



FINTELEGRAM COMPLIANCE INTELLIGENCE — TECHNICAL ANNEX

Cyberfinance Intelligence · Financial Crime · Compliance

Zentoria / Spinsopotamia

External Technical Evidence Dossier

Technical Annex to the NALMI Compliance Intelligence Report

A public-source deepening of the **Spinsopotamia / Zentoria anchor** case: preserved HTML artefacts, exact account-level telemetry endpoints, an 83-domain strict shared-configuration cluster, a cross-domain API and canonical-host graph, and byte-identical catalogue assets linking the anchor to seven comparison brand families — read together with the main report's wider NALMI /22 mapping.

Evidence base: 496 investigated domains · 495 inside NALMI 185.207.196.0/22 · 83-domain strict cluster across 166 preserved pages · 1,181 retained public artefacts · 120 byte-identical first-party asset groups · 3,060/3,060 manifest-verified files (0 mismatches).

Classification: Public-source OSINT · Publication-grade · Technical annex · No imputation of unlawful conduct

Read with: Zentoria / Spinsopotamia and the NALMI Casino Network — Compliance Intelligence Report (main report)

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1. Executive Summary

This annex deepens the technical case around the Spinsopotamia / Zentoria anchor that the main report establishes at the network level. Where the main report maps the wider NALMI / AS213846 casino-domain environment, this annex concentrates on the anchor itself and on the evidence layers that sit closest to it: preserved raw HTML, exact account-level telemetry endpoints, a strict multi-indicator domain cluster, a cross-domain API and canonical-host graph, and byte-identical catalogue assets.

The strongest observations here do not rest on visual similarity or on the generic use of popular cloud services. They rest on preserved URLScan result pages, exact hostnames, account- or project-specific telemetry identifiers, repeated byte-identical response hashes and directly observed cross-domain dependencies. Two preserved Spinsopotamia result pages — captured in October 2025 and March 2026 — expose an exact CSP reporting account, an exact SEON DNS token, a brand-specific Google Tag Manager container, a Google Analytics measurement ID, a Hotjar site identifier and a repeating family of platform hosts, all inside the same NALMI /22 routed envelope.

Beyond the anchor, a **strict 83-domain shared-configuration cluster** co-exposes the same exact CSPER reporting account, the same SEON DNS token and the same non-financial seasonal-promotion response hash across 166 preserved pages spanning January 2025 to March 2026. That cluster is not a flat list: it exposes 67 additional API hosts and 98 direct cross-domain dependency pairs, consistent with a facade / canonical-host architecture. Six byte-identical catalogue and language assets directly connect Spinsopotamia with Kingmaker, BillyBets, 100Neon, BigClash, DuoSpin, LunuBet and MyEmpire.

Critically, the 98 domains in the wider 16-component application-build supercluster have **zero overlap** with the strict 83-domain configuration cluster. This indicates multiple distinct platform and deployment families inside the same NALMI environment, not a single identical front-end across all domains. The annex therefore strengthens the case that Spinsopotamia is embedded in a persistent, multi-brand infrastructure and configuration environment — while it does not, and cannot on public evidence alone, establish that Zentoria legally owns every correlated domain or that a single ultimate beneficial owner sits behind the network.

Technical finding — HIGH significance against the “standalone site” hypothesis

Taken together, the preserved HTML, the exact account-level telemetry endpoints, the strict 83-domain cluster, the API-dependency graph and the byte-identical catalogue assets are highly significant against the proposition that Spinsopotamia is an isolated, standalone casino site. They place it inside a persistent, multi-brand infrastructure and configuration environment. They do **not** replace the corporate, contractual and provider records required for any final legal ownership attribution.



2. Purpose and Relationship to the Main Report

This document is a technical annex. It is intended to be read together with the main report, “*Zentoria / Spinsopotamia and the NALMI Casino Network — Compliance Intelligence Report*”. The two documents are complementary and share a single evidentiary standard.

	Main report	This annex
Primary scope	The wider NALMI / AS213846 casino-domain environment: infrastructure concentration, application clusters, telemetry and platform layers across 496 domains.	The Spinsopotamia / Zentoria anchor itself: preserved HTML evidence, exact telemetry endpoints, the strict 83-domain configuration cluster and the cross-domain API graph.
Unit of analysis	The /22 population and the 16 application-build components.	The anchor page, the strict cluster and the seven directly linked comparison families.
Evidentiary role	Establishes concentration and reproducible correlation layers.	Deepens the anchor case with HTML-level and account-level identifiers.

