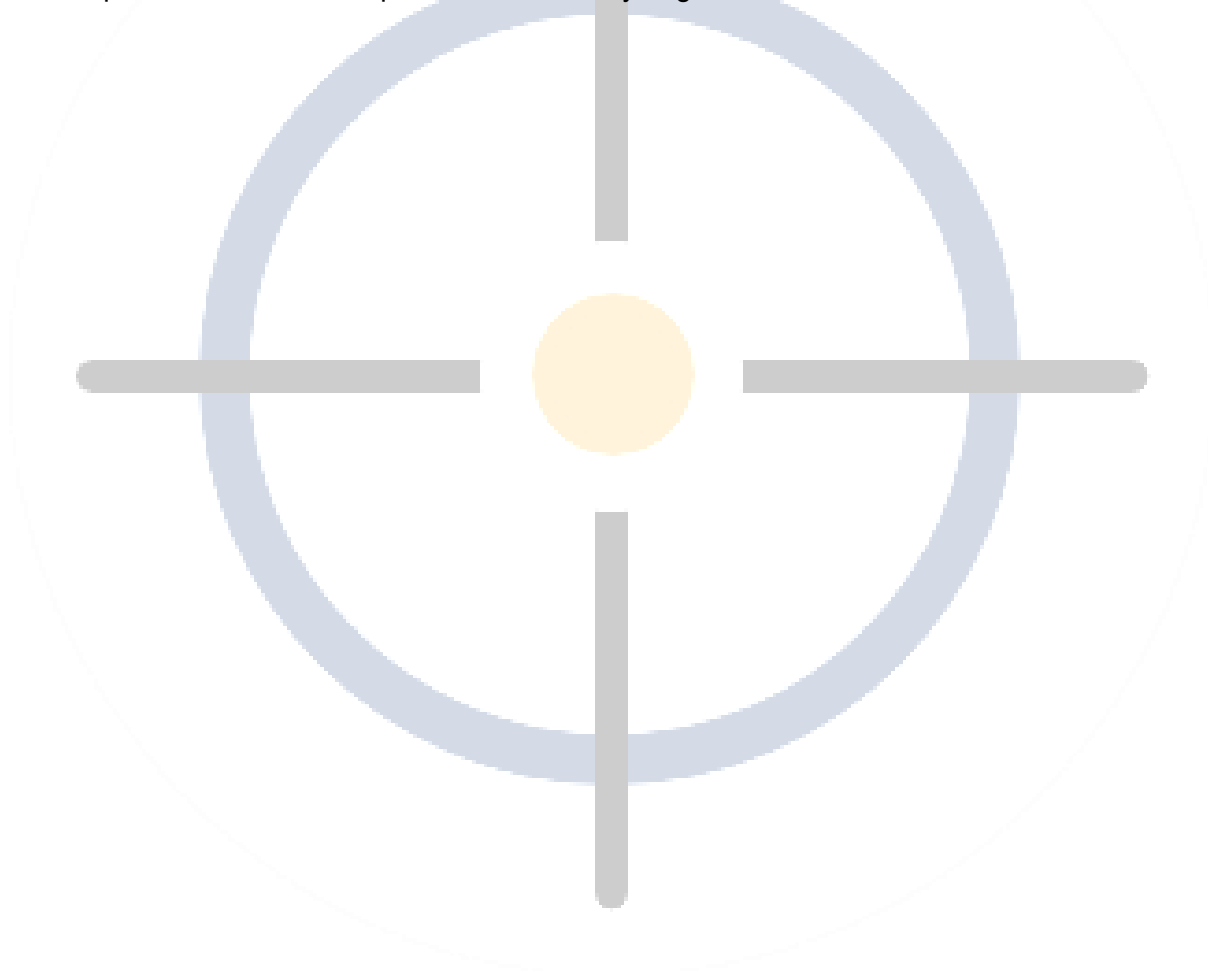
Cross-brand reuse of the same FullStory organisation ID, Pusher key or Sentry project/DSN would provide materially stronger shared-operations evidence. Until such reuse is independently captured or provider-account ownership is disclosed, the current finding remains a configuration and bridge lead rather than ownership proof.



