


Decision and reasons for decision

In the matter of disciplinary action against the corporate bookmaker registration holder QuestBet Pty Ltd (ACN 662 473 047) under section 4.5A.14(4) of the *Gambling Regulation Act 2003* (Vic)

Delegate	Jason Cremona Director, Regulatory Services Division Victorian Gambling and Casino Control Commission
Date of decision	1 August 2025
Date of reasons	1 August 2025
Delegation	Pursuant to the Instrument of Revocation and Delegation dated 31 October 2024 and effective 11 November 2024, I, Jason Cremona, Director, Regulatory Services Division of the Victorian Gambling and Casino Control Commission, make this decision under section 4.5A.14(4) of the <i>Gambling Regulation Act 2003</i> (Vic).
Decision	For the reasons attached to this decision, I have found there is a ground for disciplinary action and decided to take disciplinary action against the corporate bookmaker registration holder QuestBet Pty Ltd (ACN 662 473 047), by imposing a fine of \$80,000 to be paid within 28 days or another period as agreed by the VGCCC.
Signed	
	Jason Cremona
	Director, Regulatory Services Division

Introduction

1. This is the Victorian Gambling and Casino Control's (**VGCCC**) decision and reasons for decision regarding disciplinary action taken against the corporate bookmaker registration holder QuestBet Pty Ltd (ACN 662 473 047) (**QuestBet**) under section 4.5A.14(4) of the *Gambling Regulation Act 2003* (Vic) (**Act**).
2. Pursuant to the Instrument of Revocation and Delegation dated 31 October 2024 and effective 11 November 2024, I, Jason Cremona, Director, Regulatory Services Division of the VGCCC, make this decision under section 4.5A.14(4) of the Act.

Decision

3. I have found there is a ground for disciplinary action and decided to take disciplinary action against the corporate bookmaker registration holder QuestBet, by imposing a fine of \$80,000 to be paid within 28 days of the date of this decision or another period as agreed by the VGCCC.

Background

4. QuestBet currently holds a corporate bookmaker registration, issued by the VGCCC on 24 March 2023 and due to expire on 23 March 2033, and operates an online website offering bookmaking services. The sole director and nominee of QuestBet is Mr Timothy Allen Cleary.

The Responsible Gambling Code of Conduct

5. Pursuant to section 4.5A.10A of the Act, it is a condition of registration as a bookmaker that a bookmaker must implement a compliant Responsible Gambling Code of Conduct. Between 4 April 2023 and 7 June 2023 (**Relevant Period**), QuestBet had adopted the Victorian Bookmakers' Association's Responsible Gambling Code of Conduct dated 25 September 2020 (**RG Code**).
6. The sections of the RG Code that are relevant to the ground for disciplinary action are:

- a. Glossary, definition of Problem Gambling:

Problem Gambling occurs when a customer has difficulties in managing their gambling activities, particularly the scope and frequency of gambling and the amount of time spent gambling, with negative impacts potentially including:

- (a) extreme financial losses relative to their sources of income;
- (b) adverse personal effect on the customer, his or her family and friends; and/or
- (c) adverse effect on employers and work performance;

- b. Glossary, definition of Responsible Gambling:

Responsible Gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership of individuals, communities, the gambling industry and the government to achieve outcomes that are socially responsible and responsive to the concerns of the broader community.

- c. Section 3 of the RG Code, the Responsible Gambling commitment:

This Code aims to help protect individuals and the community and minimise the harms associated with Problem Gambling. Each VBA Member is committed to:

- *operating their business in a manner which reduces harm associated with Problem Gambling, by creating a responsible gambling culture and environment in line with:*
 - *applicable legislation*
 - *the Ministerial Direction*
 - *the Rules*
 - *best practice; and*
 - *community expectations*

- 1) Section 6(a) of the RG Code provides that:

Each VBA member will ensure that:

- *they do not accept bets from any customer displaying indicators of distress that may be related to Problem Gambling, which may include:*
 - ...
 - *making remarks that may indicate serious overspending*
 - *showing concerns about losses and payouts*
- *they direct any customer who appears to show indicators of Problem Gambling to:*
 - *Gambler's Help or Gambling Help on 1800 858 858 or at www.gamblershelp.com.au or www.gamblinghelponline.org.au; or*
 - *Gambler's Help Youthline on 1800 262 376.*

7. Section 4 of the RG Code provides that:

Each VBA member will ensure that VBA Members must have appropriate measures in place consistent with this Code to ensure customers can enjoy gambling and that systems are in place to help ensure that vulnerable individuals do not experience a loss of control from their gambling. This includes having policies, procedures and a culture of compliance in their business that promotes Responsible Gambling.

