

MinterEllison

14 August 2019

**CONFIDENTIAL
BY EMAIL**

Mr Adam Ockwell
Director, Compliance
Victorian Commission for Gambling and Liquor Regulation
Level 3
12 Shelley Street
RICHMOND VIC 3121

Dear Mr Ockwell

Crown - Section 26 Notice

We are instructed to act for Crown in connection with your letter dated 9 August 2019 giving notice under Section 26 of the *Casino Control Act 1991* (Vic) (**Act**) requiring the provision of the information and records specified in your letter.

Crown is appreciative of the VCGLR accommodating Crown's request for a short extension of time to respond to questions 2 and 3 in your letter, to be answered in conjunction with questions 5, 6 and 7. The purpose of this letter is to provide answers to questions 1 and 4.

We note the preliminary remarks in your letter, including the reference to the Crown Melbourne Limited Internal Control Statement – Junket and Premium Player Programmes, Version 10.0 approved on 24 December 2015 (**ICS**). As you will see from the response to question 1, Crown's first relevant dealings with each of the 'Relevant Entities' referred to in your letter were well prior to 24 December 2015.

Given that many of the records sought by your letter would have been made many years ago, this response has been prepared without the benefit of review of all such records, and may therefore need to be amplified or qualified by Crown's responses to the further questions.

In response to questions 1 and 4 in your letter:

1. Dates of entry into arrangement with Relevant Entities

Crown first dealt with each of the Relevant Entities in relation to the conduct of junket operations on the following dates:

- (a) *Mr Alvin Chau (and/or the Suncity Junket)*: Mr Chau became a registered Junket Operator on 10 September 2009;
- (b) *Mr Tom Zhou, aka Mr Chinatown*: Mr Zhou became a Junket Player from 21 September 2008;
- (c) *Mr Zhou Yuan Pan, aka Mr Simon Pan*: Mr Pan became a Junket Representative on 29 December 2012.
- (d) *Mr Roy Moo*: Mr Moo became a Junket Operator on 4 November 2002 and a Junket Representative on 25 February 2003; and
- (e) *Mr Zezhai Song*: Mr Song became a Junket Operator on 11 June 2009 and a Junket Player on 7 October 2010.



4. Current status of Relevant Entities

Paragraph 4a.

- 4.1 Of the Relevant Entities, only Mr Chau and Mr Song are still both Junket Operators and Premium Players.
- 4.2 Subject to paragraph 4.3(b) below, Crown does not otherwise have a relationship with any of the Relevant Entities as Junket Operators, Junket Players or Premium Players.

Paragraph 4b.

- 4.3 Crown has taken various actions to cease its relationships with Messrs Zhou, Pan and Moo, as follows:
 - (a) *Mr Zhou:* On 11 May 2010, Mr Zhou was self-excluded from the licenced gaming areas of the Melbourne casino. Mr Zhou self-excluded from the licenced gaming areas of Crown Perth on 27 March 2016.

Mr Zhou was also issued with a withdrawal of licence on 11 February 2019 for entering into a licenced gaming area of the Melbourne casino and engaging with another patron in an inappropriate manner.
 - (b) *Mr Pan:* In light of recent media reports, Crown has conducted further probity checks and determined to issue Mr Pan with a withdrawal of licence. As at the date of this letter, that determination has been approved by the Crown Melbourne Persons of Interest Committee, with the withdrawal of licence yet to be formally served on Mr Pan. Mr Pan's image will be loaded to the facial recognition technology by the end of this week, in accordance with the usual practice for excluded persons.
 - (c) *Mr Moo:* Mr Moo was issued with a withdrawal of licence on 21 March 2013 as a result of Crown becoming aware of him being charged with dealing in proceeds of crime. Crown assisted law enforcement authorities with information they sought in connection with the prosecution of Mr Moo.

Following his release from custody, Mr Moo has applied twice (once in 2014 and once in 2016) to revoke his withdrawal of licence. Crown refused both applications.

Paragraph 4c.

- 4.4 As a result of recent media, Crown has performed a number of additional due diligence checks, including of Dow Jones Risk and Compliance, and Factiva databases. Other than the media articles themselves (which commenced on 26 July 2019), these searches have not produced any additional relevant information not previously known to Crown.
- 4.5 Crown is still assessing what if any action to take in respect of Messrs Chau and Song and intends to liaise with the VCGLR in this respect.
- 4.6 With the exception of Messrs Chau and Song, none of the Relevant Entities remain registered as Junket Operators, Junket Players or Premium Players. As such, Crown does not intend to conduct further ongoing probity monitoring in respect of them.

Crown notes for completeness that the information contained in this correspondence is confidential and provided to the VCGLR pursuant to section 26 of the Act.

We trust that this is sufficient for the purposes of the request for information today, but please let us know if anything further is required.

Yours faithfully
MinterEllison



**Richard Murphy / Glen Ward
Partners**

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