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18 June 2021

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

Dear Mr Philips and Ms Gill

Royal Commission into the Casino Operator and Licence

We refer to

- the letter from the Commissioner to the directors of Crown Melbourne Limited (**Crown**) dated 10 March 2021, including a Schedule that requested that Crown identify (among other things) all actual or potential breaches of certain specified laws going back to 1 January 2010 (**RFI-002**);
- our letters dated 24 March 2021 and 21 April 2021, providing responses (in tranches) to RFI-002; and
- the Notice to Produce with the reference number NTP-061 concerning the response to RFI-002.

As foreshadowed in our letter dated 21 April 2021, Crown has continued to review its files for further information that may be responsive to RFI-002. We enclose the following schedules and information setting out a further tranche of Crown's further response to RFI-002. Unless indicated otherwise, capitalised terms are as defined in that response.

Schedule 1

Schedule 1 has been prepared following an analysis of further files maintained by Crown's Compliance department and certain legal advices and sets out Crown's third tranche response to questions 1 and 2 of RFI-002, concerning conduct that would, or might, breach any provision of the *Casino Control Act 1991* (Vic), the *Casino (Management Agreement) Act 1993* (Vic), the *Gambling Regulation Act 2003* (Vic) and the *Gambling Regulations 2015* (Vic) (**Casino Legislation**).

In addition to the conduct described in the Schedule, there are three further matters that Crown wishes to raise for the Commission's attention.

First, Crown has identified a number of instances of (non-executive level) employee misconduct concerning (among other things) theft and employee/patron collusion. Crown has not included details of those instances in the Schedule but would be willing to provide those details should the Commission wish to see them. Further, Crown generally has not included in its previous responses to RFI-002 or in this response, a number of procedural or minor breaches of the casino legislation in respect of which the Victorian Commission for

Our Ref MTMM:120999183
MTMM 514835576v3 120999183 18.6.2021

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Gambling and Liquor Regulation was aware but took no action. Crown would be willing to provide details of those matters should the Commission request them.

The second matter is Crown's approach of deducting from 'Gross Gaming Revenue' amounts in respect of certain 'bonus jackpots' which might amount to a contravention of the *Casino (Management Agreement) Act 1993* (Vic) and the Management Agreement. Since the matters raised by Counsel Assisting the Commission in the hearing on 7 June 2021, the board of Crown Resorts Limited has commenced its own urgent legal review of this matter.

The third is that, in relation to the item described at row 69 of Schedule 1 to our letter of 24 March 2021, Crown made reference to an investigation show cause notice it had received concerning the processes and procedures undertaken by Crown in respect of junket operators and the ongoing probity monitoring of junkets by Crown. By way of update to that item, on 27 April 2021, Crown was notified that the particulars outlined in the show cause notice had been made out, and that there were deficiencies in Crown's junket probity procedures. The VCGLR found that a ground for disciplinary action exists, imposed a fine of \$1 million and issued a letter of censure to Crown.

Crown is not currently aware of any further matters for inclusion its response to RFI-002 in respect of conduct that is, or might, be a breach of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) or the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007*, other than the matters addressed in the '100 Day Report' which was provided to you in response to RFI-002 on 19 May 2021. But if further matters require additional disclosure then Crown intends to make additional disclosure.

Please note that row 1 of Schedule 2 of Crown's first response to RFI-002 dated 24 March 2021 noted AUSTRAC's enforcement investigation into Crown Melbourne. On 23 April 2021, Crown Melbourne received a notice under s167(2) of the AML/CTF Act (**Notice**) from AUSTRAC, with a due date of 4 June 2021 for the response to the Notice. Crown Melbourne procured a significant extension to the due date of the Notice (20 August) in light of the existing and anticipated work involved in responding to a number of parallel investigations and inquires, including the Commission. The extension provided by AUSTRAC requires rolling productions from 4 June 2021 onwards. The Notice traverses a broad range of topics, principally relating to Crown Melbourne's historic anti-money laundering and counter-terrorism financing program. If, as Crown progresses its response to the Notice, it identifies any instances of potential or actual non-compliance with the AML/CTF Act or AML/CTF Rules, it will also bring these matters to the Commission's attention.

Schedule 3

Schedule 3 is Crown's second tranche response to questions 7 and 8 in RFI-002, concerning conduct that would, or might, breach any obligation in the Responsible Gambling Code of Conduct.

Please note that Crown's responsible gambling records include voluminous patron complaints that may identify actual or potential breaches of the Code. Crown would be willing to provide further details of those matters should the Commission request them.

Self-reporting

In addition to the information in the schedules which have been provided to date, and are enclosed with this letter (some of which concerns Crown's self-reporting of matters to the VCGLR), Crown notes the following in relation to questions 9 and 10 of RFI-002.

In March 2020, Crown Resorts Ltd self-reported to the Fair Work Ombudsman underpayments of certain of its staff. That report followed an assessment by Crown Resorts of its workforce following media reporting of wide-spread underpayment issues, particularly in the hospitality industry. The Fair Work Ombudsman is conducting an investigation into that matter, which is ongoing. Crown Resorts is co-operating with the investigation and intends to remediate payments to affected employees as soon as possible.

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In 2019, Crown self-reported to the Australian Taxation Office that it had not made superannuation guarantee contribution payments in respect of a number of sole proprietor contractors. Crown has since made payment of all outstanding amounts and has put in place processes to ensure that any superannuation payments are paid at the time they fall due and payable.

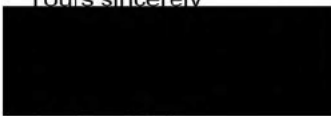
Crown has, at various times during the period specified in RFI-002, self-reported to the Australian Border Force that it had failed to notify the agency of matters concerning '457' visa holders within the timeframe(s) stipulated in the applicable regulations. Those failures are contrary to Crown's policies and usual practices and procedures and Crown has provided additional training for its HR team and instituted triggers in its HR and payroll systems to ensure future compliance.

Crown also self-reports various matters concerning non-gaming aspects of its operations, including in respect of OH&S, food safety, liquor licensing and aviation regulations, and in respect of building and property matters. Crown also makes routine adjustments to its tax returns from time to time in relation to a number of issues. Crown does not propose to provide details of those self-reporting matters unless requested to do so by the Commission.