For individuals, Responsible Gambling means gambling for pleasure and entertainment, being aware of their likelihood of losing, understanding the associated risks, exercising control over their gambling activity, gambling in a manner that is in balance with other activities in their lives and not causing problems or harm for themselves or others.

The Complaint

8. On 7 June 2023, the VGCCC received a complaint from a customer of QuestBet (**Customer**) who had gambled with QuestBet during the Relevant Period. The VGCCC identified the following particulars arising from the complaint.

Particulars

Breach 1: section 6(a) of the RG Code

9. During the Relevant Period, the Customer interacted with QuestBet on 21 occasions through QuestBet's 'Live Chat' function and by email.
10. The VGCCC was concerned that on the 6 occasions between 9 April 2023 and 7 June 2023 listed below, the Customer displayed indicators of distress that may be related to Problem Gambling by making remarks that indicated serious overspending and/or showing concerns about losses and payouts:
 - 9 April 2023 at 9:11pm: *"Hi any chance of some free loyalty bets tonight. Spent quite a bit over last couple days with no luck."*
 - 22 April 2023 at 6:32pm: *"Can you check my eligibility now for some loyalty bets. Down almost 3,000 in 24 hours."*
 - 24 April 2023 at 12:10pm: *"Hi mate. Any free bets to kick off betting this week. Down over \$3000 over the weekend with you guys. Need a bit of luck. Cheers."*
 - 30 May 2023 at 3:16pm: *"Hey mate any chance of some bonus bets today. Terrible week on the punt with you guys last week."*
 - 31 May 2023 at 8:31pm: *"Hi any chance of some loyalty bonus bets today. Spent heaps with you guys over the last couple of days. Can't deposit again until tomorrow morning."*
 - 7 June 2023 at 12:31pm: *"Any bonus bets to kick off today. Terrible day yesterday lost a heap with u guys."*
11. The VGCCC was concerned that on the above 6 occasions during the Relevant Period, QuestBet repeatedly breached the RG Code by continuing to accept bets from the Customer who was displaying indicators of distress that may be related to Problem Gambling, contrary to section 6(a) of the RG Code.

Breach 2: section 4 of the RG Code

12. The VGCCC was also concerned that QuestBet did not have appropriate measures or procedures in place consistent with the RG Code to ensure that vulnerable individuals, such as the Customer, do not experience a loss of control from their gambling, contrary to section 4 of the RG Code.
13. The VGCCC was concerned that there was no intervention with the Customer after each of the 6 remarks were made to ensure they were in control of their gambling. This demonstrated a failure to have a culture of compliance in the business which promotes Responsible Gambling to ensure that vulnerable individuals do not experience a loss of control from their gambling.

The Notice to Show Cause

14. On 15 May 2025, the VGCCC issued a notice to QuestBet pursuant to section 4.5A.14(2) of the Act to show cause within 28 days why disciplinary action should not be taken on the grounds for disciplinary action, being the particulars specified above and reflected in that notice (**Notice**).
15. On 12 June 2025, solicitors acting for QuestBet requested a two-week extension to respond to the Notice.

16. On even date, the VGCCC granted an extension for compliance with the Notice to 26 June 2025. In the same correspondence granting the extension, the VGCCC explicitly stated that if no submissions were received by 26 June 2025 (the extended date), the VGCCC would proceed to make a decision based on the materials and evidence it had before it.
17. On 26 June 2025, the VGCCC did not receive any responses or updates from QuestBet's solicitors. The VGCCC began its provisional assessment of this matter.
18. On 18 July 2025, the VGCCC queried with QuestBet's solicitors via email whether they continued to act for QuestBet and requested a response by close of business 22 July 2025.
19. On 23 July 2025, QuestBet's solicitors confirmed via email that they continued to act for QuestBet, and that they were in a position to respond to the Notice by 1 August 2025. QuestBet's solicitors stated that the reason for delay was due to the sudden departure of one of their solicitors.
20. On even date, the VGCCC responded to QuestBet's solicitors' email of 23 July 2025 by noting the passage of time already afforded to QuestBet to respond to the Notice. In those circumstances, the VGCCC did not grant a further extension to 1 August 2025, however, QuestBet was permitted to submit any further information they considered relevant to respond to the Notice by 25 July 2025.
21. The VGCCC's response also reiterated that no further time beyond the additional extension to 25 July 2025 would be granted for QuestBet to respond to the Notice, and that the VGCCC had progressed its consideration of this matter and would look to make a determination regarding the issues in the Notice before 1 August 2025.
22. To date, the VGCCC has not received any materials provided by QuestBet in response to the Notice. The VGCCC has considered in detail materials¹ previously provided by QuestBet during the VGCCC's initial investigation. I now proceed to give reasons for my decision below.

