NORTHERN TERRITORY RACING AND WAGERING COMMISSION

DECISION NOTICE AND REASONS FOR DECISION

MATTER:	Gambling Dispute for determination by the Northern Territory Racing and Wagering Commission (pursuant to section 310(4) of the *Racing and Wagering Act 2024) and section 85 of the Racing and Betting Act 1983.*
COMPLAINANT:	Mr P
LICENSEE:	Pointsbet Australia Pty Ltd trading as Pointsbet
HEARD BEFORE: **(on papers)**	Scott Perrin (Presiding Member) Susan Kirkman Ian Curnow
DATE OF DECISION:	6 May 2026

DECISION

1. For the reasons set out below, the Northern Territory Racing and Wagering Commission **(the Commission)** is satisfied that Pointsbet Australia Pty Ltd **(Licensee)** trading as Pointsbet has, in relation to its dealings with the Complainant, between 9 September 2022 and 19 September 2023, not acted in compliance with the regulatory environment imposed on it by the *Racing and Betting Act 1983* **(RBA)**, its licence conditions and the relevant Code of Practice that were in effect at the time of the events which are the subject of this gambling dispute.

2. The Commission has determined that it is appropriate to take disciplinary action against the Licensee pursuant to section 80(1)(d) of the now repealed RBA, for its contravention of condition 16 of its then licence as follows:

   i. a fine of 136 penalty units being 80% of the maximum penalty available, equating to $23,936 (2023-24 financial year penalty unit value was $176).

3. The Commission has determined that bets placed by the Complainant with Pointsbet between 9 September 2022 and 19 September 2023 are unlawful.

4. In view of the Commission's finding that the bets were unlawful, the Commission is of the view that the Licensee should return $73,691.17 to the Complainant, being the difference between the deposits and successful withdrawals made into the betting account from 9 September 2022 to 19 September 2023 after it was apparent that the Complainant was experiencing harm from his wagering.

REASONS

Background

The Licensee

5. The Licensee is currently authorised by the Commission to conduct the business of a sports bookmaker under the online branding name of Pointsbet. The sports bookmaker licence was granted by the former Northern Territory Racing Commission (former Commission) under the licensing regime contained within the now repealed RBA. In accordance with the transitional arrangements contained within the *Racing and Wagering Act 2024* (RWA), any licence issued under the repealed RBA that was valid immediately before the commencement of the RWA continues in effect on the commencement of the RWA as a licence under the RWA.

6. For ease of reference, the Commission has determined to refer to the Licensee as Pointsbet throughout the remainder of this Decision Notice.

The Complaint

7. On 30 June 2024, the Complainant lodged an online complaint with the Commission in relation to his dealings with Pointsbet. The Complainant alleged that Pointsbet did not identify that he was displaying behaviours indicative of a person experiencing harm from his wagering activity, nor did it take appropriate action to address those behaviours.

8. The Complainant seeks that the Commission declare the bets between 1 May 2022 and 19 September 2023 as void and be returned to him, being around $94,000.

Commission Hearing

9. In accordance with the transitional arrangements contained at section 310(4) of the RWA, any matters under consideration of the former Commission that were not determined under the now repealed RBA before the commencement of the RWA are to be determined by the Commission in accordance with the repealed RBA as if it was not repealed.

10. The complaint subject of this Decision Notice was lodged on 30 June 2024 and had not yet been determined by the former Commission prior to the commencement of the RWA. Given this, the Commission has determined to hear the dispute and make its determinations pursuant to section 85(4) of the RBA.

11. Pursuant to section 85(4) of the RBA, the Commission determined to investigate the matter and hear the dispute in absence of the parties, and make its determinations based on the evidence before it. That evidence includes submissions to the Commission and former Commission by both the Complainant and Pointsbet, as well as additional evidence obtained on behalf of the Commission by the Commission’s betting inspectors.

12. As a matter of procedural fairness to the Complainant and the Licensee, a draft of the Commission’s determination was provided to the parties for comment. Comments received from the Complainant and Licensee were duly considered in the finalisation of this Decision Notice.