2.6 NovaFlick and Cross-Brand Operational Pattern

NovaFlick was observed to expose platform-style hostnames — api, games, casino-admin, casino-manager and casino-testing-tools on novaflick.plus (with .int variants) — resolving behind a Cloudflare pair (104.18.26.22 / 104.18.27.22). A repeated go.* / unsub.* / feedback.* subdomain class was observed across multiple casino brands, including Wildzy, Dracula, KingdomCasino, MadCasino, Wino, Tucan, Aphrodite, Gambiva and Smash, consistent with a shared CRM/campaign/redirect/unsubscribe operations pattern. Neither pattern, alone, proves common ownership; both are operational-cluster leads and provider-disclosure targets. Cloudflare edge IPs and the softon.com wildcard/catch-all are explicitly treated as **WEAK ALONE** and are not used as service or ownership evidence.

The visible addresses 104.18.26.22 and 104.18.27.22 are Cloudflare edge addresses. The NovaFlick origin infrastructure and operator/control entity are not visible from public DNS and remain provider-disclosure or passive-DNS-history targets.





MODULE 3 — PAYMENT INFRASTRUCTURE AND CONSUMER HARM

3.1 Functional Role Assessment

On the observed markers, api.sptpub.com is assessed as a probable sportsbook-infrastructure API gateway referenced by Betzter’s telemetry configuration. The layered-stack hypothesis is that a casino facade (Betzter) sits above a realtime player-account application (Pusher/Laravel Echo), a behavioural-telemetry layer (FullStory/Sentry), a sportsbook/infrastructure bridge (SPTPub/InvisibleSport) and an undisclosed payment-orchestration route. Each layer is independently evidenced; the orchestration linking them into a single commercial entity is classified **LEAD** pending provider disclosure, and ownership of SPTPub, InvisibleSport and NovaFlick is not asserted.

3.2 Cashier Black Box

A public-facade payment scan comprising 1,020 path checks, plus review of eight downloaded public JavaScript files, found visible payment-method branding (Visa, Mastercard, Amex, crypto, Giropay, Sofort) but disclosed no payment cashier or routing identifier. No MID, no gatewayId, no connectorId, no routeUuid, no cashierSessionUuid, no acquirer identifier and no Apple Pay merchant-association path were found. All checked apple-developer-merchantid-domain-association paths returned 404 or timeout. Raw substring hits for “MID”, “provider_id” and “descriptor” were manually reviewed and rejected as payment evidence (see Appendix E). The cashier route is therefore a documented gap, and the primary disclosure target.

3.3 Regulatory Red Flags

Red flag	Observation	Compliance meaning
No visible PSD2 / EMI licence	No payment-institution or e-money licence disclosed for the cashier route.	Regulated, licensed PSP/acquirer chain ordinarily required for a gambling merchant; absence of disclosure is a transparency gap, not proof of unlicensed processing.
No verified EU-market iGaming licence	Anjouan claim ALSI-202409012-F11 / seal UUID displayed; scope and validity unverified.	An Anjouan (Comoros) seal confers no EU market authorisation; lawful service to DACH/NL consumers is a VERIFICATION PENDING question for national regulators.
Offshore licence narrative	Reported geo-targeted mirror domains; KingdomCasino16.io states only “The Company is licensed.”	Indicates awareness of, and adaptation to, national enforcement (LEAD).
Opaque cashier	No merchant/route identifiers found in 1,020 public path checks.	Ultimate merchant and settlement route cannot be mapped (MISSING NUCLEAR).
Telemetry / data-protection risk	Sentry Replay with maskAllInputs:false and maskAllText:false plus player UUID/email mapping.	Session replay capturing identity context is a profiling and data-protection risk surface alongside the AML picture.