Basis for disciplinary action

23. Pursuant to section 4.5A.14(1)(ea) of the Act, repeated breaches of the RG Code is one of the grounds for disciplinary action against a bookmaker.
24. The full particulars for each breach underpinning the grounds for disciplinary action are set out in the Notice and are summarised in paragraphs 9 to 13 above. In short, the particulars are that:
 - 1) QuestBet repeatedly breached the RG Code by:
 - (a) accepting bets from the Customer who was displaying indicators of distress that may be related to Problem Gambling (section 6(a) of the RG Code) (**Breach 1**); and

¹ The materials includes three letters dated 25 April 2024, 22 November 2024, three policies - 'Responsible Gambling Concern Management Policy', Responsible Gambling Policy' and 'Responsible Gambling Policy (internal)', and records relating to the Customer, including betting history, conversations between the Customer and QuestBet, and the Customer's exclusion status.

- (b) failing to have appropriate systems in place to help ensure that vulnerable individuals do not experience a loss of control from their gambling (section 4 of the RG Code) (**Breach 2**).

25. For the avoidance of doubt, the VGCCC finds that repeated breaches have occurred both because section 6(a) was repeatedly breached and because two sections of the Code were breached.

Breach 1: *Accepting bets from the Customer who was displaying indicators of distress that may be related to Problem Gambling*

26. Section 6(a) of the RG Code mandates that QuestBet will ensure that they do not accept any bets from a customer displaying indicators of distress that may be related to Problem Gambling. The RG Code goes on to then list a range of non-exhaustive indicators.

27. This is a harm minimisation measure designed to ensure appropriate intervention is taken to protect customers whose behaviour suggests they may be suffering harm from Problem Gambling – that is, to stop them gambling when they have difficulties in managing their gambling activities.

28. The VGCCC considers that making remarks to a bookmaker that indicate serious overspending, and/or show concern about losses and payouts, were clear instances that the Customer may be experiencing Problem Gambling. As referenced in the definition of Problem Gambling and extracted below:

Problem Gambling occurs when a customer has difficulties in managing their gambling activities, particularly the scope and frequency of gambling and the amount of time spent gambling... [emphasis added]

29. In particular, I consider it is clear that the Customer was displaying indicators of distress relating to Problem Gambling and they had communicated that directly with the bookmaker through the Live Chat function, as described in paragraph 10. I consider these communications regarding overspending and losses also indicated that the Customer had difficulties in managing their gambling activities, as they had requested free or bonus bets to enable them to continue gambling.

30. As above, QuestBet did not provide formal submissions in response to the Notice. However, in a letter previously provided to the VGCCC by QuestBet dated 25 April 2024 and responding to the VGCCC's investigation in this matter, QuestBet stated:

- 1) It did not believe that the Customer was displaying indicators of distress in their interactions with QuestBet because QuestBet considered the Customer was “*someone who was generally enjoying their gambling activity, though mindful of losses they were incurring from time to time....*”
- 2) On occasion, the Customer would contact QuestBet to confirm what offers were available at the time. In each instance, an individual assessment was made of whether an offer would be made to the Customer, proportionate to their historic behaviour and wagering comfort level. Indeed, at times, no offer was extended to the Customer.

31. I provide my views in response to each of QuestBet's statements above in paragraph 30:

- 1) Regarding paragraph 30(1) above, I refer to the reasoning in numbered paragraphs 26 to 29 of this document and consider the Customer had difficulties managing their gambling activities, communicated their overspending and/or losses, and asked for more free or bonus bets to continue gambling.
- 2) Regarding paragraph 30(2) above, there was no specific evidence provided that an individual assessment was made at each communication point with the Customer.
 - i. Furthermore, the materials provided by QuestBet to date suggest that QuestBet would either provide a free or bonus bet, or decide not to, within 2-3 minutes of receiving a communication over the Live Chat from the Customer requesting same.
 - ii. The time taken by QuestBet staff to assess whether to grant the Customer's requests militates against QuestBet having given adequate consideration to whether the Customer was displaying indicators of distress related to Problem Gambling via their remarks regarding their losses or overspending in that very same communication.

