

**SENT BY EMAIL & FIRST CLASS POST**

Martin Cave  
Competition and Markets Authority  
Victoria House  
Southampton Row  
London  
WC1B 4AD

27<sup>th</sup> May 2016

Dear Sir

**RE: Merger of Ladbrokes and Coral**

I write to you to request that you take into consideration emerging evidence and information that could be pertinent to the pending merger between Ladbrokes and Coral which is under your consideration. Please note that I am not providing any economic or competition grounds on which to base this request.

Further to [historical concerns in 2014](#) <sup>[1]</sup> and issues around criminality, child gambling and [money laundering](#) <sup>[2]</sup>, the grounds for my request are as follows:

- Representations from Ladbrokes and CEO Jim Mullen cannot be taken at face value
- Ladbrokes has not disclosed to investors all [known internal aspects of FOBT related harm](#) <sup>[3]</sup>
- Ladbrokes has a culture of neglect of staff health, safety and security
- Ladbrokes are attempting to stop disclosure of relevant legally privileged documents
- Ladbrokes are operating FOBTs in Northern Ireland where they are not legally approved raising the question of whether such profits are the proceeds of crime and whether legitimisation of such profits is money laundering.

The following pending related investigations so far are also pertinent to this enquiry:

- Employee Tribunal claim of ex Head of Health and Safety Bill Bennett
- A possible Local Authority investigation of Ladbrokes for negligence
- A serious Health and Safety Executive complaint

The merger could result in the following negative consequences:

1. Importing Ladbrokes operational culture into the Coral estate of shops to the detriment of the health and safety of staff and customers
2. Investor litigation against the merged entity as a consequence of any of the following:

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- Government action against FOBTs
- Gambling Commission action against Ladbrokes and / or Mr. Mullen
- Consequences of other investigations

At the very least I request that the CMA obtains access to all relevant documents and diligently reviews those documents. In the event of denial of access I feel that by default, the merger should be rejected.

A Campaign item on [Politics Home Central Lobby](#) provides further information.

Please contact me with any questions

Regards



Derek Webb

The Campaign for Fairer Gambling

[www.fairergambling.org](http://www.fairergambling.org) / [www.stopthefobts.org](http://www.stopthefobts.org)

#### Links

<sup>1</sup><https://www.theguardian.com/business/2013/nov/11/ladbrokes-accused-child-gamblers>

<sup>2</sup><http://www.gamblingcommission.gov.uk/pdf/Public%20statement%20-%20Ladbrokes%2023%20October.pdf>

<sup>3</sup><http://www.mirror.co.uk/news/uk-news/ladbrokes-staff-raped-killed-firm-7994485>

#### **Copied to:**

Sarah Harrison, Gambling Commission  
Tony Page, Local Government Association  
Carolyn Harris, All Party Parliamentary Group on Fixed Odds Betting Terminals  
John Whittingdale, DCMS  
David Evennett, DCMS  
Tracey Crouch, DCMS  
Clive Efford, Shadow DCMS  
Maria Eagle, Shadow DCMS  
Theresa May, Home Secretary  
Andy Burnham, Shadow Home Secretary  
Sajid Javid, Secretary of State for Business, Innovation and Skills  
Angela Eagle, Shadow First Secretary of State, Shadow Secretary of State for Business, Innovation and Skills

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