

FINLAYSONS

NAMOA SUBMISSION

**TO THE DEPARTMENT OF TREASURY & FINANCE,
SOUTH AUSTRALIA**

IN RESPONSE TO THE

‘UNLAWFUL INSTRUMENTS OF GAMING’

FINAL POLICY PAPER FEBRUARY 2013

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1. This submission is made in response to the Final Policy Paper '*Unlawful Instruments of Gaming*' (the ***Final Policy Paper***), issued by the Department of Treasury and Finance of the Government of South Australia (the ***Department***) in February 2013.

NAMOA

2. This submission is made on behalf of the National Amusement Machine Operators Association Ltd of Australia (***NAMOA***). We refer to our previous submission made on 20 May 2011. There is nothing in the Final Policy Paper that would suggest to us that any statement or position made in the 2011 submission was erroneous or wrong, and to the extent necessary we rely on those submissions here.

Final Policy Paper

3. The Final Policy Paper details four policy positions:
 - (a) The provision of commercial gambling products to persons below the age of 18 years is prohibited in South Australia;
 - (b) Industry self-regulation should complement formal regulation of amusement machines with the characteristics of gaming machines;
 - (c) The Government should prevent the provision of amusement machines with the characteristics of gaming machines by declaration of such machines as instruments of unlawful gaming under section 59A of the *Lottery and Gaming Act 1936*; and
 - (d) The Government should declare a device that is described as a 'gaming machine' or 'pokie', or is marked or otherwise uses other words associated with gambling, or uses a spinning reel, as an instrument of unlawful gaming.

Academic studies

4. The Final Policy Paper's position is based upon conclusions drawn from academic studies, as follows –

- (a) Evidence suggests that problem gamblers start gambling at a younger age than non-problem gamblers (Delfabbro *et al* (2005));
 - (b) The 'vast majority' of problem gamblers begin gambling before the age of 20 (National Gambling Input Study Commission (1999));
 - (c) 'Some' problem gamblers begin gambling between the ages of 8-12 (although what proportion this represents is not stated, nor is the form of gambling, or means of introduction to gambling of those problem gamblers. There is no suggestion that arcade machines were in any way implicated in this statistic.); and
 - (d) Actual facsimiles of 'pokies' in the UK (fruit machines) are associated with problem gambling in children (Fisher (1993), Fisher (1995) and Fisher & Griffiths (1995)).
5. The Final Policy Paper refers to the fact that at least one study has pointed out that it was not possible to show that there is any causal relationship between all arcade amusement games or video games and gambling -
- 'It is not possible...to show that there is any causal relationship between video games and gambling and...there are a number of common antecedent factors that may account for the association and which need to be further investigated.' (Delfabbro *et al* (2009)).
6. However the Final Policy Paper also concludes that there is 'convincing evidence that exposure [of children]...to arcade amusement machines that are similar to gaming machines should also be prohibited'.
7. This conclusion was reached despite the report most relied upon by the Department stating that 'the results also question the strength and validity of this relationship [between game playing and gambling]'.
8. As stated by Delfabbro *et al* (2009):
- '[It] has been argued that the association between the two activities [ie. video games and gambling] might be due to the proximal location of both activities in arcades. In Australia, this argument is less easy to sustain because gaming machines can only be provided in clearly designated gaming areas that are set apart from other activities.'
9. Delfabbro *et al* (2009) also finds that game playing is a 'relatively minor' correlative risk factor for problem gambling, and that much of the other research relied upon, (ie. Fisher *et al* (1995), and National Gambling Impact Study Commission, 1999) was unhelpful because of the idiosyncrasies of the jurisdictions in which the research was conducted -

'The Australian gambling market differs in several ways from other countries such as the United Kingdom and Canada in that video games

are very rarely located at the same locations as other forms of gambling, most notably gaming machines. Where it is possible to encounter fruit machines and video games in amusement arcades in the UK or find gaming machines outside gaming venues in Canada, Australian gaming machines are only located in designated gaming areas.' (Delfabbro *et al* (2009)).

