

## Formal Warning

### under section 64A of the *Interactive Gambling Act 2001*

To: Ralseft Limited

Of: Michail Kasialou 24 Geri 2200  
Nicosia, Cyprus

Attention:



I, Rochelle Zurnamer, delegate of the Australian Communications and Media Authority (ACMA), being satisfied that Ralseft Limited, has contravened subsection 15AA(3) of the *Interactive Gambling Act 2001* (the IGA):

HEREBY issue Ralseft Limited a formal warning under section 64A of the IGA, for one or more contraventions of subsection 15AA(3) of the IGA, being a civil penalty provision.

#### Details of the contravention

#### *Obligations under the IGA*

1. A 'prohibited interactive gambling service' is defined in section 5 of the IGA and a 'gambling service' is defined in section 4 of the IGA. Subsection 5(3) of the IGA lists services that are not prohibited interactive gambling services, including an excluded lottery service (paragraph 5(3)(ae)).
2. An 'excluded lottery service' is defined in section 8D of the IGA and is a kind of regulated interactive gambling service (as defined in section 8E of the IGA).
3. Subsection 15AA(3) of the IGA provides that:

A person must not provide a particular kind of regulated interactive gambling service if:

  - (a) the service has an Australian customer link; and
  - (b) the person does not hold a licence (however described) under a law of a State or Territory that authorises the provision of that kind of service in the State or Territory
5. Under section 8 of the IGA, a gambling service has an Australian-customer link if, and only if, any or all of the customers of the service are physically present in Australia.

#### *Investigation*

6. Under section 21 of the IGA, on 7 December 2021, the ACMA commenced an investigation into whether the Lotto Express service provided an unlicensed regulated interactive gambling service in contravention of the IGA.
7. During the period of the investigation the Lotto Express service was available via the URL <https://www.lottoexpress.com>
8. Ralseft Limited is the provider of the Lotto Express service.

***Contravention of subsection 15AA(3) of the IGA***

9. The Lotto Express service offered 'gambling services', being services for the supply of lottery tickets (paragraph (d) of the definition of 'gambling service' in section 4 of the IGA).
10. The gambling service was provided in the course of carrying on a business and was provided to customers using an internet carriage service (section 5 and paragraph 8E(1)(i)-(j)) of the IGA.
11. The Lotto Express service had an Australian customer-link.
12. Ralseft Limited is not licensed by an Australian State or Territory to provide regulated interactive gambling services to Australians (paragraph 15AA(3)(b)).
13. The ACMA found that, as the provider of the Lotto Express service, Ralseft Limited, has contravened subsection 15AA(3) of the IGA by providing an unlicensed regulated interactive gambling service to customers physically present in Australia

Dated this 22 April 2022



---

**Rochelle Zuramer**  
**Delegate of the Australian Communications and Media Authority**