



19 January 2018

Victorian Commission for Gambling and Liquor Regulation
 49 Elizabeth St
 Richmond VIC 3121
 GPO Box 1988
 Melbourne VIC 3001

Attention: Stephen Berriman

Dear Mr Berriman

Notice issued under s 26 of the *Casino Control Act* ('Act')

We refer to the notice issued under the Act dated 4 January 2018 (**Notice**).

Enclosed is a USB device containing documents which Crown has located in response to the Notice. Most of the documents contained on the USB are confidential. In some cases, the information contained in those documents is commercially sensitive.

Accordingly, several documents contained on the USB have been redacted to the extent they relate to other components of the Crown business, and (in that respect) are not relevant or responsive to the Notice. Where documents have been redacted on the basis of relevance and confidentiality, Crown can make unredacted copies available for inspection by the VCGLR at its premises if required.

Please note that we have made all reasonable endeavours to search our databases and records in the relatively short time period provided to respond. Should any further documentation come to light we will forward it to you accordingly.

In relation to the categories of documents sought by the Notice, and the materials included on the enclosed USB, we note as follows:

1. Category 1

Any written Court records or materials regarding the Court matter heard at the Shanghai Baoshan District Court

- 1.1 Crown Resorts Limited and Crown Melbourne Limited (collectively, **Crown**) were not parties to the proceedings heard by the Shanghai Baoshan District Court (**China Criminal Proceedings**). Accordingly, Crown was not entitled to (and did not receive) documents from the Court in respect of the China Criminal Proceedings. The individual staff members were the defendants and they each had separate local legal representation.
- 1.2 Crown's lawyers obtained copies of some documents within this category from local legal representatives, but these documents are subject to legal professional privilege. Accordingly Crown is not in a position to produce those documents in response to the Notice.
- 1.3 In case it is of assistance to the VCGLR, we have included on the enclosed USB a copy of an ASX release made by Crown that refers to developments in the China Criminal Proceedings.

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2. Category 2

Correspondence and material between Australian Department of Foreign Affairs and Trade (DFAT) and Crown regarding the above.

- 2.1 Crown has documents in its possession that fall within this category, all of which constitute confidential communications with a Federal Government Agency.
- 2.2 We have contacted DFAT to seek confirmation that it is content for us to supply these documents to the VCGLR. However, we have not yet had a response.
- 2.3 This being the case, we have not included the documents falling within this category on the enclosed USB. However, we have compiled a folder of these documents that is available for the VCGLR to inspect at Crown's premises.

3. Category 3

The letter referred to in Michael CHEN's email to Randy Phillips on 10 July 2015.

- 3.1 A copy of the requested letter is included on the enclosed USB.

4. Category 4

Crown's Premium Gaming Strategy from 2014 to 2017.

- 4.1 Crown does not have a 'Premium Gaming Strategy' document.
- 4.2 We assume your request is directed towards reports that were made to the board of Crown Resorts Limited concerning the strategy for the VIP international business.
- 4.3 Redacted copies of these reports are included on the enclosed USB. Unredacted copies are available for inspection by the VCGLR at Crown's premises.

5. Category 5

Crown's Internal Audit Plan relevant to its overseas operations including marketing, junket operations and Premium Gaming Strategy.

- 5.1 A redacted copy of Crown's internal audit plan that contains material of relevance to Crown's overseas operations is contained on the USB. An unredacted copy of this document is available for inspection by the VCGLR at Crown's premises.

6. Category 6

The August 2015 representation of Crown Melbourne's Corporate Risk profile presented to the Crown Resorts Limited Board.

- 6.1 Crown has been unable to locate any documents falling within this category. The Crown Resorts Limited board did meet in August 2015. However, it appears that there was no agenda item on risk, and no document provided to the board presenting the Risk profile.

7. Category 7

Minutes of the Risk Management Committee meeting held on 12 November 2015.

- 7.1 A copy of the requested minutes is included on the enclosed USB.



8. Category 8

The MCE Risk Assessment and Mitigation Report regarding the Crown employees convicted in China including any reviews conducted of its related processes.

- 8.1 Crown has been unable to locate any document that meets the description of this request.

9. Category 9

Reports provide by the Co-ordination team reporting to the Crown Resorts CEO and other key executives and stakeholders.

- 9.1 Crown does not have any documents falling within this category. Reports were provided verbally.

10. Category 10

Any out of cycle or additional reviews of the Risk Profile for Crown relating to the arrest and conviction of crown employees.

- 10.1 Crown does not have any documents falling within this category. No out of cycle or additional reviews of the Risk Profile were undertaken. The Crown Resorts Risk Matrix & Risk Profile was amended in 2016. Crown has previously supplied the VCGLR with a copy of the amended profile.

11. Category 11

The last known contact details including email, telephone and address of former Crown employees Dan PAN, Alfreed GOMEZ and Jerry XUAN.

- 11.1 Crown understands that the VCGLR has already obtained contact details for (and contacted) Ms Pan and Mr Xuan.
- 11.2 The contact details according to Crown's records of the three named persons are as follows:

Jerry Xuan



Jane Pan



Alfreed Gomez



This information is personal in nature, and the individuals to whom it relates have not authorised its disclosure.



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12. Category 12

The budget for the operation of Crown's overseas offices in China and or Hong Kong for each financial year between 2012 and 2017. The relevant authorisation position(s) or role(s) for the budget. The reporting line between Crown's overseas operations and Crown Resorts Limited/Crown Melbourne Limited.

12.1 Included on the USB is the information requested by this category:

- (a) a table setting out the relevant budget information, which, for your ease of reference, Crown has extracted from the information that underlies Crown's broader formal budgets; and
- (b) an organisational chart that shows the relevant positions and reporting line at the relevant time.

13. Category 13

All correspondence between Mintz and Crown Resorts Limited/Crown Melbourne Limited and Mintz and Crowns overseas operation.

13.1 The enclosed USB contains correspondence between Crown and Mintz Group which we have located to date. We are still reviewing our database to identify whether there are further emails falling within this category and, if there are, we will supply them separately.

14. Category 14

The details and timeframes of the contract that Mintz was engaged for. If no formal contract was entered into, the details of any requests and billing between Mintz and Crown.

14.1 Letters of engagement, case sheets and invoices issued by the Mintz Group are included in the enclosed USB.

As noted above, this letter and most of the enclosed documents contain information that is confidential, and in some respects commercially sensitive. It is provided to the VCGLR pursuant to s 26 of the Act, on the basis it will be treated as such, and will not be voluntarily disclosed to any third party.

Please do not hesitate to contact me directly if you have any queries or require further information.

Yours sincerely

Joshua Preston
Chief Legal Officer – Australian Resorts

Enclosure