10. It is important to note that Delfabbro *et al* (2009) was concerned only with video games (of which modern gaming machines or 'pokies' are a sub-set, and single reel amusement machines are conspicuously *not* so). The relevance of that study to the current issues is thus questionable.
11. Fisher *et al* (1995) found that excessive game playing is 'contingent upon the player's biological and psychological constitution and situational variables'. The report notes that structural characteristics of arcade machines may play a role, which it goes on to list. None of these factors includes a reference, either directly or indirectly, to a 'spinning reel' or something of similar effect.
12. Similarly, Griffiths *et al* (2000) concluded that there is a 'cluster of factors' linked to gambling, such as 'genetic and/or biological predisposition, social upbringing, psychological constitution, situational and structural characteristics.'
13. Delfabbro *et al* (2007) concludes that people with a psychological predisposition to gambling are 'addiction-prone' and would be 'likely to fall victim to some other form of addiction' if gambling did not exist.
14. It is therefore unclear what 'convincing evidence' the Department refers to in its statement that arcade amusement machines that are similar to gaming machines should also be prohibited in order to protect children, or how the proposed regulation would achieve this.
15. NAMOA recognises that notwithstanding all of the above (and noting that all the cited academic references were those selected by the author of the Final Policy Paper), the Paper has taken the view that such a prohibition is necessary. Accordingly, NAMOA seeks to assist the Department in creating a framework that addresses the issues articulated in the Final Policy Paper, without unnecessarily penalising South Australian businesses, or creating arbitrary and illogical prohibitions.
16. NAMOA does not accept the view that regulation of the industry is necessary, but it is most certainly willing to work with the Department to ascertain the best manner in which the industry can comply with and bring itself within the broader governmental regulatory framework.

Department's Proposed Regulation

17. The Final Policy Paper states that it considers that '[i]f it looks like a gaming machine and its play is similar to a gaming machine, it should be treated as a gaming machine.'
18. The Final Policy Paper further specified the following characteristics, which it considers will bring an amusement machine within the definition of a gaming machine:
 - (a) markings or description of a machine as a 'gaming machine' or 'pokie';
 - (b) use of a word associated with gambling, such as 'gambling', 'bet' or 'jackpot'; or
 - (c) use, or depiction, of a spinning reel.
19. NAMOA concedes that the first two indicia referred to above are included inappropriate and may be objectionable. It supports the proposed regulation in this respect. It will be pleased to work with the Department to ensure compliance from the industry. It is however NAMOA's position that the designation of machines containing a spinning reel as unlawful gaming machines is arbitrary, and not supported by any research or evidence. The following section elaborates on this.

Characteristics of Gaming Machines

20. NAMOA takes issue with the characterisation of a spinning reel as being the sole and decisive indicator of the characteristics of a gaming machine. Delfabbro *et al* (2009) details the shared characteristics of gambling machines and arcade machines as being -

'eg. lights, sounds, graphical features, [and] bonus features'.
21. Fisher *et al* notes that -

'... [s]tructural characteristics of slot machines which are designed to induce the player to play and/or to continue playing are likely to play an important role. Such characteristics include frequent pay out and event intervals, arousing near miss and symbol proportions [sic.], multiplier potential, bettor involvement and skill, exciting light and sound effects, and significant naming [sic]'.
22. Few if any of these characteristics are present within the single spinning reel amusement machines reviewed by the Department. The research fails to point to a *single* spinning reel as being a characteristic of a gaming machine. NAMOA suggests that a more realistic and accurate list of characteristics would include a combination of at least one and possibly more of the following -

- (a) a plurality of spinning reels, each moving independent of each other reel;
 - (b) the ability to 'hold' a reel;
 - (c) a button or release which, when activated, causes the plurality of reels to spin in a manner that is in no way affected by the actions of, or input from, the player;
 - (d) the dispensing of money or money's worth upon successful completion of a predetermined goal, such as achieving a row of identical figures; and
 - (e) a momentary pause between the settling of each subsequent spinning reel (which creates or invokes a tension in or psychological stimulation of the player).
23. NAMOA submits that it would be wrong to state that any one of these indicia is, in and of itself, sufficient to classify an amusement machine as a gaming machine (although some may be stronger indicia than others). Rather, it is a *combination* of these factors which together bring a machine within the classification of having the characteristics of a gaming machine. Importantly, NAMOA notes that a single spinning reel (ie. not a plurality) is not characteristic of any pokie or gaming machine which it has encountered.
24. Attached marked 'A' is a picture of a US manufactured machine called 'All Aboard'. This has three spinning reels. NAMOA and its members encounter this machine at trade shows and elsewhere. They have deliberately never distributed this machine in Australia, having formed the view that it is indeed too similar in its 'look and feel', operation, or functionality to a traditional gaming machine (ie. an old fashioned pokie). NAMOA would concede that it is appropriate that such a machine should be the subject of such a prohibition as is discussed in the Final Policy Paper.
25. By way of further illustration, we attach marked 'B' and 'C' photographs of, respectively, a modern gaming machine (pokie) and a sample of the single spinning reel amusement machine which would under the proposed draft regulation, be treated as a gaming machine. It will be apparent from even the most cursory glance that visually, impressionistically, functionally. and otherwise, there is no real similarity.
26. It would be perverse, for example, for a machine which approximates to a 'pokie' (ie. by the use of a series of cards or tiles to display a facsimile of the operation of a pokie machine), but without utilising a spinning reel, *not* to be classified as having the characteristics of a gaming machine; whilst another machine which has a large single reel, the actuation of which determines the speed (and duration) of its rotation, is so classified.

