

BTSF

Payment media, selling platforms — Louise ANDREASEN

Contract number 2017 96 05 — New Food Investigation Techniques —
Phase II - *Course 2b: E-Commerce of food advanced*

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BTSF Cooperation with (PSPs)

Payment Service Providers



BTSF

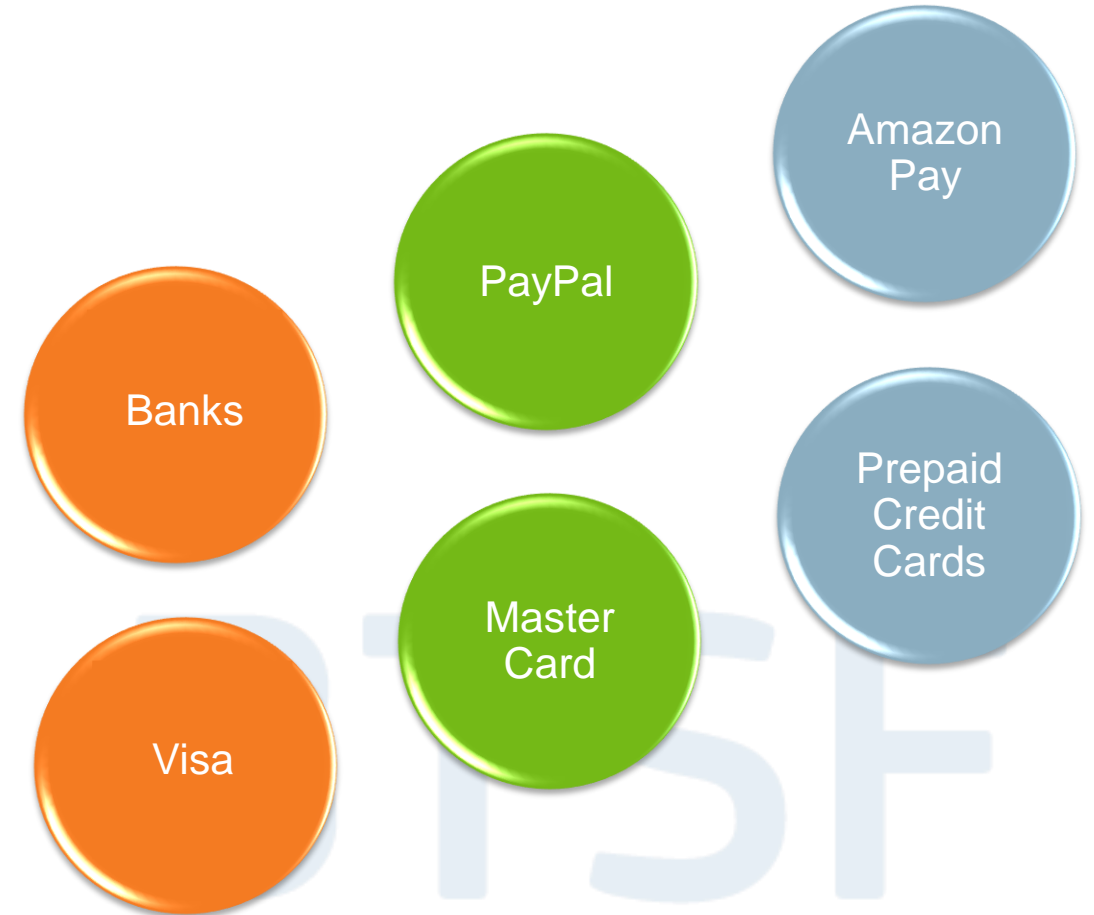
BTSF Cooperation with PSPs

Why?

- Test purchases
- Information requests
- Following the money



BTSF Cooperation with PSPs



BTSF Cooperation with PSPs

- Usually not the first hint in an investigation
- Could be useful for competent authorities at a later stage
- Identification of account information via test purchase/information request
- Authorities need to check whether they are competent to receive/request that kind of information



BTSF Cooperation with PSPs

- PayPal account for test purchases
- PayPal account for information requests
 - Via PayPal ID - Not website/domain
 - PayPal ID: usually e-mail address
 - Challenge: How to retrieve PayPal ID?
 - e.g. via extended search, test purchase
- PayPal Law enforcement guide
 - <https://www.paypalobjects.com/digitalassets/c/website/marketing/na/us/law-enforcement/le-guide-safety-hub.pdf>

PayPal

Global Asset Protection

As you may have learned through the eBay Inc. for announcement of September 30, 2014, plans were made to separate eBay Inc. into two independent publicly traded companies: eBay Marketplace and PayPal.

As a result of this separation, there are now two separate and fully independent Global Asset Protection teams supporting the new eBay and PayPal businesses, each of which has a system allowing Law Enforcement to submit lawful requests for user data and transactional history consistent with the robust and seamless processes already utilized by our global law enforcement partners.

Both companies will continue to maintain highly transparent, productive, and collaborative relations with the law enforcement community and the content of the information provided will remain of the same high standard. As with any new company, slight changes in services provided will occur, and we commit to keeping you fully abreast of those in advance.

PayPal Holding, Inc.'s global portfolio of businesses enables hundreds of millions of people to pay online. PayPal Holdings, Inc. established the Global Asset Protection Team to promote the safe use of its platforms and to collaborate with local, federal and international law enforcement in apprehending and prosecuting criminals. Our diligence in this area is demonstrated by the arrests that are made and the trust that is built both within the community and our law enforcement and industry partners.


