



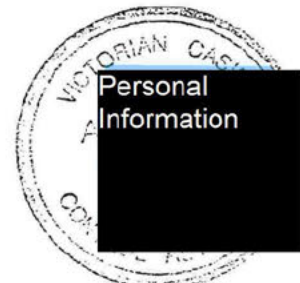
PART III
CHEQUE CASHING

Personal
Information

PART III - CHEQUE CASHING

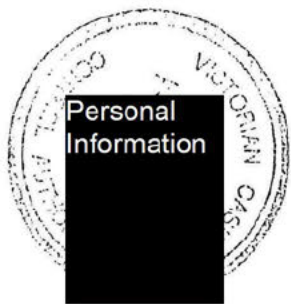
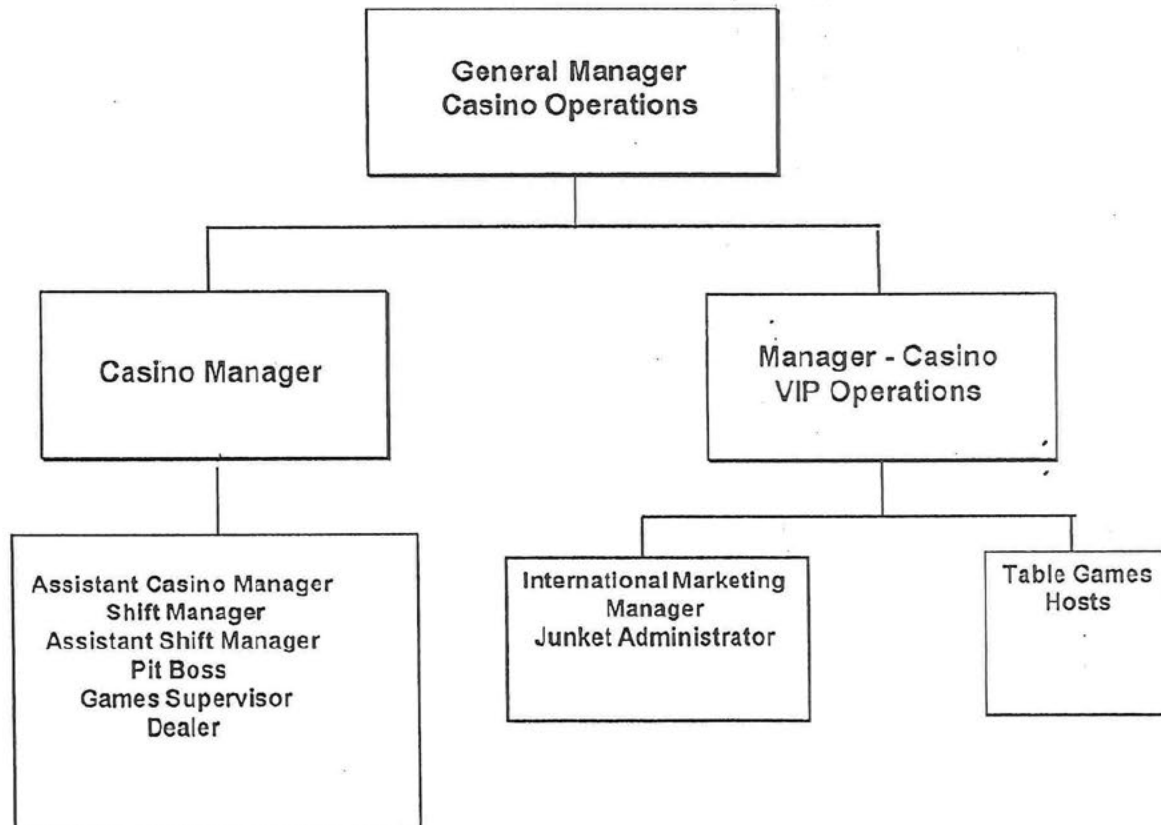
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TOWN CASINO LIMITED
Organisational Structure
Controlled Positions

Table Games Department



CROWN LIMITED**SYSTEM OF ACCOUNTING AND INTERNAL CONTROL****PART III - CHEQUE CASHING/CREDIT****A. GUIDELINES AND PHILOSOPHY FOR GRANTING CHEQUE CASHING AND CREDIT FACILITIES AND USE OF PERSONAL CHEQUES AND COUNTER CHEQUES AND CREDIT BY GAMING PATRONS**

The granting of cheque cashing and credit facilities and use of personal and Counter Cheques and credit in Crown will include comprehensive verification procedures and management's constant and consistent review of cheque cashing facility practices.

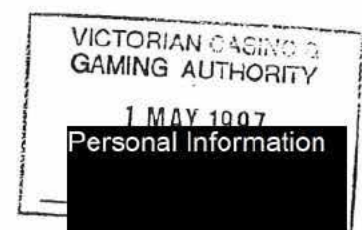
Cheque cashing facilities approved and authorised pursuant to this System of Accounting and Internal Control, whether in the form of personal cheques or Crown issued Counter Cheques may be exchanged for cash or Chip Purchase Vouchers, Table Game play or coin for Gaming Machine play.

AND

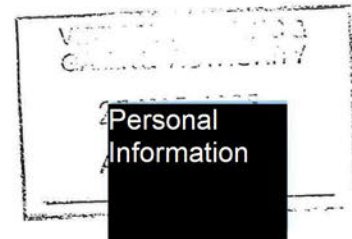
Outside the scope of Cheque Cashing Facilities as set forth above, Crown will allow for the cashing of patron's personal cheques for cash subject to limitations imposed by Crown as set out in Section C of this Part III.

Except as otherwise provided by this section, neither Crown nor any person acting on behalf of or under any arrangement with Crown will:

- i. Cash any cheque, make any loan, or otherwise provide or allow to any person any cheque cashing facilities or advance of anything of value or which represents value to enable any person to take part in gaming activity as a player; or
- ii. Release or discharge any debt which is uncollectable, either in whole or in part, which represents losses incurred by any player in gaming activity without maintaining a written record of the deposit, cheque return, and collection efforts as required by the Act and this System of Accounting and Internal Control.



- iii. Make any loan which represents any loss incurred by any person in gaming activity without receiving from the player in exchange therefore, a cheque for the loan, which conforms with the requirements of the Act and this System of Accounting and Internal Control.
- iv. No employee of Crown Casino or any person acting on behalf of or under any arrangement with Crown Casino may accept a cheque, other than a personal cheque, third-party cheque, recognised traveller's cheque, or other cash equivalent, from any person to enable such person to take part in gaming activity as a player, or may give cash or cash equivalents in exchange for such cheque unless the requirements of this System of Accounting and Internal Control concerning cheque cashing facilities, redemption, substitution, consolidation, collection and recording procedures are followed by Crown Casino and its employees and agents.



