

MinterEllison

8 February 2019

BY EMAIL

Mr Adam Ockwell
Director, Compliance
Victorian Commission for Gambling and Liquor Regulation
49 Elizabeth Street
RICHMOND VIC 3101

Dear Mr Ockwell

RE: Crown – China Investigation

Thank you for your letter dated 22 January 2019.

In reply:

1. Crown also understands the reference to the protocol to be to the document headed '*Reception Procedures in case of government investigation in China*'.
2. Thank you for confirming that the VCGLR does not require a full set of scorecards.
3. Crown has reviewed its records and has been unable to locate a copy of the 29 June 2013 scorecard. As that date fell on a weekend, it is unlikely that one was ever produced. Attached instead is a copy of the 3 June 2013 scorecard, which does not exclude RM play.
4. Crown has also reviewed its records and has been unable to locate a copy of the 29 June 2017 scorecard. Again, it is unlikely that a scorecard of that date was ever produced, because by that time scorecards were not being produced daily. Attached instead is a copy of the 30 June 2017 scorecard, which is the closest in date to 29 June 2017 which Crown has been able to find.
5. Thank you for your confirmation that no further management reports are sought.
6. We note your comments under the heading 'Mr Xuan's statement'. Crown accepts that you have invited it to provide submissions and evidence relevant to the investigation, but we reiterate that Crown is not properly in a position to do so until it understands whether the VCGLR proposes to make any findings and, if so, what they are and on what basis. We have on Crown's behalf made various submissions in response to propositions put by VCGLR staff, including in the earlier draft report of Compliance Division staff. But to make further submissions, or provide additional evidence to the VCGLR, Crown needs to know specifically what findings staff are urging the Commission to make and on the basis of what evidence.
7. We note in this regard that a further draft report by Compliance Division staff is to be provided for Crown to consider and respond to with further submissions and evidence. Crown accepts that will duly accord procedural fairness, providing that the report clearly sets out the findings the Commission will be urged to make and the evidentiary basis for them.
8. Thank you for confirming that we can inspect the English translation of the Baoshan court judgment. Josh Preston will arrange an appointment for this purpose.
9. We note your comments under the heading 'Class action discovery'. As explained in our meeting of 19 December 2018, the process of compiling, managing and extracting documents from the electronic database required for the purpose of defending the class action has been extensive

and expensive. It has yielded many thousands of documents which have been discovered to the applicants in the action. Crown remains willing to provide copies of all the discovered documents to the VCGLR or, if the VCGLR prefers, a subset based on only some of the search terms used for the purposes of the discovery exercise. We invite you to review the documents we have provided to you in relation to the search terms and the discovery exercise more broadly if you would like Crown to produce such a subset of documents.

10. You have invited Crown to provide a statement as to its search methodology in relation to responding to the VCGLR's notices. We would like to discuss this invitation further with you; there may be more efficient means of answering any questions you might have about Crown's process than providing a formal statement.

We look forward to hearing from you. If, in the meantime, you have any queries, please feel free to contact us or Mr Josh Preston of Crown.

Yours faithfully
MinterEllison



Partner: Richard Murphy

OUR REF: RDM 1147099