Consideration of the Issues

Codes of Practice

13. Licence Conditions attached to all sports bookmaker licences granted by the former Commission, required licensees to adhere to any Codes of Practice. The Northern Territory Code of Practice for Responsible Service of Online Gambling 2019 (**2019 Code**) which came into effect on 26 May 2019, was approved by the former Commission to provide guidance on responsible gambling practices that must be implemented by sports bookmakers to minimise the impact of any harms that may be caused by online wagering. Under the

transitional arrangements contained within the RWA at section 313, any codes of practice made under section 148A of the now repealed RBA and in effect immediately before the commencement of the RWA continue to apply as if they were adopted or established under the RWA.

14. The 2019 Code requires that wagering providers are required to identify red flag behaviours and to take appropriate action to address problem gambling. Specifically, and as set out below:

    Clause 3.2. Recognising potential problem gamblers

    Where appropriate a customer who displays some, or a number, or a repetition of red flag behaviours should be monitored by an online gambling provider and appropriate customer interaction should take place to assist or protect that customer which reasonably corresponds to the circumstances. Online gambling providers should ensure responsible gambling policies and procedures are in place to allow staff to detect and assist customers who may be experiencing problems with gambling.

Wagering Activity

15. The Complainant opened the betting account with Pointsbet on 18 September 2021. During the two years that the betting account was open, the Complainant deposited $131,112.10 and withdrew $42,757.50, thereby sustaining losses of $88,354.60 from his wagering activity with Pointsbet. During this period, the Complainant placed numerous bets, with total stakes of $659,988.74.

16. The Complainant has submitted that his wagering activity should have promoted Pointsbet to identify that he was experiencing harm from his wagering activity as:

    i. There was a significant increase in the amount of money he was depositing into the account alongside with a significant increase in the size of his bets; and

    ii. He wagered for long periods of time, several days in a row.

17. The Complainant alleges that Pointsbet failed to make contact with him to ensure that he was wagering within his means and allocated a VIP manager after wagering levels had diminished.

18. Pointsbet has submitted that following a review of the complaint, it is satisfied with the way in which it dealt with the Complainant's account from a responsible gambling perspective.

19. Upon reviewing the Complainant's betting activity, the Commission has observed that the Complainant's activity can be broken down into several distinct stages.

Wagering period 1 – Initial Activity (September 2021 to March 2022)

20. From opening his account on 18 September 2021 until the end of March 2022 the Complainant made 111 deposits and bet every month for a total of 1,634 bets. Generally, the amount deposited every month was between $150 and $2,705 with maximum individual deposits of $500. The average bet size was approximately $30, with maximum bet sizes varying between $60 and $500. Generally, the average time the Complainant spent wagering each day, from first to last bet was around six hours, although there was a period in October 2021 where that increased to nine hours. During this seven-month period, the Complainant lost a total of $2,683 and on 31 March 2022, the Complainant's overall account balance was nil.

21. At this stage, the Complainant's activity appears to be that of a recreational gambler. There was no indication of excessive wagering, nor were there any signs of problematic behaviour such as rapid increases in deposit amounts or high-frequency activity. The Commission is of the view that during this period of wagering there were no obvious red flags, and the Complainant appeared to be engaged in low stake, recreational wagering.

22. The Commission notes that during this period, Pointsbet contacted the Complainant upon registration of the wagering account on 18 September 2021 via a generic email listing the RSG tools offered by the wagering operator. The Complainant chose not to set a deposit limit when prompted to do so by the RSG email.

Wagering period 2 – Gradual Increase in Deposit Activity, Change in Wagering Behaviour (April 2022 to May 2022)

23. Starting on 21 April 2022, the Complainant's deposit amounts began to escalate with a deposit of $1,000. This was followed by deposits of a further $1,000 on 28 April 2022, $3,500 on 5 May 2022, $4,000 on 7 May 2022 and $1,000 on 8 May 2022. In total $14,228.93 was deposited over the two-month period. The Complainant withdrew $3,380 over 10 transactions and by 31 May 2022 had incurred overall losses of $10,848.93.

24. Over the course of the two months the Complainant placed 297 bets with an average bet of $145, and the largest stakes being $4,028 in April 2022 and $3,500 in May 2022. The Commission notes the increase in the Complainant's wagering activity demonstrated a concerning pattern.

25. In conjunction with the increase in deposits and number and size of bets, the Commission notes that the Complainant started to wager for longer periods of time. During May 2022, the Complainant spent five separate days betting for periods of over seven hours, sometimes up to nearly ten hours without taking a break.