27. In light of this, NAMOA submits that the words 'by the use or depiction of a spinning reel' be replaced with the words 'by the use or depiction of **a plurality of spinning reels**'.

Certainty for Business

28. The Final Position Paper states that one aim of the draft regulation is to provide certainty to business. NAMOA supports this goal; but believes that the proposed regulation fails in this respect. It is important that amusement game operators are aware of what will, and what will not, be prohibited by the regulation. It is for that reason that NAMOA seeks the addition of the words 'and only if' to the wording of Regulation 4A(2)(b), ie. that an amusement machine will be taken to have the characteristics of a gaming machine '*if and only if ... [etc.]*'. This will confirm that the list of prohibited characteristics is exhaustive within the regulation, and avoid the possibility of confusion or uncertainty.

Competition with Online and Mobile Platforms

29. The proposed regulation will create additional cost and 'red tape' for South Australian businesses, whilst creating a competitive disadvantage for amusement machine operators, who will be subject to restrictions on games which do not, in fact, replicate or simulate gaming machines.
30. At the same time developers and sellers of online gambling (ie. Zynga Poker) and mobile gaming machine simulators will not be regulated. Attached marked 'D' is a list of games available on either the Apple iTunes App Store, the Google Play Store, or both, which purport to directly simulate gaming machines. Each such programme contains all aspects of gaming machines, from the depiction of a plurality of spinning reels, to the simulation of adding funds and winning money. Some of the games allow for tactile simulation of a gaming machine, and almost all of them use wording ('jackpot', etc.) which would be prohibited under the proposed regulation.
31. This list is only a small sample of a much larger library of available games. These games are accessible to minors, as there is no formal or technological means of preventing minors from gaining access to them.
32. The imposition of the proposed regulation will mean that South Australian businesses that operate amusement machines will be less likely to be able to compete with international manufacturers of online and mobile gaming apps. In NAMOA's submission, those apps would clearly breach the regulation proposed by the Department if the app were to be placed or embodied within a physical machine, rather than on a mobile or internet device. The situation is made all the more illogical by the fact that these legal games are *clearly* simulations of gaming machines, whereas amusement machines deployed by NAMOA members are likely to be caught even though they do not emulate or

seek to emulate the characteristics of a gaming machine (as identified by the academic research).