Resources for Law Enforcement Investigations and Service Levels

PayPal Holdings, Inc. developed a system to enable law enforcement officers seeking records for investigations related to the PayPal platform quickly and securely:

Safety Hub – PayPal Law Enforcement Tool is an online web-form designed for law enforcement and government agencies to submit their PayPal data requests, inclusive of uploading their supporting documents such as a letterhead, court order or subpoena. This site (<https://safetyhub.paypal.com>) may only be used by law enforcement personnel who will go through an authentication processes. The Safety Hub site replaces and eliminates the previous process of mailing, faxing or emailing requests to us. All requests must be submitted via Safety Hub – PayPal Law Enforcement Tool are still handled manually by our team and are processed in approximately **10 business days**.



BTSF Cooperation with PSPs

 Safety Hub - PayPal Law Enforcement Tool

[Home](#) [Help](#)

Step 1 Step 2 Step 3 Successful submission

Safety Hub - PayPal Law Enforcement Tool is a three-step process.


Step 1: Email Authentication

Select your country:

Enter your official government issued email address :

Enter the security code provided in the image:

(Type the characters you see in the image)



[Refresh Image](#)

After the first step is completed, you will receive an email containing a link to proceed to Step 2.



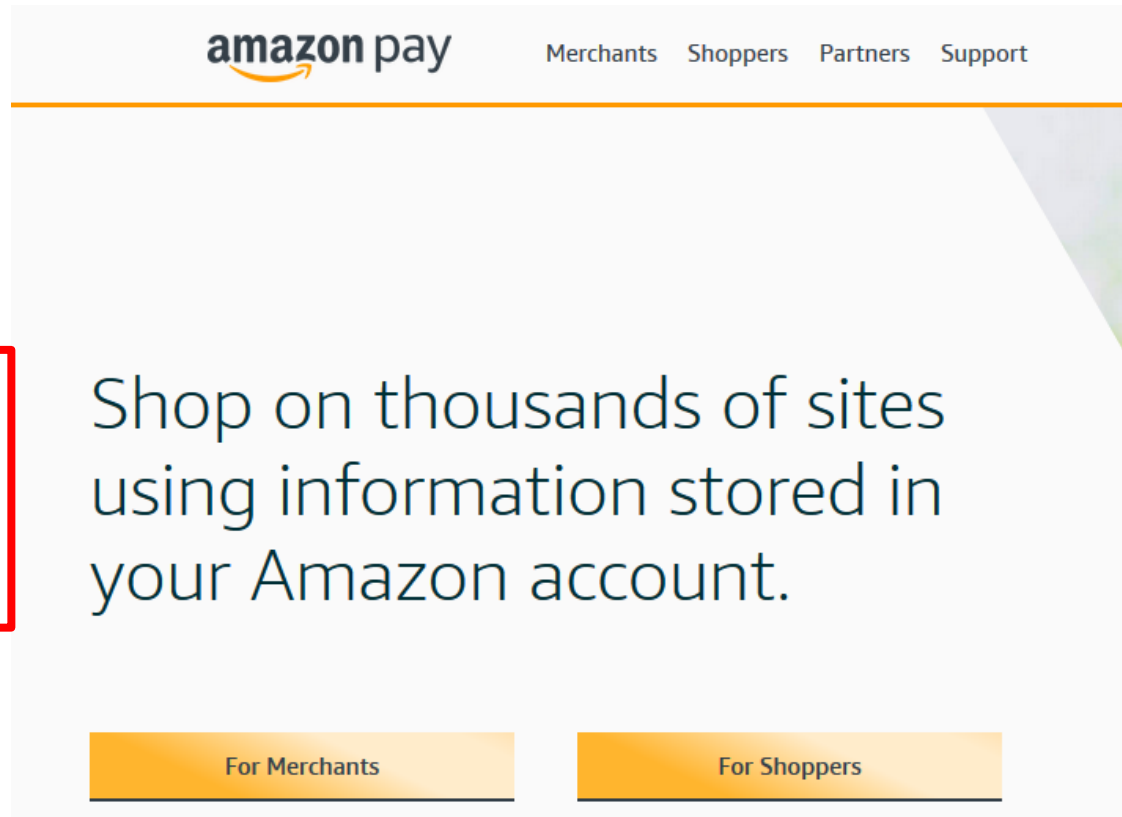
T S F

<https://safetyhub.paypalcorp.com>

BTSF Cooperation with PSPs

- Option for test purchases
- Possibility for information requests?
- <https://pay.amazon.com/us/help/201212430>

“[...]we may restrict transactions [...] or limit access to funds in your Payment Account [...] if [...] required by [...] law enforcement or any governmental entity.”



<https://pay.amazon.com/uk>

BTSF Cooperation with PSPs

- EU COM tried to establish contact
- Ongoing process
- „These are the main ways we use your information:[...] To help prevent fraud and money laundering, improve security, comply with applicable laws, [...]”
- „These are the main ways we share your information:[...] With law enforcement and public authorities as required by applicable laws and regulations“


https://intellilink.spendmanagement.visa.com/Custom_ST/VISA_PrivacyPolicy.asp



BTSF Cooperation with PSPs

- Contact established by EU COM
- COM WG „e-commerce“
- Law Enforcement Referral Form



Law Enforcement Referral Form

Date:

Law Enforcement Agency Information

Agency:

<https://www.mastercard.us/content/dam/mccom/en-us/documents/mastercard-law-enforcement-referral-form-electronic-signature-1291.pdf>