2.1 What this annex adds

- **HTML-level evidence.** Two preserved Spinsopotamia URLScan result pages, with exact CSP, telemetry and resource markers reproduced from the raw bytes.
- **A strict 83-domain cluster.** Domains that co-expose the same exact CSPER account, SEON token and non-financial seasonal-promotion response hash, all inside the NALMI /22.
- **A cross-domain API graph.** 67 additional API hosts and 98 direct dependency pairs, revealing a facade / canonical-host structure beneath the public domains.
- **Catalogue and asset-level links.** Six byte-identical assets that directly connect Spinsopotamia to seven named comparison families.

2.2 The legal boundary is unchanged

Legal boundary (consistent with the main report)

- This annex does not claim that Zentoria Limited owns or controls all NALMI domains.
- It does not establish a single proven ultimate beneficial owner (UBO).
- It does not convert shared infrastructure, providers, CDNs or edge services into proof of ownership.

It states what is *identical*, what is *shared*, and what remains *unresolved*. Final ownership attribution continues to depend on provider, contractual and corporate records outside the public technical layer.



3. Methodology and Evidence Boundary

The annex draws exclusively on the supplied public-source archive. No login was performed, no account was created, no authenticated endpoint was accessed, no transaction was initiated and no security control was bypassed. At the instruction governing this work, the annex deliberately excludes all payment, cashier, merchant and transaction analysis.

3.1 Evidence sources and their use

Evidence source	Use in this annex
Preserved URLScan result-page HTML	Scan-time hostnames, response metadata, headers, CSP, exact external-account endpoints and delivered resource references.
Current / supplied DNS snapshots	Apex IP distribution and placement inside the NALMI routed prefix.
RRIPE-route attribution in the package	Origin AS213846 and responsible organisation NALMI Limited for 185.207.196.0/22.
Retained public HTML / JavaScript	Exact SHA-256 comparison, application-build grouping and public client-side configuration.
Cross-domain request inventory	Facade-to-canonical-API relationships and alternate API hostnames.
Certificate-transparency rows	Historical hostname and certificate context; not treated as ownership proof by itself.

3.2 Integrity

All four virtual-machine evidence packages passed their internal manifests: 3,060 of 3,060 files verified, with zero manifest mismatches. The consolidated evidence set contains 30,189 certificate-transparency rows, 959 preserved URLScan references and 1,181 retained HTML / JavaScript artefacts.

3.3 Evidentiary weight system

Tier	Definition
PRIMARY	Byte-identical public objects, exact account-specific hostnames, direct public dependencies, preserved scan-time IPs and raw HTML evidence.
SECONDARY	A finding corroborated by two or more independent technical layers.
LEAD	A plausible public indicator requiring further confirmation.
BACKGROUND	Generic provider use, common CDN / cloud service, visual similarity or contextual information.

A match at the network layer is never silently converted into a match at the company, customer-account or ownership layer. A blocked fetch, missing body or incomplete scan is recorded as a collection gap and is not interpreted as proof that a marker or relationship was absent.

3.4 Excluded theories

Names not used as direct technical proof

No direct raw technical string for **Quadcode**, **NovaForge**, **OnePalm**, **Payabl** or **Zentoria** was found inside the virtual-machine raw corpus. Such names appear only in generated reports or external attribution material. They are not used in this annex as direct technical proof of ownership or operation.



4. Zentoria / Spinsopotamia Anchor and Preserved HTML Evidence

The supplied prior corporate report identifies the public-facing relationship recorded below. This section reproduces that supplied corporate context and then analyses the preserved Spinsopotamia HTML independently. The wider correlations become relevant to Zentoria only because Spinsopotamia is the supplied public anchor; the analysis therefore begins at the anchor and moves outward layer by layer.