26. This stage of the Complainant's wagering behaviour marks the first clear sign of potentially at-risk behaviour. In the Commission's view, the red flag associated with increased deposit limits from a responsible gambling perspective and as mandated by the 2019 Code, was identified by Pointsbet and an appropriate customer intervention occurred.

27. The Commission notes that upon identifying the increase in the Complainant's deposit activity, Pointsbet sent an email to the Complainant on 8 May 2024 to again inform the Complainant of the responsible gambling tools available to him. In the Commission's view, the action taken by Pointsbet at this time was appropriate and met its regulatory responsibilities through its early intervention in response to potentially at-risk behaviour.

Wagering Period 3 – Return to Initial Activity Levels (June 2022 – August 2022)

28. During the period June 2022 to August 2022, the Complainant's betting and deposits returned to amounts that were more consistent with the activity identified in wagering period 1. At the end of August 2022, the Complainant had lost $14,663 since opening his account. During this wagering period the largest deposit made by the Complainant was around $500.

Wagering period 4 – Intensive Wagering (9 -16 September 2022)

29. In September 2022, the Complainant utilised his account for an eight-day wagering period during which time his activity on the account changed significantly. His turnover in this month was nearly triple that of the entire turnover for his account in the previous 12 months. He deposited over $50,000 during the month where previously his total monthly deposits (apart from May 2022 when the Complainant's total deposit amounted to $4,000) had

totalled usually around $1,500. His maximum deposit for the month was $20,000, as was his maximum bet. Prior to September 2022, the Complainant's average bet size was $44 over 2,220 wagers. This increased during this period to $1,678. During the month, the Complainant incurred losses of $30,308.70, bringing his total loses to $44,972.13.

30. Commencing 9 September 2022 until 16 September 2022, the Complainant started to make deposits in high volumes, with multiple deposits on the same day. Over the eight days, the Complainant made the following deposits:

    i. 9 September 2022, one deposit totalling $5,000

    ii. 12 September 2022, six deposits totalling $18,000

    iii. 13 September 2022, two deposits totalling $23,689.70

    iv. 15 September 2022, three deposits totalling $2,500

    v. 16 September 2022, 10 deposits totalling $2,619

31. This stage of the Complainant's wagering activity represents a concerning development given that large, frequent deposits can be an indicator of at-risk wagering and in the Commission's view, this rapid increase in deposit amounts, especially over a short period, is a clear red flag from a responsible gambling perspective.

32. The Commission also notes the increase in size of bets being placed during this period, including individual bets of $20,000; $10,000; $8,000; $6,000 and four valued at $3,000. Over the eight days the Complainant placed 197 bets valued at $322,745.88:

    i. 9 September 2022, one bet totalling $5,000

    ii. 10 September 2022, one bet totalling $9,416

    iii. 11 September 2022, 14 bets totalling $23,281.94

    iv. 12 September 2022, 27 bets totalling $32,094.80

    v. 13 September 2022, 37 bets totalling $101,612.56

    vi. 14 September 2022, 54 bets totalling $111,445.46

    vii. 15 September 2022, 24 bets totalling $28,993.44

    viii. 16 September 2022, 39 bets totalling $10,901.68

33. Again, the Commission is of the view that the size of the bets placed by the Complainant, both individually and collectively, are indicators of at-risk wagering and raises responsible gambling concerns.

34. Of further concern to the Commission is the change in the length of time the Complainant engaged in online wagering activity. Between 12 September and 16 September 2022, the Complainant placed a bet every day for a minimum of nearly nine hours and up to 14 hours without a break. Failure to take a break can be an indication that an individual is chasing losses and is not fully in control of their wagering.

35. During the eight days of activity in September 2022, the Complainant suffered overall losses of $30,308.70, having made five withdrawals totalling $21,500.

36. Despite accumulating substantial losses, the Complainant continued to place large bets in what would appear to be attempts by him to recover these losses. The frequency and size of the bets, coupled with the rapid succession of lengthy wagering sessions, further suggests to the Commission that the Complainant was becoming increasingly caught in a cycle of escalating risk.

