

# MinterEllison

11 December 2019

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

Dear Mr Ockwell

## **VCGLR - China Investigation – Section 26 Notice ('Notice')**

We refer to your letter dated 2 December 2019 and our response dated 10 December 2019.

As foreshadowed, enclosed (by way of secure digital file transfer) are the documents referred to in our response.

The enclosed documents are confidential, contain private personal information relating third parties, and are in some respects commercially sensitive. The documents are provided to the VCGLR on the basis that they will be treated as such, and in particular that the VCGLR will not disclose their contents to any third party.

### **Missing and incomplete records**

To assist the VCGLR, we make the following observations about the documents produced:

- (a) Crown does not have in its possession a complete copy of the signed contracts of employment of Frank Cao dated 23 December 2015, or Herbert Jia dated 3 July 2013. Crown has produced unsigned final versions of these contracts, and understands that these would have been otherwise identical in terms to the final signed version of the respect contracts;
- (b) Alfred Gomez was employed by Crown from 1997 until 2017, and over time entered into a number of employment agreements with Crown. As a consequence of his tenure, Crown has been unable to locate all of Mr Gomez' executed employment agreements. To the extent that Crown has been unable to locate a historical employment agreement in executed form, Crown now provides a copy of that agreement in unexecuted form; and
- (c) neither of Athena Tang and Fiona Cai entered into written contracts of employment with Crown.

Should you have any issues accessing these documents please do not hesitate to contact us.

Yours faithfully  
**MinterEllison**



**Richard Murphy**  
**Partner**

Contact: Richard Murphy [REDACTED]  
 [REDACTED]

Level 23 Rialto Towers 525 Collins Street Melbourne  
 GPO Box 769 Melbourne VIC 3001 Australia DX 204 Melbourne  
 T +61 3 8608 2000 F +61 3 8608 1000 minterellison.com



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