4.1 Supplied corporate context

Field	Recorded value in supplied prior report
Company name	ZENTORIA LIMITED
Registered address	2nd Floor, Palmerston House, Denzille Lane, Dublin 2, Ireland
Company type	Private Company Limited by Shares
Director	Alina Vavilova
Secretary	Cafico Secretaries Limited
Recorded activity code	NACE 9200 — Gambling and betting activities
Public-facing anchor	SPINSOPOTAMIA.COM

These are supplied corporate-record values, reproduced as context. Any individual named here is referenced without any finding of wrongdoing by this annex and is entitled to the presumption of innocence and a right of reply. *Editorial note: the registered-address and officer details in this supplied dossier differ in places from those in the main report's corporate summary; both are reproduced from their respective source records and any divergence should be reconciled against the current Irish corporate filing before publication.*

4.2 Preserved Spinsopotamia result pages

Preserved file	Scan / context	SHA-256 (prefix)
spinsopotamia.com_0199cf56..._result_page.html	URLScan result, 10 Oct 2025; full request graph and headers	2241d06ada1501e2...
spinsopotamia.com_019ce085..._result_page.html	URLScan result, 12 Mar 2026; later endpoint observation	d79417c753443c42...

4.3 Exact identifiers preserved in the full result page

The following markers were preserved in the raw Spinsopotamia HTML. They are exact account-, project- or site-specific identifiers rather than generic provider references, which is what gives them evidentiary weight.

Layer	Exact observed marker	Interpretation
CSP reporting	60ab6379c3b8cdd26efe1969.endpoint.casper.io	Account / project-specific CSP reporting endpoint.
Fraud / device telemetry	eb6a7d55...seondsresolve.com	Exact SEON DNS token.
Tag management	GTM-M2FPVCG6	Spinsopotamia-specific Google Tag Manager container.
Analytics	G-13VRTQ7M96	Spinsopotamia-specific Google Analytics measurement ID.
Behaviour analytics	hotjar-6481401.js	Spinsopotamia Hotjar site identifier.
Consent script	99762f4a...js	Specific CookieScript resource.



Layer	Exact observed marker	Interpretation
Campaign resource	mr_punter.js	Named public campaign / advertising resource.
Support infrastructure	1-vbus-eu.ladesk.com	Public LiveAgent regional host; supporting only, not an account-specific tenant.
Platform-host family	m.pg-nmga.com; m.pgf-euy2bt.com; m.pgwhois.com	Repeated exact hosts in the public CSP / connect-src configuration.
Marketing host	my.rtmark.net	Repeated public host in the CSP configuration.

4.4 Preserved CSP excerpt

The following excerpt is drawn from the preserved result page identified above. It shows simultaneous use of multiple exact platform / telemetry hosts and the exact CSPER reporting account within a single content-security-policy declaration:

```
connect-src 'self' ... https://pgf-euy2bt.com https://pgwhois.com https://m.pgwhois.com
https://static.pgf-euy2bt.com https://m.pgf-euy2bt.com ... https://pg-nmga.com https://m.pg-nmga.com ...;
frame-src 'self' https://1-vbus-eu.ladesk.com ...;
img-src 'self' data: ... https://my.rtmark.net ...;
report-uri https://60ab6379c3b8cdd26efe1969.endpoint.casper.io/;
```



5. Network Attribution and Endpoint Continuity

The strongest independent layer is the network allocation. The Spinsopotamia anchor was preserved on two addresses within the same immediate /24 and the same NALMI /22, separated by roughly five months — evidence of endpoint continuity rather than a single transient snapshot. **[PRIMARY]**

Observation	Address / range	Assessment
Preserved 10 Oct 2025 result page	185.207.197.250	Spinsopotamia endpoint inside 185.207.197.0/24.
Preserved 12 Mar 2026 result page	185.207.197.216	Later Spinsopotamia endpoint inside the same /24.
Aggregate routed envelope	185.207.196.0/22	Covers 185.207.196.0 through 185.207.199.255.
Origin / responsible organisation	AS213846 / NALMI LIMITED	Authoritative attribution recorded in the supplied matrix.
Wider dataset	495 of 496 domains	All but genieplay.com placed inside the same /22 snapshot.

5.1 The /22 distribution

Sub-range (/24)	Investigated domains	Note
185.207.196.0/24	491	Dominant casino-endpoint segment.
185.207.197.0/24	2	Includes SPINSOPOTAMIA.COM.
185.207.198.0/24	1	Adjacent segment inside the same /22.
185.207.199.0/24	1	Adjacent segment inside the same /22.

Significance

The anchor did not merely use a generic global CDN address. Both preserved endpoints sat inside the same small routed /22 allocation that contained 495 of the 496 investigated casino-related domains. This is a strong infrastructure bridge between the anchor and the wider population. It does not, by itself, prove that one legal entity owns every domain in that allocation.



