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19 April 2021

Mr Craig Phillips
Ms Abigail Gill
The Solicitors Assisting the Royal Commission
Into the Casino Operator and Licence

Personal Information

Dear Mr Phillips and Ms Gill

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

We refer to:

- Notices to Produce references NTP-001, NTP-007, NTP-009, NTP-010, NTP-016, NTP-018, NTP-020, NTP-021, NTP-029, NTP-031 and NTP-039 (the **Notices**); and
- your letter dated 16 April 2021 (**Letter**).

We will shortly send you a link to a production which contains documents that are responsive to a number of categories of the Notices. The Schedule to this letter contains a summary of the current status of production of documents responsive to the Notices, including reference to documents previously produced, those in the current production and the status of the outstanding documents. Those items shaded in grey are categories where Crown's production is now complete or where Crown has provided the key documents and does not intend to take further steps at this stage unless the Commission requires any additional information.

Unfortunately, in the short time available since receiving the Letter for particular documents by midday today, it has not been possible to review and process all of the requested documents, although a significant number of the categories requested will be satisfied by the documents in today's production.

In terms of the other priority categories referred to in the Letter, Crown is progressing these as a matter of urgency to provide to the Commission as soon as possible and will make further productions before Friday, 23 April 2021. In this regard:

- A number of priority categories are those which relate to communications with CPH and/or James Packer. A document review team commenced review of these documents several weeks ago. However, given the breadth of these requests, it will take further time to satisfy them fully. Crown will produce an initial tranche of these documents this week. If there are custodians or time periods which should be prioritized, please let us know.
- Many of the categories requested by the Commission seek 'Reports', which are defined to include materials provided to the Boards and Committees of Crown Resorts and Crown Melbourne. Crown made a proposal in its letters dated 8 and 16 April 2021 which was intended to allow Crown to get this type of material to the Commission promptly and

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into the Casino Operator and Licence

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efficiently. To do so, however, Crown requires a further Notice. We would be grateful if the Commission would issue this Notice so that the documents can be produced.

- Crown sent letters to the Commission on 25 March and 8 April 2021 asking for further clarification in relation to privilege. These letters remain unanswered and this is an issue which impacts a number of categories of documents, including those contained in the Commission's list of priorities set out in the Letter. We would be grateful if the Commission could respond to this letter as soon as possible so that Crown can take the appropriate approach to privilege in respect of any outstanding documents.

To date, Crown has received a total of 22 Notices from the Commission. These Notices contain an extremely broad set of requests going back more than twenty-five years and requiring significant effort to collate, review and process for production. Crown has proceeded in good faith to comply with these Notices in what it has perceived to be the most effective and helpful way and, prior to the Letter, in the absence of any guidance from the Commission as to its priorities. In order to do so, Crown has already provided the Commission with the majority of the documents that were produced in the Bergin Inquiry (in total 27,251 documents).

The table containing the status of production in the Letter suggests that Crown has not produced documents responding to many categories of the Notices. As explained to you in our letter dated 23 March 2021, Crown prioritized the production of documents responsive to NTP-009 and NTP-010 category 2 (which called for those documents produced in the Bergin Inquiry) because those documents also responded to a significant number of the Commission's requests (including many of those noted in the Letter) and would allow Crown to assist the Commission by providing as many documents as possible, as quickly as possible. Crown therefore directed its resources to preparing those documents for production as a priority whilst progressing other aspects of the Notices in parallel. As the Schedule demonstrates, this set of documents contained a large volume of relevant material across categories and Notices beyond what was set out in the Letter.

We would be happy to discuss any of the above matters further to ensure that the approach adopted by Crown continues to be helpful to the Commission.