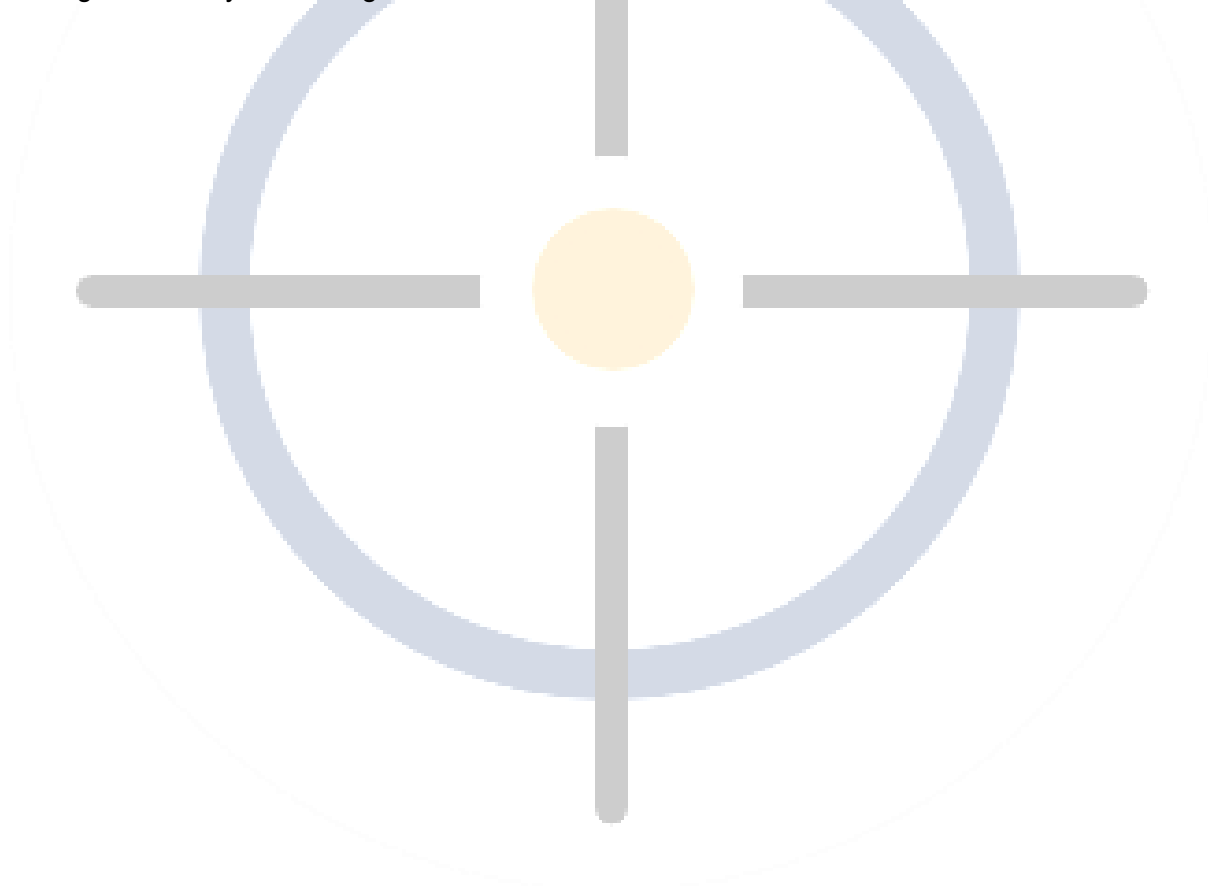
3.4 AML Risk Assessment (FATF Methodology)



Applying an FATF-style inherent-risk lens across product, channel, geography and customer factors:

- **Product risk — HIGH.** Online gambling with card, crypto and instant-bank (Sofort/Giropay/iDEAL) rails is an inherently high-risk product for layering and rapid value movement.
- **Channel risk — HIGH.** Non-face-to-face onboarding with an opaque cashier and no disclosed KYC chain elevates impersonation and mule-account risk.
- **Geographic risk — MEDIUM/HIGH.** An Anjouan licensing surface combined with German-hosted infrastructure, an Estonian conduit indicator and DACH/NL-facing payment methods spans low-oversight licensing and high-value consumer markets.
- **Customer / telemetry risk — HIGH.** Session replay with masking disabled plus player UUID/email mapping creates a profiling and data-protection risk surface alongside reported weak casino-level KYC.

Composite inherent AML risk: **HIGH.** This is an assessment of inherent risk indicators; it is not a finding that money laundering has occurred.





MODULE 4 — REGULATORY REFERRALS & EVIDENTIARY INVENTORY

4.1 Regulatory Referral Recommendations

FinTelegram recommends that the following authorities review the matters set out herein and, where appropriate, preserve evidence. None of these referrals presumes a finding of wrongdoing.

