

**Debra Tegoni**

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**From:** Barry Felstead [REDACTED]  
**Sent:** Thursday, 10 March 2016 2:06 PM  
**To:** Joshua Preston; Debra Tegoni  
**Cc:** Barry Felstead  
**Subject:** Re: Legally Privileged and Confidential -not for forwarding [CM-LEGAL.FID240]

I've got a meeting in later today to discuss this with you Josh.

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**From:** Joshua Preston [REDACTED]  
**Sent:** Thursday, March 10, 2016 10:43 AM  
**To:** Debra Tegoni  
**Cc:** Barry Felstead [REDACTED]  
**Subject:** Re: Legally Privileged and Confidential -not for forwarding [CM-LEGAL.FID240]

Morning Deb and Barry,

I'm not sure as to the exact query however with Crown Perth, the *Casino (Burswood Island) Agreement Act 1985 (State Agreement)* provides at clause 21(d) that Crown Perth may not, without the prior consent of the Commission:

- (i) accept a credit wager from any Person;
- (ii) make a loan to any Person;
- (iii) provide cash or chips to any Person in respect of a credit card transaction; or
- (iv) extend credit in any form to any Person

In terms of "credit" being advanced to International Commission Business patrons, this is permitted by the Commission (consistent with the requirements of the State Agreement) under Direction 3F of the **Burswood Casino Directions**, which relevantly provides:

### **3F. Funds Advance Facilities**

*3F.1 Subject to direction 3F.2, the Casino Operator may provide a Funds Advance facility to a player, if that player is identified as an International Commission Business player who does not normally reside within Australia.*

*3F.2 The provision of a Funds Advance facility to a player is subject to the limits in amounts that may be advanced, the form in which those funds are advanced, and the repayment requirements and time periods, set out in the section of the Casino Manual (Operations) relating to Funds Advance facilities.*

3F.3 These directions constitute "prior consent" for the provision of a Funds Advance facility, as required by clause 21(d)(ii) of the Agreement.

With respect to all other gaming, the **Casino Manual (Accounting and Internal Control Policies and Procedures – Section 03A GBCM "AC 3")**, which is approved by the Commission, relevantly provides:

**2. CASHIERS' CAGE RESPONSIBILITIES**

Except where specifically approved by the Gaming & Wagering Commission, Burswood and its staff will not allow access to or the use of any form of credit by Casino patrons for the purposes of gaming. Credit may only be offered to Casino patrons where indicated and in the manner described in various sections of these procedures, including Funds Advance Facilities (section 4.5 Cheque Cashing & Funds Advance Facilities for Casino Patrons); and Credit Card Draw Downs (section 20 Electronic Drawdown of Funds).

**15. EFTPOS (Electronic Funds Transfer – Point Of Sale)**

Patrons wishing to obtain cashouts against their cheque or savings accounts using bank transaction cards and PIN (Personal Identification Numbers) may do so at the various EFTPOS terminals sited throughout the various Cage areas. Patrons will not be allowed to conduct EFTPOS cashout transactions with the Cage on Credit Card accounts. EFTPOS terminals will access the various electronic banking networks and indicate that a patron's transaction has been paid (or not paid). Upon transaction approval being indicated by the EFTPOS terminal, the Cage Cashier will make a cash payment to the patron.

Give me a call to discuss if you have any queries.

Cheers

Josh

Joshua Preston  
Executive General Manager  
Legal and Corporate Services  
Crown Perth  
Sent from my iPhone

On 10 Mar 2016, at 7:09 AM, Debra Tegoni [REDACTED] wrote:

Baz,

As just discussed, below are the relevant provisions – most relevant is S68(2)(c) as highlighted.

I have just had a very quick look at the WA Casino Control Act and I can't see the same provisions so maybe it's not an issue for Perth or at least not the same issue but Josh is obviously best to judge that. I understand that he was of the view that he would have to go to the regulator there to provide the same service from the hotel as we are here.

Let me know when we should discuss next steps.

Thanks

Deb

#### Section 68 (2)

Except to the extent that this section otherwise allows, a casino operator must not, and an agent of the operator or a casino employee must not, in connection with any gaming or betting in the casino—

- (a) accept a wager made otherwise than by means of money or chips; or
- (b) lend money or any valuable thing; or
- (c) provide money or chips as part of a transaction involving a credit card or a debit card; or
- (d) extend any other form of credit; or

S. 68(2)(e) amended by No. 114/2003 s. 12.1.2 (Sch. 5 item 83).

- (e) except with the approval of the Commission, wholly or partly release or discharge a debt.


S. 68(8) inserted by No. 73/1996 s. 10, amended by No. 114/2003 s. 12.1.2 (Sch. 5 item 83).

(8) Despite subsection (2), a casino operator may provide chips on credit to a person who is not ordinarily resident in Australia for use while participating in—

- (a) a premium player arrangement with the casino operator; or
- (b) a junket at the casino—

if the casino operator and the person satisfy the requirements of any relevant controls and procedures approved by the Commission under section 121 in respect of a premium player or a junket player (as the case may be).

Kind regards

**Debra Tegoni** | Executive General Manager, Legal & Regulatory Services | Crown Melbourne Limited  
 w:  
[www.crownmelbourne.com.au](http://www.crownmelbourne.com.au)

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