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22 January 2019

Our ref:

Mr R Murphy
Partner
MinterEllison

Email: [REDACTED]

Dear Mr Murphy

Further information provided by Crown on 5 December 2018

Thank you for your correspondence dated 5 December 2018 and the accompanying eight folders of material provided in response to the s26 notices issued by the Victorian Commission for Gambling and Liquor Regulation (VCGLR), including the notice on 14 November 2018 to Crown.

As previously noted, the Sixth Casino Review team did not review the Crown Resorts Limited Board papers and minutes for any meetings held in 2018, and only reviewed Crown Resorts Limited Board papers for meetings held in 2017.

After reviewing the materials provided on 5 December 2018, I request you clarify the matter below.

Correspondence between Crown staff

I note that in the documentation (Folder 1, tab 2) there is reference to a Crown protocol for detention in China by public security. Can you confirm is this the same document as the document headed *Reception Procedures in case of government investigation in China*, that has previously been provided by Crown.

With respect to the queries in your correspondence dated 5 December 2018, I advise as follows.

2.5 Further information about targets

In relation to the VIP Daily Turnover Scorecards (**scorecards**), I note your advice that Crown has located approximately 40,000 iterations of the scorecards for the requested period. In light of your advice that these iterations do not materially differ from the scorecards provided to the VCGLR, I confirm that the VCGLR does not require copies of these records. Although the VCGLR would be assisted if Crown could provide specific scorecards for:

- 29 June 2013 (the scorecard provided set out results that excluded all JN play (premium and key play), unlike the May 2013 scorecard and other scorecards provided by Crown)
- 29 June 2017 (no June 2017 scorecard was provided, only July 2017).

3.17 *Management reports*

I note that you have stated that there are thousands of daily management reports of financial results for the VIP International division. In light of your advice that these iterations of the report merely duplicate information regarding targets and results for regions or for the VIP International department in the period, I confirm the VCGLR does not wish to receive all of these reports.

3.14 *Mr Xuan's statement*

In your letter dated 5 December 2018 you have submitted that Crown should be given due notice of any proposed findings and the evidence upon which the proposed findings are based, to afford Crown a proper opportunity to provide relevant evidence and submissions. The VCGLR will at an appropriate time provide a draft report to Crown for it to consider and provide submissions and any further evidence it wishes to provide.

Although, I do note that the VCGLR has in the course of the investigation provided Crown with the opportunity to respond to various information obtained by the VCGLR from other sources and also given Crown the opportunity to provide any submissions and evidence that Crown considers relevant to the investigation.

3.16 *Judgement of the Shanghai Baoshan District People's Court*

In response to your request for inspection of the Shanghai Baoshan District People's Court judgement and any English translation of it held by the VCGLR, the VCGLR does not object to an inspection by a person authorised by Crown.

Please contact Inspector Tim Bryant on [REDACTED] to arrange the inspection.

3.19 *Class action discovery*

I note your comment that "*Crown has complied with its statutory obligations, in that it has undertaken reasonable steps to locate and provide to the VCGLR documents the subject of the section 26 notices.*"

In your letter dated 5 December 2018 you stated that Crown would welcome the opportunity to discuss the discovery process which has been undertaken in the class action, including the search terms used to interrogate the database, and any process which might be undertaken to identify other documents which the VCGLR may wish to review.

I have considered your advice regarding the class action discovery at the meeting between the VCGLR and you and Mr Preston on behalf of Crown on 19 December 2018.

I wish to confirm the VCGLR has sent out statutory notices requiring Crown to provide records in relation to matters identified by the VCGLR and Crown has been responsible for complying with the relevant notices. The VCGLR has also given Crown the opportunity to provide any documents it considers relevant to the investigation.

It is open to Crown, if it wishes, to provide a statement as to how its representatives conducted searches to comply with the s26 notices and to identify any other documents that Crown consider may be relevant. If Crown wishes to provide a statement as to its search methodology this should be provided within the next 14 days, as the VCGLR seeks to finalise its investigation.

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,
Chief Legal Officer
Crown Resorts