The enclosed schedules are produced in accordance with a requirement to do so under the *Inquiries Act 2014*, in response to NTP-061.

Given the significant scope of RFI-002, Crown is continuing to review its records to prepare further tranches to the questions in RFI-002 (including to supplement the information included in the enclosed schedules). Crown would be happy to provide any further information about any of the matters set out in this letter or the schedules.

Yours sincerely



Andrew Maher
Partner
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Belinda Thompson
Partner
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Matthew McCarthy
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Royal Commission into the Casino Operator and Licence

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No	Provision(s) of the legislation / contracts which have or may have been breached or to which the conduct relates	Details of acts or things which constitute breach or potential breach	Steps taken to remedy the breach or potential breach; or steps taken to report the conduct	Date of relevant conduct	Steps taken to ensure that the conduct will not be repeated
1	<p><i>Casino (Management Agreement) Act 1993</i>, s 11.</p> <p>Management Agreement, cl 22.</p>	<p>The VCGLR has claimed that Crown is required to pay Gross Gaming Revenue gaming tax on the entry fee component of poker tournaments held at Crown. Crown has disputed that entry fees are subject to gaming tax, primarily based on:</p> <ul style="list-style-type: none"> • For a number of years in times past, the Rules for Poker Tournaments, approved by the VCGLR, specifically provided that GGR did not apply to the entry fee; • The ATO has declared that the entry fee component is 'not a gambling supply' and is therefore subject to GST; • The fee does not fit the definition of GGR or gambling, in that there is no possibility of a return from paying the fee as it is not wagered; and • The VCGLR has determined that poker tournaments where 	<p>The VCGLR has raised the matter periodically over more than 12 years and on 2 May 2018 served Crown with a Notice pursuant to s 26 of the Casino Control Act to provide certain data for an assessment to be made.</p> <p>Crown responded to the Notice by providing three large tranches of data covering 2003 to 2018.</p> <p>In respect of data from prior to 2003, Crown advised the VCGLR that no further data was available as it had either been destroyed and/or it is now unreadable, as Crown no longer had the historic systems required to read it (note that Crown is only required by the Casino Control Act to keep data going back seven years and eight years of data was provided).</p> <p>The various information regarding the amount of entry fees that have been received by Crown for Poker Tournaments and other tournaments has been provided to the VCGLR for its consideration and the issue was</p>	Ongoing	The matter is pending further consideration by the VCGLR.

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		<p>the buy-in is returned to players as prizes which are permitted outside the casino, are not subject to gambling regulation or a casino licence and are not subject to a gaming tax.</p> <p>Discussions with the VCGLR in regards to this matter are ongoing. Crown Melbourne has recognised an \$11.0 million provision in respect to this matter, which is consistent with the balance at 30 June 2020.</p>	referred to in the Fifth and Sixth Reviews of the Casino Operator and Licence and reported in the media.		
2	<i>Financial Transaction Reports Act 1988 (Cth) (FTR Act)</i>	<p>Crown has operated on the understanding that reporting obligations that it had under the FTR Act had been superseded by reporting obligations under the <i>Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth) (AML/CTF Act)</i>.</p> <p>While it has yet to reach a concluded view, Crown now considers that it may have in fact retained obligations under the FTR Act. If it has, then Crown will not have complied with these obligations.</p>	Crown will reach a concluded view on this issue as a matter of urgency and, if it concludes that it has, or may have, in fact retained obligations under the FTR Act then it will promptly raise this matter with AUSTRAC and discuss next steps, which may include applying for an exemption from any ongoing obligations under the FTR Act.	2010 - present	
3	<i>Casino Control Act 1991</i>	MinterEllison retained experts to undertake inspections at the casino and provide reports detailing their observations. The experts identified a number of issues which might be breaches of the <i>Casino Control Act 1991</i> and other legislation.		2018	
4	<i>Casino Control Act 1993, s 121(4)</i>	Further to the matter identified in item 69 of Schedule 1 to Crown's first response	In addition to the matters previously articulated, Crown has caused banning	24 December	Crown refers to and repeats the matters set out in the

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		<p>to RFI-002 dated 24 March 2021, on 18 May 2021 the VCGLR wrote to Crown to notify of a potential further instance evidencing this breach of s 121, in respect of a further junket operator.</p> <p>Crown responded on 27 May 2021, conceding that the matters identified by the Commission did further evidence its breach of s 121. Crown also identified and disclosed to the VCGLR that a further matter relating to a separate junket operator, which had not been identified by the VCGLR in its correspondence, particularised the breach the VCGLR had identified in respect of the first junket operator.</p>	<p>notices to be issued to all junket operators concerned with this breach at all of its casino properties.</p>	<p>2015 – 30 October 2020</p>	<p>corresponding cell entry for item 69 of Schedule 1 to Crown's first response to RFI-002 dated 24 March 2021.</p>
5	<i>Casino Control Act 1993</i> , s 121(4)	<p>Crown Melbourne failed to cease its relationship with a junket operator contrary to a direction issued by the VCGLR under cl 2.6 of the Crown Melbourne Internal Control Statement for Junket and Premium Player Programs, by permitting a separate patron to effect a funds transfer to Mr Yong on 12 January 2016.</p>	<p>This item was identified by the VCGLR in the same correspondence set out in item 4. Crown refers to and repeats the matters set out in the corresponding cell entry for item 4.</p>	<p>24 December 2015 – 2019</p>	<p>This item was identified by the VCGLR in the same correspondence set out in item 4. Crown refers to and repeats the matters set out in the corresponding cell entry for item 4.</p>
6	<i>Casino Control Act 1993</i> , s 121(4)	<p>On 18 May 2021, the VCGLR wrote to Crown and advised that it considered that Crown may have contravened s 121 of the Casino Control Act on the basis that Crown allegedly failed to notify the Commission of a new Junket Operator under cl 2.4.1 of the Internal Control Statement.</p>	<p>Crown made a series of enhancements to its junket due diligence processes from mid-2017 onwards. These improvements were superseded by the decision in August 2020 by the Crown Resorts Board to temporarily suspend Crown Melbourne's dealings with junkets. This suspension was made</p>		