BTSF Cooperation with PSPs

- Option for test purchases -> anonymity



<https://www.viabuy.com>



<https://www.paylife.at>

Prepaid
Credit
Cards

BTSF Cooperation with PSPs

Anonymous vendors

Example of missing contact data

- Imprint: Offshore p.o. box
- Domain is registered anonymously
- Package arrives without return address

VITAMIN EXPRESS Suche

Gratis Versand in Deutschland 100 Tage Geld zurück Garantie

Menü SEHR GUT 4.9 / 5

Konto Hilfe Kontakt

Animal Pak AKTION, 44 Packs
von Universal Nutrition

[Schreiben Sie die erste Bewertung](#)

- enthält über 50 verschiedene Wirkstoffe
- verbessert den Stoffwechsel
- verstärkt die Proteinsynthese
- führt zu einer Kraft- und Ausdauersteigerung
- enthält viele Vitamine und Mineralien

Eigenschaften

Lieferzeit nur 2-4 Werktage

Preis **Ihr Preis** **Sie sparen** **Versand**

€38,90	€ 34,80	10%	Gratis
--------	---------	-----	--------

Sparen Sie 5% zusätzlich beim Einkauf über €100

Auf Lager. Gratis Versand in Deutschland.

1 In den Warenkorb

PayPal MasterCard VISA SOFORT BANKING

Lastschrift, Vorkasse, Nachnahme

Produkt Details

Animal Pak AKTION

Art.Nr.	3601
Marke	Universal Nutrition
Packungsgröße	44 Packs

Product notified in RASFF (alert)

BTSF Cooperation with PSPs

Anonymous vendors

- “Whois query” to identify domain provider
- Notification of domain provider (“abuse report”)

Domain Status: clientTransferProhibited <https://icann.org/epp#clientTr>

Registry Registrant ID:

Registrant Name: PERFECT PRIVACY, LLC

Registrant Organization:

Registrant Street: 12808 Gran Bay Parkway West

Registrant City: Jacksonville

Registrant State/Province: FL

Registrant Postal Code: 32258

Registrant Country: US

Registrant Phone: +1.5707088780

Abuse: To report spam or any other abusive behavior by any Perfect customer, e-mail abuse@perfectprivacy.com, including in any such report of the offending domain (for example, xyz.com) and the type of abuse (for example, spam, illegal acts, harassment, etc.) in the "subject" field of Legal Complaints: It is Perfect Privacy's policy to respond with reasonable promptness to subpoenas and other legal processes served on Perfect its subsidiaries that seek information, documents or other business records. Parties wishing to serve such process on Perfect Privacy may do so in

Articles about successful abuse reports:

<http://blog.easydns.org/2014/08/15/heres-why-we-took-down-a-pharmacy-domain-without-a-court-order/>

<https://thinksteroids.com/news/godaddy-shuts-down-steroid-websites-under-pressure-from-legitscript/>

BTSF Cooperation with PSPs

Anonymous vendors

Options to obtain contact data

- PayPal law enforcement e-request
<https://www.paypal.com/webapps/mpp/law-enforcement>
- Trademark search
<https://euipo.europa.eu/eSearch>



A silhouette of a rock climber hanging from a rope against a large, reddish-brown rock face under a clear blue sky.

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Cooperation with PSPs

Challenges



Establishing contact to PSPs



Legal basis for information requests

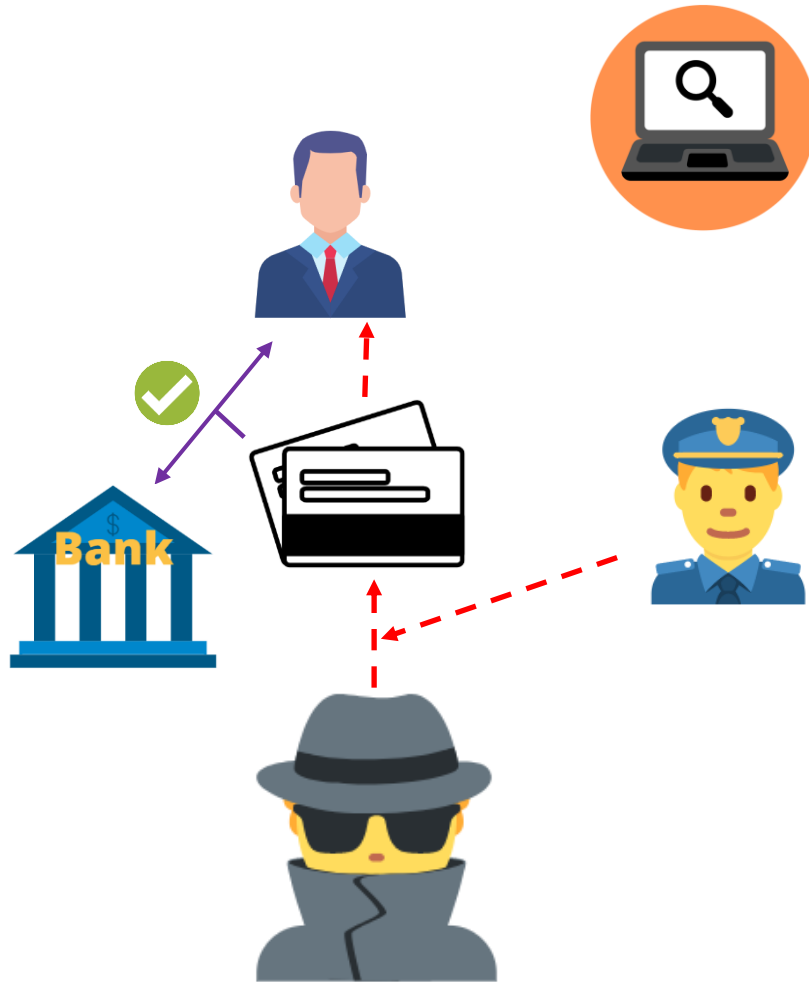


Probably cooperation between authorities needed



Obtaining anonymous payment options for test purchases

BTSF Cooperation with PSPs - Advantages



- Useful tool for internet investigation
- If other options fail (imprint, whois etc.)
- “follow the money”
- Cooperation with tax authorities and/or police
- Higher likelihood for correct information
- For vendors: harder to provide wrong contact info to a bank