CROWN LIMITED

SYSTEM OF ACCOUNTING AND INTERNAL CONTROL

PART III - CHEQUE CASHING

B. CHEQUE CASHING FACILITIES

NOTE: In this Section, the term "Cage Cashier or above" refers to the positions of Cage Cashiers, Cage Supervisors, Cage Shift Managers and Cage Manager.

1. Application

A cheque cashing facilities file for each patron wishing to cash personal cheques and/or use Crown Casino prepared Counter Cheques in conformity with this section will be prepared by a Credit Control Representative or Cage Cashier or above with no incompatible functions, either manually or on computer before Crown Casino approves a patron's cheque cashing facilities limit. All patron cheque cashing facilities limits and changes thereto will be supported by the information contained in the cheque cashing facilities file. Such file will contain a Cheque Cashing Facilities Application Form (see sample form in Forms Submission) on which will be recorded, the following required information as provided by the patron:

- a. Patron's name.
- b. Home address of the patron.
- c. Date of Birth.
- d. 100 point identification process as required by Austrac.
- e. Verification Statement as required by Austrac.
- f. Banking information including:
 - i. Name and location of the patron's bank.
 - ii. Account number of the patron's personal cheque account on which the patron is individually authorised to draw. All Counter Cheques and all cheques used for substitution, redemption or consolidation will be drawn on one of these accounts. Cheque accounts which can be activated by one cheque signatory will be considered as personal

cheque accounts. Partnership or corporate cheque accounts will not be considered personal cheque accounts.

- g. The cheque cashing facilities limit requested by the patron.
- h. The patron's signature acknowledging the following statement, which is included at the bottom of every cheque cashing facilities application form:

Declaration:

"I declare that the above information is true and correct"

Terms and Conditions:

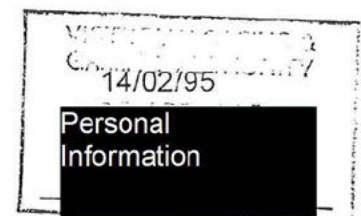
" I hereby authorise Crown Limited ("Crown"), in its sole discretion, to apply any and all gaming chips I may redeem and/or any funds held in other accounts with Crown first to the reduction of any outstanding cheque cashing facility balance, with the remainder, if any, to be returned to me.

I authorise Crown to seek access from National Australia Bank ("NAB") to Banker's Opinions containing any personal information about me including information about my consumer or commercial credit worthiness, credit history, credit standing or credit capacity and I appoint Crown as my agent for this purpose and authorise NAB to provide that information. If required Crown may forward this acknowledgement to NAB. I also acknowledge that Crown may exchange personal information about me with other casino operators."

In addition, to the extent such information is available and required by Crown Casino Management, the patron will provide for the following information on the Application Form.

- a. Patron's home telephone number.
- b. Passport Number, if applicable.
- c. Employment information including:
 - i. Name of the patron's employer, or an indication of self-employment or retirement.
 - ii. Type of business
 - iii Patron's position

- iv Number of years employed.
 - v Patron's business address.
 - vi Patron's business telephone number.
- d. The name of each gaming facility where the patron has a gaming cheque cashing facilities limit.
2. The Credit Control Representative or Cage Cashier or above with no incompatible functions will record the following information in the cheque cashing facilities file before Crown Casino allows the patron access to a patron's initial cheque cashing facilities limit:
- a. The type of identification credentials examined containing the patron's signature and whether said credentials included a photograph or general physical description of the patron or personal attestation by the Casino Games Shift Manager or above.
 - b. The signature of a Credit Control Representative or Cage Cashier or above with no incompatible functions stating that the signature of the patron in the cheque cashing facilities file appears to agree with the signature on the identification credentials presented by the patron, and that the physical description of the patron appears to agree with the patron's actual appearance. The date and time that the Credit Control Representative or Cage Cashier or above with no incompatible functions signs is recorded either manually or in the computer system contemporaneously with the transactions.



CROWN LIMITED

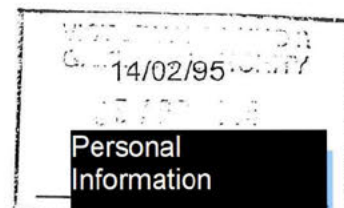
SYSTEM OF ACCOUNTING AND INTERNAL CONTROL

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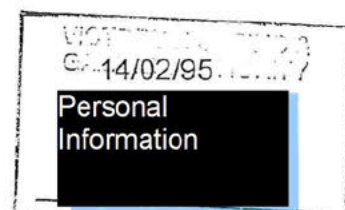
B. CHEQUE CASHING FACILITIES2. Verification

Prior to Crown Casino approval of the patron's cheque cashing facilities limit, a Credit Control Representative with no incompatible functions shall where practical:

- a. Verify the address of the patron's residence.
- b. Verify the patron's current gaming cheque cashing facilities limits and outstanding balances, if available through a recognised Casino Gaming Credit Bureau which shall include the following:
 - i. The date the patron's cheque cashing facilities account was established.
 - ii. The amount of the current approved cheque cashing facilities limit at each gaming facility.
 - iii. The current balance and status of the patron's cheque cashing facilities account at each gaming facility, including cheques deposited by other gaming facilities that have not yet cleared the bank and derogatory information. "Derogatory" is defined as patron cheque cashing facilities accounts partially or completely uncollectable, cheques returned unpaid by the patron's bank, settlements, liens, judgments, and any other cheque cashing facilities' problems of the patron.
- c. Assess the patron's outstanding indebtedness to the extent information is available by utilising a recognised Consumer Credit Bureau.
- d. Verify the patron's personal cheque account information which shall include, but not be limited to, the following:
 - i. Type of account (personal or sole proprietorship).
 - ii. Account number.
 - iii. Whether the patron can sign individually on the account.