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		On 27 May 2021, Crown responded to the VCGLR and conceded that this was a contravention.	permanent by the Crown Resorts Board on 17 November 2020. See further the courses of action taken by Crown at Rows 14-16 in Schedule 2, Annexure 1.		
7	<i>Casino Control Act 1993</i> , s 58A(1)(b)	Mr Xavier Walsh did not complete the approved refresher course for the period 2013 to 2021 as Crown's 'Crown Learn' training platform had not designated him as a special employee 'in relation to gaming machines' and, accordingly, he did not receive the internal prompts to complete that course. Had Mr Walsh been designated as a special employee 'in relation to gaming machines', he would have been required to complete the approved refresher course on at least two occasions in the period between 2013 and 2021 (during 2016 and 2019).	Upon detecting this error as a consequence of proactively reviewing his training history, Mr Walsh immediately completed the training referenced in s58A(1) on 7 June 2021. Mr Walsh also self-reported the breach to the VCGLR on 15 June 2021, having conducted an initial review into the matter. For completeness, Mr Walsh had also completed additional advanced responsible gaming training in 2013 and 2017, which is additional to (but not a substitution for) the training required by s58A(1) of the Act.	2013 – 2021	As a consequence of Mr Walsh's review, Crown has decided to adjust its systems and processes so that all members of the Crown Melbourne Business Operations team (being persons holding roles of General Manager level and above), and all Crown Group executives, will be required to complete the training referenced in s58A(1).
8	<i>Gambling Regulation Act 2003</i> , s 3.5.11	In the installation of Ticket-In-Ticket-Out (TITO) capabilities, Crown may have allowed alternations to electronic gaming machines that had not been approved by the VCGLR.	Crown is investigating this matter and is in discussions with the VCGLR.	2020 – 2021	Crown is investigating this matter and is in discussions with the VCGLR.
9	<i>Casino Control Act 1991</i> (Vic)	Patron was incorrectly placed on a turnover program, rather than a Standard or 'DOMCOMP' program.	Revenue Audit corrected the situation, which was resolved to the VCGR's satisfaction.	30 January 2010	
10	<i>Casino Control Act 1991</i> (Vic), s 64(1)(c)	Patron was incorrectly issued with additional chips that exceeded the value paid for by the patron.		19 February 2010	

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		When the patron was approached to return the additional chips valued at \$200, the patron left the room with 10 light pink chips (valued at \$100).			
11	<i>Casino Control Act 1991</i> (Vic)	A patron was incorrectly recorded as a domestic player when she was a foreign citizen and likely to have been domiciled overseas. The amount of Front Money approved was therefore incorrect.	The patron was placed on the correct program on 25 February 2010.	23 February 2010	
12	<i>Casino Control Act 1991</i> (Vic)	A turnover program was opened but nil Front Money was deposited by the patron.	Communication were circulated by Crown's Gaming Audit Manager to remind VIP staff to be compliant with the relevant Standard Operating Procedures (SOPs).	30 August 2010	
13	<i>Casino Control Act 1991</i> (Vic), s 60	Various instances where dealers had either failed to establish correctly their own hand or correctly compare hands in Bonus Texas Hold'em games. These instances were noted by Surveillance.		21 January – 23 February 2011	<p>Recommendations outlined included:</p> <ul style="list-style-type: none"> • brief refresher training for all coded dealers by an experienced Poker trainer; • encouragement of Game Supervisors to focus on Texas Hold'em supervision; • conducting log entries for dealer errors to identify those who require development;

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					<ul style="list-style-type: none"> disciplinary action for poor errors and repeat offenders; and utilisation of new technologies such as a combination of sensors to detect card values to aid the dealer.
14	<i>Casino Control Act 1991</i> (Vic), s 60	In a game of Baccarat, a shoe was incorrectly dealt with one card missing. The Gaming Supervisor and dealer had failed to count the cards before conducting a manual shuffle.		4 November 2011	The staff involved were reminded of what action should have been taken in the circumstances.
15	<i>Casino Control Act 1991</i> (Vic), 121(4)	A review of Chip Runner Inventory Forms for August 2012 noted 2 instances (of 31 sampled) where the Chip Runner Inventory Form was not signed by the incoming Chip Runner at shift commencement.		August 2012	Compliance procedures for the completion of Chip Runner Inventory Forms were reinforced by Cage management.
16	<i>Casino Control Act 1991</i> (Vic), 121(4) Internal Control Statement – Cage Operations	Compliance issues were identified with respect to: <ul style="list-style-type: none"> Independent verification and approval of Front Window Cashier Turn-In and Exchange Forms not being signed by a Main Bank Cashier (2 of 159); Independent verification and approval of Front Window Cashier Float at shift commencement not being 		8 August 2012	Compliance requirements were reinforced by Cage management.

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		signed by the incoming Front Window Cashier (5 of 29).			
17	<i>Casino Control Act 1991</i> (Vic), 121(4) Internal Control Statement – Cage Operations	System generated Balance Sheets (14) were not signed by the incoming Cashier at shift commencement for independent verification and approval of Poker Pro Customer Management System inventory.		8 – 14 August 2012	Compliance requirements were reinforced by Cage management.
18	<i>Casino Control Act 1991</i> (Vic), 121(4) Internal Control Statement – Cage Operations	Preliminary Deposit Reports (6) were not signed by Cage management as evidence of independent approval of personal / counter cheques to be banked.		8 – 21 August 2012	Compliance requirements were reinforced by Cage management.
19	<i>Casino Control Act 1991</i>	A report was made to Crown about a staff member engaging in breaches of the <i>Casino Control Act 1991</i> .	Crown undertook an internal investigation and concluded that, while the complaint was suspicious, nothing could be found to support it.	24 September 2012	
20	<i>Casino Control Act 1991</i> (Vic), s 121(4)	Gaming table (CS2408) had commenced with gaming without first being opened in SYCO.		21 November 2012	
21	<i>Casino Control Act 1991</i> (Vic)	The table games manager placed 5 x \$100,000 plaques belonging to a patron into the float after conducting the shoe result.	Surveillance reviewed the incident but the patron did not want to accept the returned plaques. The plaques and other chips totalling \$6,125,975 were left by the patron on the table and locked into safety deposit boxes. Crown negotiated with the patron to resolve the matter.	17 January 2013	
22	<i>Casino Control Act 1991</i> (Vic), s 60	The VCGLR conducted an investigation following a patron complaint on the game		14 May 2013	