37. The Commission notes that on 14 September 2022 Pointsbet sent an RSG 'in-app pop up' to the Complainant. The in-app pop up directly took the Complainant to the RSG page which listed all RSG tools offered by Pointsbet. Approximately one minute after this RSG interaction, the Complainant opted into setting a deposit limit of $7,500 per day. Pointsbet says it sent this notification as it had detected *"Potential Red Flag Behaviour (increased account activity)"*. This was the only intervention made by Pointsbet and the two days of activity on the Complainant's account following the intervention was significantly reduced compared to the period prior to the in-app pop up being activated. Although the Complainant did set a deposit limit of $7,500 a day it was in excess of his wagering history and this should have prompted further investigation by Pointsbet.

38. On 15 September 2022 an account manager was appointed and the RSG log maintained by Pointsbet notes *"$1,000 deposit match welcome"*.

39. The RSG log also noted on 28 September 2022 that *"Placing into RSG Watch currently has a dep limit and is turning over winnings but want to watch."*

Wagering period 4 – October 2022 – September 2023

40. In October 2022, the Complainant made one deposit of $400 for the whole month.

41. The Complainant made total deposits of $3,500 and $2,400 in November and December 2022, with an average bet size of $224 and $142 and finished the year 2022 having lost $48,797.53 during the term of the account.

42. On 5 and 6 January 2023, the Complainant deposited $12,126.30 into his account. He had a maximum bet of $6,000. On 6 January 2023, the Complainant placed 60 bets over 11 hours without a break. He lost all the funds deposited so that his losses by end of January 2023 were $59,008.43.

43. The Commission notes that on 10 January 2023, Pointsbet placed an RSG call to the Complainant. When contact was made with the Complainant he stated he was busy *"at the shops"* and would call back. This did not occur and Pointsbet subsequently suspended the account and sent an in app RSG message with available tools for use. The log maintained by Pointsbet notes the call was initiated due to *"Potential Red Flag Behaviour (increased account activity) / Intervention (failed RSG call resulting in account suspension)"*

44. No activity occurred on the account in February 2023 and March 2023 as the account was suspended.

45. On 21 April 2023, the Complainant called Pointsbet in relation to his suspended account. The call was for a duration of 1 minute 22 seconds. During this call Pointsbet's RSG staff member advised the Complainant that his 'account activity did increase a little' in January 2023, invoking the suspension. The Complainant was asked to confirm if he was comfortable with the 'spend' on his account. In response, the Complainant confirmed that everything was 'all good' and that the level of spend observed was 'nothing that's detrimental'. The Complainant stated that he was a 'share trader' and had 'quite a lot of excess funds'. The Complainant was then advised by Pointsbet of his active deposit limit and that his wagering account would be opened after the completion of the call.

46. After the RSG call on 21 April 2023 until 15 September 2023, the Complainant continued betting, accruing a further loss in this period of $29,346.17. During this time the Complainant placed 1,522 bets and 219 bonus bets, made 249 deposits to the amount of $36,196.17, and 39 withdrawals totalling $6,850. Throughout this period, the Complainant's wagering activity returned to levels previously observed in April 2022 and May 2022.

47. Pointsbet sent RSG in-app messages on 16 June 2023 and 5 July 2023, with the Complainant viewing both messages. The log maintained by Pointsbet in relation to both these messages notes the messages were sent *"due to appearing on red flag reports, increased account activity"*.

48. In addition to the RSG actions undertaken by Pointsbet specifically for the Complainant, generic RSG messages were sent to all Pointsbet customers for the 2022 Spring Racing Carnival on 20 September 2022 and for Gamble Aware Week on 20 October 2022.

49. From November 2022 until September 2023, the Complainant (except for February and March 2023 where the account was suspended) made 280 deposits and had placed 1,700 bets. The activity during this period was not as significant as in September 2022, however, was still substantially higher than levels prior to that month, apart from May 2022. When the activity on the Complainant's account ceased in September 2023, he had lost $88,354.63 over the entire term of the account, and $81,621.60 since 1 May 2022 which is when the Complainant says Pointsbet should have acted in accordance with clause 3.2 of the Code.

Commission Assessment

50. Clause 3.2 of the Code imposes a duty upon Licensees to recognise and appropriately interact with potential problem gamblers. The Complainant claims that he displayed several red flag behaviours from May 2022 and that Pointsbet failed to appropriately monitor these behaviours and undertake appropriate customer interaction as required under the Code.

51. Pointsbet claim that they had responsible gambling policies and procedures in place to allow their staff to detect and assist the Complainant and that the actions which they took reasonably corresponded to the circumstances and as such Pointsbet fulfilled and discharged their responsibilities under the Code.

