

## Complaint and Investigation Assessment (CIA) for Interactive Gambling Matter

### COMPLAINT/MATTER DETAILS

Date complaint received by the ACMA (if relevant)	17 July 2022
CRM Reference (i.e. complaint ID)	IGA-2022-00432
URL	<a href="https://8xbet11.cc">https://8xbet11.cc</a>
Provider (registrant/advertiser/broadcaster)	Not known
Service name	8xbet
Relevant provision/s of the <i>Interactive Gambling Act 2001 (IGA)</i>	<ul style="list-style-type: none"> <li>Subsection 15(2A) – providing a prohibited interactive gambling service that has an Australian-customer link</li> <li>Subsection 15AA(3) – providing an unlicensed regulated interactive gambling service that has an Australian-customer link</li> <li>Subsections 61EA(1A) and (2A) – publishing or authorising or causing the publication of a designated interactive gambling service advertisement in Australia and the publication is not permitted by sections 61EB, 61ED, 61EE and 61EF of the IGA</li> </ul>
Relevant investigations (previous and current investigations)	N/A
<b>Comments</b>	
<p>The ACMA has received a complaint from independent journalist ██████████ about the service available at <a href="https://8xbet.cc">https://8xbet.cc</a> (8xbet)</p> <p>██████████ alleges that the provider of the 8xbet service, through its sponsorship of the Manchester City soccer club has been advertising its services to Australians and has been targeting users in our region.</p> <p>The service available at <a href="https://8xbet.cc">https://8xbet.cc</a> is provided in an Asian language, however, when the user clicks on English translation, they are redirected to <a href="https://8xbet5.com">https://8xbet5.com</a>. which appears to provide the same website in English. When further reviewed, the URL <a href="https://8xbet.cc">https://8xbet.cc</a> redirected the consumer to <a href="https://8xbet11.cc">https://8xbet11.cc</a></p> <p>A review of the website indicates that it offers casino-style games and wagering on sport, including in-play betting. The home page states that the service is licensed in Curacao.</p> <p>The home page also includes banners of the Manchester City soccer club, and the statement 'official betting partner of Manchester City FC'.</p> <p>The registration process enables a customer to set up an account by entering a user name and setting up a password. The deposit options list a number of foreign currencies, with AUD not provided as an option. However, various forms of cryptocurrency are available to deposit funds</p> <p>An initial review of the Manchester City FC website at <a href="https://www.mancity.com">https://www.mancity.com</a> does not indicate a reference to 8xbet. However, a google search identified a media release issued on 6 July 2022, which states that Manchester City and 8xbet, 'have today announced a new regional partnership that will see the brand become the Official Betting Partner of the club in Asia'. The release goes on to say that 8xbet is licensed and regulated in Great Britain by the Gambling Commission.</p>	

### STAFF RECOMMENDATION

Section 21 of the *Interactive Gambling Act 2001 (IGA)* provides that the ACMA, on its own initiative or in response to a complaint, investigate relevant IGA matters if the ACMA thinks it is desirable to do so.

It is recommended that the ACMA investigate the relevant matter because of the following public interest considerations:

- > The nature and extent of the alleged misconduct is serious and subject to both civil and criminal penalties under subsections 15(2A) and 15AA(3) of the IGA, including that the service is likely to be in contravention of the IGA for providing both a prohibited and unlicensed regulated interactive gambling service in Australia
- > The investigation is novel, as it involves one of the highest profile sporting teams in the world entering into a partnership with an offshore online gambling provider that offers casino style services and wagering on sport, including in-play betting.

*Risk management*

Having considered the *ACMA Risk Management Guide*, the operational level risk of investigating this matter is low.

Risk category and key examples	Key risk and consequence	Likelihood	Consequence
<b>Compliance</b> e.g. the consequence may be greater if the matter: <ul style="list-style-type: none"> <li>- is of significant public interest</li> <li>- may impact on the community at large</li> <li>- may be novel and/or have precedent value</li> <li>- may concern systemic non-compliance</li> <li>- may involve formal enforcement action</li> <li>- may raise concerns about the adequacy of the relevant provision or involve policy considerations</li> </ul>	Decision of investigation and subsequent actions not adequately informed by Authority views / Level of compliance with Australian laws and regulations not adequate and/or consistent	Unl kely	Minimal
<b>Stakeholder management</b> e.g. the consequence may be greater if the matter has, or may develop, strong community, political, media or industry sensitivity because, for example, of the issues raised, the context and/or broader environmental considerations	Stakeholder expectations not met and/or not managed at appropriate level / Reduced confidence in the ACMA and/or legislative framework	Unl kely	Minimal
<b>Regulatory and program delivery outcomes</b> e.g. because of the issues raised, the matter has, or may reveal unintended regulatory outcomes, or may reveal issues with regulatory drafting or enforcement mechanisms	Decision of investigation and subsequent outcome was not contemplated by the parliament that passed the legislation and/or enforcement of the legislation is shown to be inadequate and/or inconsistent	Unl kely	Minimal

It is anticipated that the investigation findings will be made by:

- A delegate**, where the power is delegated in the *Instrument of Delegation*; or
- The Authority**; or
- Not applicable** (for matters that will not be investigated).

**DECISION WHETHER TO INVESTIGATE MATTER**

I, [REDACTED], being at the appropriate level in the *Instrument of Delegation*, and noting the public interest considerations in the *IGA Investigation Manual and Toolkit*, including the matters listed above in the staff recommendation, decide that the matter:

- will be investigated under section 21 of the *Interactive Gambling Act 2001*; or**
- will not be investigated.**

[REDACTED]

Date: 10 / 08 / 2022

[REDACTED]  
 A/g Manager, Interactive Gambling Team