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		<p>of Baccarat, whereby a coup was voided without having referred to footage to ascertain whether the order of cards could be determined in accordance with rule 11.11 of the Baccarat Rules.</p> <p>The fourth card dealt by the Dealer was the cutting card, however, the error was not noticed until all cards were viewed. The Area Manager made the immediate decision to void the hand. Surveillance were not called at the time of the incident but the footage was reviewed at a later time pursuant to the patron complaint. The matter is now closed.</p> <p>The VCGLR concluded that no further action was required to be taken.</p>			
23	<i>Casino Control Act 1991</i> (Vic), s 60	Various incidents of gaming integrity breaches, the majority of which relate to misplaced cards.		June 2013 – November 2013	
24	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> • one instance on a closed program where no key players were listed in the Program Agreement; and • three instances where the players listed in the Agreement did not match those listed in SYCO. 		October 2013	Recommended that Service Managers be reminded of the importance of ensuring that the names on Junket Program Agreements are updated for key players who have been added to the program in SYCO, and that the Service Manager who settles the Program is to ensure that all requisite paperwork has been completed including list of key players.
25	<i>Casino Control Act 1991</i> (Vic), s 121(4)	An internal audit identified one instance on a closed program where no key		November 2013	Recommended that the relevant Service Manager be reminded of

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		players were listed in the Program Agreement.			the importance of ensuring that the names on Junket Program Agreements are updated for key players who have been added to the program in SYCO.
26	<i>Casino Control Act 1991 (Vic)</i> , s 60	VCGLR investigated an irregularity with a Roulette dealer's 'no more bets' call on AR1105 as the ball was dropping and while a patron was still moving chips. Cash, which the dealer had counted out for chips, was also left unprotected while patrons were placing wagers on the layout.	The supervisor spoke to the dealer afterwards and reminded the dealer that he needs to be very watchful on the game and he needs to call 'no more bets' at least three spins before the ball drops into a compartment.	9 February 2014	
27	<i>Casino Control Act 1991 (Vic)</i> , s 121(4)	An internal audit identified insufficient or unconfirmed domicile evidence having been recorded in SYCO in respect of certain patrons.	VIP International Customer Service followed up with each patron to confirm domicile status.	April 2014	Requirements for the ongoing testing of the international patron domicile status for key players on Junket Programs were to be re-clarified by the Gaming Audit Manager, in consultation with Gaming management and Legal / Compliance.
28	<i>Casino Control Act 1991 (Vic)</i>	In a game of Blackjack, a dealer on table BJ1603 failed to return cards to the continuous shuffler and after 25 minutes the machine ran out of cards. Crown was made aware of the issue due to a patron complaint. An internal investigation found the dealer had done this before. The matter was escalated to the VCGLR.	The Assistant Casino Manager (ACM) decided to void the hand. The dealer received a verbal warning. The ACM was not disciplined. It was proposed that the matter be settled with the offer of a payment to the patron.	18 June 2014	

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29	<i>Gambling Regulation Act 2003</i> (Vic)	Review of Surveillance Issue Register identified that 22 out of 35 requests for corrective maintenance / repair works were more than 60 days outstanding.		August – October 2014	Proposed that requirements for the logging and completion of jobs are to be reinforced and appropriate oversight maintained. A review date of December 2014 was agreed.
30	<i>Casino Control Act 1991</i> (Vic), s 121(4) Internal Control Statement – Junket and Premium Player Program	An internal audit identified: <ul style="list-style-type: none"> • one instance of a Non-Exclusive Overseas Gaming Promotion Agreement not being dated; • one instance of a Junket Program Agreement being signed, but not dated; • three instances where the players listed in the Agreement did not match those listed in SYCO; • two instances of program-type not being recorded; • one instance of Front Money not being deposited; and • one instance of a Premium Player Agreement being signed, but not dated. 		October 2015	Recommended that it is ensured that Mahogany staff members and Cage Managers are aware of their obligations when completing Junket Program Agreements and Premium Player Agreements and complete a note in PeopleSoft if appropriate.
31	<i>Casino Control Act 1991</i> (Vic), s 121(4)	An internal audit identified: <ul style="list-style-type: none"> • 2 instances of Junket Program Agreements having been signed but not dated; and 		November 2015	Recommended that it is ensured that Mahogany staff members and Cage Managers are aware of their obligations when completing Junket Program

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		<ul style="list-style-type: none"> a settlement sheet not being found in a Program packet. 			Agreements and Premium Player Agreements and complete a note in PeopleSoft if appropriate.
32	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> 1 instance of a Junket Program Agreement having not been signed or dated; 6 instances of Junket Program Agreements or Premium Player Program Agreements being signed but not dated; 1 instance of a Premium Player Program Agreement not indicating the type of program; 1 instance of further proof of residence being required. 		December 2015 – January 2016	Recommended that it is ensured that Mahogany staff members and Cage Managers are aware of their obligations when completing Junket Program Agreements and Premium Player Agreements and complete a note in PeopleSoft if appropriate.
33	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit report summarises potential Internal Control Statement non-compliance issues related to the completion and independent approval (by 'a minimum of 2 employees') of Junket and Premium Player Program Agreements, being:</p> <ul style="list-style-type: none"> 2 instances (from 35 Junket Programs sampled by Gaming Audit) of Junket Program Agreements not signed (as evidence of approval) in accordance with procedural requirements (Junket Agent (1), 		February – July 2016	<p>The non-compliance issues were escalated and reported. Internal Control Statement requirements were enforced by VIP International management.</p> <p>Recommended that it is ensured that Mahogany staff members and Cage Managers are aware of their obligations when completing Junket Program Agreements and Premium Player Agreements and complete a note in PeopleSoft if appropriate.</p>