Yours sincerely

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Andrew Maher

Partner

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Belinda Thompson

Partner

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Matthew McCarthy

Managing Associate

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1 NTP-001 – Current position

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-001: Category 1	The board papers, reports and presentations provided to: a. members of the board of Crown Melbourne; b. members of the Audit Committee; and c. members of the Compliance Committee, on and after 1 June 2017.	The previous production included the following documents: minutes of the Crown Melbourne Limited Board from 1 January 2014 to 23 July 2020; <ul style="list-style-type: none">• minutes of the Crown Melbourne Limited Audit Committee from 1 January 2014 date; and• minutes of the Crown Melbourne Executive Risk & Compliance Committee meetings from 1 January 2014 to 23 July 2020.	Nothing further in this production.	Outstanding documents to be produced shortly.
NTP-001: Category 2	The minutes of the meetings of the: a. board of directors of Crown Melbourne; b. Audit Committee; and the c. Compliance Committee, held on and after 1 June 2017.	<ul style="list-style-type: none">• all papers, reports and presentations provided to the Crown Melbourne Limited Board from 1 June 2017 to date; and• minutes of the Crown Melbourne Limited Board from 23 July 2020 to date.		
NTP-001: Category 3	Any Report that addresses Crown Melbourne's material business risks and risk appetite.	The previous production included the following documents, which were produced in response to Summons	The current production also includes:	Crown has suggested, in its letter dated 8 April 2021, that the Commission capture the various

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-001: Category 4	Any Report that addresses the manner in which Crown Melbourne: (a) has dealt with its material business risks; (b) should deal with its material business risks.	2020-107 issued by the Bergin Inquiry: • any board papers produced in response to NPT-01 Categories 1 and 2 and NTP-007 Categories 33 and 34 which are responsive to these categories; and • Crown Resorts' risk management policies and risk registers dated from 1 January 2014 to late December 2017.	<ul style="list-style-type: none"> • Crown risk artefacts and reports relating to Crown's standard operating procedures (SOP) compliance; and • Risk Management Plans and Risk Management Reports prepared by the Crown Melbourne Risk Management Committee, and Reports Against Material High Risks prepared in respect of Crown Resorts. 	'Reports' requested by issuing a further Notice to Produce which captures a broad set of additional Board and Committee materials. Once it complies with such a Notice, Crown does not intend to take any further steps to respond to this category such as, for example, undertaking broad searches of CEO inboxes.
NTP-001: Category 5	Any Report or advice that addresses how Crown Melbourne should deal with the findings and conclusions in the Bergin Report.	Some of the responsive material for this category is included in documents Crown has previously produced to the Commission under NTP-001: Category 1 and NTP-007: Category 34.	Not in current production.	Crown is conducting searches among relevant Crown repositories (including searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.
NTP-001: Category 6	Any Report that addresses Crown Melbourne's corporate governance processes.		The current production includes: <ul style="list-style-type: none"> • any board papers produced in response to NPT-001 Categories 1 and 2 and NTP-007 Categories 33 and 34 which are responsive to these categories; • materials relating to Herbert Smith Freehills' advice in relation to the 	Crown has suggested, in its letter dated 8 April 2021, that the Commission capture the various 'Reports' requested by issuing a further Notice to Produce which captures a broad set of additional Board and Committee materials.