Failure to Provide National Uniformity

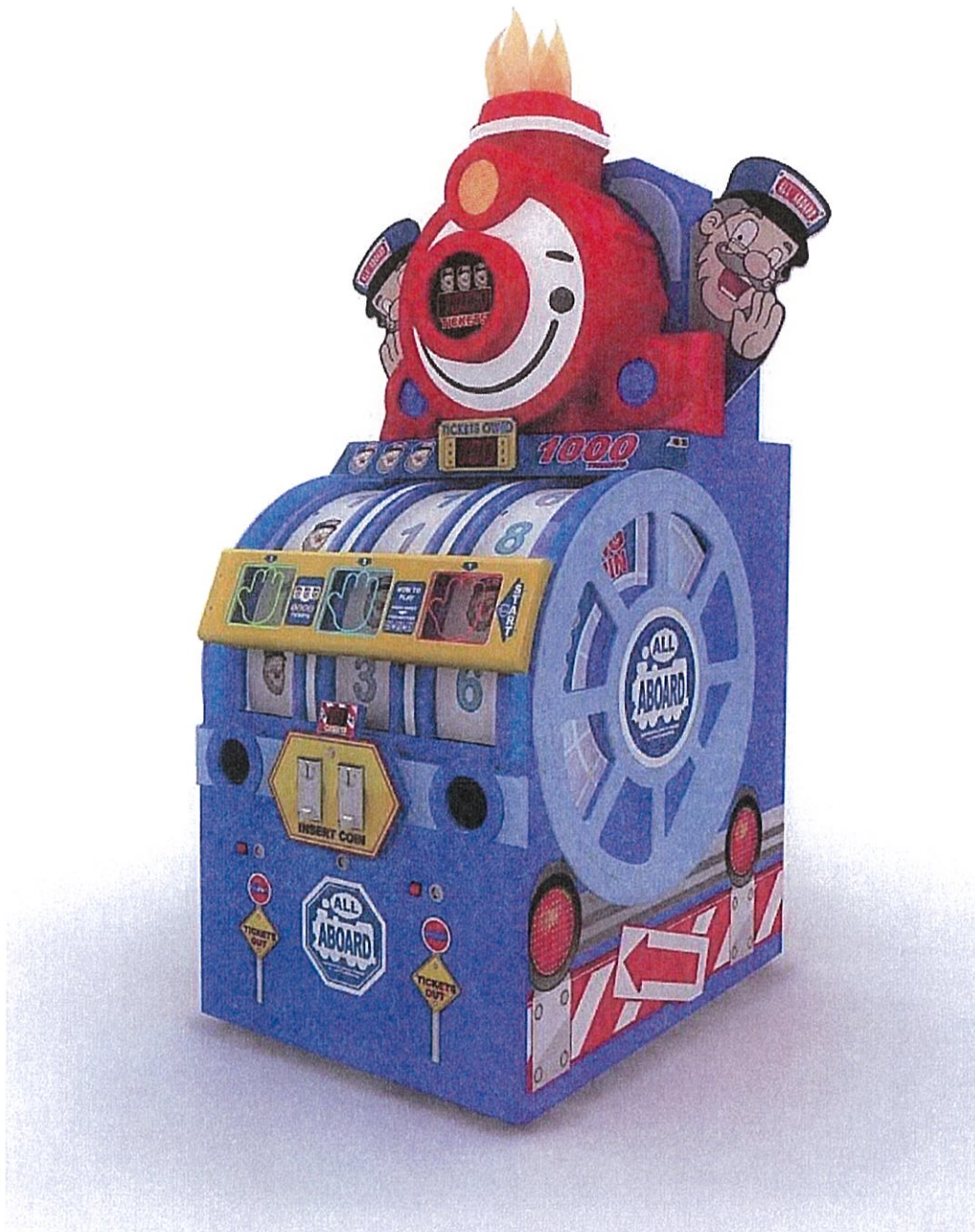
33. The proposed regulation is inconsistent with the regimes in other States of Australia. South Australia will be 'out on a limb', both nationally and internationally; NAMOA does not know of any countries or other jurisdictions in which single spinning reel machines have been banned; it is not aware of any regulation which prohibits games solely on the basis of their depiction or use of a spinning reel. This regulation will place pressure on South Australian businesses, which are unable to compete with their interstate rivals, and will prevent South Australian businesses from expanding into other States (because of the additional costs associated with finding compliant equipment. Businesses which seek to have multi-State operations will be required to meet a variety of inconsistent and incongruous regulations, adding cost and overhead to businesses whose revenues are increasingly constrained.
34. The Final Policy Paper sets out that one of the proposed next steps is commencement of the Regulation four months after they are proclaimed. NAMOA submits that this would be too short a period. One of the games which would be caught (on the currently proposed wording of the Regulations) is an extremely popular and successful machine which has been installed in many amusement venues in South Australia. The industry will require a reasonable time in order to make the arrangements to find and develop substitute games in an effort to reduce the financial impact of the Regulations on South Australian operators. NAMOA believes that a period of 12 months would be sufficient for these purposes.

Conclusion

35. In summary, NAMOA's submission is as follows –
 - (a) The appropriate manner to address industry concern, at least in the first instance, is via self-regulation;
 - (b) In the event that regulation is required, the proposed regulations are flawed as:
 - (i) the proposed regulation is not worded so as to provide certainty to the industry;
 - (ii) the academic studies relied upon by the Department state that there is no evidence linking the playing of amusement games to problem gambling; and
 - (iii) even if the link between amusement games and problem gambling were established, there is no evidence whatsoever that the inclusion of a spinning reel has any effect on increasing the predisposition to problem gambling;

- NAMOA / 8 March 2013

Annexure A: 'All Aboard' amusement machine



Annexure B: 'Pokie' machine



Annexure C: Amusement machine



Annexure D: Games available on Google Play Store



Slot Machine

APOSTEK SOFTWARE

/CARDS & CASINO

(90,022)

INSTALL

TOP VEGAS MULTI-LINE SLOTS: MINI GAMES, SUPER JACKPOT\$, SHOP & MORE! FREE! ★ Slot Machine+ voted the BEST CASINO GAME by Best App Ever Awards 2011! <http://bestappever....>



Video Poker

NOVEMBER31

/CARDS & CASINO

(589)

INSTALL

Video Poker just like in the casinos! Unlike slots machines, video poker allows the player to use skill to beat the house. Play this popular game just like in Las Vega...



