


Tim Falkiner


Confidential



19 April 2021

Hon. Ray Finkelstein AO QC
Commissioner
Royal Commission into the Casino Operator and Licence

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Dear Commissioner

CASINO REGULATION AND HARM MITIGATION

It has been many years since I was the Commercial/Legal Officer with the Victorian Casino Control Authority. In the light of subsequent events, I would now offer this advice.

Casino Regulation

The casino should be run by an entity that operates the casino as a vocation. That is to say, the entity should have one or more Australian-only casinos as its sole business and focus all its attention upon running casinos.

The casino should be run by an Australian corporation with Australian shareholders.

The casino should not have as a major shareholder any entity or person who has any excessive power to influence government, such as a media proprietor.

The Office of Director of Casino Surveillance should be reinstated.

Harm Mitigation

If any one measure is taken to mitigate the harm caused by gambling addiction, it should be the provision of a third-party exclusion power. This is done in Singapore and might not constitute a departure from the agreement made at the time of the establishment of the casino. The Victorian exclusion procedures should use the intervention order mechanisms involving the police and magistracy. (Although it may or may not be beyond the terms of reference, third party exclusion arrangements should be made in respect of other gambling by Victorians, so the casino is operating on a level playing field.)

I would be prepared to appear if you so wish.

Kind regards

Tim Falkiner