

The Hon Ray Finkelstein AO QC  
Commissioner for the Royal Commission into  
the suitability of Crown Melbourne Limited to  
hold a Casino Licence  
Castan Chambers  
460 Lonsdale Street  
Melbourne Vic 3000  
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10 March 2021

The Directors  
Crown Melbourne Limited  
Crown Towers  
Level 3  
8 Whiteman Street  
SOUTHBANK VIC 3006

Dear Directors

**Royal Commission into the suitability of Crown Melbourne Limited to hold a Casino Licence  
(Commission)**

I refer to my previous letter dated 10 March 2021.

It would assist the Commission if Crown Melbourne Limited provide the information requested in  
the **attached** Schedule (**Crown's Response**).

Please provide Crown's Response by no later than **24 March 2021**.

Crown's Response should also identify the officer or officers from whom additional information may  
be obtained in relation to each matter set out in the Schedule.

Yours sincerely



The Hon Ray Finkelstein AO QC  
Commissioner and Chairperson of the Commission

## SCHEDULE

In this schedule:

**"Casino Agreement"** means the agreement dated 21 September 1993 between the Victorian Casino Control Authority and Crown Melbourne Limited then known as Crown Casino Ltd, as varied from time to time.

**"Casino Licence"** means the licence granted on 19 November 1993, under and subject to the provisions of the *Casino Control Act 1991 (Vic)*, to Crown Melbourne Limited then known as Crown Casino Ltd to conduct and play games and use gaming equipment at the Melbourne Casino, as varied from time to time.

**"Management Agreement"** means the agreement dated 20 September 1993 between the Minister, acting for and on behalf of the State of Victoria and Crown Melbourne Limited then known as Crown Casino Ltd pursuant to s 15 of the *Casino Control Act 1991 (Vic)* as varied from time to time.

1. Since 1 January 2010, has Crown Melbourne engaged in conduct that would, or might, breach any provision of:
  - (a) the *Casino Control Act 1991 (Vic)*;
  - (b) the *Casino (Management Agreement) Act 1993 (Vic)*;
  - (c) the *Gambling Regulation Act 2003 (Vic)*;
  - (d) the *Gambling Regulations 2015 (Vic)*;
  - (e) the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*;
  - (f) the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007*; and/or
  - (g) the *Financial Transaction Reports Act 1988 (Cth)*?
  
2. If yes to any part of Question 1:
  - (a) identify the particular provision(s) that has been or may have been breached;
  - (b) set out the acts or things that constituted the breach or potential breach;
  - (c) state what steps (if any) were taken to remedy the breach; and
  - (d) identify what steps (if any) have been taken to ensure that the act or thing will not be repeated.
  
3. Since 1 January 2010, has Crown Melbourne engaged in conduct that would, or might, constitute "grounds for disciplinary action" under, and within the meaning of section 20(1) of, the *Casino Control Act 1991 (Vic)*?
  
4. If yes to Question 3:
  - (a) identify that conduct;
  - (b) explain the circumstances in which that conduct occurred; and
  - (c) identify what steps (if any) have been taken to ensure that the conduct will not be repeated.

5. Since 1 January 2010, has Crown Melbourne engaged in conduct that would, or might, breach any provision of:
  - (a) the Casino Agreement;
  - (b) the Management Agreement; and/or
  - (c) a condition of the Casino Licence?
6. If yes to any part of Question 5:
  - (a) identify that conduct;
  - (b) explain the circumstances in which that conduct occurred;
  - (c) state what steps (if any) were taken to remedy the breach; and
  - (d) identify what steps (if any) have been taken to ensure that the conduct will not be repeated.
7. Since 1 January 2010, has Crown Melbourne engaged in conduct that would, or might, breach of any obligation in the Responsible Gambling Code of Conduct?
8. If yes to any part of Question 7:
  - (a) identify that conduct;
  - (b) explain the circumstances in which that conduct occurred;
  - (c) state what steps (if any) were taken to remedy the breach; and/or
  - (d) identify what steps (if any) have been taken to ensure that the conduct will not be repeated.
9. Since 1 January 2010, has Crown Melbourne engaged in any conduct which it was required to self-report, or which it has reported, to any government body, agency or authority?
10. If yes to question 9:
  - (a) identify that conduct;
  - (b) explain the circumstances in which that conduct occurred;
  - (c) identify when and to whom the conduct was reported;
  - (d) if the conduct was not reported, explain why; and/or
  - (e) identify what steps (if any) have been taken to ensure that the conduct will not be repeated.