- iv. Name and title of the person supplying the information.
- e. All verifications performed by the Credit Control Department above, together with accurate and verifiable information received from the Security and Surveillance Departments where requested, is recorded in the cheque cashing facilities file and accompanied by the signature of the Credit Control Representative who performed the required verifications or filed the relevant information. The date and time that the Credit Control Department Representative signed is recorded either manually in the cheque cashing facilities file or in the computer system, contemporaneously with the transaction. The Credit Control Department may perform verification procedures using one or more of the following steps:
 - i. Verification of the patron's home address, as required above, will be satisfied by confirming the patron's address with a Consumer Credit Bureau or bank. If neither of these sources has the patron's address on file or will not provide the information, Crown Casino may use an alternative source which will not include any identification credentials required above or other documentation presented by the patron at the gaming facility. Crown Casino will record the source of verification and the method by which such verification was performed in the patron's cheque cashing facilities file. Verification of the patron's address may be performed by the telephone via Directory Assistance or International Directory Assistance.
 - ii. Proof of the patron's current gaming cheque cashing facilities limits and outstanding balances, as discussed above, may be performed through direct contact with other gaming facilities or, if available, a centralised consumer agency which performs such services. Crown Casino will record the source of proof and the method by which such verification was performed in the patron's cheque cashing facilities file. If no gaming cheque cashing facilities information relating to the patron is available from these sources, this will be noted in the patron's cheque cashing facilities file. The confirmation may be performed by telephone before the cheque cashing facilities approval provided a Crown Credit Control Department Representative requests written documentation of all such information as soon as possible and includes such written documentation in the patron's file. All requests for written documentation will be maintained in the patron's file until such documentation is received.
 - iii. Assessment of the patron's outstanding indebtedness, as discussed above, may be obtained by contacting a Consumer Credit Bureau(s) which is reasonably likely to have information on the patron, to the extent such Consumer Credit Bureau is available, and a Gaming



Credit Bureau(s) to determine whether the applicant has any liabilities or if there is any derogatory information on the applicant's cheque cashing facilities history.

Such contact will be considered proof of the outstanding indebtedness provided by the patron. If such contact is not immediately possible, Crown Casino may use an alternative source which has made the required contact. Crown Casino will record the source of proof and the method by which such proof was obtained in the patron's cheque cashing facilities file.

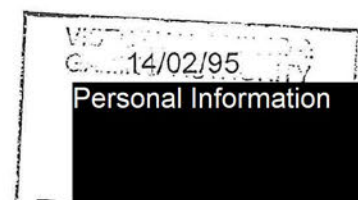
If either one or both of these Credit Bureaus as noted above do not have information on a patron's outstanding indebtedness, this is recorded in the patron's cheque cashing facilities file.

The proof may be prepared and obtained by telephone before the cheque cashing facilities approval, if a Crown Credit Control Department Representative, with no incompatible function, requests written documentation of all such information as soon as possible, and includes such written documentation in the patron's file. All requests for written documentation are maintained in the patron's file until such documentation is received.

- iv. Verification of the patron's personal cheque account information, as required above, is performed by Crown Casino or a bank verification service directly with the patron's bank. A bank verification service, utilised by Crown Casino, may make use of another bank verification service to make direct communication with the patron's bank.

If such information is not immediately available, Crown Casino may use an alternate source. Crown Casino will record the source of verification and the method by which such verification was performed in the patron's file. The proof may be obtained by telephone before the cheque cashing facilities approval, provided a Crown Credit Control Department Representative, with no incompatible function, or bank verification service requests written documentation of all such information as soon as possible, and such written documentation is included in the patron's file.

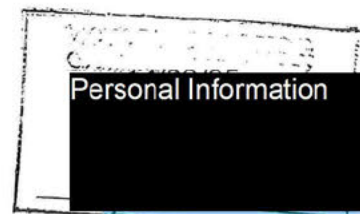
All requests for written documentation are maintained in the patron's file until such documentation is received. If a bank verification service is used as a primary source of verification, either directly by Crown Casino or by another bank verification service, each service and Crown Casino will, in addition to complying with any other requirement in this section, record the date that the patron's personal



cheque account information was received from the bank by the service.

- f. When performing verification steps as set forth in this Section B.2. if Crown Casino is unable to obtain bank or consumer credit data for any reason, Crown Casino will use its best efforts to obtain data sufficient upon which to base its extension of a cheque cashing facilities facility. In these instances, two authorised personnel will be required to approve any cheque cashing facility. (See Section B.3.a. of this Part III for authorised positions). Where oral approval is given, confirmation signatures of the personnel approving the facility must be obtained as soon as practical on their return to the premises.

Subsequently, Crown Casino will attempt to obtain the required bank information and other missing information, to the extent available, so that the Cheque Cashing privilege file is complete.



PART III - CHEQUE CASHING

B. CHEQUE CASHING FACILITIES3. Approval

- a. All gaming cheque cashing facilities are authorised and activated by the appropriate cheque cashing facilities authorisers as approved by management and documented in the patrons cheque cashing facility application form. The following employees have the authorisation to approve cheque cashing facilities or make changes to the approved limit as defined in the following approved criteria:

The following personnel must sign and date the Application for Cheque Cashing Facility after perusing bank opinions and references where possible and indicating whether the Application has been approved or declined.

- | | | |
|------|--|-----------------|
| i. | Credit Control Manager | up to \$2,000 |
| ii. | Gaming Shift Managers
Mahogany Room Operations Manager | up to \$20,000 |
| iii. | Mahogany Room Operations Manager/
Gaming Shift Manager/ and one of the following:
Vice President, International Business Development
Vice President, Japanese Marketing
Senior Vice President, International Marketing
President, Customer Relations | up to \$100,000 |
| iv. | Two of the following:
Vice President, International Business Development
Vice President, Japanese Marketing
Vice President, Mahogany Room Operations
Senior Vice President, International Marketing
Senior Vice President, International Business
President, Customer Relations
Executive Director, Finance
Chief General Manager, Operations
Chairman | up to \$200,000 |

VICTORIAN CASINO &
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Y:

- v. Two of the following: \$200,001 up to \$500,000

Senior Vice President, International Marketing
Senior Vice President, International Business
 President, Customer Relations
Executive Director, Finance
Chief General Manager Operations
Chairman

- vi. Two of the following: \$500,001 or above

Senior Vice President, International Business
Executive Director, Finance
Chief General Manager Operations
Chairman

The above groupings of employees also have the authority to approve This Trip Only (TTO) facilities. The total TTO amount approved for any patron by an employee/s must not exceed 50% of the employee/s permanent cheque cashing facility approval limits.

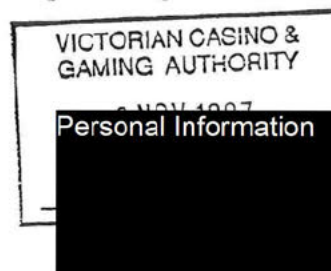
In the event authorisation is approved by telephone, a notation will be made on the patron's application form indicating those individuals contacted and the date of their approval. The application will then be signed upon their return to the premises.

All cheque cashing applications will be processed via the Credit Control Section. Applications received outside of business hours will be reviewed/completed by Cage personnel and, where necessary, appropriate authorisations sought. These applications will be checked and initialled by Credit Control the following business day.

