



7 May 2021

By mail and email: [REDACTED]

Mr Ross Kennedy  
 Chairperson  
 Victorian Commission for Gambling and Liquor Regulation  
 Level 3, 12 Shelley Street  
 RICHMOND VIC 3121

Dear Mr Kennedy,

I refer to the Victorian Commission for Gambling and Liquor Regulation (VCGLR) review into former Crown patron Simon Pan, which led to the VCGLR issuing Crown Melbourne a Show Cause Notice on 2 October 2020 and subsequently taking disciplinary action against Crown as outlined in its letter of 27 April 2021.

In reviewing this matter, I have recently identified two matters which I would like to bring to the VCGLR's attention to ensure it is fully informed.

*Revocation of Withdrawal of Licence*

The first matter relates to Mr Pan's initial three-month Withdrawal of Licence (WOL) in February 2019. I was recently reminded that the WOL was revoked on 8 March 2019. The circumstances surrounding the WOL and later revocation are outlined below:

- Mr Pan was issued a WOL on 21 February 2019 for a three month period as a result of several attempts to bring excluded patrons into the Mahogany Room and a history of abusing employees when asked to produce his membership card upon entry, or when signing in guests. I became aware of the WOL on 22 February 2019 when a senior member of VIP International brought it to my attention.
- My recollection is that I was told that Mr Pan believed the WOL was excessive and wanted it reviewed. At that time, I had no knowledge (and was not made aware) of Mr Pan's background or previous behavioural issues at Crown, I asked the VIP International team member to discuss the request with senior representatives of Table Games and Security and come to a decision, which they subsequently did after meeting with Mr Pan on 8 March 2019. I was advised of their decision and the WOL was revoked on 8 March 2019.
- Whilst the revocation was recorded in our casino management system, it was not known by Mr Barton when instructing Crown Melbourne in responding to the Show Cause Notice on 30 October 2020. Separately, I did not recall this matter when reading material prior to appearing before the VCGLR on 21 January 2021 and consequently I did not bring it to the VCGLR's attention at that time. However, I wanted to ensure that this fact was known to the VCGLR.



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*Entry into Crown Perth*

The second matter relates to Mr Pan visiting Crown Perth after the WOL was issued at Crown Melbourne on 16 August 2019. Previously, I had understood that Mr Pan had been excluded from all Crown Resorts properties. However, it has recently come to my attention that:

- Despite the 16 August 2019 WOL being intended to apply to Mr Pan at all Crown Resorts properties, this was not implemented at Crown Perth until a Notice Revoking Licence (NRL), the Western Australian equivalent of a WOL, was recorded against his Crown Perth profile in June 2020. However, stop codes were not placed on Mr Pan's Crown Perth account until December 2020.
- The stop codes were intended to prompt staff to serve Mr Pan with the NRL when he next visited. However, Mr Pan had multiple accounts and the stop codes were not applied to each.
- The error was detected by Crown Perth staff in January 2021, and stop codes were applied to all accounts associated with Mr Pan. An NRL to enter Crown Perth was served on Mr Pan on 15 January 2021.
- In total, Mr Pan entered Crown Perth's Pearl Room 29 times post 16 August 2019:
  - 7 times between 21 and 29 August 2019, as an interstate program player;
  - On 13 February 2020, as a guest of another player; and
  - 21 times as a guest of another player between 26 December 2020 and 15 January 2021.

I am not aware of the reason the NRL was not issued by Crown Perth at the same time the WOL was issued by Crown Melbourne, or why stop codes were then not applied until December 2020. Nor am I aware of how Mr Pan was able continue to utilise multiple accounts and circumvent the stop codes applied in Crown Perth, as these accounts should have been deactivated prior to this issue arising. An investigation as to how this occurred is currently in progress, and I intend to update you further once the findings of that investigation are received.

I wish to re-emphasise Crown's intention to be transparent and proactive with all of our regulators, including the VCGLR. For this reason, I believe it to be important to bring these matters to your attention.

Please do not hesitate to contact me should you have any queries in respect to these matters.

Yours sincerely,



**Xavier Walsh**  
Chief Executive Officer  
Crown Melbourne Limited

Copy: Catherine Myers, Chief Executive Officer, VCGLR  
Scott May, Director Legal Services & General Counsel, VCGLR  
Helen Coonan, Executive Chair, Crown Resorts Limited