Authority	Basis for referral	Specific request
Cyprus National Betting Authority (reconciled from "GCSC")	Softon Ltd is the named Cyprus operator of Betzter.	Confirm licensing status, permitted markets, and whether the Anjouan claim is recognised.
Central Bank of Cyprus (CBC)	AML and payment supervision of Cyprus-domiciled activity.	Review any Cyprus payment/EMI nexus and the cashier chain serving the brands.
Gemeinsame Glücksspielbehörde der Länder (GGL) (reconciled from "GSpBehörde")	DACH-facing payment methods; German-hosted infrastructure lead.	Assess accessibility to German consumers absent a German licence.
Dutch Kansspelautoriteit (KSA)	Reported CRUKS breach and Dutch mirror-domain targeting.	Consider enforcement and payment-blocking; verify CRUKS-circumvention reports.
European Banking Authority (EBA)	Cross-border payment-rail and AML concern.	Onward coordination and typology awareness.
Europol EC3	Cross-border infrastructure and payment typologies.	Intelligence intake; coordination with national units.
Hetzner Online GmbH (abuse/legal)	Provider of 159.69.41.140 / .141.	Customer-account and routing-metadata preservation request dispatched.
Estonian Financial Intelligence Unit (FIU)	Kaspela Labyrinth OÜ revenue pattern and Cyprus nexus.	Assess whether reported turnover corresponds to genuine education sales; identify counterparties.
Cyprus Bar Association	Professional-conduct question on formation agents for gambling-linked vehicles.	Review adequacy of conduct rules and ongoing AML obligations of regulated professionals.

4.2 Evidentiary Inventory

#	Item	Source	Weight	Status
1	Softon Ltd HE 463977 registry record (EUR 2,000; C. Paraskeva)	Cyprus Registrar [01]	PRIMARY	CONFIRMED
2	Softon Ltd named as Betzter owner/operator	Betzter.com [05]	VERIFIED	Held
3	Form HE1 statutory declaration (A. Siamaris, sworn 30.07.2024)	Cyprus Registrar [03]	PRIMARY	CONFIRMED
4	Anjouan licence ALSI-202409012-FI1 + seal UUID	Betzter.com [05]/[15]	VERIFIED (claim)	CONFIRMED
5	KingdomCasino mirror domains (NL/IT/AT)	Whistleblower/OSINT [10][12]	LEAD	PENDING
6	Tink open-banking + Transferop routing; CRUKS player	Whistleblower [10][14]	LEAD SINGLE SOURCE	PENDING



#	Item	Source	Weight	Status
7	Kaspela Labyrinth OÜ code 16837533; 2025 financials	Estonian e-Business Register [02][04]	PRIMARY	Held
8	Kaspela alternate code 14758547	Related material [11][13]	LEAD	PENDING reconciliation
9	Identity question (Christiana vs Christina; law firm)	Whistleblower/profile [08][13]	LEAD	PENDING
10	Former-insider brand cluster / Crae Group / Shark.partners	Whistleblower [12]	LEAD SINGLE SOURCE	PENDING
11	Alleged SE/ES enforcement on related brands	Whistleblower [18]	LEAD	NOT RETRIEVED
12	Gadzooks Limited HE 438503 registry record	Cyprus Registrar	SECONDARY	Held
13	api.sptpub.com → 159.69.41.140/.141; PTR 11451.your-cloud.host; AS24940	Source traceroute, Jun 2026	PRIMARY	Held
14	HTTP response on .140 (403 vs 404/openresty)	Source vs OSINT package	PRIMARY (conflicting)	PENDING reconciliation
15	Pusher key 057098928717a40e62b9 + private channels	Betzter public JS	PRIMARY	Held
16	FullStory Org ID o-23D3EG-na1	Betzter public JS	PRIMARY	Held
17	Sentry DSN 7363894271784a978de7f4e11b0640bd / project 4504971543642112	Betzter public JS	PRIMARY	Held
18	Sentry markers sptpub.com / ui.invisiblesport.com	Betzter public JS	PRIMARY	Held
19	NovaFlick admin/manager/testing hostnames	DNS/CT	STRONG LEAD	Held
20	Cross-brand go/unsubscribe/feedback pattern	DNS/redirect scan	STRONG LEAD	Held
21	Cashier/PSP/MID/gateway/acquirer/Apple Pay	Facade scan (1,020 paths)	MISSING NUCLEAR	NOT FOUND
22	OSINT_Evidence_MODULAR.zip	Passive OSINT package	PRIMARY (preservation)	879 files; held
23	FACADE_PAYMENT_OSINT-20260612	Passive facade scan package	PRIMARY (preservation)	58 files / 1,020 checks; held
24	SSL SANs / CT history; full traceroute; browser 403 capture	—	—	PENDING