6. Strict Shared-Configuration Cluster

The supplied verification package identified 166 preserved result pages across **83 unique domains** on which four exact indicators co-occurred. Because this annex excludes payment analysis, it relies only on the three non-financial indicators that necessarily co-occurred on those same pages. The excluded fourth indicator is payment-related and is not used here. **[PRIMARY]**

Exact indicator	Observed value / evidence
Seasonal-promotion response	SHA-256 e9e12cd30c18046a... for /api/v3/promotion/list?cacheBust=0&category=season_promo
CSP reporting account	60ab6379c3b8cdd26efe1969.endpoint.casper.io
SEON DNS token	eb6a7d55...seondnsresolve.com
Network envelope	83 / 83 domains resolved inside 185.207.196.0/22 in the supplied snapshot.

6.1 Why this is stronger than provider similarity

CSPER and SEON are not generic provider homepages. The preserved values are exact account- or project-style identifiers. Their repetition across 83 domains, together with the same byte-identical non-financial API response and the same compact routed network envelope, materially strengthens the inference of a common technical or operational platform configuration. This is a configuration-level correlation across three independent layers, not a single shared service.

6.2 Temporal span

The strict preserved scans span from **18 January 2025 through 31 March 2026**. The repeated markers therefore represent persistent configuration reuse over more than a year, rather than a single short-lived page snapshot.

6.3 Closest narrow-network neighbour

Within the strict 83-domain set, only **vegasino4.com** shares the narrower 185.207.197.0/24 with Spinsopotamia in the supplied DNS snapshot. The other strict-cluster domains remain inside the same aggregate /22 but in different /24 segments. The full 83-domain roster is reproduced in Appendix A.

Boundary

The strict cluster demonstrates a shared, persistent configuration environment across 83 domains. It does not, on the public layer alone, identify which legal entity or customer account provisioned that configuration, nor does it prove common ownership of the 83 domains.



7. Cross-Domain API and Canonical-Host Architecture

The strict cluster is not a flat list of domain names. It exposes a layered domain architecture in which public-facing domains frequently call different canonical or alternate API hosts. The supplied master analysis records **83 public domains**, **67 additional API hostnames**, **150 unique technical nodes** and **98 direct cross-domain dependency pairs**. [PRIMARY]

7.1 Observed API roles

Observed API role	Domain count	Reading
EXTERNAL_OR_CANONICAL_API_ONLY	40	Public facade calls a separate canonical API host.
MIXED_SELF_AND_EXTERNAL_API	26	Public domain calls both itself and an external / canonical host.
SELF_HOSTED_API_ONLY	17	Public domain serves its own API only.

7.2 Representative facade-to-canonical relationships

Public-facing domain	Observed canonical / alternate API host(s)
100neon54.com	762342neon54.com; 7836neon54.com
bankonbet100.com	bankonbet877862.com
billybets100.com	billybets.com; billybets3.com; billybets-4933.com
mafiacasino2.com	mafiacasino1.com
robycasino5.com	robycasino3.com; robycasino-1310.com
spinrollz235518.com	spinrollz3.com

Operational interpretation

The pattern supports rotating public facades, canonical API hosts and migration / fallback domains. It is stronger than a mere naming resemblance because the dependencies were observed directly in preserved public request graphs. It is an operational-architecture observation; it does not by itself identify the operator or contracting party for any host.



8. Catalogue and Asset-Level Correlation

Six exact SHA-256 asset groups directly connect Spinsopotamia with one or more comparison families. These are byte-for-byte identical public objects — game images, language resources and internal catalogue identifiers — not visual judgments. **[PRIMARY]**

Families linked to Spinsopotamia	Asset / internal identifier	SHA-256 (prefix)
100Neon; BigClash; BillyBets; DuoSpin; Kingmaker; LunuBet; MyEmpire	/dimg/language/1680270471572_en.svg	1297083b34d4fa90...
BillyBets; Kingmaker	1722324361391_olympus4.jpg	3cc8672761462e12...
BillyBets	1722344705956_fallen4.jpg	2cdfdba735c0644f...
Kingmaker	UUID 81107f6e-6e0a-41c4-bc6e-bf57391e9d3f	b2a0fc09ff24bc4d...
BillyBets	1687727333159_400x600immortalwaysdiamond.jpg	2162c391764d7558...
Kingmaker	UUID 2c628798-ad39-4b6e-9235-6bb906b23728	02419d98ca1f6714...