52. Pointsbet states that the Complainant's betting activity was always subject to Pointsbet's ongoing RSG monitoring program and when potential red flag behaviours were identified appropriate intervention steps were undertaken.

53. Pointsbet provided the following summary in support of its position in respect of the complaint:

> *"As the NTRWC itself often notes, the wagering operators can only do so much and the customer themself as an onus of responsibility to manage their betting behaviour. At all times, PointsBet made tools available to Mr P for this purpose - indeed, Mr P took advantage of those tools including through use of a deposit limit. Respectfully, we submit that responsible gambling is a two-way street. PointsBet has conducted reasonable due diligence, monitored Mr P's betting activity and taken appropriate steps. Considering the high threshold of responsibility on the gambler that is applied by the Courts (and is often noted by the NTRWC in its decisions), we consider there are no material grounds for the matter to be further considered, and certainly that there are no material grounds for an adverse finding against PointsBet."*

54. The Commission does not consider that Pointsbet undertook appropriate customer interaction to assist or protect that customer which reasonably corresponds to the circumstances as required under clause 3.2 of the Code.

55. The Complainant's betting activity from opening the account on 18 September 2021 until April 2022 was consistent. Apart from an RSG message on opening the account, no other RSG action was taken by Pointsbet during this period.

56. The Complainant's activity in May 2022 increased significantly. The wagering activity of the Complainant in the previous eight months since opening the account provided significant and sufficient data to enable a responsible wagering operator to measure and act upon that data. Pointsbet relies upon its 8 May 2022 RSG email to the Complainant during this period as having taken appropriate steps to ensure that its duty under the Code was properly taken. Pointsbet in its own notes at this time, which prompted this interaction, show that it did so as the Complainant was displaying potential red flag behaviours by way of increased deposit activity.

57. Given the deposit activity increased on 5 and 6 May 2022, it is considered that an RSG message could have been delivered earlier than 8 May 2022. It is during May 2022 that the Complainant states his betting became a problem and Pointsbet should have been aware of his changed behaviour and activity. This is in fact acknowledged by Pointsbet – their system identified a reasonable change in activity as measured against the data from the previous eight months which raised, according to their own records "red flag behaviour."

58. Prior to 8 May 2022 the Complainant had received only generic RSG messages from Pointsbet. Whilst his wagering activity during May 2022 alerted Pointsbet to his increased wagering activity and had caused them to identify him as potentially exhibiting problem gambling signs, Pointsbet never spoke with the Complainant or conducted any enquiries as to his capacity to afford his losses.

59. The betting activity after May 2022 and until August 2022 returned to levels that were approximately consistent with the first eight months of the account.

60. It was in September 2022 that deposit and bet sizes increased significantly above that exhibited in May 2022.

61. In response and armed with the knowledge of potential red flag behaviour being identified back in May 2022, Pointsbet sent a RSG message to the Complainant on 14 September 2022 which he acted upon almost immediately by setting a deposit limit of $7,500 a day. The Complainant had in the days prior to the notice made significant deposits well beyond that previously made and had been betting for long hours.

62. Pointsbet did not suspend the account and make an RSG call at this time. Pointsbet acknowledges that instead they appointed an account manager, Mr SG to the account on 15 September 2022 and immediately offered the Complainant a free $1,000 bonus bet which is described in the log as a "welcome".

63. Mr SG was directly employed with Pointsbet and Pointsbet has confirmed that Mr SG does have commission-based renumeration as a component of his overall remuneration.

64. Pointsbet's decision to allocate an account manager to the Complainant and offer a bonus bet the day after he engaged with the RSG tools and was in the middle of a five consecutive, nine to 14 hours a day betting period, does not meet the requirements of the Code. The Commission has a view that this conduct could be seen as a mechanism to continue or enhance this increased activity.

65. Pointsbet records show that they were very aware of red flag behaviour at this time and the only action taken was sending an RSG message to the Complainant.

66. The actions of Pointsbet should be reviewed by what it says in response to the Complaint in paragraph 53 of this decision "*PointsBet has conducted reasonable due diligence, monitored Mr P's betting activity and taken appropriate steps*. The Commission does not consider that Pointsbet took appropriate action at this time.