BTSF Cooperation with selling platforms

Market
places

Social
media

Fulfillment
centres

Apps



© Anna Frajtova/ Adobe Stock

BTSF Cooperation with selling platforms



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BTSF Product search

Example: Health hazard caused by children's toys

Forwarded to G@ZIELT by German federal state authority

- Consumer purchased the helmet on Amazon; competent authority was notified due to strange smell
- Laboratory analysis: Extremely high content of polycyclic aromatic amines


Ab 20 EUR versandkostenfrei bestellen!

[zurück zur Liste](#)

Kinder-Helm für Rennfahrer

Art. 6615 | [mehr Helme](#)

DAS Accessoire für coole und lässige Rennfahrer. Egal ob Formel 1 oder Motorrad, wenn Ihr Sprössling ein heißes Eisen fahren möchte, zumindest in der Vorstellung, ist dieser Helm am Arm ein Pflicht-Accessoire. Der Helm kann natürlich auch aufgesetzt werden, erfüllt seinen Zweck aber schon beim lässigen Tragen. Er ist aus Kunststoff hergestellt und im Inneren mit Stoff ausgekleidet. Ein rundum gelungenes Accessoire für Kids, die nicht einfach ein Schwert tragen möchten, sondern einen schnellen Fitzer fahren wollen.

 sofort lieferbar

Lieferung bis Montag, 07.07.2014, wenn Sie in den nächsten 23 Stunden, 7 Minuten, 35 Sekunden per Expressversand bestellen.

12,99 €

inkl. MwSt. zzgl. Versandkosten

Anzahl: [In den Warenkorb](#)

Mehr Info: Der Helm hat eine Kinder-Größe und passt nicht bei Erwachsenen.

Artikel: Kinder-Helm für Rennfahrer
Farbe: rot
Material: Kunststoff, Stoff
Größe: Einheitsgröße für Kinder

Online offer (Screenshot)

BTSF Product search

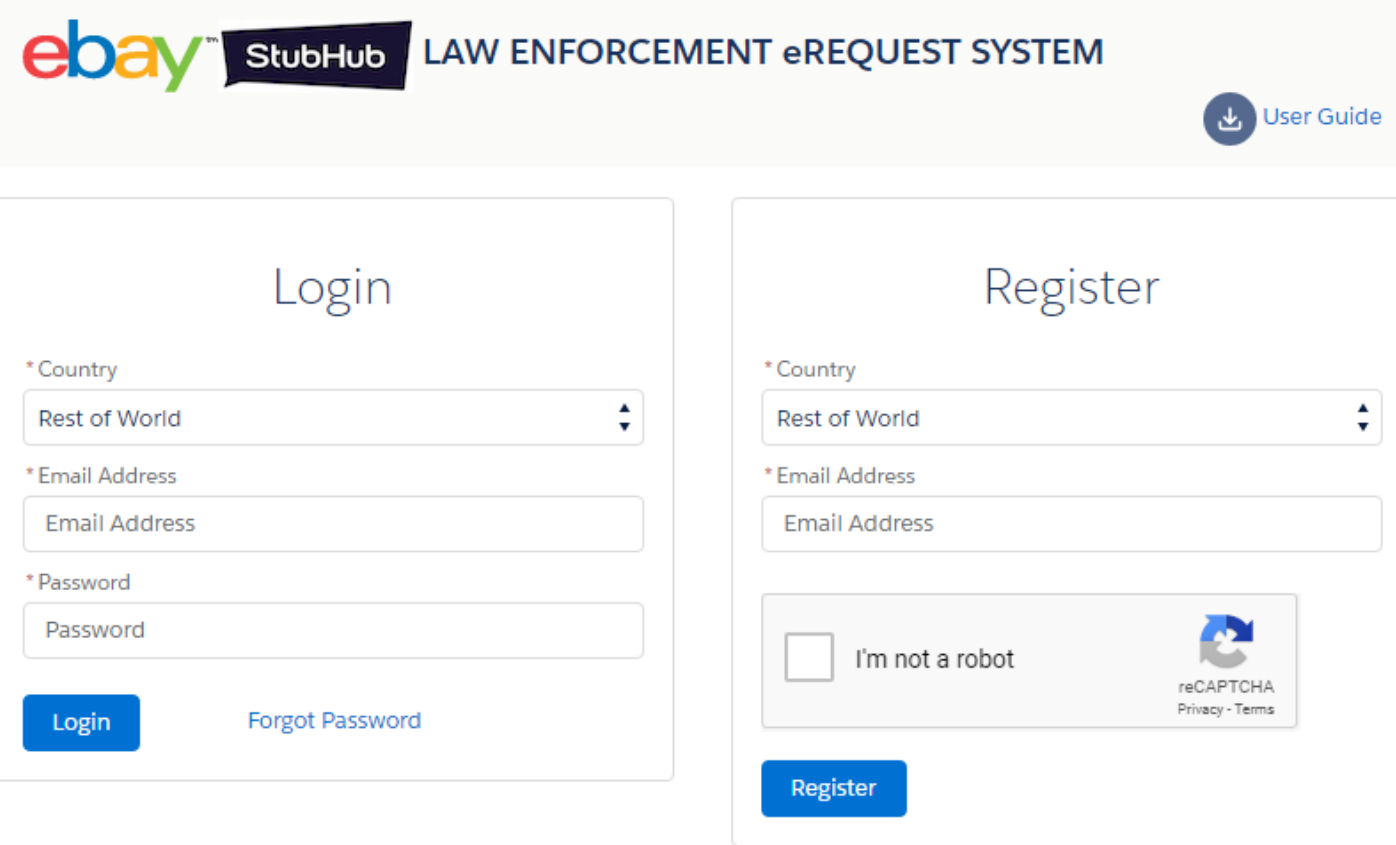
Example: Health hazard caused by children's toys

