DA Register

	Crown submitted that the limit capabilities on FATos were disabled as alleged, when the State wide pre-commitment system (YourPlay) was introduced and available to gaming machines only. The law prevents two pre-commitment systems being operated for EGMs. Crown was therefore required to disable its own pre-commitment system (PlaySafe) which operated simultaneously across both gaming machines and FATOs. Accordingly, when PlaySafe was disabled as required for EGMs, it also ecased to operate on FATOS. On 11 April 2016, Jason Cremona, was provided, as requested, with a letter outlining the scope and estimated timelines for the works to be carried out. Crown is committed to undertaking the necessary works either within or ahead of the schedule provided. Crown was deeply involved in discussion and consultation with the Department of Justice (DOJ) prior to 10 November 2015, however, it was deeply involved in discussion and consultation with the Department of Justice (DOJ) prior to 10 November 2015, however, it was determined that only one pre-commitment system would be permitted to operate on EGMs in the State; despile Cory position or PlaySafe (in operation since 2003) Crown was required to disable PlaySafe and introduce YourPlay. The effect of this was clear to all parties. As PlaySafe operated across both EGMs and FATOs at Crown, it would cease to operate on both platforms when YourPlay commenced. YourPlay with its application solely for EGM harm minimisation and player protection features, did not account for, nor have the capability to extend to FATOs in accordance with Rule 3.9 of the FATOs Rules. Crown submits that there should be no disciplinary action. The effect of turning off PlaySafe (as was required) was clear. Once turned off there would be no limit setting capabilities operating on FATOs, a position not disputed by the DOJ. Further, this position was reinforced by the DOJ in recently obtaining Ministerial clarification of the policy position with regards to limit setting on FATOs, reaffirming that there	unavailable on FATGs from 10 November 2018 with the introduction of YourPlay)	DATE OF SHOW CAUSE NOTICE 30-Mar-1		SUBMISSION TO VCGLR	DECISION / OUTCOME 6 19/07/16 the VCGLR determined that Disciplinary Action was warranted and issued Crown with a Letter of Censure and a fine for \$25,000 - matter closed.		CROWN CONTACT Michelle Fielding		Fine Total \$803,000	Acceptance by Crown of Finding
DA 28/112 Alleged breach of f (Worksite) 3,9 of the FATG R (Rules) and consequently s 60(2)(c) of the Cas Control Act 1991 (Vic). Worksite 106 Alleged breaches c the Junket and Premium Player Programs Internal Control Statement (ICS), which result in alleged breacher s 121(4) and consequently S 20(1)(b) of the Cas Control Act 1991	les table games (FATGs) configuration. It is specifically alleged that for a period, there was no ability to set daily loss and time limits on FATGs. It is noted that the VGQLR's Notice to Show Cause addresses 13 FATGs allegedly in breach, however, two of the thirteen (Tables 0725 and 1021) are Semi-Automated Table Games. 70 70 70 70 70 70 70 70 70 7	30-Mar-16 (PlaySafe unavailable on FATGs from 10 November 2015 with the introduction of YourPlay) Date of programs range	30-Mar-1	16 25-Apr-16	VCGLR	8 19/07/16 the VCGLR determined that Disciplinary Action was warranted and issued Crown with a Letter of Censure	26-Jul-16	Michelle Fielding	\$25,000	\$803,000	
(Worksite) 3.9 of the FATCR (Rules) and consequently s 60(2)(c) of the Cas Control Act 1991 (Vic). Worksite 106 Alleged breaches c the Junket and Premium Player Programs Internal Control Statement (ICS), which result in alleged breacher s 121(4) and consequently s 20(1)(b) of the Cas Control Act 1991	les table games (FATGs) configuration. It is specifically alleged that for a period, there was no ability to set daily loss and time limits on FATGs. It is noted that the VGQLR's Notice to Show Cause addresses 13 FATGs allegedly in breach, however, two of the thirteen (Tables 0725 and 1021) are Semi-Automated Table Games. 70 70 70 70 70 70 70 70 70 7	(PlaySafe unavailable on FATGs from 10 November 20 15 with the introduction of YourPlay)		16 25-Apr-16	20-Apr-16		28-Jul-16	Michelle Fielding	\$25,000	\$803,000	
#614394 the Junket and Premium Player Programs Internal Control Statement (ICCS), which result in alleged breaches s 121(4) and consequently s 20(1)(b) of the Cas Control Act 1991	Player Programs Internal Control Statement (ICS). Most of the alleged breaches are technical in nature (e.g. illegible hand writing on forms). It is specifically alleged that there were 21 breaches covering five (5) Junket Player Programs, which resulted in alleged breaches of s 121(4) and consequently s 20(1)(b) of the Cas no Control Act 1991 (Vic)(Act). d	programs range									