The above employees can also authorise the re-activation of all cheque cashing facilities in case of suspension, after the required re-verification criteria has been met. The cheque cashing facilities file is given to a Credit Control Representative who will enter the approved cheque cashing facilities limit and the authorisation code into the patron's computer file.

The Credit Control Representative/Cage Cashier or above will access the patron's computer file by entering their password. The Clerk will then enter the patron's approved cheque cashing facilities limit along with the authorisation code of the employees who approved the limit. Employee Licence numbers are used by the system as authorisation code. To consummate the transaction, a Cage Supervisor or Credit Control Department Manager must enter their password into the system to authorise the transaction subsequent to verification of the documents.

A daily Cheque Cashing Facilities Limit Maintenance Report will be computer generated, listing any new cheque cashing facilities limits approved that day. The computer generated Daily Cheque Cashing Facilities Limit Maintenance Report will also include any increases or decreases made to cheque cashing facilities limits and



approved that day. The report will also include the person who entered the limit as well as who approved the limit.

This report will be forwarded daily to Credit Control and Internal Audit for review. The Credit Control Manager or designee will sign the report to signify that the report was reviewed for accuracy. The report will be maintained in the cheque cashing facilities office for six months. The Daily Cheque Cashing Facilities Limit Maintenance Report will contain the following:

- Patron name.
- Account number.
- Address.
- Cheque cashing facilities status.
- Previous limit.
- Current limit.
- Type of limit (i.e. TTO (This Trip Only) or permanent limit).
- Authoriser(s).
- Person who input.

- b. The approval is recorded in the cheque cashing facilities file and will include:
 - i. Any information used to support the cheque cashing facilities limit or changes to it, including the source of the information, if such information is not otherwise recorded as per the following section.
 - ii. A brief summary of the key factors or key factor codes (shown below) relied upon in approving or reducing the requested cheque cashing facilities limit and any changes thereto.
- c. Key Factor Codes

The following decision codes will be used to indicate the key factors relied upon in making the appropriate decision of granting or denying cheque cashing facilities. The appropriate code shall be documented in the space designated behind the signature of the Credit Control Department Manager in the patron's manual cheque cashing facilities file.

- i. Approval codes used to activate and/or increase a permanent cheque cashing facilities line and TTO's:

A-1 Bank report, central cheque cashing facilities, Credit Bureau Reports.

A-2 Bank report.

A-3 Central cheque cashing facilities history.

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ACN 006 973 262

DATE: _____

By signing below I _____
Agree to pay CROWN LIMITED

The Sum of _____

\$ _____

CROWN ACCOUNT _____

PATRON _____

CREDIT MARKER RECEIPT

TABLE: _____

DATE: _____

THE SUM OF _____

\$ _____

RECEIPT ONLY

CHIP PURCHASE VOUCHER

CROWN ACCOUNT: _____

DATE: _____

TABLE: _____

\$ _____

C
P
V

C
P
V

Dealer

Patron

Cage Supervisor

Cage Cashier

Pit Clerk

Games Supervisor

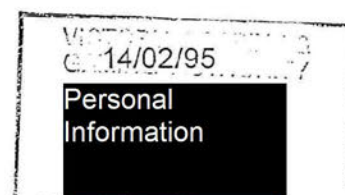
CHIP PURCHASE VOUCHER

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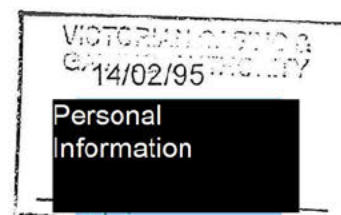
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- A-4 Credit Bureau Report.
 - A-5 Payment history at Crown Casino.
 - A-6 Income and/or assets at the time of approval.
 - A-7 Other — requires written explanation in the comments section of the cheque cashing facilities application or, if space is unavailable, on the display/update account messages screen in the patron's computer file.
- ii. Derogatory codes to be used if cheque cashing facilities are approved when derogatory information was received on the initial approval, permanent limit increase, TTO's, reinstatement of cheque cashing facilities limit or if cheque cashing facilities are denied:
- D-1 Bank report and/or Credit Bureau Report.
 - D-2 Payment history at Crown Casino.
 - D-3 Central cheque cashing facilities history (other clubs).
 - D-4 Income and/or assets at the time of approval.
 - D-5 Bank Error.
 - D-6 Gaming Facility Error - requires written notation as to reason, i.e., wrong BSB number, account number, place of payment, sent to wrong bank, endorsement missing, improper encoding, etc. in the comments section of the Cheque Cashing Facilities Application, or if space is unavailable, on the display/update account message screen in the patron's computer file.
 - D-7 Other — requires written explanation in the comments section of the Cheque Cashing Facilities Application or, if space is unavailable, on the display/ update account message screen in the patron's computer file.
- iii. The signature of the employee(s) approving the cheque cashing facilities limit. The date and time the signature is recorded either manually or by the computer contemporaneously with the transaction.
- d. Before approving a cheque cashing facilities limit increase, a representative of the Credit Control Department or a Cage Cashier or above will use best endeavours to:

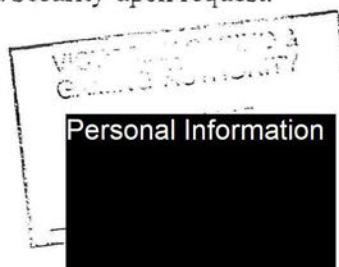


- i. Get a written request from the patron which will include:
 - Date and time of the patron's request.
 - Amount of the cheque cashing facilities limit increase requested by the patron.
 - Signature of the patron.
 - ii. Verify the patron's current gaming cheque cashing facilities limits and outstanding balances with other gaming facilities, unless that verification has been performed earlier that same gaming day.
 - iii. Proof of the patron's residence and personal cheque account information, as required above, unless these procedures were performed within the previous six months.
 - iv. Consider the patron's player rating based on a continuing evaluation of the amount and frequency of play after the patron's initial receipt of cheque cashing facilities. The patron's player rating is readily available to the Credit Control Department before approving a patron's request for a cheque cashing facilities limit increase.
 - v. Include the information and documentation required by paragraphs d.i. through d.iii. above, and the patron's player rating will be reviewed and verified at the time the cheque cashing facilities increase is approved and so indicated in the patron's cheque cashing facilities file.
 - vi. For any customer requesting to decrease his cheque cashing facilities limit, the Credit Control Manager or above must be contacted at this time so that the limit decrease can become effective immediately, and the customer's cheque cashing facilities application is marked to reflect the limit decrease. The most recent change is included in his original cheque cashing facilities file. It is the responsibility of the Credit Control Department to continually update its cheque cashing facilities information and reduce previously established customer cheque cashing facilities limits by making appropriate changes on their respective cards and obtaining the proper signature of the Credit Control Manager or above.
- e. A cheque cashing facilities limit increase may be approved without performing the requirements above if the increases are temporary and are noted as being for this trip only (TTO) in the cheque cashing facilities file.



