

From: IG Taskforce
Sent: Wednesday, 5 March 2025 3:27 PM
To: info@gcb.cw
Subject: Advice to Gaming Control Board Curacao regarding Formal Warning to Hollycorn N.V.
[SEC=OFFICIAL]
Attachments: Advice to Gaming Control Board Curacao re Formal Warning.pdf; Formal Warning - Hollycorn N.V.
(Lets Lucky).pdf

Dear Sir/Madam,

Please see attached a letter from the Australian Communications and Media Authority advising of the Formal Warning issued to Hollycorn N.V. for contravening the Australian *Interactive Gambling Act 2001*.

Yours sincerely,

Gambling Compliance Team

Australian Communications and Media Authority

T +61 2 9334 7700 F +61 2 9334 7799

igtaskforce@acma.gov.au

acma.gov.au



The ACMA acknowledges First Nations peoples as the Traditional Owners and Custodians of Australia. We respect and celebrate First Nations peoples as the original storytellers and content creators of the lands on which we work and honour the enduring strength and commitment of Aboriginal and Torres Strait Islander peoples to the land, waters and their communities. We pay our respects to Elders past, present, and emerging.



5 March 2025

Gaming Control Board Curaçao
Emancipatie Boulevard Dominico F. "Don" Martina 23
Willemstad
Curaçao

By email: info@gcb.cw

ACMA file reference: ACMA2024/1379-42

Dear Sir/Madam

Contravention of the Australian *Interactive Gambling Act 2001* – Hollycorn N.V.

The Australian Communications and Media Authority (the ACMA) is responsible for investigating and taking enforcement action for contraventions of the Australian *Interactive Gambling Act 2001* (the IGA).

The ACMA has recently completed an investigation into the Lets Lucky service made available at <https://www.lets lucky23.com>.

The ACMA found that Hollycorn N.V. contravened subsection 15AA(3) of the IGA by providing an unlicensed regulated interactive gambling service to Australian customers.

On 13 February 2025, the ACMA advised Hollycorn N.V. of the ACMA's preliminary contravention findings. No response was received.

The ACMA finalised the investigation on 3 March 2025. The ACMA issued a Formal Warning to Hollycorn N.V. under section 64A of the IGA on 5 March 2025.

Hollycorn N.V. has previously been found by the ACMA to have contravened 15(2A) of the IGA as the Lets Lucky service also provides prohibited interactive gambling services to Australian customers.

If Hollycorn N.V. continues to provide unlicensed regulated interactive gambling services to persons physically located in Australia, the ACMA may take further action.

I have attached a copy of the Formal Warning issued to Hollycorn N.V. as well as the key provisions of the IGA.

We have brought this matter to your attention as the online gaming licence register on the Curaçao Gaming Control Board website indicates that Hollycorn N.V. was granted an online gaming licence on 29 July 2024. We understand that findings of illegal activity relating to entities licenced by the Curaçao Gaming Control Board may be relevant to you.

We would appreciate it if you could forward this Formal Warning to Hollycorn N.V. to ensure that it has been brought to their attention.

If you have any questions on the above, please contact me at [REDACTED].

Thank you for your engagement in this process.

Yours sincerely

[REDACTED]

[REDACTED]

Manager, Gambling Compliance Team

Encl: Formal Warning

Formal Warning

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

To: Hollycorn N.V.

Of: Scharlooweg 39 U.22
Curaçao

[REDACTED]

Attention: [REDACTED] and [REDACTED]
Statutory Directors of Allyant Group B.V., Statutory Director

I, [REDACTED], delegate of the Australian Communications and Media Authority (ACMA), being satisfied that Hollycorn N.V. has contravened subsection 15AA(3) of the *Interactive Gambling Act 2001* (the IGA):

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

Details of the contravention/s

Obligations under the IGA

1. 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.
2. An excluded wagering service is a kind of regulated interactive gambling service (as defined in section 8E of the IGA).
3. An 'excluded wagering service' is defined in section 8A of the IGA and includes betting on a sporting event except to the extent it is an in-play betting service (subsection 8A(3) of the IGA).
4. 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

5. Under section 21 of the IGA, on 30 January 2025, the ACMA commenced an investigation into whether the Lets Lucky service provided an unlicensed regulated interactive gambling service in contravention of the IGA.
6. During the period of the investigation the Lets Lucky service was available via the URL <https://www.lets lucky23.com>.
7. Hollycorn N.V. is a provider of the Lets Lucky service.

Contravention of subsection 15AA(3) of the IGA

8. The Lets Lucky service offered 'gambling services', including services for the placing, making, receiving or acceptance of bets (paragraph (a) of the definition of 'gambling service' in section 4 of the IGA), including in-play betting services.
9. The Lets Lucky 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).
10. The Lets Lucky service had an Australian customer-link.
11. Hollycorn N.V. is not licensed by an Australian State or Territory to provide regulated interactive gambling services to Australians (paragraph 15AA(3)(b)).
12. The ACMA found that, as a provider of the Lets Lucky service, Hollycorn N.V. has contravened subsection 15AA(3) of the IGA by providing an unlicensed regulated interactive gambling service to customers physically present in Australia.

Dated this





Delegate of the Australian Communications and Media Authority