8.1 Pairwise comparison scores

The supplied analysis records the following pairwise asset-overlap scores between Spinsopotamia and each comparison family. Higher scores indicate greater shared-asset overlap in the preserved corpus.

Reference family	Comparison family	Score
Spinsopotamia	DuoSpin	953
Spinsopotamia	MyEmpire	713
Spinsopotamia	BigClash	703
Spinsopotamia	100Neon	698
Spinsopotamia	BillyBets	668
Spinsopotamia	Kingmaker	618
Spinsopotamia	LunuBet	568

Evidence boundary

Exact catalogue assets show common delivered content, shared internal identifiers or catalogue integration across these brands. They do not by themselves identify the legal operator or contracting party for any brand, and they are not presented as ownership proof.



9. Link to the Wider NALMI Application-Build Supercluster

A separate application layer — analysed in full in the main report — contains 120 meaningful byte-identical first-party asset groups connecting 98 domains into 16 technical components. The analytically important point for this annex is that these 98 domains have **zero overlap** with the strict 83-domain configuration cluster. The two structures are distinct: the strict cluster is defined by shared exact configuration (CSPER / SEON / promotion response), while the supercluster is defined by shared byte-identical application builds.

[PRIMARY]

Component	Domains	Shared hashes	Representative families / domains
APP-01	36	49	BoaBoa, Boomerang Casino, BuranCasino, Cadoola, CasinoInfinity, CasinoUnlimited, Castyr, Fezbet, Librabet, Rabona
APP-02	16	13	Casinoly, Joker8, Posido
APP-03	7	4	Casinado, Gozabet
APP-04	4	6	Frumzi
APP-05	4	4	BetRiot
APP-06	4	4	GreatWin
APP-07	4	4	PowerUpCasino
APP-08	3	4	OhMySpins
APP-09	3	1	LuckyElektra
APP-10	3	4	ExciteWin
APP-11	3	4	Playzilla
APP-12	3	4	PolestarCasino
APP-13	2	1	CrazyTower, LolaJack
APP-14	2	11	FunID
APP-15	2	4	LegendPlay
APP-16	2	3	PowBet

Correct model

The evidence supports a NALMI network supercluster containing several distinct application and operational subclusters — a strict configuration cluster around the anchor, and a separate set of 16 byte-identical application-build families. It does not support describing all 496 domains as one identical front-end, or as one legal entity.



10. Provider and Service-Layer Observations

Provider reuse is presented by evidentiary weight. Generic cloud / CDN use is contextual; exact tenant, account or project hostnames carry greater weight. Payment-related services are omitted from this annex.

Provider / layer	Observed scope	Technical role	Weight
NALMI / AS213846	495 domains inside 185.207.196.0/22	Casino-facing origin / routed allocation	VERY HIGH — infrastructure
Cloudflare	372 targets	Edge, anti-bot, caching and shielding	Low for ownership
Google Cloud / Storage	300 targets	Content and application-support resources	Low for ownership
AWS / CloudFront	255 targets	Cloud / CDN and resource delivery	Low for ownership
Google Analytics / Tag Manager	228 targets	Marketing and event instrumentation	Context unless IDs match
Zendesk / ZD Assets	198 targets	Support and customer-service tooling	Medium when named tenant exists
Hotjar	190 targets	Behaviour analytics / session tooling	Context; stronger with exact site ID
SEON	170 targets; exact token across strict 83	Fraud / device intelligence	High for shared project config
Anjouan components	119 targets	Public licence / seal component class	Context unless seal resolved
Sportradar	59 targets	Sports / data integration	Context
DeviceInfo	31 targets	Device / profile instrumentation	Context
SPTPub / Trickz	1 direct confirmed host	Direct platform-host reference on spinrollz235518.com	Specific lead
Hetzner / AS24940	20 targets / 10 IPs	Mostly ancillary tracking / consent infrastructure	Not dominant origin

10.1 Exact hosts shared by Spinsopotamia and seven comparison families

The following exact public hosts were observed across Spinsopotamia and all seven comparison families (Kingmaker, DuoSpin, 100Neon, BigClash, MyEmpire, BillyBets and LunuBet) in the preserved request graphs. The repetition of identical platform, telemetry and marketing hosts across the same eight brands is a configuration-level correlation.