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		<p>Mahogany Room representative (1));</p> <ul style="list-style-type: none"> • 3 instances (from 105 Premium Player Programs sampled by Gaming Audit) of Premium Player Agreements not signed (as evidence of approval) in accordance with procedural requirements (Cage Area Manager and Mahogany Room representative (2), Mahogany Room representative (1)); • 5 instances of Premium Player Program type not documented; • Where the number of key Junket Players recorded in SYCO exceeded the number recorded in the Junket Program Agreement; in 3 of 9 instances, a SYCO extract detailing the additional key Junket Players had not been attached to the Junket Program Agreement, as required. 			
34	<i>Gaming Regulation Act 2003</i> (Vic)	<p>VCGLR received a complaint from a patron regarding an electronic gaming machine G1101 which froze in the Teak room.</p> <p>VCGLR requested footage, a statement from technicians who attempted to revive the machine, and a statement from staff members who reportedly advised the</p>	<p>Patron was compensated for the hurt and distress and loss of winning opportunity with a combination of monetary payout and hotel suite / dinner.</p>	9 August 2016	

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		patron that VCGLR inspectors were available to discuss complaints. The patron denied being told this by staff.			
35	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> 1 instance where the players listed in a Premium Player Program Agreement did not match those listed in SYCO; 1 instance of a Premium Player Program Agreement having been correctly signed, but dated after the date on which the patron commenced play under the program; 1 instance of program-type not being recorded correctly in a Premium Player Program Agreement; Information requested in previous audits having not yet been provided. 		August 2016	<p>Recommended that it is ensured that Mahogany staff members and Cage Managers are aware of their obligations when completing Junket Program Agreements and Premium Player Agreements and complete a note in PeopleSoft if appropriate.</p> <p>Recommended that Mahogany staff are to ensure that the names of Junket Players listed in SYCO are added to the Junket Program Agreement or that the SYCO printout which lists Players is attached prior to Settlement.</p>
36	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> 1 instance of an agreement being signed but not dated; insufficient domicile evidence having been recorded in SYCO (not containing a residential address) in respect of 8 patrons. 		December 2016	<p>Required that Mahogany staff provide domicile evidence for the patrons identified.</p> <p>Recommended that it is ensured that Mahogany staff members fully complete all documentation for Junket and Premium Player Programs.</p>

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37	<i>Casino Control Act 1991 (Vic), s 60</i>	A dealer did not alternate the wheel for eight spins.	The dealer was given a verbal warning and a payment of \$1,700 was made to the patron.	7 December 2016	
38	<i>Casino Control Act 1991 (Vic), s 60</i>	A blue card was lodged beside the shuffled cards. The shoe was dealt in breach for a period of 10 minutes minus one card. Surveillance confirmed a patron lost between \$600 to \$1,000.	A payment of \$1,000 was made to the patron.	16 December 2016	
39	<i>Casino Control Act 1991 (Vic), s 121(4)</i>	Patron identified with multiple programs opened despite no longer holding any current proof of identification.	An indefinite WOL was recommended for the patron based on Crown's reviews, the patron's play history and making fraudulent ratings claim requiring surveillance reviews.	August 2016	
40	<i>Casino Control Act 1991 (Vic), s 121(4)</i>	An internal audit identified: <ul style="list-style-type: none"> • 1 instance of a program agreement not having a program number; • 2 instances of a program agreement being signed but not dated; • insufficient domicile evidence having been provided respect of 11 patrons; • 2 instances of no minimum front-money having been recorded in 		January 2017	Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified. Recommended that it is ensured that Mahogany staff members and Cage staff fully complete all documentation for Junket and Premium Player Programs.

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		<p>a Premium Player Program Agreements;</p> <ul style="list-style-type: none"> 1 instance of insufficient front money being provided for the program opened. 			
41	<i>Casino Control Act 1991</i> (Vic), s 60	<p>After completion of the shoe in a game of Blackjack, a patron complained because she had lost \$650 and queried if the dealer had completed a full manual shuffle. After consulting with Surveillance, it was confirmed the Dealer had only completed the final third part of the shuffle. Surveillance also confirmed the patron lost \$650 during that shoe.</p>	<p>Acting Casino Manager approved the patron to have her \$650 in losses reimbursed from the table.</p>	17 January 2017	
42	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> insufficient domicile evidence having been recorded in SYCO in respect of 10 patrons; 1 instance of no minimum front-money having been recorded on a Premium Player Program Agreement; 1 instance of a Cage Manager not having signed a Premium Player Program Agreement; 1 instances of a patron not having signed a Settlement Sheet; 		February 2017	<p>Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified.</p> <p>Recommended that it is ensured that Mahogany staff members and Cage staff fully complete all documentation for Junket and Premium Player Programs.</p>

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		<ul style="list-style-type: none"> 1 instance of a patron not having dated a Premium Player Program Agreement. 			
43	<i>Casino Control Act 1991</i> (Vic), s 121(4)	An internal audit of identified insufficient domicile evidence having been recorded in SYCO in respect of 9 patrons.		March 2017	Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified.
44	<i>Gambling Regulation Act 2003</i> (Vic)	VCGLR inspector identified variances in the High Limit Jackpot pool, and sought explanations from Crown.		31 March - 2 April 2017	
45	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> 1 instance of a Premium Player Program Agreement not listing any junket players and no SYCO printout listing the junket players; insufficient domicile evidence having been recorded in SYCO in respect of 5 patrons. 		April 2017	<p>Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified.</p> <p>Recommended that it is ensured that Mahogany staff members and Cage staff fully complete all documentation for Junket and Premium Player Programs.</p>
46	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> 1 instance of a SYCO printout being dated after the date of settlement; 		May 2017	<p>Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified.</p> <p>Recommended that Mahogany Service staff and Cage Area Managers ensure that all</p>

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		<ul style="list-style-type: none"> insufficient domicile evidence having been recorded in SYCO in respect of 2 patrons. 			documentation is completed and filed at the time of settlement.
47	<i>Gambling Regulation Act 2003 (Vic)</i>	<p>In May 2017, the VCGLR received a complaint in which it was alleged that a particular EGM in the Teak room was not paying out for certain combinations whereas those combinations were paying out on an identical EGM on the main floor.</p> <p>A VCGLR inspector investigated the matter.</p>		May 2017	
48	<i>Casino Control Act 1991 (Vic), s 121(4)</i>	<p>An internal audit identified:</p> <ul style="list-style-type: none"> 1 instance of a Junket Program Agreement not being dated; 1 instance of a SYCO printout being dated after settlement; 1 instance of a program number not being recorded on an agreement; insufficient domicile evidence having been recorded in SYCO in respect of 2 patrons. 		June 2017	<p>Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified.</p> <p>Recommended that Mahogany Service staff and Cage Area Managers ensure that all documentation is completed and filed no later than the date of settlement.</p>