The period of a TTO increase will be limited to the number of hold days and cheque clearing days as discussed in Section B-4 of this Part III.

- f. All transactions affecting a patron's outstanding indebtedness to Crown Casino will be recorded in chronological order in the patron's cheque cashing facilities file. All cheque cashing facilities transactions will be segregated from customer deposit transactions. The following information is included:
- i. Date, amount and cheque number of each Counter Cheque initially accepted from the patron.
 - ii. Date, amount and cheque number of each consolidation cheque and the numbers of the cheques returned to the patron.
 - iii. Date, method, amount and cheque number of each redemption transaction and the cheque number of the cheque returned to the patron.
 - iv. Date, amount and cheque number of each substitution transaction and the cheque number of the cheque returned to the patron.
 - v. Date, amount and cheque number of each cheque deposited.
 - vi. Date, amount and cheque number of each cheque returned to Crown Casino by the patron's bank and the reason for its return.
 - vii. Outstanding balance after each transaction.
 - viii. Date, amount and cheque number of any cheques which have been partially or completely written off by Crown Casino and a brief explanation of the reason for the write off.
- g. All information recorded in the cheque cashing facilities file will be in accordance with the Crown Casino System of Accounting and Internal Accounting Control.
- h. All actions to establish or modify a patron's cheque cashing facilities limit and all cheque cashing facilities transactions as recorded in the Cashier's Cage Department will be made available to Surveillance Department employees who are responsible for performing specific verification procedures on patron's cheque cashing facilities. These procedures include but are not limited to standard surveillance investigative procedures regarding patron background and activity. Patron cheque cashing facilities activity is available to Surveillance/Security upon request.



i. Signature Verification System

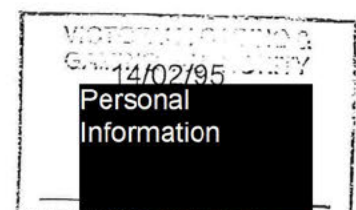
Crown Casino may use a computerised signature verification system. When a new cheque cashing line is established or the first time a cash deposit account is established, the patron's signature will be entered into the computerised signature verification system and verified.

The signature system will be held in the Casino cage. Access to the on-line file of computerised signatures is by inquiry only by Pit or Cage CRT Terminals. The security is controlled by the main frame security system which requires a password to inquire into the file.

Prior to the patron's account being activated, the Cage employee will verify that the patron's computerised signature appears to agree to the actual patron's signature appearing on the Patron's Signature Card and/or cheque cashing facilities application.

This verification will be documented by the Cage employee signing the Patron Signature Card or cheque cashing facility application.

In the event the computerised signature verification system is unavailable, the original or copy of the Patron's Signature Card will be used as a basis of signature verification for cheque cashing facilities.



PART III - CHEQUE CASHING

B. CHEQUE CASHING FACILITIES

4. DEPOSIT AND CLEAR

- a. All cheques, unless redeemed or consolidated prior to the requirements herein, received from gaming patrons and made payable to Crown Casino, Ltd. in conformity with this System of Accounting and Internal Control will be deposited in Crown Casino's bank account in accordance with Crown Casino's normal business practice. Crown Casino's normal business practice concerning the depositing of cheques is for next banking day deposit unless held in conformity with provisions below and as approved by the Credit Control Manager or above on the cheque cashing facility form:
 - i. Cheques drawn on banks within Australia will be held to a maximum of five (5) business days, except where the drawer of the cheque is an overseas resident. In such cases, the cheques will be held to a maximum of twenty (20) business days. The drawer will submit evidence of this residency when establishing the cheque cashing facility.
 - ii. Cheques drawn on banks outside of Australia will be held to a maximum of twenty (20) business days.
- b. In the event of a series of consolidation, substitution or redemption transactions with a patron, they are redeemed in LIFO order. Cheques may be redeemed out of LIFO order only if they are redeemed using cash or other cleared funds, other than a personal cheque. In such circumstances, approval must be provided by the Gaming Shift Manager or above, and the Senior Authority Inspector on duty must be advised in writing.

For the purposes of determining the maximum number of days for which the cheques used to consolidate, substitute or redeem other cheques can be held, the commencement date of the holding period will be deemed to be the date of the earliest dated cheque in the group of cheques being consolidated, redeemed or substituted.

Cheques awaiting clearance through the banking system are held against the patron's cheque cashing facilities limit. Crown Casino's normal business practice regarding time allotted for cheques to clear the bank is in accordance with Australian banking regulations.

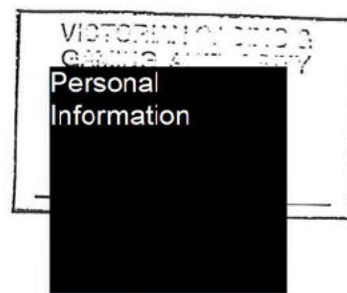
Personal
Information

5. EARLY CLEAR POLICIES ON CHEQUES

The purpose of this procedure is to verify that a personal cheque or counter cheque has cleared a patron's bank. If the patron's bank verifies the document has cleared, that portion of the cheque cashing facility limit will become available.

The Cage Cashier or above receiving information from the patron's bank will:

- a. Verify information that the document has cleared the patrons bank.
- b. Make a notation of the above in the early clear register.
- c. Early clear cheque in computer system.
- d. Inform the Credit Control Department of early clear if required.



CROWN LIMITED

SYSTEM OF ACCOUNTING AND INTERNAL CONTROL

PART III - CHEQUE CASHING

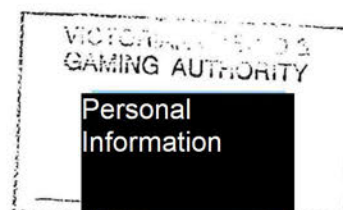
C. LIMITED CHEQUE CASHING

1. Outside the scope of cheque cashing facilities as discussed in Part III of this System of Accounting and Internal Control, Crown Casino will allow limited personal cheque cashing for cash at the Casino Cage with a Cage Cashier.
2. Limited personal cheques can be approved by the following staff:

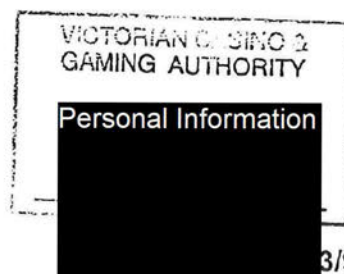
Personnel in the job capacities referred to in Section B3 of Part III;
Cage Manager;
Cage Shift Manager; and
Cage Supervisor.
3. Crown has entered into an arrangement with Telecheck, an external cheque clearing agency, to facilitate the clearing of limited cheques.
4. A patron must produce a driver's licence or passport as identification when presenting a limited cheque. Cage personnel enter the details of the patron and the identification produced on an Account Reference Card and agree the signature on the identification to the signature on the cheque.

