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19 February 2019

Our ref:

Mr R Murphy
Partner
MinterEllison
GPO Box 769
Melbourne VIC 3001

By email

Dear Mr Murphy

VCGLR Investigation into detention of Crown Group staff in China

Thank you for your letter dated 8 February 2019. I confirm receipt of the additional scorecard records dated 3 June 2013 and 30 June 2017.

In relation to the documents held by Crown that are relevant to the investigation, I reiterate that the Victorian Commission for Gambling and Liquor Regulation (VCGLR) has issued notices under statute requiring the production of records and the provision of information by Crown (**statutory notices**). It is Crown's responsibility to comply with those notices under the *Casino Control Act 1991*.

I understand that Crown is concerned to ensure disclosure of all relevant documents to the VCGLR in accordance with the statutory notices during the investigation.

In relation to the class action discovery process, the VCGLR does not intend to review all the documents discovered in the class action. It is open to Crown to provide further documents to the VCGLR, if Crown considers there are critical documents relevant to the investigation that have been identified in the discovery process, but have not been previously provided to the VCGLR, as they did not fall within the terms of the statutory notices issued by the VCGLR. If this is the case, please notify me in writing within the next 5 working days and provide the relevant documents within 14 days of this letter.

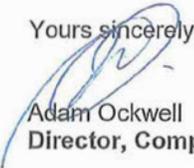
If at a later time during or after the class action proceedings, documents are identified that were not previously disclosed by Crown to the VCGLR during the investigation, but ought to have been in accordance with the VCGLR's statutory notices, then the VCGLR would need to carefully assess whether any regulatory action is appropriate. Essentially, the question pursuant to section 27 of the *Casino Control Act* is whether Crown failed, without reasonable excuse, to comply with the statutory notices. In making such an assessment, the VCGLR would take into consideration the particular circumstances pertaining to the documents, including the nature of the documents, the relevance of the information in the documents, the searches undertaken by Crown and any other relevant information. Of course, if this occurred, Crown would be invited to provide information and submissions in relation to that matter prior to any Commission assessment and determination. I trust this is of assistance and clarifies your queries.

As I outlined in my previous correspondence, it is open to Crown to provide a statement of the search methodology utilised by Crown to identify documents for the purposes of responding to the statutory notices, and if you wish, this statement can annex the list of search terms used by Crown for the purposes of its searches, if Crown considers this would

be of assistance. This statement could be provided in conjunction with any further material Crown requests the VCGLR take into account in finalising the investigation. At this stage, I do not consider a further meeting about Crown's search efforts is required. Alternatively, this could be provided if and when a question arose as to compliance with the Commission's statutory notices, as outlined above.

Should you require any further information, please do not hesitate to contact me on [REDACTED]

Yours sincerely



Adam Ockwell
Director, Compliance

Cc Mr J Preston