Slot Machine Deluxe

CANDY MOBILE

/CASUAL

(61,546)

INSTALL

Slot Machine Deluxe is the #1 virtual casino slot machines game! Slot Machine Deluxe lets you spin the reels on your very own set of virtual casino slot machines to wi...



Slots Royale - Slot Machines

MYWAVIA STUDIOS PVT. LTD.

/CARDS & CASINO

(39,236)

INSTALL

Virtually Experience LIVE Casino with 3-packed SLOTS ROYALE and Wheel of Fortune Virtually Experience The LIVE Casino with the 3-packed SLOTS ROYALE for FREE from MyW...



Slotomania - slot machines

PLAYTIKA

/CARDS & CASINO

(276,761)

INSTALL

The most popular social video slots game in the world! Play Slotomania, one of the Top Apps of 2012 and the #1 slot machine game on Andorid and Facebook! Enjoyed by ...



Slot City - slot machines

DRAGONPLAY

 /CARDS & CASINO

(230,391)

INSTALL

★★★★★ THE BEST FREE-TO-PLAY SLOT MACHINES APP! Slot City by Dragonplay, is a new Vegas Style slots app where you can play amazing video slot machines anytime anywhere!...



Slot Machine

WORDS MOBILE
/CARDS & CASINO
(3,470)

INSTALL

Slot Machine lets you carry the excitement of Las Vegas in your Android phone. Slot Machine lets you carry the excitement of Las Vegas in your Android phone. Slot Mach...



Slots Heaven:FREE Slot Machine

SUPER LUCKY CASINO
/CARDS & CASINO
(54,934)

INSTALL

★★★ Voted Best Free Slot Machines for Android ★★★ If you enjoy free slot machine games like Slotomania or free slotsgames like SlotsJourney, then Slots Heaven is the f...



Super Snake Slot Machine

EXOBYTE
/CARDS & CASINO
(3,455)

INSTALL

Slot machine that is feature packed and will test your skill! This is the free version of Super Snake slot machine game. This slot machine game has Nudges, Winspins a...



Jackpot Slots - Slot Machines

GREE, INC
/CARDS & CASINO
(13,415)
INSTALL

You won 1,000 FREE COINS. Download now to claim! Win tons of coins and become a high roller with Jackpot Slots. Explore endless machines and never get bored aga...



Poker Slot Machine

TIDDA GAMES
/CARDS & CASINO
(379)
INSTALL

Poker slot is a simulated casino poker game in slot form, it has 5 wheels; each wheel represent a card of poker hand and game requires two spins to determine the WIN, ...



Balloon Blitz Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO
(3,928)
INSTALL

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! This slot machine game works with the free app Reel Deal Slots Club. Please install it...



Farm Casino - Slots Machines

DRAGONPLAY



/CARDS & CASINO

(33,100)

INSTALL

Slots Machines Farm Casino by Dragonplay is a new video slots game created with fun and exciting Farm themes! Play this amazing video slot machine app anytime, anywhere...



Cherry Chaser Slot Machine

EXOBYTE

/CARDS & CASINO

(3,538)

INSTALL

Slot machine that is feature packed and will test your reflexes! This free slot machine game has Nudges, Steppa-win, Stoppa-win, Win-spins and the special Cherry Chase...



Flaming 7s Slot Machine Free

LEETCOM

/CARDS & CASINO

(5,584)

INSTALL

Flaming 7s provides you with true Las Vegas slot machine experience. Download Today and receive 1,000 free coins! Flaming 7s is a Las Vegas inspired slot machine for ...



9 WHEEL SLOT MACHINE

TIDDA GAMES
/CARDS & CASINO

(1,556)

INSTALL

9 Wheel Slot Machine is a simulated casino popular slot machine game, the game has 9 reels. 1) Game has 8 betlines which gives more chances to win and makes game more...



Halloween Slot Machine HD

CASINOAPPS1234
/CARDS & CASINO

(269)

INSTALL

Halloween Slot Machine games fun for all ages! This high-definition slot machine game is just in time for Halloween! Challenge your friends to see who can get the hig...



Slot Machine - Megan Fox

SPICY APPS
/CARDS & CASINO

(5,334)

INSTALL

Slot machine with a twist; use credits you win to unlock high quality wallpapers One of the most requested thing from our fans was to release a game with some famous a...