Exact public host	Class
60ab6379c3b8cdd26efe1969.endpoint.csper.io	CSP reporting account
pg-nmga.com; m.pg-nmga.com; static.pg-nmga.com	Platform-host family
pgf-euy2bt.com; m.pgf-euy2bt.com; static.pgf-euy2bt.com	Platform-host family
pgwhois.com; m.pgwhois.com; static.pgwhois.com	Platform-host family
m.cvoz8476l.com; m.j67z85nx4.com; static.j67z85nx4.com	Platform / static hosts
in.hotjar.com; vars.hotjar.com; ws5.hotjar.com	Behaviour analytics
dev.visualwebsiteoptimizer.com	Experimentation / A-B tooling
my.rtmark.net	Marketing host
1-vbus-eu.ladesk.com	LiveAgent regional host (generic)
www.google-analytics.com	Analytics (generic)

Two of these hosts — the LiveAgent regional host and the generic Google Analytics host — are shared generic infrastructure and are flagged as such; the weight lies in the exact CSPER account and the repeating platform-host families.





11. Brand-Specific Support Tenants

The archive contains preserved public Zendesk HTML for four named casino brands. These are stronger than a generic Zendesk asset because the tenant hostname itself contains the brand name. The pages also reference a common support layer, **peachhelpsupport.zendesk.com**. [PRIMARY]

Brand tenant	Preserved HTML SHA-256 (prefix)	Common reference
mafiacasino.zendesk.com	ed7897bc3103fcd5...	peachhelpsupport.zendesk.com
robycasino.zendesk.com	cd7a5b29d2d5db4b...	peachhelpsupport.zendesk.com
spinrollz.zendesk.com	0bfc802eaa4078c2...	peachhelpsupport.zendesk.com
vinylcasino.zendesk.com	4a9182929ec7a8e6...	peachhelpsupport.zendesk.com

Interpretation

The named tenants demonstrate separately provisioned brand support portals. Their common reference to peachhelpsupport.zendesk.com is a supporting operational link. It does not automatically prove a single legal owner, but it is relevant when combined with the same strict configuration cluster, the cross-domain API dependencies and the NALMI network concentration.



12. Telemetry and Data-Protection Relevance

The consolidated corpus contains confirmed public Sentry Replay configuration markers on **51 domains across 14 brand families**, with both session and error replay sample rates set to 0.1. Matching sample values alone do not prove a single Sentry project, but all 14 families also appear in the byte-identical application components. **[PRIMARY]**

Observed configuration	Scope
<code>replaysSessionSampleRate = 0.1</code>	51 domains / 14 brand families
<code>replaysOnErrorSampleRate = 0.1</code>	51 domains / 14 brand families
Families	BetRiot, Casinado, Casinoly, ExciteWin, Gozabet, GreatWin, Joker8, LegendPlay, OhMySpins, Playzilla, PolestarCasino, Posido, PowBet, PowerUpCasino

12.1 Separate earlier risk indicator

A separate, earlier evidence source recovered a deployment with `maskAllInputs: false`, `maskAllText: false` and `blockAllMedia: false`. That configuration is important for provider-side review, but it is not projected onto all 496 domains and is not presented as a direct Spinsopotamia finding without project-level confirmation. **[SECONDARY]**

Data-protection significance

The public configurations justify provider-side questions about project ownership, masking policy, retention and cross-brand aggregation. They do not prove that every recorded session contained unmasked personal data, nor that any data flow was unlawful. These are questions for the relevant provider and data-protection authority.



13. Corrections, Rejected Indicators and Limitations

In keeping with the publication standard of the main report, the following claims were tested and corrected or rejected. Recording them is part of the evidentiary discipline of the annex.

Rejected or corrected claim	Correct position
994 investigated domains	The verified total is 496 unique target domains.
Spinsopotamia and MafiaCasino have identical front-ends	Their retained first-party front-end builds and account IDs differ. The bridge is at the shared backend / configuration and exact feature-response level.
Generic LiveAgent host proves one tenant	1-vbus-eu.ladesk.com is generic regional infrastructure; named tenant or widget IDs are required for stronger attribution.
Cloudflare labels the NALMI /22 as AS13335	The supplied route analysis attributes 185.207.196.0/22 to AS213846 / NALMI Limited.
GTM-W parser fragments are account IDs	Malformed / truncated values were excluded.
Quadcode owns or operates Spinsopotamia	No direct Quadcode string or tenant marker was found in the raw anchor corpus.
NovaForge is proven technical owner	No direct raw technical identifier proves this in the virtual-machine material.
All 495 NALMI domains are controlled by Zentoria	Not established. The evidence proves a shared routed environment and multiple technical subclusters.
Missing body means no relationship	Collection gaps are not treated as negative evidence.