A patron who is unable to produce the above identification may still be authorised to have access to limited personal cheque cashing by gaming management or cage management, provided the patron has been known to the authorising employee for at least 36 months. The authorising employee must attest to knowing the patron for this period on the patron's Account Reference Card.

5. The following procedures are followed when dealing with Telecheck
 - the Cage Supervisor or above swipes the limited cheque through a Telecheck terminal and enters the amount of the cheque into the terminal. The terminal display shows if the cheque amount entered is approved or disallowed by Telecheck.
 - If a cheque is approved, the patron receives cash to the value of the cheque. The cheque details are recorded in the system and the cheque treated in the same manner as cheques received through a cheque cashing facility.



- **If a cheque which has been approved by Telecheck is subsequently dishonoured by the bank, Telecheck is liable for the dishonoured amount. The Credit Control Manager is responsible for invoicing and receiving payment from Telecheck.**
 - **If a cheque is disallowed by Telecheck, the patron is informed that Crown will not accept the cheque.**
6. The maximum allowed for these limited personal cheque transactions cannot exceed \$500 per patron per day.
 7. These limited personal cheque transactions will be deposited the banking day following the transaction.
 8. **If the Telecheck system is unavailable and Crown is unable to obtain an opinion on a cheque, the patron must present two forms of identification.**



CROWN LIMITED**SYSTEM OF ACCOUNTING AND INTERNAL CONTROL****PART III - CHEQUE CASHING****D. RESTRICTED CHEQUE CASHING**

1. Outside the scope of cheque cashing facilities as discussed in Part III of this System of Accounting and Internal Control, Crown Casino will allow restricted personal and counter cheques for negotiation for chips at the gaming tables or for cash at the Cage.

2. **Definition**

'Restricted Cheque Cashing' facility means that a person may be authorised by specified senior personnel of Crown to cash a personal or a counter cheque without first having to complete an application for a cheque cashing facility as required pursuant to Part III B. In certain circumstances, Crown may accept a personal or a counter cheque from an approved patron without completing an application and providing personal details.

3. Approval of these restricted personal and counter cheques will be by one of the following persons:

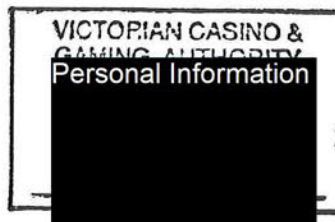
Chairman
Chief Operating Officer

The approval level of the above for Restricted Cheque Cashing will be the same as for Cheque Cashing Facilities, as detailed in Section B.3.

Where the approval is given verbally to a Crown authorised employee, written approval from the approving person shall be obtained as soon as practical. For the purposes of this Section D, the following persons are deemed to be authorised employees:

General Manager Casino Games
General Manager International Operations
Gaming Shift Managers

In such instances, the authorised officer's approval level for restricted cheque cashing shall be the same as the approving person's Cheque Cashing Facilities approval level, as detailed in Section B.3.



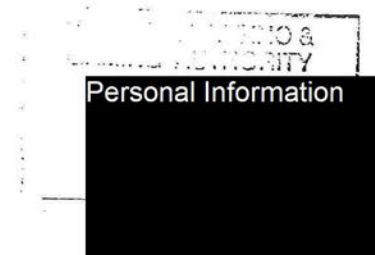
In such instances, the authorised officer's approval level for restricted cheque cashing shall be the same as the approving person's Cheque Cashing Facilities approval level, as detailed in Section B.3.

- 4 Identification and approval procedures relating to these restricted personal and counter cheques shall be at the discretion of the above authorising personnel.
5. A restricted personal or counter cheque may be negotiated at a gaming table for chips with the approval of the above authorising personnel.

In all circumstances, a Chip Purchase Voucher will be raised by Cage personnel and delivered by Cage management to the gaming table and exchanged for the restricted personal or counter cheque.

Restricted personal and counter cheques will be negotiated through the patron's account in the same manner as other cheques discussed in this Part III.

6. Restricted personal and counter cheques will be deposited in the same manner as cheques received through a Cheque Cashing Facility, as detailed in Section B.4.



CROWN LIMITED

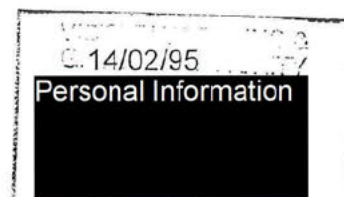
SYSTEM OF ACCOUNTING AND INTERNAL CONTROL

E. EXPIRATION AND SUSPENSION OF CHEQUE CASHING FACILITIES

For customers with cheque cashing facilities, Crown Casino Credit Control will:

1. Comply with the requirements of either 2 and/or 3 below whenever:
 - a. A patron's cheque cashing facilities file has been inactive for a twelve-month period.
 - b. A patron has not completely paid off all outstanding balances at least once within a six-month period.
 - c. A cheque is returned to Crown Casino by a patron's bank.
 - d. Any information is received by Crown Casino Credit Control which reflects negatively on the patron's continued cheque cashing facilities worthiness.
 - e. The information in the patron's cheque cashing facilities file as required by 2a through 2d in Section B above, has not been verified for a twelve month period.
2. Re-verify the patron's address, current gaming cheque cashing facilities limits, outstanding balances, outstanding indebtedness, and personal cheque account information, as required by Section B.2.e. above.
3. Suspend the patron's facilities. If a patron's cheque cashing facilities have been suspended, the procedures required by 2a through 2d in Section B will be performed before that patron's cheque cashing facilities are reinstated. However, if the suspension is the result of the requirement of c above, Crown Casino may alternatively reinstate the patron's cheque cashing facilities by following the requirements below.

Any patron having a cheque returned to Crown Casino unpaid by the patron's bank will have his cheque cashing facilities suspended by Crown Casino until such time as the returned cheques have been paid in full or the reason for the derogatory information has been satisfactorily explained.

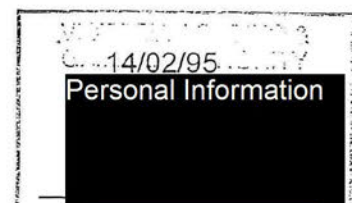


All derogatory information concerning a patron's cheque cashing facilities account will be maintained in the patron's file and reported by Crown Casino on a daily basis, or as necessary, to the Gaming Credit Bureau used by Crown Casino.