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Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
			<p>governance and organisational structure of Crown Melbourne;</p> <ul style="list-style-type: none"> presentations provided to the Crown Board in relation to proposals to enhance Crown's Compliance and Governance processes; and Crown Board or Committee Reports in relation to the implementation of recommendations relating to corporate governance matters arising from the Sixth Review. 	<p>Once it complies with such a Notice, Crown does not intend to take any further steps to respond to this category such as, for example, undertaking broad searches of CEO inboxes.</p>
NTP-001: Category 7	The charter of the Audit Committee of Crown Melbourne and any proposed changes to the charter.		<p>The current production includes:</p> <ul style="list-style-type: none"> the current charter of the Audit Committee of Crown Melbourne dated July 2020; and the current charter of the Compliance Committee of Crown Melbourne dated August 2020. 	Complete. Nothing further to be provided.
NTP-001: Category 8	The charter of the Compliance Committee of Crown Melbourne and any proposed changes to the charter.			
NTP-001: Category 9	Any communications between a director, officer or employee of Crown Melbourne and CPH or James Packer that addresses the appointment of directors to Crown Resorts or Crown Melbourne.	<ul style="list-style-type: none"> Some of the responsive material for this category was included in Crown's responses to Summonses 2020-047, 2020-051, 2020-052, 2020-055, 2020-056 and 2020-058 issued by the Bergin Inquiry. These are included in Crown's response to 	Not in current production	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
		NTP-009 and NTP-010: Category 2.		
NTP-001: Category 10	Any communications between a director, officer or employee of Crown Melbourne and CPH or James Packer that addresses the Bergin Report.		Not in current production	As above in relation to NTP-011: Category 9.
NTP-001: Category 11	Any communications between a director, officer or employee of Crown Melbourne and CPH or James Packer concerning changes (if any) that should be made to the management structures and management of Crown Melbourne or Crown Resorts.		Not in current production	As above in relation to NTP-011: Category 9.
NTP-001: Category 12	Any Report or other document that records the result of any investigation into: (a) money laundering at Crown Casino; (b) the involvement, or possible involvement, of persons with a criminal background in gambling at Crown Casino or in junket operations or operators associated with Crown Casino.		The current production includes: <ul style="list-style-type: none"> A Report prepared by Initialism and dated 16 November 2020, together with annexure in relation to Crown's Controls Assessment. Forensic Data Analyses prepared by Grant Thornton in relation to the Riverbank and Southbank accounts. Memoranda provided by Joshua Preston to Barry Felstead in relation to reviews of certain junket operators. 	Crown is compiling some further documents that respond to this category and which will be provided in a subsequent tranche. In addition, Crown has suggested, in its letter dated 8 April 2021, that the Commission capture the various 'Reports' requested by issuing a further Notice to Produce which captures a broad set of

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
			<ul style="list-style-type: none"> • Memoranda provided by Minter Ellison to Crown Melbourne's CEO and/or Crown Melbourne's Persons of Interest (<i>POI</i>) Committee. • Reports and annexures to Reports (including background checks obtained from ASIC and SAI Global, and media reports) provided to the Crown Melbourne CEO and/or POI Committee. 	<p>additional Board and Committee materials.</p> <p>Once it complies with such a Notice, Crown does not intend to take any further steps to respond to this category such as, for example, undertaking broad searches of CEO inboxes.</p>
NTP-001: Category 13	Any Report or advice that records the result of any investigation into Crown Melbourne's compliance with section 69 of the Casino Control Act 1991 (Vic).		The current production includes Audit Reports provided to the Crown Melbourne CEO in relation to Crown's compliance with its obligations under section 69 of the Casino Control Act 1991 (Vic) over the relevant period.	<p>Crown has suggested, in its letter dated 8 April 2021, that the Commission capture the various 'Reports' requested by issuing a further Notice to Produce which captures a broad set of additional Board and Committee materials.</p> <p>Once it complies with such a Notice, Crown does not intend to take any further steps to respond to this category such as, for example, undertaking broad searches of CEO inboxes.</p>
NTP-001: Category 14	Any Report or other document that records the result of any investigation into the contravention, or the possible contravention by Crown Melbourne of:		As foreshadowed in our letter dated 25 March, the current production includes a spreadsheet summarising Crown Melbourne's record of investigations into potential contraventions of Crown's regulatory obligations under items	Crown has suggested, in its letter dated 8 April 2021, that the Commission capture the various 'Reports' requested by issuing a further Notice to Produce which