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49	<i>Casino Control Act 1991</i> (Vic), s 121(4)	An internal audit identified insufficient domicile evidence having been recorded in SYCO in respect of 2 patrons.		July 2017	Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified.
50	<i>Casino Control Act 1991</i> (Vic), s 121(4)	An internal audit identified: <ul style="list-style-type: none"> insufficient domicile evidence having been recorded in SYCO in respect of 3 patrons; 1 instance of a Premium Player Program Agreement not being signed by a Service Manager. 		August 2017	Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified. Recommended that Mahogany staff members be reminded of their obligation to sign and date all documentation for Junket and Premium Player Programs.
51	<i>Casino Control Act 1991</i> (Vic)	A Table Games dealer was alleged to have provided a patron with an advantage while he played Baccarat.	The employee was terminated. The dealer and patron were charged by police with offences relating to theft by deception and issued with a withdrawal of license.	20 March 2014	
52	<i>Casino Control Act 1991</i> (Vic), s 121(4)	An internal audit identified: <ul style="list-style-type: none"> insufficient domicile evidence having been recorded in SYCO in respect of 4 patrons; 1 instance of an expired driver's licence being scanned into SYCO; 1 instance of a Premium Player Program Agreement having been signed but not dated. 		September 2017	Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified.

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53	<i>Casino Control Act 1991</i> (Vic)	<p>A cheque was issued out of sequence. Cage management could not provide an explanation.</p> <p>Cheques had been pre-signed by a Cage Operations Manager to save time.</p>		26 September 2017	<p>The requirement for issuance of cheques in sequential order was reinforced by the General Manager, Cage & Count.</p> <p>Following discussion with the General Manager, Cage & Count it was agreed that pre-signing of cheques should be limited to no more than 5 cheques, decreasing risk of unauthorised or fraudulent activity (note in the event of unauthorised or fraudulent activity a compensating control exists via daily reconciliation of gaming cheques presented to SYCO records, completed by Revenue Audit).</p> <p>The requirement was subsequently communicated and enforced by the General Manager Cage & Count.</p>
54	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> • insufficient domicile evidence having been recorded in SYCO in respect of 3 patrons; • 1 instance of a Premium Player Program Agreement having been signed but not dated. 		October 2017	Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified.
55	<i>Casino Control Act 1991</i> (Vic), s 121(4)	An internal audit identified insufficient domicile evidence having been recorded in SYCO in respect of 2 patrons.		November 2017	Required that Mahogany staff provide and scan into SYCO

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	<i>Internal Control Statement - Junket and Premium Player Program</i>				domicile evidence for the patrons identified.
56	<i>Casino Control Act 1991 (Vic)</i> , ss 64(1)(a)(ii), 121(4)	A table in use for the game of Dice Duel was identified as BJ0443 instead of DL0443 in breach of the Gaming Equipment Internal Control Statement. The error arose due to a sticker reflecting 'DL' being placed over the 'BJ' plate during commissioning.		November 2017	New 'DL' plates were purchased for the affected table.
57	<i>Casino Control Act 1991 (Vic)</i> , s 121 Generic SOP 1.2.1(a)	A Poker Chip Box was not fitted to table PK40 when the boxes were changed in the morning. Staff did not check to ensure the poker chip box was fitted when opening the table.	Gaming ceased immediately and the Area Manager placed commission of approximately \$125 in the drop box on PK3345 as that was the table to where the game was moved. Surveillance was notified.	10 November 2017	Information and training was provided to staff involved to prevent recurrence. The information was also communicated to the wider poker management team. Disciplinary action was applied to staff directly involved.
58	<i>Gambling Regulation Act 2003 (Vic)</i>	A customer complained to VCGLR that Crown's Colossal Cash Jackpot on R0701 was faulty after he missed out on the Jackpot. The alleged fault was investigated by Crown.		16 November 2017	
59	<i>Casino Control Act 1991 (Vic)</i> , s 121(4)	An internal audit identified: <ul style="list-style-type: none"> the licence number of a Crown Representative was illegible on several agreements and 		December 2017	Required that Mahogany staff provide domicile evidence for the patron identified. Recommended that it is ensured that licence numbers be legible when completing documentation

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		<p>settlement sheets and was missing from some documents;</p> <ul style="list-style-type: none"> insufficient domicile evidence having been recorded in SYCO in respect of 1 patron. 			and that Mahogany staff ensure that all Junket players are listed on Junket Agreements prior to the commencement of program play.
60	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> 1 instance of a junket agent also being a player but not being recorded as a player on the agreement; 1 instance of minimum front-money not being listed on an agreement; 1 instance of a program-type not being recorded on an agreement; 1 instance of a licence number not being legible on an agreement; insufficient domicile evidence having been recorded in SYCO in respect of 3 patrons; 1 instance of an agreement not being dated. 		January 2018	<p>Required that Mahogany staff provide and scan into SYCO domicile evidence for the patrons identified.</p> <p>Recommended that it is ensured that licence numbers be legible when completing documentation and that Mahogany staff ensure that all Junket players are listed on Junket Agreements prior to the commencement of program play.</p> <p>Recommended that Management consider a review and update of 2 Premium Player Program Agreements.</p>
61	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p>		February 2018	Required that Mahogany staff provide domicile evidence for the patron identified.