32. I find that by accepting bets from the Customer between 9 April 2023 and 7 June 2023 and in the circumstances of the Customer making the remarks about his gambling to QuestBet, QuestBet repeatedly breached section 6(a) of the RG Code. That is, a breach occurred on each of the 6 occasions QuestBet accepted a bet after 9 April 2023 until 7 June 2023. This amounts to repeated breaches of the RG Code.

33. Accordingly, I find that Breach 1 is established.²

Breach 2: *the systems in place did not help ensure that vulnerable individuals do not experience a loss of control from their gambling... this includes having... a culture of compliance in their business that promotes Responsible Gambling*

34. Section 4 of the RG Code requires QuestBet to ensure that systems were in place to ensure vulnerable individuals do not experience a loss of control from their gambling. In particular, such systems include having a culture of compliance in their business that promotes Responsible Gambling.

35. During the VGCCC's initial investigation, QuestBet stated via correspondence that it had some systems operating during the Relevant Period, to identify, monitor, support and assist instances of potential gambling harm. Regarding its systems, QuestBet relevantly stated it:

- 1) further employs 'advanced customer intelligence technologies' to monitor and assess various parameters of customer gambling behaviour in real time.³
 - i. The technologies utilise a comprehensive set of criteria closely aligned with the indicators specified by the RG Code, aiding in the early identification of potential distress indicators.

² Whilst not put to QuestBet and does not form part of this disciplinary action, I note for completeness that section 6(a) of the RG Code requires a bookmaker to ensure that they direct any customer who 'appears to show' indicators of Problem Gambling to Gambler's Help. I understand the Complainant was not directed to Gamblers Help at any time between 9 April 2023 and 7 June 2023, as QuestBet considered the Customer did not display indicators of distress related to Problem Gambling (this position I disagree with).

³ As per QuestBet's letter dated 25 April 2024.

- ii. This technology is designed to complement existing responsible gambling policies and processes.
- 2) QuestBet also confirmed⁴ they had a 'Responsible Gambling Concern Management Policy' (**RG Concern Management Policy**) and a 'Responsible Gambling Policy' in place during the Relevant Period, and these two policies were further enhanced with a 'Responsible Gambling Policy (internal)' document, effective from 1 August 2023 (**Internal RG Policy**).
36. QuestBet then concluded that the Customer's wagering activity was considered low risk at the time, and there were no notable distress indicators that may be related to Problem Gambling.
37. With each respect to QuestBet's statements above in paragraph 35, I consider:
- 1) To the extent any 'advanced customer intelligence technologies' complimenting existing responsible gambling policies and processes were utilised in assessing the Customer's gambling behaviour, and in the absence of further information, I am unable to determine the efficacy of same. Therefore, these technologies do not form part of my consideration of whether this breach has been made out.
 - 2) QuestBet's RG Concern Management Policy outlines a requirement for its staff to provide assistance to customers facing negative consequences from their gambling. It includes "recommending helpful tools and resources (putting bet limits, self exclusion etc)" and "referring customers to support services like counselling."
- i. In particular, the RG Concern Management Policy outlines how to recognise gambling problems, to assist and recognise customers who are struggling with their gambling habits by looking for certain indicators, which explicitly included:
 - (1) under the heading "customer[s] contacting customer service" - making "frequent complaints about not winning", "excessive requests for bonuses following losses" and "talking about negative impacts of gambling;" and
 - (2) under the heading "Red Flag Behaviour" – making "remarks that may indicate serious overspending" and "showing concern about losses and payouts."
 - ii. The RG Concern Management Policy also required staff to always endeavour to '*minimise risk of harm for customers day and night, 'that customer protection comes BEFORE commercial considerations,'* among other requirements. [original emphasis]
- 3) I consider QuestBet staff did not provide assistance to the Customer when they were facing negative consequences from their gambling as outlined above, when they should have done so in line with the RG Concern Management Policy and based on the information provided to them by the Customer on each of the 6 occasions as described in paragraph 10. This demonstrates a failure by QuestBet staff to have in place a culture of compliance in their business that promotes Responsible Gambling.