4.3 Source Protection Statement

The whistleblower-derived findings were provided on terms of confidentiality and are handled under FinTelegram’s anonymisation protocol: no names, contact details, submission dates or technical metadata identifying a source are recorded. Source identities are protected under applicable journalistic source-protection provisions, including Article 10 ECHR jurisprudence on the protection of journalistic sources and corresponding national media-privilege rules. The passive-OSINT boundary (no login, no registration, no payment flow, no authenticated-endpoint testing) was maintained to ensure the collection method is lawful and reproducible. This report is classified CONFIDENTIAL — JOURNALISTIC PRIVILEGE and is prepared in furtherance of public-interest reporting on cross-border financial-crime risk.

4.6 Source Bibliography



Scope and handling note. This consolidated bibliography lists all input materials underlying both source reports, renumbered consecutively. Whistleblower-derived entries are anonymised: no names, contact details, submission dates or technical metadata are recorded, and all such entries are marked “Unverified — investigative lead only.” Where a document was obtained by query rather than at a public URL, the entry states “On file with FinTelegram.”

[01] Cyprus Registrar — Organisation details for Softon Ltd, HE 463977 (Active; reg. 09.08.2024; objects “General Trade”; office Arch. Makariou III 64, Kaimakli 1021, Nicosia; Christiana Paraskeva as director/secretary/sole shareholder; capital EUR 2,000). Extract footer 10.05.2026; efilng.drcor.mcit.gov.cy. PRIMARY — registry/official.

[02] Estonian e-Business Register (RIK) — company record for Kaspela Labyrinth OÜ, code 16837533, Tallinn (board/shareholder/UBO entries for Christiana Paraskeva). On file with FinTelegram. PRIMARY — registry/official.

[03] Form HE1 — Statutory Declaration of Compliance, Companies Law Cap. 113 art. 17(2), Softon Ltd: declarant lawyer Alexandros Siamaris (alt. Shiamaris), Nicosia; sworn 30.07.2024; correspondence Christiana Paraskeva, Kaimakli. PDF on file. PRIMARY — registry/official.

[04] Majandusaasta aruanne (Annual Report) of Kaspela Labyrinth OÜ, FY2025: EMTAK 85599; revenue EUR 320,844 (2025) vs EUR 134,959 (2024); net loss EUR 39,795 (2025) vs profit EUR 42,141 (2024); cash EUR 2,411 at 31.12.2025; contact +357 99140671 and christianaparaskeva3@gmail.com; signed 12.02.2026 by Christiana Paraskeva. PRIMARY — financial statement.

[05] Betzter.com legal/footer statement: “owned and operated by Softon LTD,” HE 463977, Kaimakli; support@betzter.com; claimed Anjouan licence ALSI-202409012-FI1. Screenshot on file; <https://betzter.com>. SECONDARY — public-facing statement.

[06] KingdomCasino16.io Terms & Conditions (last update 13.03.2024): self-designation “KingdomCasino.io”; licensing addressed only by “The Company is licensed.” Screenshot on file. SECONDARY — public-facing statement.

[07] KingdomCasino / KingdomCasino6 cashier captures: Dutch-language deposit interface; Open Banking (“Popular”), iDEAL, Bancontact, Sofort; deposit limits EUR 10–EUR 4,000. Screenshots on file (within research visual). SECONDARY — public-facing statement. Original full-frame captures to be confirmed.

[08] Team profile of L. Papaphilippou & Co LLC: “Christina Paraskeva, Senior Associate.” <https://www.papaphilippou.eu/our-team/>; screenshot on file. SECONDARY — professional profile. Listed person not confirmed identical with the Softon/Kaspela officer.

[09] Shiamaris Law — public website of the incorporating lawyer’s practice; <https://www.shiamarislaw.com/>. SECONDARY — professional profile. Site content to be independently captured.

[10] Whistleblower submission — alleged KingdomCasino deposit chain: Tink open banking → Transferop Payment Gateway Ltd; alleged CRUKS-registered player; alleged refund denial; alleged mirror-domain redirection. On file (Whistle42). LEAD — whistleblower (Unverified — investigative lead only).