34		from July 2015 September 2015		25/01/2017	18/01/2017	FY 2017 On 18 January 2017, Crown made a submission to the Commission asking that the Notice be withdrawn or suspended, as a result of it containing a large number of factual errors. Pending this, Crown also requested the Commission provide additional information in relation to the alleged breaches. The Commission notified Crown on 24 January 2017 that they have accepted its request for additional information and will grant an additional seven (7) days to respond once received. "After this time has concluded the Commission will proceed to determine any of soipinary act on a netal or to the a leged breaches." As of 4 April 2017 the VCGLR have withdrawn seven (7) of the allegations and Crown has fourteen (14) days to respond to the revised Notice of fourteen (14) allegations. On 27 April 2017 Crown responded to the Notice issued by the Commission, maintaining that Crown was not in breach of s 121(4) and subsequently s 20(1)(b) of the Act. Crown defended thirteen (13) alleged breaches (as another had been withdrawn) and will await a response from the Commission in due course. On 6 December, the Commission issued Crown with its finding resulting in a \$150,000 fine, which Crown subsequently paid via cheque on 20 December 2017. The matter is now closed. On 9 February 2017, the Commission purported to provide Crown with the additional information to correct the errors in its Notice to Show Cause. However, the further information also went to establishing that the Notice was issued on the basis or erroneous assumptions. On 15 February 2017, Crown responded requesting that the Notice be withdrawn or suspended until the further clarifying information can be provided. The VCGLR again granted the extension and Crown awaits their further advice. On 22 February 2017, the Commission notified Crown that they are considering a response to Crown's request for the Notice to be withdrawn or suspended. The Commission also acknowledged that Crown was not is a position to respond to the Notice to Show Cause until further informati	06/12/2017 \$150,000	Michelle Fielding	150,000	953,000	
	n	27 March 2017 20 April 2017.	- 8 December	5/01/2018	5/01/2018 26/02/2018	FY 2018 On 5 January 2018, Crown responded to the Notice issued by the Commission defending Crown's position to the allegation of varying machine type and games without approval. On 6 February 2018, the Commission responded to Crown upholding their position on the matter. The Commission invited Crown to respond within 14 days. On 26 February 2018, Crown responded to the Commission. On 26 April 2018, the Commission made a determination, issuing a Letter of Censure and Imposing a \$300,000 fine. Crown paid the fine via cheque on Tuesday 1 May 2018. The matter is now closed.	01/05/2018 (\$300,000)	Michelle Fielding	\$450,00	\$1,253,000	
Worksite 06 Button Picks #614391 (Wilky allegation)	On 13 July 2018, The VCGLR issued Crown with a Notice pursuant to s 26 of the Cas no Control Act 1991 (Vic), in relation to Crown-banded 'picks' (button picks), which were able to be inserted in buttons on unrestricted EGM to allow simultaneous play of multiple machines. The VCGLR requested information in relation to the picks, inclusive of their use and instructions to staff, advise to patrons etc. On 7 March 2019, the VCGLR wrote to Crown advising of the finding, a required Crown to provide a report by 8 April 2019, detailing the steps taken by Crown to comply with the Direction. On 8 April 2019, Crown wrote to the VCGLR, setting out actions taken to comply with the 7 March 2019 VCGLR letter.	Period of Use	13/07/2018	27/07/2018 10/08/2018	18/07/2018 10/08/2018	FY 2019 On 7 March 2019, the VCGLR wrote to Crown with a determination that button picks were considered gaming equipment under s 64 of the Act. The VCGLR issued a Direction under s 23 banning button picks.	\$0	Michelle Fielding	\$450,00	\$1,253,000	Crown does not accept the finding (Button Picks require approval as gaming equipment).
38 Worksite 06 C8308 Button Faul	On 27 September 2018, the VCGLR issued Crown with a Section 26(1) Notice pursuant to the Cas no Control Act 1991 (Vic), requesting information pertaining to EGM C8308 operating in continuous play mode (alleged as 'unrestricted mode' in the Notice) when a player card was not inserted. On 20 December 2018, the VCGLR (on-site inspectorate) wrote to Crown requesting clarification on several matters and an explanation as to why Crown breached's 62AB(2) of the Casino Control Act 1991 (Vic).		27/09/2018	11/10/2018	11/10/2018	On 11 October 2018, Crown responded to the VCGLR, by providing information as requested by the VCGLR (letter dated 27 September 2018). On 8 January 2019, Crown responded to the letter dated 20 December 2018, reinforcing its position as documented in Crown's response dated 11 October 2018, that the machine was not functioning in unrestricted mode and that the continuous play arose from a malfunction. On 14 January 2021, the VCGLR issued Crown with a Notice of Non-Compliance. No further action will be taken by the VCGLR.	0		\$450,00	\$1,253,000	
Worksite 06 Crown Rewards Loyalty Scheme ar EGM in Unrestricte Mode		n/a	19/11/2018	18/12/2018	18/12/2018	On 18 December 2018, Crown responded to the VCGLR's letter dated 19 November 2018.	0		\$450,00	\$1.253,000	
Worksite 06 Your Play Pre- #41654 commitment scher	On 5 October 2018, the VCGLR wrote to Crown to make inquiries of a preliminary nature regarding the operation of the Your Play pre- e commitment scheme under s 26 of the Casino Control Act 1991 (Vic), requesting Crown to provide information and produce records as stated in the letter.	n/a	05/10/2018	26/10/2018	26/10/2018	On 26 October 2018, Crown responded to the Notice and provided all requested information.	0		\$450,00	\$1,253,000	