

From: [REDACTED]
Subject: RE: FOR CLEARANCE - Brownlow Medal news article and publication of outcome of investigation [SEC=OFFICIAL]
Date: Tuesday, 13 December 2022 5:03:00 PM
Attachments: [image011.gif](#)
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yes

[REDACTED]
Manager
Interactive Gambling Team

Australian Communications and Media Authority

T [REDACTED]
www.acma.gov.au



The ACMA acknowledges the traditional custodians of this land on which we meet, work and live. We recognise and respect their continuing connection to the land, waters and communities. We pay our respects to Elders past and present and to all Aboriginal and Torres Strait Islanders

From: [REDACTED]
Sent: Tuesday, 13 December 2022 5:02 PM
To: [REDACTED]
Subject: FW: FOR CLEARANCE - Brownlow Medal news article and publication of outcome of investigation [SEC=OFFICIAL]

[REDACTED]
Are you happy with the green highlighted addition (rather than [REDACTED]'s additional wording)

From: [REDACTED] >
Sent: Tuesday, 13 December 2022 4:31 PM

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: FOR CLEARANCE - Brownlow Medal news article and publication of outcome of investigation [SEC=OFFICIAL]

Thanks [REDACTED] and [REDACTED] – see suggestions below while we are awaiting [REDACTED]'s comments on the news release etc

From: [REDACTED] >
Sent: Tuesday, 13 December 2022 3:44 PM

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: FOR CLEARANCE - Brownlow Medal news article and publication of outcome of investigation [SEC=OFFICIAL]

Thanks [REDACTED] will do.

Below is a draft email to the Dept/MO advising of our action for your review.

Dear [REDACTED]

For information

The ACMA has finalised an investigation into whether Sportsbet contravened the Interactive Gambling Act 2001 (IGA) by offering online in-play betting during the Brownlow medal count and advertising live odds during the broadcast of the event on Channel 7 in September. The investigation was commenced in response to a complaint.

The in-play betting rules prohibit (fill in correct wording). Consequently, the core consideration for the ACMA was whether the Brownlow award ceremony could be categorised as a sporting event for the purposes of the legislation.

The in-play betting rules prohibit online bets on a sporting event after it has commenced, or on a contingency that may or may not happen in the course of a sporting event. The ACMA found that while the Brownlow medal count relates to the performance of players in sporting events, the televised presentation is not a sporting event itself, nor is the outcome of the count a contingency that may or may not happen in the course of a sporting event. Therefore, providing a betting market on the outcome is not an in-play betting service under the IGA. It follows that Sportsbet did not contravene the advertising prohibitions in the IGA by authorising the broadcast of betting markets during the Brownlow medal count .

We will be issuing a news article and also publishing the outcome of the investigation on the ACMA website on our [gambling investigations page](#). I have attached copies of each, which are to be published on Monday. We have also written to Sportsbet and the complainant with details of our findings and provided each with an advance copy of the news article (requesting they maintain confidentiality until the article is released).

We have made it clear that our investigation is not related to any investigation into betting on the Brownlow being conducted by Victoria police.

If you have any questions please let me know.

From: [REDACTED]

Sent: Tuesday, 13 December 2022 2:30 PM

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: FOR CLEARANCE - Brownlow Medal news article and publication of outcome of investigation [SEC=OFFICIAL]

Okay thank you – happy to leave it in but when the package goes up to [REDACTED] for review please provided that background/additional context in the covering email

Regards,
[REDACTED]

From: [REDACTED]

Sent: Tuesday, 13 December 2022 1:37 PM

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: FOR CLEARANCE - Brownlow Medal news article and publication of outcome of investigation [SEC=OFFICIAL]

Thanks [REDACTED]

In response to your question about publishing information on other awards – below is a query

we received this year (from the same complainant who lodged the formal complaint in relation to the Brownlow). We have also had similar approaches from other wagering operators in the past.

We believe the information about other awards is of educative value and will provide some clarity, while being couched by 'each matter on its merits'. [REDACTED]

[REDACTED]
[REDACTED]
From: [REDACTED] >

Sent: Monday, 19 September 2022 4:29 PM

To: [REDACTED]

Cc: [REDACTED] >

Subject: Brownlow Medal Online in-play Betting

Hi [REDACTED]

On behalf of Bet Right I am seeking clarification regarding online in-play betting on last night's AFL Brownlow Medal.

Whilst the AFL has listed the Brownlow as an event that is covered by its Product Fee and Information Sharing Agreement, we note that the Minister has not made a declaration under Section 10A of the IGA as to whether it is or is not a declared sporting event. Consequently, we are seeking confirmation that next year we can take in-play bets online during the night, up until the winner of the Brownlow Medal is announced.

Given the upcoming AFL and NRL Grand Finals we are also seeking urgent advice as to whether online in-play betting on the best and fairest awards for the Norm Smith Medal (AFL) and Clive Churchill Medal (NRL) is similarly permitted.

Your assistance is greatly appreciated.

Regards,

[REDACTED]
Chief Operating Officer | BetTube

☐ [REDACTED] ☐ [REDACTED] ☐ bettube.com

From: [REDACTED] >

Sent: Tuesday, 13 December 2022 12:59 PM

To: [REDACTED]

[REDACTED]
[REDACTED] >

Subject: RE: FOR CLEARANCE - Brownlow Medal news article and publication of outcome of investigation [SEC=OFFICIAL]

Thanks [REDACTED] and [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Happy to discuss

Regards,

From: T [REDACTED]

Sent: Tuesday, 13 December 2022 10:32 AM

To: [REDACTED]

[REDACTED]

Subject: FOR CLEARANCE - Brownlow Medal news article and publication of outcome of

investigation [SEC=OFFICIAL]

Hi [REDACTED],

As you know, we have investigated whether Sportsbet contravened the IGA by broadcasting live markets and offering in-play betting during the Brownlow medal count.

We have completed the investigation and found no contravention of the IGA.

Please find attached:

- The news article which is due to be released on 19 December (as part of our ebulletin)
- The outcome of our investigation, which will be published on the ACMA website (gambling investigations page) in conjunction with the news article.
- Letter to Sportsbet with our findings
- Letter to IRPSX (the complainant) with our findings

All information in the documents has been reviewed and cleared by LSD.

Can you please provide your clearance for the news article and the outcome of the investigation to be published on our website.

We will also prepare an email to the Dept and MO for your review.

Please let us know if you have any questions.

[REDACTED]

[REDACTED]

Interactive Gambling Team

Australian Communications and Media Authority

T + [REDACTED]

[REDACTED]
acma.gov.au