⁴ As per QuestBet's letter dated 22 November 2024.

38. I therefore conclude in respect to Breach 2 that QuestBet did not have systems in place to help ensure that vulnerable individuals, such as the Customer, do not experience a loss of control from their gambling.⁵
39. Accordingly, I find that Breach 2 is established.

Disciplinary Action

40. In light of the above, I conclude that the two breaches of the RG Code identified in paragraphs 9 to 13 give rise to repeated breaches of the RG Code and that a ground for disciplinary action has been established pursuant to section 4.5A.14(1)(ea) of the Act.
41. Given that there are repeated breaches of the RG Code, I have decided to take disciplinary action against QuestBet, pursuant to section 4.5A.14(4) of the Act.

Appropriateness of a fine

42. Section 4.5A.14(1) of the Act provides that the disciplinary action that the VGCCC may take against a bookmaker is any of the following:
- (a) *the cancellation or suspension of the bookmaker's registration;*
 - (b) *the variation of the conditions of the bookmaker's registration;*
 - (c) *the issuing of a letter of censure to the bookmaker;*
 - (d) *the imposition of a fine not exceeding an amount that is 50,000 times the value of a penalty unit fixed by the Treasurer under section 5(3) of the Monetary Units Act 2004 (Vic).*
43. At the date of the relevant conduct, the value of a penalty unit was \$184.92, meaning that the maximum penalty that may be imposed is \$9,246,000.
44. Section 4.5A.14(4) of the Act entitles the VGCCC to take disciplinary action against QuestBet as it sees fit.
45. I consider that a letter of censure would not be a sufficient and proportionate outcome in the circumstances. In particular, it would not achieve the key objectives of general and specific deterrence referred to below in paragraph 46.
46. Ultimately, I have concluded that disciplinary action in the form of a fine is warranted for the following reasons.

- 1) Firstly, general deterrence would not be achieved by anything less than a fine.

⁵ For completeness, the VGCCC does not take issue with QuestBet utilising different systems and processes to comply with the obligations under the Code, so long as such systems are in place to help ensure that vulnerable individuals do not experience a loss of control from their gambling.

- i. Bookmakers must understand that there are serious consequences for committing repeated breaches of the relevant Responsible Gambling Code of Conduct (see section 4.5A.10A of the Act), particularly where such codes are important harm minimisation tools that minimise the gambling harm associated with problem gambling.
 - ii. The need for general deterrence is further emphasised in circumstances where bookmakers can derive not insignificant revenue from conduct of this nature.
- 2) Secondly, specific deterrence would not be achieved by anything less than a fine.
- i. QuestBet must be deterred from again engaging in the same conduct described in this decision above as Breaches 1 and 2, and to encourage QuestBet to seek to redress gaps in its systems.
 - (1) In particular, the fact that QuestBet continued to accept bets from the Customer who repeatedly displayed indicators of distress related to Problem Gambling (a total of 6 times from 9 April 2023 to 7 June 2023) is hugely concerning.
 - (2) It also cannot be said that Breach 1 was an isolated incident, as the Customer had interacted six times with QuestBet from 9 April 2023 to 7 June 2023.
 - (3) Staff must be trained to follow any appropriate policies and procedures, to ensure that there is a culture of compliance within the QuestBet business that promotes Responsible Gambling.
 - ii. I note QuestBet has no compliance history, which I have considered in mitigation.
 - iii. I also note that QuestBet had originally provided information to the VGCCC upon requests during its initial investigation into these breaches. However, QuestBet did not provide formal submissions in response to the Notice within timeframes imposed by the VGCCC.

Number of fines

47. As a preliminary matter, I consider that despite determining there are two breaches of the RG Code, there is one ground for disciplinary action against QuestBet for which the VGCCC served a single notice to show cause under section 4.5A.14(2). Therefore, I will issue a single fine under section 4.5A.14(4) covering all two breaches of the RG Code.

Setting the fine in this case

48. In all the circumstances, I consider that a fine of \$80,000 is an appropriate penalty in all the circumstances. I provide my reasons below for concluding this.

