

[REDACTED]

From: IG Taskforce
Sent: Wednesday, 19 July 2023 4:58 PM
To: [REDACTED]; [REDACTED]
Subject: RE: RE: Request for access to documents under the Freedom of Information Act [SEC=OFFICIAL]

Dear [REDACTED]

Thank you for your prompt response.

Kind Regards,

Interactive Gambling Team

Australian Communications and Media Authority

E igtaskforce@acma.gov.au

www.acma.gov.au



From: [REDACTED]
Sent: Wednesday, 19 July 2023 3:43 AM
To: IG Taskforce ; [REDACTED] ; [REDACTED]
Subject: CM: RE: Request for access to documents under the Freedom of Information Act [SEC=OFFICIAL]

Hi [REDACTED]

Thank you for your letter (ACMA file reference: ACMA2023/331).

I hereby inform you that we don't have any objection to granting access to the documents as redacted by you under the Australian Freedom of Information Act 1982 (the FOI Act).

According to us, the 47G business exemption doesn't apply to the documents you shared with us.

If you have any further questions or requests, feel free to contact us.

Regards,

[REDACTED] **MBA, CISA, CISSP**

Waarnemend lid RvB
Manager ICT

Curaçao Gaming Control Board

Emancipatie Boulevard Dominico F. "Don" Martina 23 | Willemstad | CURAÇAO

Web: www.gamingcontrolcuracao.org



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[REDACTED]

From: IG Taskforce
Sent: Monday, 10 July 2023 10:00 AM
To: vlieg_e@gcb.cw; info@gcb.cw
Subject: Request for access to documents under the Freedom of Information Act (2 of 2) [SEC=OFFICIAL]
Attachments: Documents for third party consultation - Curacao Gaming Control Board (2 of 2).zip

Dear [REDACTED]

Please see attached the second half of the attachment.

Kind Regards,

Interactive Gambling Team

Australian Communications and Media Authority

E igtaskforce@acma.gov.au

www.acma.gov.au



[REDACTED]

From: [REDACTED]
Sent: Saturday, 15 July 2023 3:39 AM
To: IG Taskforce; Info GCB
Subject: RE: Request for access to documents under the Freedom of Information Act [SEC=OFFICIAL]

Follow Up Flag: Follow up
Flag Status: Completed

Hi,

I hereby acknowledge delivery of your email.

We will contact you soon with regards to your letter.

Regards,

[REDACTED] MBA, CISA, CISSP
Waarnemend lid RvB
Manager ICT

Curaçao Gaming Control Board

Emancipatie Boulevard Dominico F. "Don" Martina 23 | Willemstad | CURAÇAO

[REDACTED]
Web: www.gamingcontrolcuracao.org



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From: IG Taskforce
Sent: Sunday, July 9, 2023 7:59 PM
To: [REDACTED] ; Info GCB
Subject: Request for access to documents under the Freedom of Information Act [SEC=OFFICIAL]

Dear [REDACTED]

Please see attached correspondence from the ACMA. We sent this on 6 July but received a notification it was not delivered due to the attachment size.

I will send the second half of the documents in a separate email.

Could you please acknowledge receipt?

Kind Regards,

Interactive Gambling Team

Australian Communications and Media Authority

E igtaskforce@acma.gov.au

www.acma.gov.au



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[REDACTED]

From: IG Taskforce
Sent: Monday, 17 July 2023 5:23 PM
To: [REDACTED]
Subject: Request for access to documents under the Freedom of Information Act 1982 (Cth) [SEC=OFFICIAL]
Attachments: 2023-07-17 ACMA Letter to Curacao Gaming Control Board.pdf; Schedule of Documents - Curacao.zip

Dear [REDACTED]

Please see attached correspondence from the ACMA regarding an FOI request received on 23 June 2023.

Kind Regards,

Interactive Gambling Team

Australian Communications and Media Authority

E igtaskforce@acma.gov.au

www.acma.gov.au



17 July 2023

[REDACTED]
Acting Director
Curacao Gaming Control Board
Emancipatie Boulevard Dominico F "Don" Martina 23
Willemstad Curacao

By email: [REDACTED]; info@gcb.cw

ACMA file reference: ACMA2023/331

Dear [REDACTED]

Request for access to documents under the *Freedom of Information Act 1982 (Cth)* - Third party consultation

On 23 June 2023, the ACMA received an application for access to documents under the Australian *Freedom of Information Act 1982* (the **FOI Act**). There are 34 documents which fall within the terms of the request which contain or disclose personal information and business or commercial information related to the Curacao Gaming Control Board. I have attached, for ease of reference, a copy of the relevant documents.

The purpose of this letter is to consult with you about the personal information and business, commercial or financial affairs which are contained in the 34 documents that fall within the terms of the request.

