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24 March 2021

Mr Craig Phillips
Ms Abigail Gill
The Solicitors Assisting the Royal Commission
Into the Casino Operator and Licence
Level 25, 567 Collins Street
Melbourne VIC 3000

Dear Mr Phillips and Ms Gill

**Royal Commission into the suitability of
Crown Melbourne Limited to hold a Casino Licence**

We refer to the further letter from the Commissioner to Crown Melbourne Limited (**Crown**) dated 10 March 2021, and to our letter dated 22 March 2021 concerning that request.

Attached are schedules setting out Crown's initial (and partial) response to questions 1 and 2 in the Schedule to the Commissioner's letter (**RFI Schedule**). Crown will supplement this initial response with further responses following additional searches for, and analysis of, relevant documents.

The first schedule has been prepared following an analysis of papers presented to Crown's board compliance committee in the period from 2014 to date, its disciplinary action register and other documents maintained by its Regulatory and Compliance department and discussions with key personnel of that department. An amended version will be provided as soon as possible which will provide further information in response to questions 1(a) to (d) and 2 of the RFI Schedule arising from Crown's ongoing analysis of relevant records.

The second schedule has been prepared following an analysis of papers presented to Crown's board AML committee in the period from 2017 to date and other documents, and sets out Crown's initial response to questions 1(e) and (f) of the RFI Schedule. (Answers to question 1(g) will be provided in a further response.)

Crown makes the following observations about the schedules.

- In 2018 Crown implemented an improved system for maintaining and reporting information concerning any compliance related issues, using compliance management software developed by CURA Software Solutions. Prior to the implementation of that improved system, Crown's record keeping relating to compliance related issues involved a number of different departments within Crown. The improved system has streamlined the task of identifying actual or potential breaches for the period since 2018 compared to earlier periods, for which a number of different information sources must be searched. This is reflected in Schedule 1 which contains substantially more information for the period since 2018 than for earlier periods.
- Crown has taken a broad view of conduct that would, or might, constitute a breach of the statutes and regulations identified in questions 1(a) – (f) of the RFI Schedule and has included information

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about matters which were the subject of a notice issued under section 26 of the *Casino Control Act 1991* (Vic) but which were not necessarily related to an actual or potential breach.

- In the time available to prepare the schedules, it has not always been possible to identify (or identify comprehensively), the particular provision(s) to which the conduct relates or may relate. Crown will, if requested, provide a supplement to the schedules identifying the particular provision(s) for each entry.
- Where the documents on which the schedules are based identify an event as possibly breaching legislation referred to in question 1 of the RFI Schedule as well as some other agreement, code or standard referred to elsewhere in the RFI Schedule, the potential breach of that other agreement, code or standard is also included in this response.
- There are a number of empty fields in the schedules where the documents on which the schedules are based do not provide sufficient information to give an answer. In particular, Crown is making further inquiries of key personnel to identify the steps which were taken to remedy breaches, and to ensure that the relevant conduct would not be repeated. Crown will supplement the schedules to complete any unanswered questions in further responses as additional information is analysed.
- Crown will provide in a further response details of the officer or officers from whom additional information may be obtained in respect of the matters identified in the schedules.

Crown is continuing to prepare more detailed responses to questions 1 and 2, and responses to the other questions in the RFI Schedule, and will provide those responses as soon as reasonably possible. Crown would be happy to provide any further information about any of the matters set out in this letter or the schedules.

Yours faithfully



Andrew Maher
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Partner
Allens

Matthew McCarthy
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