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		<ul style="list-style-type: none"> • 8 instances of the licence number of a representative being illegible on a Junket Agreement or Settlement Sheet; • 1 instance of a Cage Representative not signing a Junket Agreement; • 1 instance of a Mahogany representative not signing a Premium Player Program Agreement; • insufficient domicile evidence having been recorded in SYCO in respect of 1 patron; • 1 instance of a Premium Player Program Agreement not being dated; • 2 instances of the licence number missing from a Premium Player Program Agreement. 			Recommended that staff ensure their licence numbers are legible when completing documentation and that Management consider a review and update of 2 Premium Player Program Agreements.
62	<i>Casino Control Act 1991</i> (Vic), s 121(4)	An internal audit identified insufficient domicile evidence having been recorded in SYCO in respect of 2 patrons.		March 2018	<p>Required that Mahogany staff provide domicile evidence for the patron identified.</p> <p>Recommended that staff ensure their licence numbers are legible when completing documentation and that Management consider a review and update of 2 Premium Player Program Agreements.</p>

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63	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>An internal audit identified:</p> <ul style="list-style-type: none"> 1 instance of a patron not signing a settlement sheet and no 'Authority to Disperse' found; 4 instances of a licence number on an agreement or settlement sheet not being legible; 1 instance of a licence number missing from an agreement; 1 instance of a program-type not being recorded on an agreement; insufficient domicile evidence having been recorded in SYCO in respect of 3 patrons. 		April 2018	<p>Required that Mahogany staff provide domicile evidence for the patron identified.</p> <p>Recommended that staff ensure their licence numbers are legible when completing documentation and that Management consider a review and update of 2 Premium Player Program Agreements.</p>
64	<i>Casino Control Act 1991</i> (Vic), s 121(4)	Active Key Players in in-house junkets were not listed on the relevant Program Agreements.	Communications were circulated to remind the Service Team to add Key Players to the Program Agreement when they arrive.	April 2018	
65	<i>Casino Control Act 1991</i> (Vic), s 121(4)	Active Key Players in in-house junkets were not listed on the relevant Program Agreements.	Communications were circulated to arrange for program packets for Sun City and Meg Star to be checked and Key Player lists to be updated.	May 2018	
66	<i>Casino Control Act 1991</i> , s 26	Crown did not comply with a requirement to produce all documents required under a section 26 notice within the required timeframe and produced additional documents after the due date.		21 September 2018 – 18 March 2019	

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67	<i>Casino Agreement</i>	The VCGLR sent Crown an email on 1 November 2018 stating that Crown had not complied with the requirement to file its Annual Financial Report by 31 October 2018.	The report was located and Crown contacted the VCGLR to apologise for the oversight. The Report was immediately sent through. On 19 November 2019, the VCGLR sent Crown a letter closing the matter.	November 2018	
68	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>Various documentation irregularities in respect of player programs, such as:</p> <ul style="list-style-type: none"> • missing or illegible Crown ID numbers; • missing or illegible names; • missing signatures; • missing program numbers; • incorrect Front Money sums or designation as cash; • incorrect documentation being used; • program type not selected or incorrectly selected; and • discrepancies in player settlement sheets, program agreements and player lists. 	Communications were circulated identifying the issue.	August 2018 – April 2019	
69	<i>Casino Control Act 1991</i> (Vic), s 121(4)	An internal audit of Crown's VIP Operations department's administration procedures identified a number of instances of incomplete premium player and junket program agreements.		2018	All program documents are now reviewed quarterly to ensure that all authorised employees are added. The documents will also be reviewed and audited by a compliance team member to

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					monitor accuracy and reduce errors.
70	<i>Casino Control Act 1991 (Vic)</i> , s 121(4)	VIP Slots Program for certain patrons were extended on SYCO without due authority from the Operational Manager.		February – April 2019	Staff were reminded of the process for Program extensions beyond 30 days require a copy of the approval to be included in the Program Packet.
71	<i>Gambling Regulation Act 2003 (Vic)</i>	On 19 November 2018, the VCGLR (Director, Compliance) wrote to Crown advising that they are continuing to investigate the circumstances relating to the malfunction of EGM C8308. The VCGLR sought further information from Crown as to whether regulation 18(6) of the <i>Gambling Regulation (Pre-commitment and Loyalty Scheme) Regulations</i> had been complied with.	On 18 December 2018, Crown responded to the VCGLR's letter dated 19 November 2018, stating that no breach of Reg 18(6) had occurred and attaching the VCGLR's approval of the current operating format. On 14 January 2021, the VCGLR issued a notice of non-compliance in relation to this matter, and noted that 'Crown had taken action/s to ensure similar breaches do not occur again. However, further breaches of the Act/s may lead to an escalation of regulatory action.'	November 2018	As a result of this issue, various audits and reviews of similar machines were undertaken by Crown.
72	<i>Casino Control Act 1991 (Vic)</i> , s 121(4)	VIP Slots Programs had been closed for certain patrons on SYCO without a settlement sheet prepared.	Communications were circulated identifying the issue and arranging for a settlement sheet to be completed.	July 2019	
73	<i>Gambling Regulation Act 2003 (Vic)</i>	On 23 August 2019, during a routine Crown/VCGLR YourPlay audit, it was noted that encoded casual cards were no longer valid (expired). YourPlay collateral states that the casual card will expire two years from the date of first use of the player card. As at 4 November 2019, no further contact from the VCGLR	Crown contacted Intralot (who manage the state-wide pre-commitment scheme), which confirmed that casual YourPlay accounts have two expiry dates: 1. Unused casual YourPlay accounts will expire 730 days from the creation date of the casual YourPlay account if not used; and	September 2019	

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			<p>2. This resets for a further 730 days from the date of first use of the casual YourPlay account, if it is first used within 730 days of casual account creation.</p> <p>Crown notified the VCGLR that this is a state-wide issue (of which the VCGLR was not aware) and intended to address it with Intralot.</p>		
74	<i>Casino (Management Agreement) Act 1993</i>	On 25 October 2019, the VCGLR emailed Crown in relation to the May 2019 Escrow Reconciliation, noting that certain jackpot machine requirements were not reported in the Jackpot Configuration File – Monthly (JCM), as required.	Crown has confirmed that the JCM report does not hold the missing jackpot data. Due to a timing issue, the data is not captured when the report is run. The report automatically runs on the seventh of each month for the previous month. Crown spoke with the VCGLR and advised that the monthly report would be rectified and in the interim, the Jackpot Configuration File — Daily (JCF) provides the reporting they require.	October 2019	The issue was rectified in DACOM release (6.23), approved on 9 January 2020.
75	Surveillance Standard Operating Procedures	<p>Surveillance experienced reporting issues to the VCGLR due to IT issues.</p> <p>Specifically, the Daily Operators Reports were not capturing all information entered over a number of weeks but was manually corrected each day and the VCGLR were notified.</p>	On 13 January 2020, Compliance was advised that the matter has been rectified.	November 2019 – January 2020	
76	<i>Casino (Management Agreement) Act 1993</i>	Escrow was not reporting reliably from DACOM. The relevant report is not correctly dealing with the introduction of Funded Startout Jackpots and there is an issue with the overflow calculation.		February – May 2020	The issue was partially rectified in DACOM release (6.24), approved on 16 March 2020. The installation of that version of DACOM has been delayed by IT