The documents

The documents are as follows:

1. Letter from ACMA to Gaming Control Board regarding Duranbah Limited dated 12 February 2019
2. Letter from ACMA to Gaming Control Board regarding Mirage Corporation N.V. dated 3 April 2019
3. Letter from ACMA to Gaming Control Board regarding Equinox dated 4 April 2019
4. Letter from ACMA to Gaming Control Board regarding Game Tech Group N.V. dated 16 April 2019
5. Letter from ACMA to Gaming Control Board regarding Olimpbet N.V. dated 30 January 2020
6. Letter from ACMA to Gaming Control Board regarding Direx NV dated 29 July 2020
7. Letter from ACMA to Gaming Control Board regarding Audeo N.V. and Merus (UK) Ltd dated 15 September 2020

8. Letter from ACMA to Gaming Control Board regarding Digimarkets N.V. and Speqta Media N.V. dated 5 March 2021
9. Letter from ACMA to Gaming Control Board regarding Audeo N.V. and Merus (UK) Ltd dated 12 April 2021
10. Letter from ACMA to Gaming Control Board regarding Hollycorn N.V. and Libergos Limited dated 22 February 2022
11. Letter from ACMA to Gaming Control Board regarding Speqta Media N.V. dated 7 March 2022
12. Letter from ACMA to Gaming Control Board regarding Galaktika N.V. dated 14 March 2022
13. Letter from ACMA to Gaming Control Board regarding Rabidi N.V. dated 18 March 2022
14. Letter from ACMA to Gaming Control Board regarding Speqta Media N.V. dated 16 June 2022
15. Letter from ACMA to Gaming Control Board regarding Halcyon Super Holdings dated 25 July 2022
16. Letter from ACMA to Gaming Control Board regarding TechOptions Group B.V. dated 25 July 2022
17. Letter from ACMA to Gaming Control Board regarding Hollycorn N.V. dated 18 August 2022
18. Letter from ACMA to Gaming Control Board regarding Block Dance B.V. dated 18 August 2022
19. Letter from ACMA to Gaming Control Board regarding Dama N.V. dated 18 November 2022
20. Letter from ACMA to Gaming Control Board regarding Rabidi N.V. dated 29 November 2022
21. Letter from ACMA to Gaming Control Board regarding Cesario N.V. dated 5 January 2023
22. Letter from ACMA to Gaming Control Board regarding Dama N.V. dated 1 March 2023
23. Letter from ACMA to Gaming Control Board regarding Hollycorn N.V. dated 1 March 2023
24. Letter from ACMA to Gaming Control Board regarding Beaufort Media BV and Ridley Media N.V. dated 13 March 2023
25. Letter from ACMA to Gaming Control Board regarding Alistair Solutions N.V. dated 14 March 2023
26. Letter from ACMA to Gaming Control Board regarding Investan N.V. dated 24 March 2023
27. Letter from ACMA to Gaming Control Board regarding Rabidi N.V. dated 10 May 2023
28. Email from Gaming Control Board to ACMA dated 27 May 2023
29. Email from Gaming Control Board to ACMA dated 1 June 2023
30. Email from ACMA to Gaming Control Board dated 1 June 2023
31. Email from Gaming Control Board to ACMA dated 7 June 2023
32. Email between ACMA Interactive Gambling Team members regarding summary of meeting with Gaming Control Board dated 8 June 2023
33. Email to ACMA staff regarding summary of meeting with Gaming Control Board dated 8 June 2023
34. Letter from ACMA to Gaming Control Board regarding Dama N.V. dated 19 June 2023

The Australian FOI Act

Section 47F of the FOI Act relevantly provides that:

- (1) A document is conditionally exempt if its disclosure under this Act would involve the unreasonable disclosure of personal information about any person (including a deceased person).

Section 47G of the FOI Act relevantly provides that:

- (1) A document is conditionally exempt if its disclosure under this Act would disclose information concerning a person in respect of his or her business or professional affairs or concerning the business, commercial or financial affairs of an organisation or undertaking, in a case in which the disclosure of the information:
 - (a) would, or could reasonably be expected to, unreasonably affect that person adversely in respect of his or her lawful business or professional affairs or that organisation or undertaking in respect of its lawful business, commercial or financial affairs; or
 - (b) could reasonably be expected to prejudice the future supply of information to the Commonwealth or an agency for the purpose of the administration of a law of the Commonwealth or of a Territory or the administration of matters administered by an agency.

Consultation

We note that the applicant has agreed to exclude parts of any document that would involve the unreasonable disclosure of the personal information of any person. Therefore, as you will see from the attached documents, we have redacted all personal information of individuals who are not in the public domain from the documents (such as names, emails and phone numbers).

As set out above, the purpose of this letter is to invite you, in accordance with section 27 of the FOI Act, to make a submission about whether or not the 47G business exemption should apply to any of the 34 documents.

I note that the ACMA must give the applicant access to the document/s if it is conditionally exempt **unless** (in the circumstances) granting access would, on balance, be **contrary to the public interest** (section 11A of the FOI Act). The public interest is considered to be:

- something of serious concern or benefit to the public (cf merely of individual interest)
- related to matters of common concern or relevance to all members of the public, or a substantial section of the public
- not something of interest **to the** public, but something **in the** interest of the public, and
- not something which is fixed or unchanging but something which changes.

Information about the exemptions and the public interest test is available in the Guidelines issued by the Australian Information Commissioner available at www.oaic.gov.au.

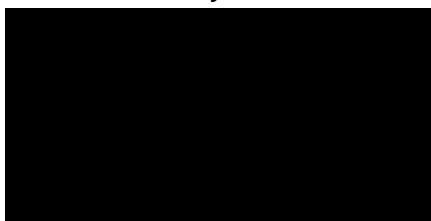
As the FOI Act imposes strict timeframes in which all FOI decisions must be made I would appreciate it if you could provide any submission that you wish me to take into account in making my decision on access by close of business on

31 July 2023. The submission should set out your reasons and include any supporting information/evidence. It may be sent to me by email.

Please note that if I do not hear from you by the date specified above I will proceed to make a decision on access.

If you have any questions or wish to discuss any issue I have raised please contact me on [REDACTED] or [REDACTED]

Yours sincerely



Manager, Interactive Gambling Team

Phone [REDACTED]

Email [REDACTED]

Authorised decision maker pursuant to section 23(1) of the FOI Act