- Measures
 - Notification of Amazon
 - Offer was removed the same day
 - Product search and notification of competent authorities (national, international) about online offers (within 1 week)
- Success
 - All online offers offline (after 2 weeks)

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BTSF Contact to market places

Authorities can apply for a LE account:



The screenshot displays the 'eBay StubHub LAW ENFORCEMENT eREQUEST SYSTEM' interface. It features two main sections: 'Login' and 'Register'. The 'Login' section includes fields for Country (dropdown menu set to 'Rest of World'), Email Address, and Password, with a 'Login' button and a 'Forgot Password' link. The 'Register' section includes the same Country and Email Address fields, a reCAPTCHA 'I'm not a robot' checkbox, and a 'Register' button. A 'User Guide' link with a download icon is located in the top right corner of the header.

ebay™ StubHub LAW ENFORCEMENT eREQUEST SYSTEM

User Guide

Login

* Country
Rest of World

* Email Address
Email Address

* Password
Password

Login Forgot Password

Register

* Country
Rest of World

* Email Address
Email Address


☐ I'm not a robot

reCAPTCHA
Privacy - Terms

Register

<https://le.corp.ebay.com>

BTSF Contact to market places - example



Zum Heranzoomen mit der Maus über das Bild fahren.

Ähnlichen Artikel verkaufen? [Selbst verkaufen](#)

Glycolsäure 30% 50ml Fruchtsäure Peeling NEU + Neutralisationslösung 50ml GRATIS
gepufferte & kosmetische Qualität, BESTER PREIS! AKTION

🔥 1 Beobachter in den letzten 24 Stunden

Artikelzustand: **Neu**

Restzeit: 28T 09Std

Stückzahl: 2 verfügbar

EUR 20,90

[Sofort-Kaufen](#)

[Beobachten](#)

2 Beobachter

Verkäufer in Deutschland

Neu

Versand: **EUR 2,80** Standardversand | [Weitere Details](#)
Artikelstandort: Deutschland
Versand nach: Deutschland

Zahlungen: [Überweisung](#) | [Weitere Zahlungsmethoden](#)

Rücknahmen: Keine Rücknahme











✉️ [f](#) [t](#) [p](#) | [Auf die Beobachtungsliste](#)

Angaben zum Verkäufer
20 (653 ★)
98,3% Positive Bewertungen
Angemeldet als privater Verkäufer

[+ Diesem Verkäufer folgen](#)
[Andere Artikel aufrufen](#)

private seller

BTSF Contact to market places - example

 hat alles super geklappt. Danke!	 (11)	Vor über einem Jahr
GLYCOLSÄURE PEELING das MILDE 4-ER SET SUPER PROFIWARE (Nr.320390295455)	EUR 39,00	
 Alles gut gelaufen! Vielen Dank, gerne wieder :)	a***f (521 )	Vor über einem Jahr
GLYCOLSÄURE 75% CHEM.PEELING - FRUCHTSÄURE +NEUTRALISAT (Nr.320390682790)	EUR 29,00	
 Alles Super! Immer wieder gerne!!!	b***y (48 )	Vor über einem Jahr
GLYCOLSÄURE 75% CHEM.PEELING - FRUCHTSÄURE +NEUTRALISAT (Nr.320390683086)	EUR 29,00	
 war alles ok, danke	5***5 (63 )	Vor über einem Jahr
GLYCOLSÄURE 75% CHEM.PEELING - FRUCHTSÄURE +NEUTRALISAT (Nr.320389425122)	EUR 29,00	
 war alles ok, danke	5***5 (63 )	Vor über einem Jahr
GLYCOLSÄURE AHA PEELING - 6er SET-3 SÄUREN+2 VORBEHANDL (Nr.320386872451)	EUR 59,00	

private seller

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BTSF Search on marketplaces

Search engine challenges – GTIN/ASIN

- Product may lack brand names or other characteristics for search queries
- Search by GTIN (Global Trade Item Number)/EAN (European Article Number)



GTIN 13: Country Code Company Code Article Number
Check digit

BTSF Search methods

Search engine challenges

Example: RAPEX A12/0239/14 – “children’s working gloves”

- No product name or brand name that can be searched for
- Google search for GTIN 4001273012352 reveals relevant offers on the internet