All documentation received from the Gaming Credit Bureau is maintained in the patron's cheque cashing facilities file.

If Crown Casino desires to continue the patron's cheque cashing facilities on the basis that a satisfactory explanation was received for the returned cheque, it may do so if the explanation for its decision is recorded in the cheque cashing facilities file before accepting any further cheques from the patron.

The signature of the Credit Control Representative accepting the explanation must also be recorded.



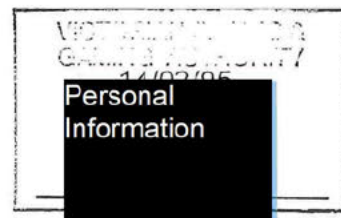
CROWN LIMITED

SYSTEM OF ACCOUNTING AND INTERNAL CONTROL

PART III - CHEQUE CASHING

F. COLLECTION PRACTICES FOR CHEQUES RETURNED AFTER DEPOSIT AND;G. POLICY FOR WRITE-OFF OF CHEQUES RETURNED AFTER DEPOSIT

1. All dishonoured Gaming cheques returned by the bank, are returned to Credit Control Department which lists the cheques on the Return Cheque Log and inputs returned cheque details into the computer system and then transfers the Return Cheque Log and the return cheques to the Cheque Bank in the Cage where they will be filed and maintained. A copy of the Returned Cheque Log is forwarded to the Credit Control Department. The Return Cheque Log must contain the signature of the Credit Control Manager or designate attesting to the accuracy of the information recorded on the Return Cheque Log, and the signature of the Cheque Bank Cashier receiving the Returned Cheque Log and the return cheques in the Cheque Bank.
2. Generally, no person other than a Credit Control Department representative may engage in efforts to collect on returned cheques. However, in conduct of international and junket gaming activities, marketing and player development personnel with appropriate patron contacts may engage in collection activities. These efforts will be coordinated with Credit Control Department and documented in the Collection file maintained by Credit Control Department.
3. Continuous records of all returned cheques are maintained by the Credit Control Department. The Collections Patron File contains the following:
 - a. Date of birth
 - b. Name, address and telephone number of the drawer
 - i. Residence
 - ii. Work
 - c. A note as to where mail is to be sent



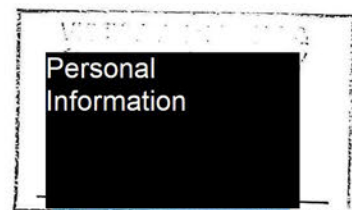
- d. The drawer's:
 - i. Bank name.
 - ii. Address.
 - iii. Account number.
 - iv. BSB number.
 - e. Amount of the cheque.
 - f. Date(s) the cheque was dishonoured.
 - g. Counter Cheque serial number for Counter Cheques.
 - h. Date(s) and amount(s) of payments received on the cheque after being returned by a bank.
4. Any cheque dishonoured by the bank will be immediately re-deposited if Crown Casino believes that the cheque will be honoured the second time.

The Cheque Bank Cashier maintains the returned cheques and a computer generated Returned Cheque Log. The Returned Cheque Log is used by the Cheque Bank Cashier to balance the documentation of the return cheques and is generated shift to shift and contains the following:

- a. The balance of returned gaming cheques on hand at the beginning of the shift.
- b. Patron's name.
- c. Patron's computer assigned account number.
- d. Payments received.
- e. Returned cheques received.
- f. Signature of incoming and outgoing Cheque Bank Cashiers.

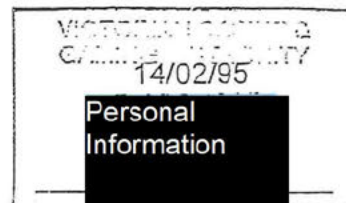
The closing balance on the Returned Cheque Log is reconciled by the Cheque Bank Cashier to the returned cheque alpha file, at a minimum, weekly.

5. Follow-up action is taken by the Credit Control Department, as soon as practical upon initial receipt of a returned cheque or immediately upon receipt of a cheque returned for a second time when re-deposit was made as provided in 4. above. All correspondence supporting collection efforts is maintained and controlled by the Credit Control Department.



6. After reasonable collection efforts, which can include, by way of example a pattern of telephone collection attempts, sending of letters and statements, institution of suit and other efforts returned cheques may be considered uncollectable for accounting purposes, and charged to Crown Casino's allowance for uncollectable patron's cheques.
 - a. Any patron's indebtedness, more than \$1,000, may only be considered uncollectable for Accounting purposes and charged to the allowance for uncollectable patron's cheques account after the following information has been included in the patron's cheque cashing facilities file:
 - i. Documentation by two Crown Casino employees showing independent efforts, to collect the patron's outstanding cheques, and the reason why such collection efforts were unsuccessful and/or:
 - ii. A letter from a Solicitor or Collection Agency representing Crown Casino documenting the efforts to collect the patron's outstanding cheques, and the reason why such collection efforts were unsuccessful or were not pursued further.
7. Listing of uncollectable cheques shall be approved in writing by the Authority and, at a minimum, the Director Administration & Finance for cheques less than \$10,000 and the Director Administration & Finance and Chief Operating Officer for cheques greater than \$10,000. Such cheques and listing are maintained and controlled by the Cheque Bank Cashiers.

A continuous trial balance of cheques written off is maintained by Cheque Bank Cashiers with no incompatible functions. This trial balance is adjusted upon receipt of any payment.



CROWN LIMITED

SYSTEM OF ACCOUNTING AND INTERNAL CONTROL

PART III - CHEQUE CASHING/CREDIT

H. CREDIT FACILITIES

General

Section 68 (8) of the Casino Control Act provides as follows:

“Despite sub-section (2), a casino operator may provide chips on credit to a person who is not ordinarily resident in Australia for use while participating in:

- (a) a premium player arrangement with the casino operator; or
- (b) a junket in the casino -

if the casino operator and person satisfy the requirements of any relevant controls and procedures approved by the Authority under section D1 in respect of a premium player or junket player (as the case may be).”

Accordingly, the provision of credit facilities will only apply to persons who reside outside of Australia and who qualify for Commission Based Player Programs as detailed in Part IV of the Internal Control Manual.

The application of Credit facilities is restricted only to these Commission Based Players who reside outside of Australia and will generally be persons of high net worth with a high propensity to gamble and a known capacity to meet their debts as and when they fall due.