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		<p>Gaming Finance are unable to reconcile the movements and Escrow was not accrued correctly for February and March 2020.</p> <p>As at 22 January 2021, no further update from the VCGLR has been received on the matter.</p>			<p>due to the COVID-19 shutdown of the business.</p> <p>An additional fix was scheduled into the development of DACOM 6.25, estimated to be completed by the end of June (subject to VCGLR approval), after which the reports for the months of February, March, April and May would be re-run and submitted to the VCGLR.</p>
77	<i>Casino Control Act 1991</i> (Vic), s 81AAB (1)	<p>Crown self reported two instances whereby Crown paid out two patrons winnings in excess of \$2,000 in cash on a restricted gaming machine. The first incident occurred when a Cage employee paid out \$2,850 in cash and \$2,000 in cheque. The second incident involved a Cage employee processing a patron payout of \$2,300 in cash. The Cage were able to contact the patron via phone, the patron agreed to return the \$300 in cash. The Cage issued a cheque for \$300.</p>	<p>The payments were made as a result of staff errors.</p>	March 2021	<p>Staff errors.</p> <p>1) Staff member 'confused' the payout amount after being stood down due to COVID-19.</p> <p>2) The staff member did not follow process and check the TITO ticket when paying out the customer.</p>
78	<i>Casino Control Act 1991</i> (Vic), s 121(4)	<p>In March 2021, Crown reported an error in the calculation of GST in the November 2020 payment. The error resulted in the GST figure being overstated by \$43, 618.95 and resulted in the Gaming tax payable being understated by \$43, 618.95.</p>	<p>The error occurred when the carry over loss value stated for August 2020 was incorrectly carried over.</p>	November 2020	<p>Crown is in the process of correcting the error.</p>
79	<i>Revised Operating Conditions (COVID)</i>	<p>On 13 November 2020, Gaming Machines conducted a review of customers who were playing during the</p>	<p>Six of the 13 occurrences were the result of one team member misunderstanding the 90 minutes of</p>	November 2020	<p>COVID Marshals were directed to inform members when they have 15 minutes left in their play</p>

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		government required 90 minute play restriction. Gaming Machines advised there were 13 occurrences (of the 117 play sessions) that had gone beyond the directed 90 minutes of play.	play versus the 2 hour booking sessions. The other occurrences were across multiple other gaming areas and team members. These team members received retraining, before commencing COVID Marshal duties. The main team member involved has received verbal counselling and was retrained and not allocated as a COVID Marshal over the following week.		session. All team members acting in a COVID Marshal role were required to sign and acknowledge the COVID Opening Roles and Responsibilities document to confirm their understanding when managing the gaming rooms. Additionally, all COVID Marshals received training in the process of booking a session and 90 minutes of play.
80	<i>Casino Control Act 1991</i> (Vic), s 121(4)	Junket Program was settled by an individual who was not an appointed agent by the junket operator, nor listed on the Table Games Junket Program Agreement.		1 September 2019	
81	<i>Casino Control Act 1991</i> , s 26	Crown did not comply with a requirement to produce all documents required under a section 26 notice within the required timeframe and produced additional documents after the due date.		21 September 2018 – 18 March 2019	
82	<i>Casino Control Act 1993</i> , s 68(3)	Crown accepts payment of bank cheques payable (in the first instance) to patrons which might be a breach of the section 68(3)(b).			Crown is considering its position in respect of this matter.
83	<i>Casino Control Act 1993</i> , s 81AAC	Patrons potentially gambling while intoxicated.	Patrons assessed as intoxicated are removed from the gaming floor.	2010 - present	Relevant staff are required to complete training on the Responsible Service of Alcohol.

Schedule 3

No	Identification of the conduct	Circumstances in which the conduct occurred	Steps taken to remedy the breach or steps taken to report the conduct	Date of relevant conduct	Steps taken to ensure that the conduct will not be repeated
1	Failure to display responsible gambling information.	<p>Non-compliance issues were detected in audits in relation to:</p> <ul style="list-style-type: none"> the display of responsible service of gaming (RSG) talkers, stickers, QR codes, and signage required on the gaming floor / gaming machines; the provision of the required RSG brochures or correct game rules; or the visibility of clocks. 	Non-compliance issues were identified and resolved appropriately in each case.	Various dates between 1 January 2016 and the present.	The frequency of spot audits conducted by Gaming Audit was increased to reduce the risk of non-compliance. Gaming spot audits supporting responsible gaming compliance are completed on a weekly basis covering, among other things, the provision/display of responsible gaming talkers, stickers, brochures, game rules, entry point signage and ATM signage.
2	Various issues raised by experts retained to undertake inspections and reports of the Casino.	MinterEllison retained experts to undertake inspections and provide reports detailing their observations. The experts identified a number of issues might be breaches of the Code of Conduct.		2018	
3	Self-excluded patron invited to attend VIP program in Perth	<p>On 28 November 2019, Crown Perth Responsible Gaming were advised by VIP International Operations staff that a patron currently self-excluded in Crown Melbourne had been invited to attend a VIP program in Crown Perth.</p> <p>The patron was found to have two accounts.</p>	<p>The patron's account was amended to reflect as restricted access to prevent entries to VIP areas in Crown Perth.</p> <p>The patron's accounts are now merged into a single account with the stop codes in place. The invitation to participate in the program was revoked.</p>	November 2019	<p>VIP International Operations have now been granted access to SYCO LUI, which will ensure that if RSG Class is present, the patron is not contacted and programs cannot be opened.</p> <p>In future, the activation of CPP will assist by having the RSG class present and merging any duplicate accounts which does not reflect the RSG class.</p>