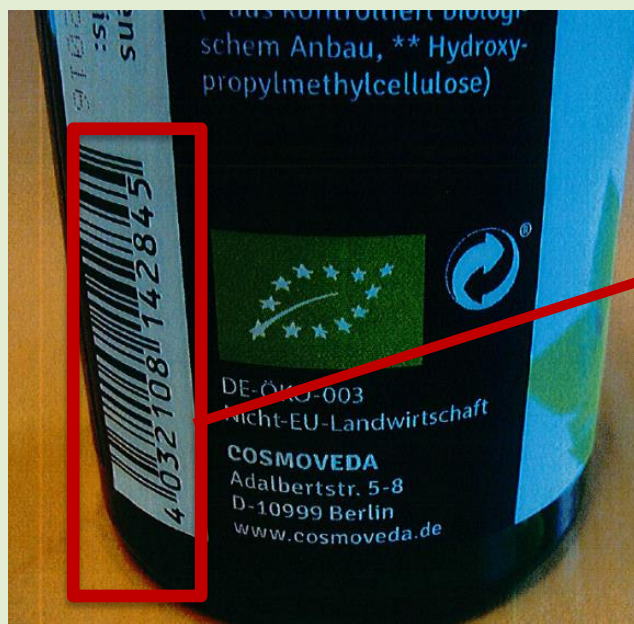
Hint: Tool for conversion of GTINs/EANs into Amazon product numbers (ASINs):

http://www.marktplatz-tools.de/asin_ean_convert.php



BTSF Search methods

Tool for conversion of GTIN/EAN in Amazon product numbers (ASIN): http://www.marktplatz-tools.de/asin_ean_convert.php



EAN-ASIN-Konvertierung:

EAN	ASIN	Artikelbezeichnung
4032108142845	B00S2Z330Y	Cosmoveda Bio Trikatu Kapseln, 1er Pack (1 x 29g, ca. 80 Kapseln) - BIO

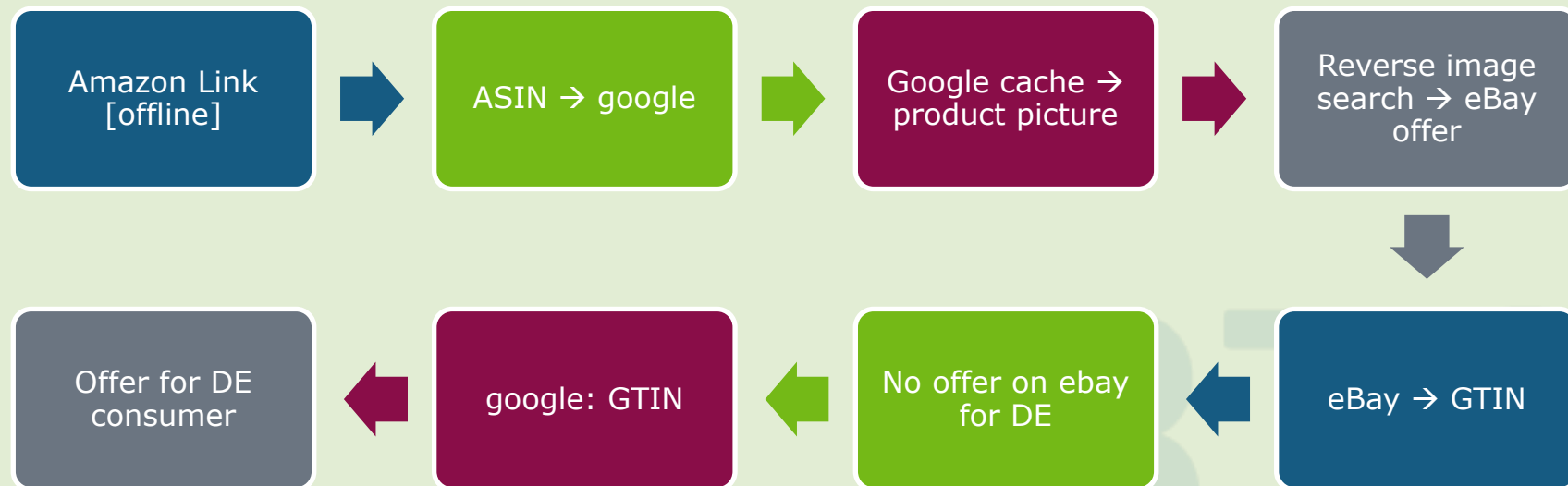


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Complex search technique involving market places

- Non-compliant offer on Amazon
- Challenge: Identify offers for DE consumers
 - No clear product name
 - No GTIN available
 - Amazon offer already offline (not directly accessible)

BTSF Complex search technique involving market places



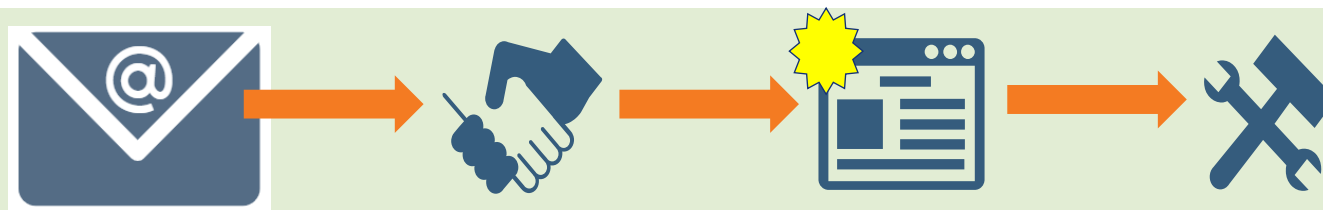
BTSF Cooperation with selling platforms

- Online sales from TC are often managed via Fulfillment Centres
- Sometimes market places act as Fulfillment Centres
- Challenge: Legal Status
 - FBO?
 - ISSP?