Las Vegas Slot Machine HD

CASINOAPPS1234

/CARDS & CASINO

(219)

INSTALL

Las Vegas Slot Machines, fun game for all - easy to use - exclusive to Android! This high-definition slot machines game is perfect for anyone who loves Las Vegas! Cha...



SLOTS FREE (5 SLOT MACHINES)

VIADEN

/CARDS & CASINO

(2,430)

INSTALL

5 great slot machines for FREE! The LEADER of SLOTS games on Apple Store VIADEN GAMING presents: 5 SLOT MACHINES with free spins and bonus games guarantees Vegas fun i...



Brazilian Beauty Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(427)

AU\$3.00 BUY

Fire up the drums it's time for CARNIVALE! The party has begun and Brazilian Beauty is here to get your reels spinning, for the first time from WMS Gaming! The Brazili...



Slots Fever - slot machines

KAKAPO
/CARDS & CASINO
(2,849)
INSTALL

★★★★★ Top Free Casino Video Slot Machines Game On Android! Win big and claim your special bonus every two hours with Slots Fever – slot machines, a free Vegas-style sl...



Kilauea - HD Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO
(238)
AUS\$3.00 BUY

The Fires of Mount Kilauea have finally come to your favorite mobile device for the first time from WMS Gaming! Hit the Free Spin Eruption Bonus and watch as lava wash...



Rome and Egypt HD Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO
(565)
AUS\$2.89 BUY

Rome and Egypt The riches of Rome And Egypt have finally come to your favorite mobile device for the first time from WMS Gaming! Hit the Free Spin Bonus and watch as...



Slot Machine Multi Payline

QUI GAMES
/CARDS & CASINO
(374)
[INSTALL](#)

This multi betline slot machine lets you carry the experience of casino in your phone with an easy to use interface. It is a 3-reel, multi pay line Slot Machine. The vi...




Alice - HD Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO
(142)
[AUS\\$2.02 BUY](#)

Alice - HD Slot Machine TAKE A JOURNEY BACK DOWN THE RABBIT HOLE AS YOU EXPERIENCE THIS CLASSIC TALE IN A WHOLE NEW WAY! This classic slot machine has been complet...



Big Win Slots™ - Slot Machines

MOBILE DELUXE

/CARDS & CASINO
(32,510)
[INSTALL](#)

Play slots bonus games and hit BIG jackpots! Become a VIP and get FREE coins! Win in the loosest and most realistic slot machines in Google Play! Just like actual casi...



Slot machine cherry master

H&P
/CARDS & CASINO
(39)
AUS\$1.55 BUY

Slot machine game! "Cherry Master" Slot machine Cherry Master Game Requirements> - 240x320,320x480,480x800,1280x720pixels are available - Besides above resolutions ar...



Multi BetLine Slot Machine

TIDDA GAMES
/CARDS & CASINO
(3,223)
INSTALL

Multi BetLine Slot Machine is a simulated casino Slot Machine game, it is little different than normal slots, here player can BET on multiple bet lines and using onlin...



Tunzamunny Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO
(4,327)
INSTALL

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! This slot machine game works with the free app Reel Deal Slots Club. Please install it...



Fortune Seeker HD Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(161)

AUS\$3.00 BUY

The Mystics of the casino have seen your future and see a huge jackpot on the horizon in Fortune Seeker, for the first time from WMS Gaming! Gaze into the crystal ball...



Reels O Dublin HD Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(834)

AUS\$3.00 BUY

Test your luck against the Luck of the Irish! This 5 reel mechanical slot from WMS Gaming is one of the best Hot Hot Super Jackpot titles we've ever seen and now's you...



Fruit Cocktail slot machine

CUCGAMES.COM

/CARDS & CASINO

(3,048)

INSTALL

Fruit Cocktail slot machine Search keywords: slot machines, 777, Las Vegas, bar, coin bet, cherries, lucky jackpot lotto credits, casino, betting line, bonuc free



Jungle Wild - HD Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(590)

AU\$2.79 BUY

Brave the jungle in search of hidden treasure! WMS Gaming and Phantom EFX have teamed up to bring this classic slot to your mobile device for the first time ever! Take...



City Slots New: Slots Machines

WINCITY

/CARDS & CASINO

(37,307)

INSTALL

The best, free CASINO-QUALITY SLOTS MACHINES and BONUS games! With Tournaments! NEW TOURNAMENTS in the best, free, CASINO-QUALITY SLOTS MACHINE game with the best CAS...



