

# MinterEllison

12 October 2018

**BY EMAIL**

Mr Stephen Berriman  
 Victorian Commission for Gambling & Liquor Regulation  
 49 Elizabeth Street  
 RICHMOND VIC 3001

Dear Mr Berriman

**VCGLR China Investigation - detention of Crown Group Staff in China**

We refer to our letter dated 21 September 2018 which enclosed 4 Volumes of documents provided in response to your letter dated 23 August 2018.

On page 8 of our letter we described the document review process being undertaken in respect of the 'T2 dataset'. That process is continuing and production of documents from that data set to the lawyers for the class action applicants is in progress.

In the course of the process we have uncovered the following documents not identified in the document searches previously undertaken by Crown, copies of which are attached:

1. 'F15 – MC assessment' dated 27 July 2015 (CWN.502.068.4737);
2. Email from Michael Chen to Jason O'Connor dated 27 July 2015 (CWN.502.068.4736);
3. 'List of Accomplishments', undated (CWN.514.028.5460) incorporating 'VIP International Score Card', undated (CWN.514.028.5461);
4. Email from Barry Felstead to Jason O'Connor dated 27 June 2016, forwarding an email from Michael Chen to Barry Felstead dated 26 June 2016 (CWN.514.028.5458);
5. Email from Michael Chen to Jason O'Connor dated 19 September 2014 (CWN.514.045.5060), forwarding an email from Herbert Jia dated 19 September 2014;
6. Email from Michael Chen to Jason O'Connor dated 13 July 2015 (CWN.514.016.3690); and
7. VIP International Strategy Workshop presentation dated April 2016 (CWN.514.027.0530).

We are providing these documents to you promptly as we have uncovered them, in advance of completion of our review of the T2 dataset. Other such documents may emerge as our review continues which we will again provide expeditiously.

We are also compiling a full set of the management financial reports included in the T2 dataset, a sample of which for the period ended 18 August 2015 (CWN.514.033.4268) is also attached.

We expect that the set for the relevant period will comprise around 800 to 1,000 similar such reports. Would you like us (on Crown's behalf) to provide the full set to you?

We await hearing further from you.

Yours faithfully  
**MinterEllison**

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