13.1 Principal limitations

This annex does not identify the NALMI customer account, the contracting entity for each domain, the beneficial owner, the legal operator of every brand or the provider-account owner behind each exact telemetry token. Those questions require records outside the public technical layer. DNS and scan data are time-bound snapshots; preserved URLScan pages may be historical; and a third-party host appearing in a CSP or scan does not prove active use in every session.



14. Compliance Relevance and Conclusion

14.1 Consolidated findings

- 1. Direct anchor.** The supplied corporate dossier identifies Spinsopotamia.com as the public-facing anchor associated with Zentoria Limited.
- 2. Preserved technical identity.** Spinsopotamia exposes exact public identifiers including a CSPER reporting account, a SEON token, a GTM container, an Analytics measurement ID, a Hotjar site ID, a consent-script ID and a repeated platform-host family.
- 3. Network continuity.** Two preserved Spinsopotamia endpoints remained inside 185.207.197.0/24 and the same NALMI / AS213846 185.207.196.0/22 envelope across roughly five months.
- 4. Network concentration.** 495 of 496 investigated domains were located inside that /22 in the supplied DNS snapshot.
- 5. Strict operational cluster.** 83 domains across 166 preserved pages shared the same exact CSPER account, SEON token, non-financial seasonal-promotion response hash and NALMI network envelope, persistently from January 2025 to March 2026.
- 6. Cross-domain architecture.** The strict cluster exposed 67 alternate API hosts and 98 direct cross-domain dependencies, supporting a facade / canonical-host structure.
- 7. Exact catalogue linkage.** Byte-identical game and language assets directly connect Spinsopotamia with Kingmaker, BillyBets and several comparison families.
- 8. Wider supercluster.** A separate 98-domain application layer contains 120 byte-identical first-party asset groups across 16 components, with zero overlap with the strict cluster — multiple technical families within the same NALMI environment.
- 9. Provider reuse.** Exact account / project endpoints and named brand support tenants add operational correlation beyond generic CDN or cloud-provider overlap.

14.2 Compliance relevance

For regulators, payment-service providers, banks and crypto exchanges, the annex narrows the target area still further than the main report. It identifies the specific account-level artefacts — a CSPER reporting project, a SEON token, named Zendesk tenants, canonical API hosts and a platform-host family — whose owners and tenants can be sought through disclosure. Each is a concrete question that provider-level records can answer, and each is independent of any payment-layer analysis, which is deliberately excluded here.

Final assessment

Taken together, the evidence is highly significant as a public-source technical dossier against the proposition that Spinsopotamia is an isolated, standalone casino site. It is instead embedded in a persistent, multi-brand infrastructure and configuration environment. The evidence remains technical and operational; it does not establish common legal ownership, a single ultimate beneficial owner, or any criminal or regulatory liability, and it does not replace the corporate, contractual and provider records required for final legal attribution.



Appendix A — Strict 83-Domain Cluster

Each domain below appeared in at least one preserved page where the exact CSPER account, exact SEON token, exact seasonal-promotion response hash and the excluded fourth (payment-related) signal co-occurred. This appendix lists the domains; the annex relies only on the three non-financial indicators.

Domain	Domain	Domain	Domain
100neon54.com	10neon54.com	1castyr68.com	9035neon54.com
abuking.com	abuking1.com	abuking100.com	alfcasin0-0152.com
alfcasin0-0256.com	alfcasino100.com	alfcasino102.com	bankonbet100.com
billybets10.com	billybets100.com	billybets6.com	billybets9.com
boomerang-bet.com	boomerang-bet1.com	cashd100.com	cashd6.com
casinia100.com	casiniabet10.com	casinova3.com	crownplay100.com
crownplay5.com	divaspin2.com	dragonia-1233.com	duospin1.com
fatpirate100.com	funbet-9873.com	funbet4.com	glorion2.com
gransino7.com	kingmaker435719.com	legiano-6543.com	legiano.com
lunubet1.com	mafiacasino1.com	mafiacasino2.com	malinabet2.com
malinasports.com	millioner-2979.com	millioner.com	myempire.com
myempire3.com	myempire61.com	nomini12.com	nomini3.com
playio100.com	playio465768.com	rabona-1826.com	revolutioncasino-1263.com
revolutioncasino12.com	revolutioncasino78.com	robocat.com	robycasino3.com
robycasino5.com	royalgame.com	royalgame2.com	slotexo100.com
slotuna5.com	spinit-1010.com	spinrollz010.com	spinrollz235518.com
spinsoglory-1324.com	spinsopotamia.com	spinsy4.com	sportuna20.com
supabet-7439.com	supabet2.com	talismania1.com	vegashero-1253.com
vegashero.com	vegasino4.com	vinylcasino5.com	vinylcasino58.com
vinylcasino6.com	wildrobin2.com	wildrobin3.com	wildsino-1243.com
wonaco13.com	wonaco15.com	wonderluck100.com	