[11] Whistleblower submission — structural analysis on Cyprus registry documents; alleged use of Softon Ltd to bypass EU/KSA oversight; references Transferop. On file (Whistle42). LEAD — whistleblower (Unverified — investigative lead only).

[12] Whistleblower submission — former customer-support insider: alleged multi-brand network (Shark.partners; tracking/redirect domains), common tech stack, alleged Crae Group involvement, alleged withdrawal-denial instructions, alleged SE/ES enforcement, alleged network-wide Anjouan licensing. On file (Whistle42). LEAD — whistleblower (Unverified — investigative lead only).

[13] Whistleblower submission — identity assertion (Softon/Kaspela officer = L. Papaphilippou Senior Associate; asserted lawyer career-history overlap). On file (Whistle42). LEAD — whistleblower (Unverified — investigative lead only).

[14] Written correspondence excerpts: (a) KingdomCasino support refund refusal/ban; (b) statements attributed to Alexandros Siamaris on the scope of an incorporating lawyer’s duties. On file. LEAD — whistleblower (Unverified). Note: materials indicate correspondence between a whistleblower and Mr Siamaris, subsequently shared with FinTelegram.

[15] Anjouan Gaming public licence register — verification resource for ALSI-202409012-FI1; <https://anjouangaming.com/license-register/>. SECONDARY. Register check not yet performed; recommended pre-publication step.



- [16] Composite research dossier graphic “KingdomCasino / Softon Ltd / Transferop rail.” FinTelegram research compilation. **SECONDARY** — research compilation; each embedded element to be traced to its underlying source.
- [17] Public professional-network profiles (LinkedIn) referenced in whistleblower submissions. **SECONDARY** — self-published; treated as lead material only.
- [18] Alleged prior enforcement against related brands: Sweden (Spelinspektionen) bans; Spain (DGOJ) fines exceeding EUR 5m. **LEAD** — whistleblower-derived; primary regulator decisions not yet retrieved.
- [19] Directive (EU) 2015/2366 (PSD2). EUR-Lex CELEX 32015L2366. **BACKGROUND** — legal framework.
- [20] EU AML framework: Directive (EU) 2015/849 (AMLD4) as amended by (EU) 2018/843 (AMLD5); Directive (EU) 2018/1673 (“AMLD6”, criminal-law); 2024 AML package (Reg (EU) 2024/1624; Dir (EU) 2024/1640). **BACKGROUND**. Note: the drafting brief cited “Directive 2021/16/EU” for AMLD6; no such directive exists — the correct citation is Directive (EU) 2018/1673.
- [21] Dutch gambling-law framework: Wet op de kansspelen as amended by the Wet kansspelen op afstand (in force 01.04.2021), including CRUKS and KSA powers. **BACKGROUND** — legal framework.
- [22] Cyprus Companies Law, Cap. 113 — incorporation framework incl. art. 17(2) HE1 declaration. **BACKGROUND** — legal framework.
- [23] Passive OSINT evidence package OSINT_Evidence_MODULAR.zip (879 files: DNS, resolver, HTTP, redirect, TLS, RDAP, CT, geo, BGP, HTML/JS, well-known, keyword, hash outputs). **PRIMARY** — preservation.
- [24] Passive facade-payment scan package FACADE_PAYMENT_OSINT-20260612 (58 files; 1,020 public path checks; 8 downloaded JS files; payment keyword/context/url tables; gap matrix). **PRIMARY** — preservation.
- [25] api.sptpub.com network capture: A records 159.69.41.140/141; Hetzner AS24940; Globalping traceroute dated 12.06.2026 19:20:16 UTC, probe bf7402a5-b5b8-5e0f-8da0-c0e3c2e99e42; route through core12.nbg1.hetzner.com and core-spine-rdev2.cloud1.nbg1.hetzner.com; 11451.your-cloud.host observed at intermediate hop 195.201.66.233. **PRIMARY** for the recorded route and public infrastructure attribution. Target-IP PTR, certificate SANs and fresh HTTP/TLS reconciliation remain **VERIFICATION PENDING**.
- [25] Form HE44 — Certificate of Incorporation, SOFTON LTD, HE 463977, Republic of Cyprus, 09.08.2024. Organization number 643282, Record number 38057840. PDF on file with FinTelegram (via Whistleblower, 15.06.2026). **PRIMARY — registry/official.**
- [26] Form HE2 — Registered Office Notice, Companies Law Cap. 113 art. 102, SOFTON LTD. Registered address Arch. Makariou III 64, Kaimakli 1021. Submission 30.07.2024, Registrar stamp 08.08.2024. Record 38049562. PDF on file. **PRIMARY — registry/official.**
- [27] Form HE3 — Director and Secretary Declaration, Companies Law Cap. 113 art. 192, SOFTON LTD. Christiana Paraskeva as Director and Secretary, ID-code 820192, ID-number 2691981. Record 38049563. PDF on file. **PRIMARY — registry/official.**
- [28] Memorandum and Articles of Association, SOFTON LTD, 24 pages, signed 30.07.2024. Share capital EUR 2,000 / 2,000 shares at EUR 1. Christiana Paraskeva, ID 2691981. Notary signature 882326. PDF on file. **PRIMARY — registry/official.**
- [29] CyprusRegistry.com company record for GIOCO LIBERO INTERNET CLUB LTD, HE 239745. Registration 13.10.2008, Limassol. Director: Riginos Paraskeva; Secretary: Christiana Paraskeva. Active status. Source: cyprusregistry.com/companies/HE/239745, verified 14.06.2026. **SECONDARY — public registry aggregator.**
- [30] Whistle42 submission (15.06.2026) — independent whistleblower reports email-bombing of approx. 1,000 emails immediately upon adding Alexandros Shiamaris to CC in correspondence with KingdomCasino.io/Softon Ltd/Paraskeva, after weeks of no response from those parties. Source contact: withheld (anonymisation protocol). On file with FinTelegram Whistle42. **LEAD — whistleblower. Unverified — investigative lead only.**
- [31] Whistle42 submission (15.06.2026) — message attributed to TheKingdomBank network containing explicit threat to FinTelegram: removal demand for articles on TheKingdomBank, acknowledgement of email-bombing (“stress testing”, “killing your emails”), threat of legal action. Reference URL provided: fintelegam.com/rail-atlas-kingdom-bank-financial-house-jeton-speedy-payment-network/. On file with FinTelegram Whistle42. **LEAD — threat communication. Confirms operational connection between TheKingdomBank and Softon/KingdomCasino cluster.**