1. Approval

- a. All credit facilities are authorised and activated by the appropriate credit facility authorisers as approved by management and documented in the patron’s credit facility application form. The employees set out below have the authorisation to approve credit facilities. Credit is provided only to bona fide Commission Based Players who reside outside of Australia and this would form the basis for such patrons entering into negotiation with Crown to ascertain whether the patron would qualify for a line of credit. Crown must conduct various checks to determine whether it will extend Credit and this process is similar to the requirement for cheque cashing prerequisites.

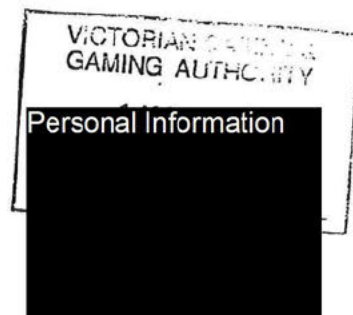
The following personnel must sign and date the Application for Credit Facility after appropriate checking of a patron as specified in 2 (i) below and where possible indicating whether the Application has been approved or declined:

- (i) Two of the following
- Senior Vice President International Business** up to \$500,000
Executive Director, Finance
Chief General Manager, Operations
- (ii) The following positions in conjunction with the Chairman \$500,001 or above
- Senior Vice President, International Business**
Executive Director, Finance
Chief General Manager, Operations

2. Procedures

- (i) The provision for credit will operate under guidelines similar to Crown's cheque cashing facilities. Patrons will be required to complete an application form and this will be used to assess their credit worthiness. As part of the verification process, Crown will also utilise the services of the Central Credit Gaming Bureau based in Nevada, United States of America to establish if the person is known at other casinos and in particular they meet their debts as and when they fall due. The processes will also include a request for the applicant to complete a consent form in order to obtain a Bankers opinion. Where applicable, Crown will also use relevant and legally obtained information on the applicant through its international office network or based on its previous experience with knowledge of the patron. If approval is granted, the patron will be required to sign a credit marker/counter cheque each time they wish to purchase gaming chips.
- (ii) A three (3) part form will be generated which will include a credit marker or counter cheque, a patron receipt and a form similar to a Chip Purchase Voucher (CPV). The credit marker or counter cheque will be signed by the patron. The lower portion will be dropped immediately on receipt at the gaming table and will be treated as drop for taxation and accounting purposes.
- (iii) At the completion of the patron's visit to the casino, the patron may redeem the credit marker or counter cheque by way of re-purchasing for cash, gaming chips, cash equivalent or a personal cash cheque.
- (iv) Crown will have the option of holding the credit marker or counter cheque for a period of 30, 60 or 90 days or for a period negotiated directly and agreed by the parties.
- (v) Prior to the expiration of the agreed time, Crown will provide the patron with advice detailing the amounts due. The debt can subsequently be cleared either by Telegraphic Transfer, cash or cash equivalent.

- (vi) All credit marker/counter cheques relating to credit players will be processed through Crown's Cheque Bank and be subject to the normal accounting procedures as detailed in Part V of the Internal Control Manual.



APPLICATION FOR A CREDIT FACILITY

1. APPLICANT DETAILS

2. OTHER CASINOS

Mr/Mrs/Ms/Miss/Dr:

Surname:

Other Names:

Residential Address:
 Street:
 City:
 Country:
 Postal Address (if different to the above):

 National ID No (if applicable):.....
 Place of Issue:
 Date of Issue: / /
 Date of Birth: / /
 Telephone No: Home:
 Work:
 Fax No:

Do you have cheque cashing or credit facilities with other casinos in Australia or elsewhere:

Yes No

If yes, list casinos and limits:

3. CHEQUE ACCOUNT DETAILS (Please ensure that you are the sole signatory on Accounts listed)

Bank Name:
 Branch Name:
 Branch Address:
 Cheque Account Name:
 BSB No: Account No:

2.
 Bank Name:
 Branch Name:
 Branch Address:
 Cheque Account Name:
 BSB No: Account No:

AMOUNT OF CREDIT FACILITY REQUESTED: \$ _____

Declaration: I declare that the above information is true and correct.
Terms and Conditions: I hereby authorise Crown Limited ("Crown"), in its sole discretion, to apply any and all gaming chips I may redeem and/or any funds held in other accounts with Crown first to the reduction of any outstanding credit facility balance with the remainder, if any, to be returned to me. I authorise Crown to seek access from National Australia Bank ("NAB") to Banker's Opinions containing any personal information about me including information about my consumer or commercial credit worthiness, credit history, credit standing or credit capacity and I appoint Crown as my agent for this purpose and authorise NAB to provide that information. If required, Crown may forward this acknowledgment to NAB. I also acknowledge that Crown may exchange personal information about me with other casino operators. This credit facility is governed by the laws of Victoria, Australia.
 I hereby agree that I will repay my full debt to Crown Limited in respect of the credit facility within _____ days from the date of issuance of the marker settlement.

Patrons Signature: Date: / /

OFFICE USE ONLY

Identification – 100 Point Check (photocopies of ID must accompany Application Form)

Type of ID	Details	Expiry Date	Points

Application taken by: ID checked by Date:..... / /

FACILITY APPROVED FACILITY DECLINED AUTHORISED DAYS OF CREDIT

Amount	Date	Signature	Lic #	Date	Signature	Personal Information	Computer

***** Credit Marker *****

(Patron Name)

(Credit Marker No:)

(Date & Time)

By Signing below I agree to pay Crown Limited the sum of

(AUD Amount Numerical)

(AUD Amount Written)

Payable in Australian Dollars

(Signature)

(Patron Name)

(Syco Program Name)

Crown Galleria

(Cashier's Login)

A C N 006 973 262

Credit Marker Receipt

(Gaming Table I.D.)

(Issuance Date)

(Patron's Crown Account Number)

(Patron Name)

(Credit Marker No:)

(AUD Amount Written)

Payable in Australian Dollars

Credit Marker Amount :

(Amount AUD Numerical)

Type CM X (Number of Credit Markers Issued)

(Amount AUD Numerical) X (Number of Credit Markers Issued)

*** Receipt Only ***

*** Receipt Only ***

*** Receipt Only ***

*** Receipt Only ***

***** Credit Marker Voucher *****

* (Credit Marker No:)

(Patron Name)

(Patron's Crown Account Number)

* (AUD Amount Written)

(Amount AUD Numerical)

* Dealer

(Patron Signature)

***** Credit Marker Voucher *****

Issued By : (Cashier Licence Number)

(Date)

(Time)

(Station)

Cage Supervisor

Cage Cashier

Game Supervisor

Pit Clerk

VICTORIAN CASINO & GAMING AUTHORITY

Personal Information