Spinsopotamia.com is highlighted as the anchor. Within this set, only vegasino4.com shares the narrower 185.207.197.0/24 with the anchor; all other listed domains resolve inside the same aggregate 185.207.196.0/22.



Appendix B — Application-Build Components

The 16 byte-identical application-build components (98 domains; zero overlap with the strict 83-domain cluster). Full per-file SHA-256 values are preserved in the consolidated evidence package.

Component	Domains	Hashes	Domains (compressed)
APP-01	36	49	1castyr1.com; 7136-librabet.com; boaboa(.com/-1993/100/101/102); boomerang-casino(1/8/17/100); burancasino(.com/100/855); cad01a-01112-0531; cadoola(2/14/352); casinoinfinity-0189-4367; casinounlimited1; fezbet(-4549-7147/11); librabet-0123-6728; rabona641
APP-02	16	13	12/14/3joker8; 2755/8395-joker8; 2467-casinoly; casinoly-0100-6330; casinoly(100/101/13/14); posido270; posido360
APP-03	7	4	6491-gozabet; casinado(-4058/-6811/132456/4/5); gozabet2
APP-04	4	6	4917-frumzi; frumzi(100/756723/8)
APP-05	4	4	betriot(-1006/-1156/10/2)
APP-06	4	4	greatwin(-0635/-5920/-5940/1)
APP-07	4	4	powerupcasino(-1131/-1201/100/109097)
APP-08	3	4	0hmypins(-1217/-1951/-2740)
APP-09	3	1	6128-luckyelektra; luckyelektra1; luckyelektra3
APP-10	3	4	excitewin(-3324/.com/7)
APP-11	3	4	playzilla(-0911/-1991/-8936)
APP-12	3	4	polestarcasino(3/4/5)
APP-13	2	1	crazytower5; lolajack5
APP-14	2	11	funid-3520; funid-6687
APP-15	2	4	legendplay; legendplay1
APP-16	2	3	powbet1; powbet100



Appendix C — Preserved HTML Evidence Inventory

Evidence file	SHA-256 (prefix)	Use in report
spinsopotamia.com_0199cf56...html	2241d06ada1501e2...	Spinsopotamia full request graph, CSP, exact telemetry / account markers and public resource references.
spinsopotamia.com_019ce085...html	d79417c753443c42...	Later Spinsopotamia endpoint observation.
762342neon54.com_ROOT_...html	d83602002529fdea...	Canonical / alternate 100Neon public HTML and build-context example.
7836neon54.com_ROOT_...html	adee01dd1c0dcd46...	Second canonical / alternate 100Neon public HTML example.
robocat2.com_ROOT_...html	315ebb679d3911e...	Public HTML example with independent GTM and deployment metadata.
mafiacasino.zendesk.com_ROOT_...html	ed7897bc3103fcd5...	Named public Zendesk tenant evidence for MafiaCasino.
robycasino.zendesk.com_ROOT_...html	cd7a5b29d2d5db4b...	Named public Zendesk tenant evidence for RobyCasino.
spinrollz.zendesk.com_ROOT_...html	0bfc802eaa4078c2...	Named public Zendesk tenant evidence for SpinRollz.
vynylcasino.zendesk.com_ROOT_...html	4a9182929ec7a8e6...	Named public Zendesk tenant evidence for VinylCasino.

Source archive SHA-256: 024529e025038b58ac8f97283e76438c6df6b659b014518f26343d9f71f4687d

Visual layout reference: supplied Zentoria / Spinsopotamia / NALMI main report (house style).

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