4.7 Appendices



Appendix A — Passive OSINT methodology

Collection was performed via passive GET/HEAD requests, public DNS resolvers, certificate-transparency queries and local processing. No login, registration, deposit/payment flow, authenticated-endpoint testing or port scanning was performed. Modular PowerShell scripts produced DNS/mail, HTTP-redirect, TLS/RDAP/CT, geo/ASN/traceroute and HTML/JS keyword outputs, hashed into an evidence package for integrity preservation.

Appendix B — Evidence package inventory

Package	Contents	Scope
OSINT_Evidence_MODULAR.zip	879 files: DNS, resolver, HTTP, redirect, TLS, RDAP, CT, geo, BGP, HTML/JS, well-known, keyword, hash outputs	Passive only
FACADE_PAYMENT_OSINT-20260612	58 files: 1,020 public path checks, 8 downloaded JS files, payment keyword/context/url tables, gap matrix	Public facade only

Appendix C — Network infrastructure snapshot

Target	Observed	Boundary
api.sptpub.com	A records: 159.69.41.140 / 159.69.41.141 PTR 159.69.41.140: static.140.41.69.159.clients.your-server.de PTR 159.69.41.141: static.141.41.69.159.clients.your-server.de Traceroute hop 11: 11451.your-cloud.host (195.201.66.233) HTTP/TLS: openresty / HTTP 403-404 observations; TLS error on.141	Strongest direct non-Cloudflare infrastructure and preservation lead. The PTR records confirm generic Hetzner reverse-DNS naming only. The traceroute hostname is a separate intermediate hop and does not identify the customer, operator, owner or beneficial owner.
api.invisiblesport.com	CNAME to an Amazon CloudFront distribution / AWS edge infrastructure.	CDN and delivery-layer lead only; not proof of account ownership or operator identity.
ui.invisiblesport.com	CNAME to an Amazon CloudFront distribution / AWS edge infrastructure.	Marker and UI delivery-surface lead; not proof of account ownership or operator identity.
NovaFlick *.novaflick.plus	Public host classes include api, games, casino-admin, casino-manager and casino-testing-tools; Cloudflare edge Ips 104.18.26.22 / 104.18.27.22 observed.	Platform, administration and testing infrastructure lead. Cloudflare addresses show edge delivery only; the operator and origin account remain unidentified.