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
	(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; (g) the Financial Transaction Reports Act 1988 (Cth); (h) the management agreement for the Melbourne Casino; (i) the Casino agreement; and (j) its Casino Licence.		14(a) to (d), and 14(h) to (j), of this request, over the relevant period. The current production also includes documents comprising updates provided to the Crown Melbourne CEO over the relevant period relating to Crown's compliance with the Standard Operating Procedures.	captures a broad set of additional Board and Committee materials. Once it complies with such a Notice, Crown does not intend to take any further steps to respond to this category such as, for example, undertaking broad searches of CEO inboxes. Crown considers that most of the relevant information in response to this category will be provided as part of Crown's response to RFI-002 and where the Commission requires further information in relation to particular breaches captured in that response, Crown would be happy to provide it.
NTP-001: Category 15	Any Report that addresses illegal activities or potentially illegal activities that occur or might occur at Crown Casino.		The current production includes the following summaries relating to this category for the relevant period: <ul style="list-style-type: none"> • CRW.512.002.0003: A spreadsheet summarising Crown Melbourne's record of 	Crown has previously provided examples of the types of reports that are regularly received by the Crown Melbourne CEO which would respond to this category and asked for confirmation of whether

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
			<p>investigations into potential illegal activities that may occur at Crown Casino;</p> <ul style="list-style-type: none"> • CRW.512.002.0028: A spreadsheet that sets out investigations into potential illegal activities carried out by Crown's Surveillance Team. • CRW.512.002.0025, CRW.512.002.0026 and CRW.512.002.0027: Summaries of footage and information requests to Crown from various law enforcement agencies. 	<p>these are of interest to the Commission.</p> <p>If the Commission is interested in any of these categories of report then Crown would be happy to provide them. However, in the meantime, Crown does not propose to provide anything further in response to this category.</p>
NTP-001: Category 16	The files of complaints made by patrons of Crown Casino, and any documents that describe how those complaints were resolved.		<p>Also as foreshadowed in our 25 March correspondence, the current production includes the following summaries relating to files of complaints by patrons of Crown Casino:</p> <ul style="list-style-type: none"> • A spreadsheet summarising information held on Crown's 'Medallia' database. This relates to complaints recorded from 2017 to 15 March 2021. • A spreadsheet summarising complaints records held on Crown's 'Verbatim' database. The Verbatim database is the predecessor to the Medallia database, and was in use by Crown from 2011 to 2017. • A document providing an overview of Crown Casino's processes for resolving complaints. 	<p>Crown does not presently intend to produce anything further in response to this category.</p> <p>If the Commission is interested in particular complaints and would like to receive further documents, Crown would be happy to extract and provide these.</p>

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-001: Category 17	Any Report or other document that describes the assets and liabilities of Crown Melbourne as at: (a) 1 January 2020; (b) 30 June 2020; (c) 1 January 2021; (d) the date of this Notice.		Crown has prepared documents which are responsive to this Notice in the first instance	Crown does not presently intend to produce anything additional in response to this category. If the Commission requires anything further on receipt of the documents, Crown would be happy to discuss this.
NTP-001: Category 18	Any document that values those assets and liabilities as at each such date, and how that valuation was arrived at.		Crown has prepared documents which are responsive to this Notice, as Crown considers this the most efficient method to respond to this request.	Complete. Crown does not propose to produce anything further.
NTP-001: Category 19	Any Report that assesses the financial impact on Crown Melbourne of the loss of income or potential income from junkets by any Crown company.	Crown has previously produced, as part of its response to NTP-036 and NTP-037 issued by the Commission: <ul style="list-style-type: none"> • a memorandum to the Crown Resorts Board in relation to the impact of ceasing dealing with junkets, dated 10 November 2020; and • analysis of the potential impact of ceasing dealing with junkets, used in the preparation of the above memorandum. 	The current production includes a Report providing a strategic review of Crown's VIP business, dated 12 December 2019, which includes information relating to the potential loss of income from junkets.	Crown considers that further relevant information in response to this category will be provided as part of Crown's response to RFS-005 and RFS-010. Where the Commission requires further information in relation to particular issues raised in that response, Crown would be happy to provide it.