[https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:52017XC0801\(01\)&from=DE](https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:52017XC0801(01)&from=DE)



BTSF Cooperation with Market Places – Danish example dba.dk (a part of eBay)



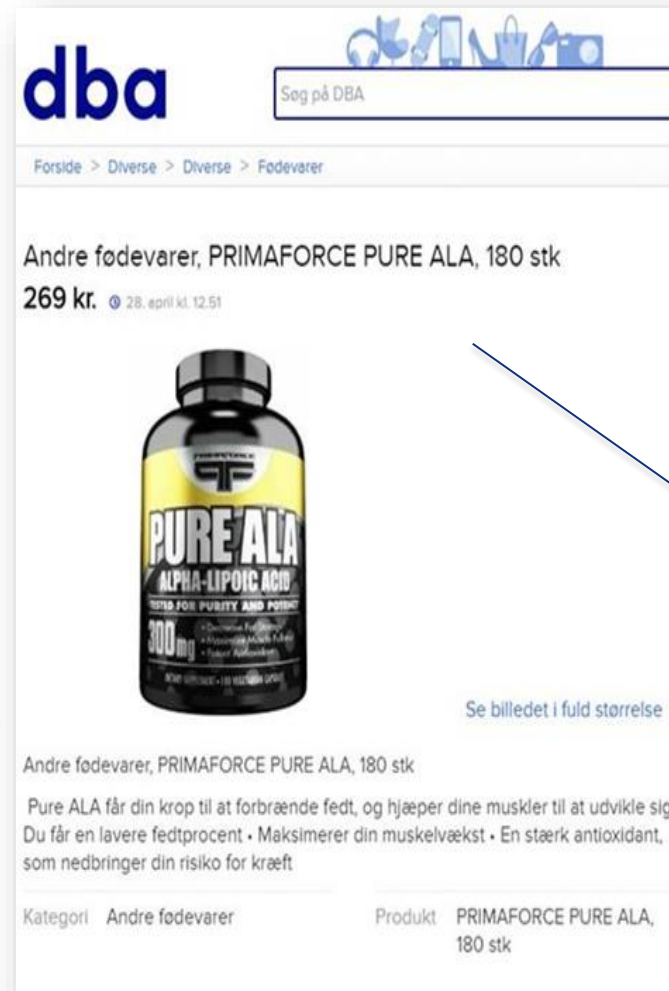
Annoncer der ikke optages

Vi forbeholder os ret til at afvise annoncer, der efter vores skøn strider mod gældende lovgivning, hensynet til læserne og brugerne eller DBA's tarv eller omdømme.

Herunder kan du se en liste over varer og ydelser, som vi ikke optager, samt hvor vi stiller bestemte krav til annonceringen.

OBS: DBA har indført et midlertidigt forbud mod indrykning af private annoncer, der er relateret til COVID-19 (corona virus). Forbuddet omhandler p.t. mundbind/masker (f.eks. operationsmasker) og desinficeringsprodukter (f.eks. håndsprit). Dette gælder også markedsføring af kosttilskud og andre fødevarer, som påstås at have en gavnlig effekt mod COVID-19.

BTSF Cooperation with Market Places – Danish example dba.dk (a part of eBay)



Reduces your risk of
cancer...

The add was
removed by the
platform

BTSF Cooperation with Market Places – Danish example dba.dk (a part of eBay)

The screenshot shows a product listing on the Danish marketplace dba.dk. The product is 'Cannabis, Hamp CBD olie 10%. Ægte Fuldspektret,...' priced at 295 kr. The listing includes a main image of a 'cannaone' logo and several smaller images of CBD oil bottles and lab test results. A map shows the seller's location in Copenhagen. The listing is annotated with several callouts:

- A green box on the left points to the product description, stating: "influence, among other things, brain, heart and joints, as well as anxiety and sleep."
- A green box on the right points to the seller's address, stating: "Address: belongs to the Danish Medicines Council -> fake company address".
- A green box on the right points to the map, stating: "The Food Supplement Group (part of The Flying Squad) handled the case".

The listing text includes:

Kosttilskud, Cannaone
Natures Finest bedste version af vores fantastiske, friske, velsmagende og koncentrerede Hamp/Cannabis olier. Indeholder 1000 mg CBD.
Blot et par dråber Hamp Olie om dagen kan forbedre din sunde livsstil og influere på bl.a. hjernen, hjertet og led, samt på uro og på din søvn.
Ekstra højt koncentrat og vores anbefaling hvis du ønsker større effekt, eller har mere udfordrende symptomer og behandlingsbehov.
100% vegansk olie
EU produceret
Fuld-og bredspektret olie

influence, among other things, brain, heart and joints, as well as anxiety and sleep.

