

Infringement Notice

Under

**Paragraph 64C(1)(m) of the *Interactive Gambling Act 2001*
Part 5 of the *Regulatory Powers (Standard Provisions) Act 2014***

Infringement Notice Number: [REDACTED]

To: Puntaa Pty Ltd trading as Picklebet
ACN 601 575 240

Of: Unit 1, 48-50 Smith Street
Darwin NT 0800

Email: [REDACTED]

Attention: [REDACTED]

I, Rochelle Zurnamer, an infringement officer authorised under subsection 64C(2) of the *Interactive Gambling Act 2001* (the **IGA**), for the purposes of issuing an infringement notice under paragraph 64C(1)(t) of the IGA, having reasonable grounds to believe that Puntaa Pty Ltd trading as Picklebet (**Picklebet**) ACN 601 575 240 has committed one contravention of subsection 61KA(3) of the IGA (the contravention), a civil penalty provision, which is subject to an infringement notice under Part 5 of the *Regulatory Powers (Standard Provisions) Act 2014* (the **RPA**),

HEREBY give an infringement notice (the **Notice**) under paragraph 64C(1)(m) of the IGA and Part 5 of the RPA, in relation to the contravention, to Picklebet.

Details of alleged contraventions

It is alleged that on 9 February 2026 Picklebet contravened subsection 61KA(3) of the IGA on one occasion by providing licensed interactive wagering services to a registered individual.

Schedule 1 to this Notice sets out brief details of the alleged contraventions of the civil penalty provision.

Amount of Penalty

The total pecuniary penalty (the penalty) specified in this Notice for the alleged contravention is \$19,800 calculated in accordance with paragraph 104(2)(b) of the RPA, as shown in the table in Schedule 2.

Payment of Penalty

The penalty should be paid to the Australian Communications and Media Authority (**ACMA**), on behalf of the Commonwealth, by deposit into the following account by **16 October 2026**.

Please include the narration "[REDACTED]" with your payment:

ABN:

Financial Institution:

Branch:

BSB:

Account No:

Account Name:

[REDACTED]
ACMA Official Administered Receipts Account

Request for an extension to pay

You may apply to have the period in which to pay the penalty extended. To be effective the application for an extension must occur on or before 16 October 2026, or the date of any extensions that have been granted by the ACMA. This should be addressed to myself in the first instance at [REDACTED]. You can apply for an extension more than once.

If the application to extend the period in which to pay is not granted, the period in which to pay will end on the day that is the last day of the period in which to pay or the day that is 7 days after the day Picklebet received ACMA's decision not to extend, whichever is the later.

If the penalty is paid

If the penalty is paid to the ACMA, on behalf of the Commonwealth, on or before 16 October 2026, or the date of any extensions that have been granted by the ACMA and the Notice has not been withdrawn, proceedings seeking a pecuniary penalty order will not be brought, in relation to the alleged contraventions.

Payment of the penalty does not constitute an admission of guilt or liability.

If the penalty is not paid

If you do not pay the penalty on or before 16 October 2026, or the date of any extensions that have been granted by the ACMA, proceedings seeking a pecuniary penalty order may be brought, in relation to the alleged contraventions.

Withdrawal of the infringement notice

The ACMA may withdraw this Notice. To be effective the withdrawal must occur on or before 16 October 2026, or the date of any extensions that have been granted by the ACMA.

If you believe that the Notice should be withdrawn, you should write to the ACMA setting out the basis/reasons for this position, on or before 16 October 2026, or the date of any extensions that have been granted by the ACMA. This should be addressed to myself in the first instance. The ACMA may take this into consideration when deciding whether or not to withdraw this Notice.

Should the ACMA withdraw the Notice, proceedings seeking a pecuniary penalty order may be brought, in relation to the alleged contraventions.

If the Notice is withdrawn after the penalty is paid, the penalty will be refunded.

Dated: 16th September 2026



Rochelle Zurnamer
Executive Manager
Australian Communications and Media Authority
Authorised Infringement Officer



SCHEDULE 1

**BRIEF DETAILS OF THE ALLEGED CONTRAVENTIONS ARE SET OUT
BELOW, IN ACCORDANCE WITH SECTION 104 OF THE RPA.**

1. Background

- 1.1. Under section 21 of the IGA, on 26 August 2025, the ACMA commenced an investigation into whether Picklebet had contravened the IGA.
- 1.2. The ACMA found that on 9 February 2026, Picklebet committed a contravention of subsection 61KA(3) of the IGA by providing a licensed interactive wagering service to a registered individual.

2. Matters giving rise to the Notice

- 2.1. Picklebet did not dispute that it provided licensed interactive wagering services to the individual with the Picklebet customer reference [REDACTED] on 9 February 2026.

3. Relevant civil penalty provision of the IGA*Subsection 61KA(3) of the IGA*

- 3.1. Subsection 61KA(3) of the IGA provides that a licensed interactive wagering service provider must not provide a licensed interactive wagering service to a registered individual.
- 3.2. ‘Licensed interactive wagering service provider’ means a person who provides a licensed interactive wagering service (see section 61GB).
- 3.3. ‘Licensed interactive wagering service’ means:
 - a regulated interactive gambling service (see section 8A)
 - that is a wagering service (see section 4),
 - has an Australian-customer link (see section 8) and
 - is not provided in contravention of subsection 15AA(3). (That is, the provider of the regulated interactive gambling service must 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) (see section 61GB).
- 3.4. ‘Licensed interactive wagering service account’ means an account that:
 - an individual has with a licensed interactive wagering service provider; and
 - relates exclusively to the provision, or prospective provision, of one or more licensed interactive wagering services to the individual (see section 61GB).
- 3.5. ‘Registered individual’ means an individual registered in the National Self-exclusion Register under Part 7B of the IGA.
- 3.6. Subsection 64B(1) of the IGA provides that each civil penalty provision of the IGA is enforceable under Part 4 of the *Regulatory Powers (Standards Provisions) Act 2014*, including the civil penalty provision in section 61KA.

4. Contravention of subsection 61KA(3) of the IGA by Picklebet

- 4.1. It is not disputed that Picklebet satisfies the key elements of a licensed interactive wagering service provider, as a person who provides a licensed interactive wagering service.
- 4.2. The individual with the Picklebet customer reference [REDACTED] became a registered individual on 9 February 2026.

- 4.3. Picklebet provided evidence that it provided the individual with licensed interactive wagering services on 9 February 2026 after they became a registered individual.
- 4.4. Subsection 61KA(3) of the IGA is a civil penalty provision.
- 4.5. The maximum penalty that the court could impose for a contravention of subsection 61KA(3) of the IGA is **\$1,237,500** for corporations.

5. The amount of the penalty

- 5.1. The total penalty specified in the Notice is calculated in accordance with subsection 104(2) of the RPA, being the lesser of:
 - (a) one-fifth of the maximum penalty that a court could impose on the person for that contravention; and
 - (b) 12 penalty units where the person is an individual, or 60 penalty units where the person is a body corporate.
- 5.2 The amount of each penalty unit being \$330 at the time of the contravention.

SCHEDULE 2

PENALTY FOR CONTRAVENTION OF SUBSECTION 61KA(3) OF THE IGA

Date of contravention	Number of contraventions of subsection 61KA(3)	Penalty units	Amount of penalty unit	Penalty imposed
9 February 2026	1	60	\$330	\$19,800