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Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-001: Category 20	Any advice provided by Crown Melbourne to, or correspondence or communications between Crown Melbourne and, a Crown company, CPH or James Packer on or after 1 February 2021 regarding: (a) the Controlling Shareholder Protocol; (b) the provision of any information regarding the affairs of a Crown company to CPH or James Packer.		Not in current production	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.
NTP-001: Category 21	Any advice received since 1 February 2021 that addresses who should become a director of Crown Melbourne.		Not in current production	As above in relation to NTP-001: Category 20.
NTP-001: Category 22	Any document that records the revenue and EBIT received by Crown Melbourne in each of the last five completed financial years and in the half year ended 31 December 2020 from:		Crown has prepared a document that is responsive to this Notice in the first instance.	Complete. Crown does not presently intend to produce anything further in response to this category.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
	(a) Junket operators; (b) premium players (or high rollers); and specifies the percentage that revenue and EBIT bears to the total revenue and EBIT from gambling.			
NTP-001: Category 23	Any Report that addresses how to attract premium players to Crown Casino.		<p>The current production includes Reports provided to the Crown Melbourne CEO in relation to initiatives to attract premium players to Crown Casino, including business plans, memoranda and other strategy documents.</p> <p>For the purposes of responding to this category, Crown has adopted the definition of 'premium player' from its Standard Operating Procedures. These define a premium player as a patron not ordinarily resident in Victoria. These define a premium player as a patron domiciled outside Victoria who participates in a premium player program offered by Crown Melbourne.</p> <p>Crown also provided documents responsive to this request in its response to various summonses issued by the Bergin Inquiry. These are included in Crown's response to NTP-009 and NTP-010: Category 2.</p>	<p>Crown has suggested, in its letter dated 8 April 2021, that the Commission capture the various 'Reports' requested by issuing a further Notice to Produce which captures a broad set of additional Board and Committee materials.</p> <p>Once it complies with such a Notice, Crown does not intend to take any further steps to respond to this category such as, for example, undertaking broad searches of CEO inboxes.</p>
NTP-001: Category 24	Any documents that identify each associate of Crown Melbourne as at the date of this Notice.		Schedule 1 of Crown's response to RFI-009 from the Commission, provided on 31 March	Complete. Nothing further to be provided.

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Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
			2021, identifies each current approved associate of Crown Melbourne.	
NTP-001: Category 25	Each notice served on Crown Melbourne under section 20(2) of the Casino Control Act 1991 (Vic).		Not in current production	Crown is currently reviewing documents it considers may be responsive to this category and anticipates being in a position to provide an update to the Commission shortly.
NTP-001: Category 26	Every document that came into existence following the service of each notice referred to in paragraph 25 above, insofar as those documents relate to each notice, including Crown Melbourne's response to each notice.			
NTP-001: Category 27	The statements of the directors and officers of Crown Melbourne and Crown Resorts, together with the exhibits or attachments to those statements, that were tendered into evidence at the hearings of the Bergin Inquiry.		These documents are included in Crown's response to NTP-009 and NTP-010: Category 2.	Complete. Nothing further to provide.
NTP-001: Category 28	Drafts of the statements of the directors and officers referred to above.		Not in current production.	Crown is currently reviewing documents it considers may be responsive to this category and anticipates being in a position to provide an update to the Commission shortly.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-001: Category 29	All documents provided by or on behalf of Crown Melbourne to the VCGLR for the purposes of the Sixth Review.	Crown has provided material responsive to this category in its response to NTP-001: Category 1 and NTP-007: Category 34.	Not in current production.	Crown is currently reviewing further documents it considers may be responsive to this category and anticipates being in a position to provide an update to the Commission shortly.
NTP-001: Category 30	Any advice obtained by Crown Melbourne relating to the Sixth Review.		Not in current production	Crown is currently reviewing documents it considers may be responsive to this category and anticipates being in a position to provide an update to the Commission shortly.
NTP-001: Category 31	All documents provided by or on behalf of Crown Melbourne to the VCGLR for the purposes of its investigation into the China arrests.		Crown provided the majority of the documents responsive to this request in its response to Summons 2019-025 and 2020-168 issued by the Bergin Inquiry. These are included in Crown's response to NTP-009 and NTP-010: Category 2.	Crown is reviewing its Compliance databases for the purpose of identifying further responsive materials and will update the Commission shortly as to any additional documents to be provided.
NTP-001: Category 32	Any advice obtained by Crown Melbourne relating to the China arrests.		Not in current production.	Crown is currently reviewing documents it considers may be responsive to this category and anticipates being in a position to provide an update to the Commission shortly.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-001: Category 33	All documents that evidence or record: a. what steps have been taken by Crown Melbourne to implement the recommendations in the Sixth Review; and b. the timing for the implementation of those steps.		The current production includes a table setting out Crown Melbourne's steps to implement the recommendations of the Sixth Review, and timing and implementation of those steps, as at 22 March 2021 [CRW.510.004.0462]. This document constitutes a form of Report that was provided at regular intervals to Crown directors and management since the Sixth Review. Previous iterations of this document are included in Crown Board and Board Committee documents that Crown has provided to the Commission.	Crown is currently reviewing documents it considers may be responsive to this category and anticipates being in a position to provide an update to the Commission shortly.