Indian Spirit Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(128)

AU\$0.99 BUY

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! ON SALE 50% OFF! This slot machine game works with the free app Reel Deal Slots Club....



Robin Hood HD Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(461)

INSTALL

Robin Hood Free HD Slot Machine A classic comes to life in this fun slot! Become the hero of Sherwood Forrest as you join with little John and the rest of the merr...



Aztec Sun Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(160)

AU\$0.99 BUY

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! ON SALE 50% OFF! This slot machine game works with the free app Reel Deal Slots Club....



Dance Electric Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(73)

AU\$0.99 BUY

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! ON SALE 50% OFF! This slot machine game works with the free app Reel Deal Slots Club....



Shimmer - HD Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO
(225)
AU\$3.00 BUY

Rubies, Emeralds, and Diamonds oh my! WMS and Phantom EFX have teamed up to bring you the shiniest slot you've ever seen! Get up to 20x your wins when you hit a wild i...



Fish Bowl HD Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO
(26)
AU\$1.87 BUY

WELCOME TO THE FISH BOWL, WHERE THE GOLDFISH ARE MULTIPLIERS AND THE BONUS ROUND IS A SPLASH! This 40 payline slot machine has stacks and stacks of WILDS for some hu...



Thor's Hammer HD Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO
(30)
AU\$1.97 BUY

Wield the power of the Norse Gods and take on the evil Midgard Serpent! With an all new pick-em bonus round you'll be striking at the heart of the monster with the Ham...



Pied Piper HD Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(17)

AUS\$2.00 BUY

The Pied Piper of fairy tale lore comes to life in the Pied Piper slot machine. The Pied Piper of Hamelin was hired to fix the town's rat problem. And he did... then...



Slot Machine - Jesse Jane

SPICY APPS

/CARDS & CASINO

(17,320)

INSTALL

Slot machine with a twist; use credits you win to unlock high quality wallpapers If you are looking to kill some time, give our slot machine a try! Unlike other simila...



Resident slot machine

CUCGAMES.COM

/CARDS & CASINO

(680)

INSTALL

Resident slot machine Search keywords: slot machines, 777, Las Vegas, bar, coin bet, cherries, lucky jackpot lotto credits, casino, betting line, bonuc free



Leprecoin Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(159)

AUS\$0.99 BUY

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! ON SALE
50% OFF! This slot machine game works with the free app Reel Deal Slots Club....



Spirit Wolf Free Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(768)

INSTALL

Spirit Wolf Free Slot Machine HD Play Spirit Wolf today in HD for FREE! This "fan favorite" mobile download is Ad Supported with many ways to remove the ads after do...



Green Thumb Free Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(503)

INSTALL

Green Thumb Free HD Slot Machine Play Green Thumb today in HD for FREE! This "fan favorite" mobile download is Ad Supported with many ways to remove the ads after do...



Slot Machine Arcade Lite

MAGICMAN CREATIONS

/CARDS & CASINO

(1,176)

INSTALL

Free Slot Machine featuring three bonus games! Super scratch card rewards! Play one of the three slot machines from Slot Machine Arcade. With three fun BONUS GAMES, ma...



New York Slot Machine HD

CASINOAPPS1234

/CARDS & CASINO

(99)

INSTALL

New York! New York Slot Machine HD is here! This high-definition slot machine game is perfect for anyone who loves New York! Challenge your friends to see who can get...



SlotTitan - Slot Machine Free

CLEMENT E.

/CARDS & CASINO

(2,161)

INSTALL

Slot Machine Titans is is Totally Free! Virtually Experience The Casino with Slot Machine Titans Free THIS GAME IS ABSOLUTELY FREE. NO REAL WORLD MONEY IS INVOLVED. ...



Dubai Poker Machine

GIAVA

/CARDS & CASINO

(21)

INSTALL

Free Poker Machine - Enjoy! - New features coming soon ! Poker's Lovers get this.
VIDEOPOKER FOR TAB AND CELL !! WITH LIVE SCORE !!! A great opportunity for
beginners ...



Fruit Slot Machine

QUI GAMES
/CARDS & CASINO
(224)
INSTALL

This is simulation of Fruit Slots. It lets you have the experience of real slot machine in
your phone/tablet with an easy to use interface. It is a 3-reel, multi pay li...



Marbella Slot Machine HD

CASINOAPPS1234
/CARDS & CASINO
(56)
INSTALL

Marbella Slot Machine game for true Marbella lovers! Love the sun and fun in
Marbella? Then this high-definition slot machine game is perfect for you and all others
wh...