Address: belongs to the Danish Medicines Council -> fake company address

The Food Supplement Group (part of The Flying Squad) handled the case

BTSF Cooperation with selling platforms

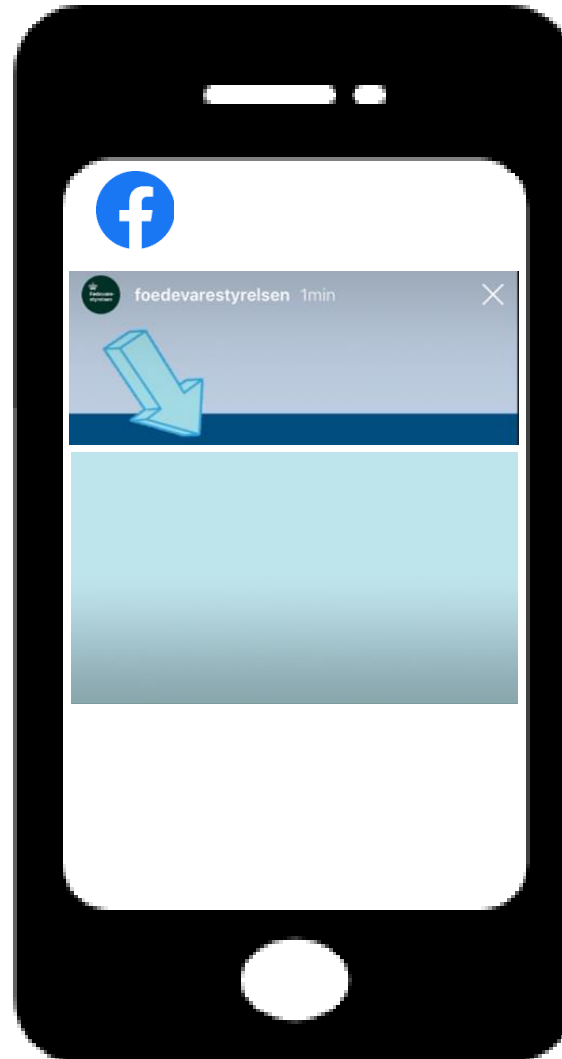
- Food and food supplements are sold on social networks
- The Flying Squad react on consumer complaints and make pro active searches for stolen food (coffee and chocolate)
 - Identification of eFBOs
 - Information project: E-commerce
- Legal challenges (closed groups, anonymity)

Social media



Sports products offered on Facebook

BTSF Danish information to online sellers



Dark Post to FB
users who are
marketing food
supplements or
interested in fitness
and health

BTSF Cooperation with selling platforms

- Food is also sold via Apps
 - Smartphone, Tablet (e.g. Android Account needed)



BTSF Cooperation with selling platforms

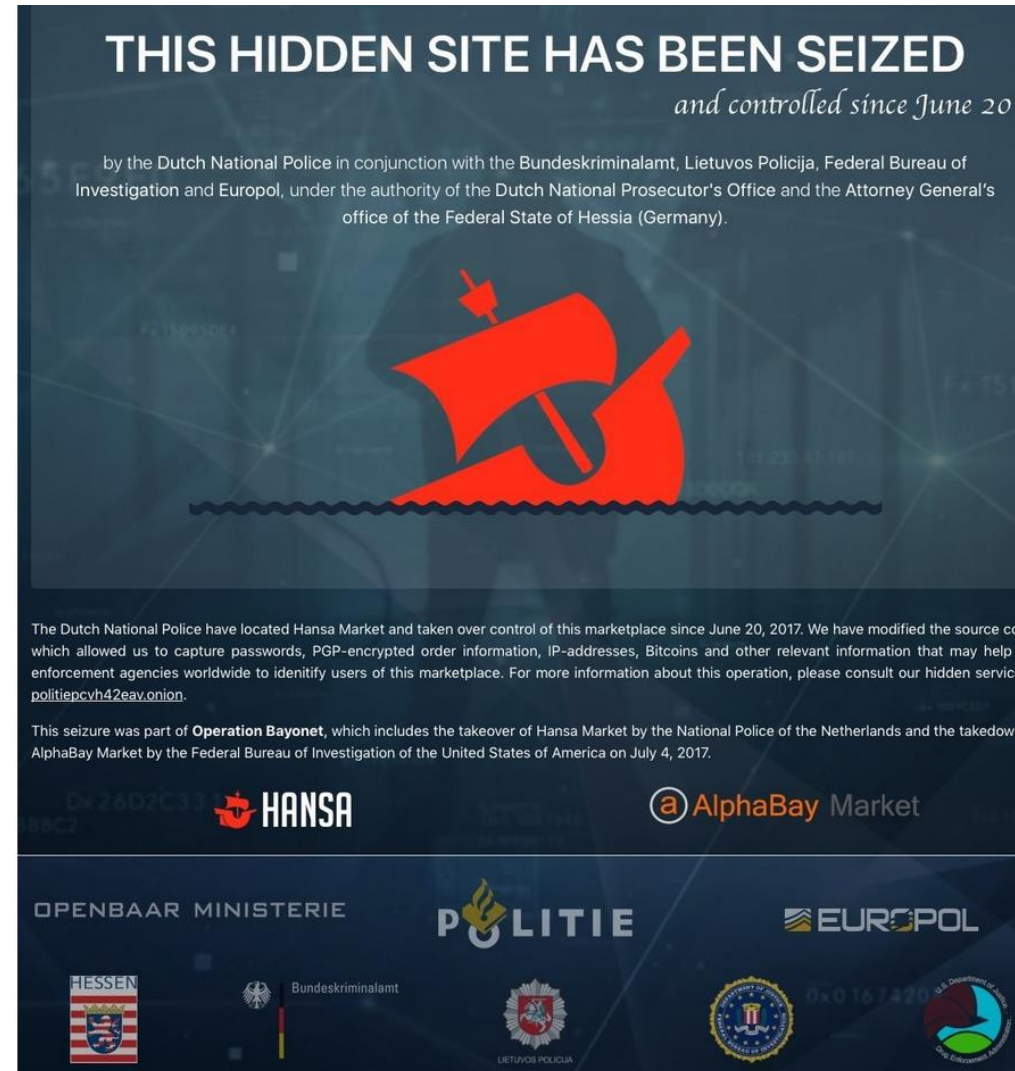
- Instead of mobile devices
- Emulators can be used (e.g. Android Account needed)



SF

BTSF Selling platforms

- Online sales in the darknet
 - Task for criminal investigators!?
 - Empowerment?
- Big challenge to control the darknet
 - Anonymity
 - Crypto currency
- Investigators need to be cautious



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Thank you

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