Technical precision note: The hostname 11451.your-cloud.host belongs to traceroute hop 11 at 195.201.66.233. It is not the PTR of either target IP. The target IPs have their own generic Hetzner PTR records under clients.your-server.de

Appendix D — Cross-brand operational pattern



A repeated go.* / unsub.* / feedback.* subdomain class was observed across Wildzy, Dracula, KingdomCasino, MadCasino, Wino, Tucan, Aphrodite, Gambiva and Smash — a CRM/campaign/redirect/unsubscribe operational pattern and a **STRONG LEAD** for shared operations, not, by itself, proof of common ownership.

Appendix E — False-positive controls (cashier scan)

Raw scan hits for “MID”, “provider_id”, “descriptor” and near-payment UUIDs were manually reviewed and rejected as payment evidence: provider_id resolves to game-provider metadata (e.g. OnlyPlay), descriptor to generic DOM/Sentry context, and UUIDs to app/game objects. All checked Apple-Pay merchant-association paths returned 404/timeout. The softon.com wildcard/catch-all means guessed cashier/payment subdomains are non-evidence.

Appendix F — Glossary and evidentiary weighting key

Term	Meaning
PRIMARY	Verified via official registry or forensic network evidence
SECONDARY	Corroborated by two or more independent non-official sources
LEAD / LEAD SINGLE SOURCE	Single-source whistleblower / OSINT claim, not yet independently verified
VERIFIED	Confirmed multi-source finding
BACKGROUND	Publicly available contextual information
VERIFICATION PENDING	Required evidence not yet obtained
PTR	Reverse-DNS pointer record mapping an IP address to a hostname
PIS / PSD2	Payment-initiation service / EU Payment Services Directive 2015/2366
CRUKS	Dutch central self-exclusion register for remote gambling
MID	Merchant identifier within a payment-acceptance chain



Appendix G — Technical Review Addendum

G.1 Preserved Globalping traceroute

```
Traceroute from 46.183.186.22 to api.sptpub.com
Using GLOBALPING, Probe bf7402a5-b5b8-5e0f-8da0-c0e3c2e99e42
RESOLVED api.sptpub.com TO 159.69.41.140
STARTED QUERY AT 2026/06/12 19:20:16 UTC
traceroute to 159.69.41.140 (159.69.41.140), 20 hops max, 60 byte packets
 1 _gateway (46.183.186.1)  1.687 ms  1.619 ms
 2 145.236.89.249  1.743 ms
 3 145.236.89.248  1.090 ms
 4 62.159.61.98  4.400 ms
 5 n-ea11-i.N.DE.NET.DTAG.DE (62.153.184.158)  11.628 ms
 6 62.157.248.138  19.243 ms
 7 core12.nbg1.hetzner.com (213.239.229.165)  11.708 ms
 8 core-spine-rdev2.cloud1.nbg1.hetzner.com (213.239.239.142)  12.417 ms
 9 * *
10 * *
11 11451.your-cloud.host (195.201.66.233)  11.909 ms
12-20 * *
Completed 7.15s
```

G.2 Outstanding supplementary exhibits

- Separate PTR queries for 159.69.41.140 and 159.69.41.141.
- Fresh timestamped and hashed HTTP captures reconciling the 403/404 observations.
- TLS certificate subject, issuer, validity period and SAN capture.
- Certificate-transparency history for api.sptpub.com and related hostnames.
- Native traceroute export and SHA-256 evidence manifest.
- Optional local PowerShell reproduction. This is supplementary and does not block the present technical review.

G.3 Technical publication conclusion

Module 2 remains technically strong after the corrections above. The evidence supports a direct Hetzner infrastructure and preservation lead, together with reproducible application-layer and operational-cluster indicators. It does not establish ownership of Betzter by SPTPub, InvisibleSport, NovaFlick or Hetzner, nor does it identify the undisclosed cashier, merchant account, acquirer or beneficial owner.