



**NICK XENOPHON**  
Independent Senator for South Australia  
**AUSTRALIAN SENATE**

[REDACTED]  
[REDACTED]  
Australian Communications and Media Authority  
GPO Box Q500 Queen Victoria Building NSW 1230

By email: [REDACTED]

Dear [REDACTED]

**RE: DoubleDown Casino on Facebook**

I write to you in order to make a formal complaint against the interactive gambling service provider DoubleDown Casino ([www.doubledowncasino.com](http://www.doubledowncasino.com)) who offer their services through the social networking site Facebook.

I understand that DoubleDown Casino is a brand of DoubleDown Interactive LLC, a company based in Seattle, Washington, United States. However it appears that DoubleDown Casino is not licensed for the provision of gambling services in the United States, or any other jurisdiction for that matter.

The DoubleDown Casino website purports to offer "free" casino games such as blackjack, slots and roulette. However a constituent has contacted me stating that soon after joining DoubleDown Casino his free chips ran out and he was required to purchase chips using real money in order to continue playing. Should a user have a "win" on the website and request the payment of their winnings, the payment is made in chips and not money. When the user complains about this their account is deactivated and they are blocked from using the website again.

On DoubleDown Casino's "Our Games" webpage the words "Just for fun – not real gambling" appear in the top right hand corner of the page. I believe that this statement is misleading because users are able to gamble by exchanging real money for chips used to wager in various casino games. As a result I am concerned that the internet gambling content offered by DoubleDown Casino is content prohibited by the *Interactive Gambling Act 2001*.

I ask that the ACMA investigates DoubleDown Casino and its interactive gambling services. I further ask that you refer the matter to the Australian Federal Police (or any other agency you deem appropriate) for investigation should you find that DoubleDown Casino are providing content prohibited by the *Interactive Gambling Act 2001*.

If you require any further information to facilitate the complaint and investigation process, please contact my office.

I look forward to hearing from you at your earliest convenience.

Yours sincerely

~~NICK XENOPHON~~

26 10 / 2011