Slot Machine : Double Diamond

JAXILY
/CARDS & CASINO
(525)
INSTALL

Slot Machines are a great way to test your luck, try to get the high score! Slot Machines are a great way to test your luck, Check out our latest Double Diamond Slot m...



Candy Shop HD Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO

(32)

AU\$2.00 BUY

Candy Shop is one sweet slot machine! This unique slot game features candy symbols that lock into place when they make a winning pay. The other symbols respin and ca...



Hooked HD Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO

(31)

AU\$2.00 BUY

One spin and you'll be Hooked on this slot machine! After every spin of this slot machine the fisherman moves to a random fishing spot. If there's a fish to catch, h...



Flaming 7s Slot Machine

LEETCOM
/CARDS & CASINO

(90)

AU\$1.93 BUY

Flaming 7s Progressive Slot Machine is a Vegas inspired slot machine for your mobile device or tablet. A lot of research went into this app to provide the gamer with t...



Oil Tycoon Slot Machine

WILLIAMS INTERACTIVE

/CARDS & CASINO

(108)

AU\$0.99 BUY

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! ON SALE 50% OFF! This slot machine game works with the free app Reel Deal Slots Club....



Slot Galaxy HD Slot Machines

GALAXY STAR ENTERTAINMENT

/CARDS & CASINO

(14,320)

INSTALL

** THE HIGHEST RATED FREE-TO-PLAY SLOT MACHINE ON ANDROID! Just like in Vegas ** Play Slot Galaxy HD Slot Machines with large, sharp high resolution graphics and great...



Slot Machine Arcade

MAGICMAN CREATIONS

/CARDS & CASINO

(122)

AU\$2.99 BUY

Three slot machines featuring ten bonus games! Super scratch card bonuses! Play
THREE slot machines packed full of BONUS FEATURES. With three to four reels,
many reel ...



Diamond Slot Machine

THRASHER!
/CARDS & CASINO

(1,789)

INSTALL

Addictive 8 reel slot machine with online leaderboards and unlockables. ★★★★★

Kevin: "Diamond slot This is ones of the most addictive and exciting fun slot game I
have..."



Zooland Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO

(74)

AU\$0.99 BUY

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! ON SALE
50% OFF! This slot machine game works with the free app Reel Deal Slots Club....



Spy Games Slot Machine

WILLIAMS INTERACTIVE
/CARDS & CASINO

(61)

AU\$0.99 BUY

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! ON SALE
50% OFF! This slot machine game works with the free app Reel Deal Slots Club....



Bovine Bling Slot Machine

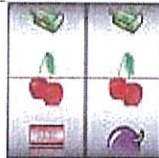
WILLIAMS INTERACTIVE

/CARDS & CASINO

(74)

AU\$0.99 BUY

Video slots just like the casino! Feel the thrill of the jackpot with Reel Deal! ON SALE
50% OFF! This slot machine game works with the free app Reel Deal Slots Club....



Cherry Slot Machine

TIDDA GAMES

/CARDS & CASINO

(2,007)

INSTALL

Cherry Slot is simulated slot machine casino game. The game has exciting graphics and sound effects, free spins, score leader board (for day, week, month) Come chase...



Slot Machines HD

CASINOAPPS1234

/CARDS & CASINO

(155)

INSTALL

Slot Machines HD Slot Machines HD is one of very few slot machines that use the latest in graphics processing abilities and this stunning 5-reel, 9-line game will keep...



Reward Hunter Slot Game - Free

META GAMES UNIVERSAL LTD

/CARDS & CASINO

(648)

INSTALL

Reward Hunter. An exciting action movie themed FREE Multi-line 5 reel slot game. This exciting 9 line, 5 reel slot game / slot Machine is designed for professional sl...



Fruit Cocktail Slot Machine HD

CASINOAPPS1234

/CARDS & CASINO

(42)

INSTALL

High resolution fruit cocktail slot machine game for Android. If you have ever played a fruit cocktail slot machine game before will love this new HD app that has been...



Slots Saga casino slot machine

ZENTERTAIN LTD

/CARDS & CASINO

(1,101)

INSTALL

★★ Get it while it's free! ★★ ★Most Exciting Slot Machine Game! Various slot machines to unlock and play!★ - Various worlds and levels to unlock! - Lots of bonus games...



Jolly Card Poker

SOLVUS LAB
/CARDS & CASINO
(263)
INSTALL

Old gamble Poker slot machine. Play authentic video poker just like the casino. Jolly Card Video Poker is old gamble Poker machine. It's intended for all who like play...
