

interests. It sought the licensing of bookmakers and, with a considerable degree of candour, admitted the volume of betting now being illegally transacted with its members and others following a similar occupation. It was admitted, too, that doubles betting constituted from 15 to 25 per cent. of the business currently being transacted by the bookmakers of the country and, inferentially, the legalization of this form of betting was sought even if it involved competition with the doubles totalizator. That doubles betting is rife we are certain, and we are disposed to think that it consists of a very much greater proportion of the betting done by the bookmakers than the secretary of the Dominion Sportsmen's Association estimated.

69. It was candidly and very properly conceded by counsel for the association that if off-course betting could, by some sufficiently comprehensive and sufficiently efficacious system, be catered for so that the requirements of all who wished to bet off course could be satisfied and the money put through the totalizator, then that system should, beyond all question, be adopted. The concession was made from recognition of the obvious fact that, through the totalizator, the recovery of taxation is made sure and simple, whilst by its employment a maximum income is made available to racing clubs for expenditure upon racing and for the provision of amenities for race-goers.

70. The fundamental claim of the association is that no sufficiently comprehensive or sufficiently efficacious system of off-course betting can be devised which will render a service comparable to the service that the bookmakers can render. It was contended that every alternative scheme for handling off-course betting is at a nebulous stage, whilst the bookmakers, if licensed, can immediately and without delay or expense divert from an illegal to a legal system and provide a complete service competent to deal with the whole off-course betting of the country. Such a system, it was contended, need not involve any loss of the ability of the State to tax moneys adventured in gambling or any loss of the ability of the racing clubs to derive income from betting. These latter contentions were based on a suggestion that a duty should be imposed upon all bets made and that, for the purpose of providing revenue for the racing clubs, a licence fee should be payable by each individual licensee based on the number of telephones employed by him. The proposal of the association is that betting transactions with bookmakers should be arranged in premises to which bettors are denied all physical access. This would involve the transaction of all betting business behind closed doors through the medium of the telegraph, the telephone, and the mails.

71. Implicit in the proposal is the continuance of two existing concomitants of the present illegal system. The first is the continuance of the present credit system of betting which constitutes much the greater