49. Firstly, I refer to the VGCCC's general approach to setting a fine when taking disciplinary action in other determinations⁶, and do not repeat that here.
50. Secondly, I note that the primary purpose of imposing a penalty or fine is to put a price on contravention that is sufficiently high to deter repetition by the contravenor and by others who might be tempted to contravene (i.e. both specific and general deterrence, respectively)⁷. It should not be seen as a "cost of doing business". The above provides helpful guidance regarding setting the quantum for pecuniary penalties.
51. As discussed in paragraph 43 above, the maximum fine available when taking disciplinary action against a bookmaker is 50,000 times the value of a penalty unit. Taking the penalty unit at the time of the contravening conduct of \$184.92, the maximum penalty that may be imposed in this case is \$9,246,000.
52. The size of the maximum penalty that may be imposed indicates that the Parliament intended for serious financial consequences to be levied by the VGCCC when a ground of disciplinary action is established and the circumstances of a matter warrant same. Naturally, disciplinary action arising from the most serious or egregious conduct would warrants fines closer to the maximum penalty.
53. The need for deterrence, both specific and general, weighs heavily when setting the appropriate quantum of fine on QuestBet. The fine must be high enough to deter future contraventions of the RG Code by QuestBet and other bookmakers, and cannot be considered the cost of doing business, particularly where non-compliance with the relevant Responsible Gambling Code of Conduct may result in vulnerable persons experiencing further potential gambling harm.
54. At the very least, the fine should exceed \$15,583.30, as that was the total benefit derived by QuestBet as a result of continuing to accept bets from the Customer between the first communication on 9 April 2023 until the last on 7 June 2023.
55. I note that QuestBet's has implemented an Internal RG Policy effective 1 August 2023 (after the Relevant Period), designed to uplift their existing RG Concern Management Policy and Responsible Gambling Policy (see paragraph 35(2)).
 - 1) The Internal RG Policy identifies "expressing concern about overspending, losses and payouts" as risk behaviours.
 - 2) It requires QuestBet staff in direct contact with customers to immediately suspend that customer's account if they identified indicators of distress that may be related to Problem Gambling, and the customer should be prevented from placing bets until the Responsible Gambling Check can be completed.
 - 3) Whilst I note QuestBet did not ultimately determine the Customer was suffering from indicators of distress that may be related to Problem Gambling, the fact that QuestBet continues to update their policies is something that I have taken into consideration regarding mitigation.

⁶ See the VGCCC's reasons for decision in disciplinary action taken against the casino operator for the 'China Union Pay' process (https://www.vgccc.vic.gov.au/sites/default/files/2024-04/vgccc_decision_-_china_union_pay.pdf) and Responsible Service of Gambling failings (https://www.vgccc.vic.gov.au/sites/default/files/2024-04/reasons_for_decision_rsg_da.pdf).

⁷ See *Trade Practices Commission v CSR Ltd* [1990] FCA 762; *Commonwealth v Director, Fair Work Building Industry Inspectorate* [2015] HCA 46.

56. I note that QuestBet has not acknowledged any wrongdoing here, since their position was that the Customer did not display any indicators of distress that may be related to Problem Gambling.
57. I also note that QuestBet initially cooperated with the VGCCC, by providing responses to information requests in the initial investigation. I also note that QuestBet was given an opportunity to respond to the Notice within specified timeframes, but did not provide a response to the Notice.
58. However, in all the circumstances I consider that the conduct is such that it falls within the lower end of the scale of the maximum penalty. I consider that a fine of \$80,000 is appropriate, which translates to just under 1% of the maximum penalty. However, a fine at the lower range should not be misunderstood to suggest that the breaches giving rise to the ground for disciplinary action were not serious.
59. The financial position of QuestBet is relevant when considering the appropriate quantum. From financial information that the VGCCC holds, I note QuestBet has been trading with net revenues in the high six-figures⁸. QuestBet has not provided any submissions to indicate it cannot pay a fine or a fine to this amount.

Review of Decision

60. Under section 4.5A.15(h) of the Act, a person whose interests are affected by a decision to take disciplinary action against a registered bookmaker may apply to the Victorian Civil and Administrative Tribunal for review.
61. An application for review must be made within 28 days after the day the decision was made.

⁸ For the period 1 August 2023 to 4 August 2024 inclusive, QuestBet earned net revenue (excluding GST) of \$882,113.71. For the period 1 August 2024 to 6 July 2025 inclusive, QuestBet earned net revenue (excluding GST) of \$710,645.04. Net revenue (excluding GST) is the revenue generated after paying winning payouts, bet backs, and free bets, but excluding GST. To determine net profit or loss, net revenue is subject to the business' operational expenses, taxes and other fees as determined by the business.