67. The Code requires Pointsbet, having recognised that the Complainant was exhibiting red flag behaviour, *"should be monitored by an online gambling provider and appropriate customer interaction should take place to assist or protect that customer"*.

68. The Commission considers Pointsbet failed to provide the appropriate customer interaction as required by the Code.

69. At a minimum, appropriate action at this time should have included conducting a thorough RSG call and suspending the Complainant's account until Pointsbet was able to adequately satisfy that he was in control of his wagering.

70. Pointsbet instigated an RSG call with the Complainant in January 2023 as a result of further red flag behaviour identified by Pointsbet on his account. The Complainant advised he was busy to take the call and at that time Pointsbet suspended the account. The Complainant called Pointsbet in April 2023 to have the account activated. This call lasted 82 seconds and Pointsbet advised the Complainant was fine to have the account activated, ending with "*give it 2 or 3 minutes you will be able to log in*".

71. The Commission does not consider that the RSG call in April 2023 met the requirements of the Code. At no time during the call did Pointsbet make proper and necessary RSG enquiries of the Complainant to establish any facts about his prior activity and behaviour other than the Complainant stating, *"I'm a share trader with excess funds"*.

72. Despite Pointsbet having flagged the activities of the Complainant as exhibiting red flag behaviour with his betting on five occasions prior to the call, Pointsbet in its submission to the Commission states "*PointsBet has conducted reasonable due diligence, monitored Mr P's betting activity and taken appropriate steps*". The Commission does not accept that Pointsbet carried out appropriate due diligence nor did they act upon the various betting activity in accordance with the requirements of the Code.

73. Pointsbet were aware from May 2022 that the Complainant had exhibited red flag behaviour. Their own systems flagged this behaviour. The actions taken by Pointsbet after that time were inadequate and ineffective.

74. Pointsbet has failed to act in accordance with the requirements of clause 3.2 of the Code.

75. Accordingly, bets from 9 September 2022 until the account was closed on 19 September 2023 are declared unlawful. The total from that period is calculated as $73,691.17 which is to be paid to the Complainant by Pointsbet within seven days from the date of this decision notice.

DISCIPLINARY ACTION

76. On the weight of evidence before it, the Commission is satisfied that pursuant to section 80(1)(d) of the RBA, Pointsbet has failed to comply with a condition of its licence that was in place at the time of the events subject to this Decision Notice occurring, specifically that it:

    i. contravened condition 16 of its licence by not complying with clause 3.2 of the 2019 Code through not having sufficient responsible gambling procedures in place between

9 September 2022 and 19 September 2023 to allow staff to detect and assist customers in a timely manner, who may be experiencing problems with wagering.

77. Disciplinary action available to be taken by the Commission in these circumstances range from the issuing of a reprimand, imposing a fine not exceeding 170 penalty units or suspending or cancelling the sports bookmaker's licence.

78. The Commission has determined that it is appropriate to take disciplinary action against the Licensee pursuant to section 80(1)(d) of the RBA as follows:

    i. for its contravention of condition 16 of its licence, a fine of 136 penalty units being 80% of the maximum penalty available, equating to $23,936 (2023-24 financial year penalty unit value was $176).

LAWFULNESS OF BETS

79. The Complainant has requested that Pointsbet return the funds he deposited into his Pointsbet account, less withdrawals, over the life of his account commencing 18 September 2021. For the Commission to agree to this request, it would need to determine that each bet placed by the Complainant during this period was not lawful.

80. Although the Commission has found that Pointsbet has contravened its regulatory obligations from 9 September 2022 onwards, the Commission has found that all bets made prior to this date are lawful.

Return of Deposits

81. The Commission has determined that bets placed by the Complainant during the period 9 September 2022 to 19 September 2023 are unlawful and is of the view that Pointsbet should return the deposits totalling $73,691.17 that were made into the betting account from 9 September 2022 at which time Pointsbet should have responded appropriately to the display of red flag behaviours exhibited by the Complainant indicating potential harm being caused from his wagering activity.

NOTICE OF RIGHTS

82. Section 85(6) of the RBA provides that a determination by the Commission of a dispute referred to it pursuant to section 85 of the RBA shall be final and conclusive as to the matter in dispute.

Scott Perrin
Presiding member
Northern Territory Racing and Wagering Commission

On behalf of Commissioners Perrin, Kirkman and Curnow