2 NTP-007 – Current position

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-007: Category 1	Any document that explains the services performed, or to be performed, by officers or employees of Crown Resorts for Crown Melbourne.		As foreshadowed in our correspondence dated 25 March 2021, Crown has collated position descriptions and employment contracts in respect of Crown Resorts employees that may be called on to perform services for Crown Melbourne from time to time. The relevant documents in respect of current Crown Resorts employees are included in the current production.	Complete.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-007: Categories 2 and 3	Documents that identify the officers and employees who perform functions for, on behalf of, or as a member of, Crown Melbourne's Audit Committee or Compliance Committee, or for the implementation of Crown Melbourne's harm minimisation strategy for responsible gambling.		Crown has provided Crown Melbourne Committee materials that provide information relating to Crown Resorts employees that are members of these committees or perform functions for Crown Melbourne in these areas. No additional documents exist.	Complete. Crown does not presently intend to produce anything further in response to this category.
NTP-007: Category 4	Any Report that addresses Crown Melbourne's material business risks and risk appetite.	See NTP-001: Categories 3 and 4 above.	See NTP-001: Categories 3 and 4 above.	See NTP-001: Categories 3 and 4 above.
NTP-007: Category 5	Any document that addresses the manner in which officers or employees of Crown Resorts should deal with Crown Melbourne's material business risk and appetite for risk.	See NTP-001: Categories 3 and 4 above.	See NTP-001: Categories 3 and 4 above.	See NTP-001: Categories 3 and 4 above.
NTP-007: Category 6	Any document that addresses what information concerning the affairs of Crown Resorts or Crown Melbourne should be provided to CPH or James Packer.		Not in current production	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.

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Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-007: Category 7	Any advice that addresses whether or not it is appropriate for Crown Resorts to provide information concerning the affairs of Crown Resorts or Crown Melbourne to CPH or James Packer.		Not in current production	As above in response to NTP-007: Category 6.
NTP-007: Category 8	The report(s) by the Berkeley Research Group regarding the relationship between Crown Resorts and junket operators.		The final report provided by the Berkeley Research Group (dated 12 September 2020), which was produced in response to Summons 2020-153 issued by the Bergin Inquiry, is included in Crown's responses to NTP-009 and NTP-010: Category 2. This is one of the privileged documents that Crown is currently in discussions with Corrs about – see NTP-009 and NTP-010: Category 2 for further detail.	Complete. Nothing further to produce.
NTP-007: Category 9	Any document that constitutes or records the instructions provided to the Berkeley Research Group for the purposes of preparing its report(s).		The current production includes the proposal from Berkeley Research Group dated 30 July 2020 that sets out the instructions for the preparation of its report.	Complete. Nothing further to produce.
NTP-007: Category 10	Any draft or interim report(s) provided by the Berkeley Research Group.		The interim report provided by the Berkeley Research Group was provided in response to Summons 2020-132 issued by the Bergin Inquiry and is included in Crown's response to NTP-009 and NTP-010: Category 2. This is one of the privileged documents that Crown is currently in discussions with Corrs about – see	Complete. Nothing further to produce.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
			NTP-009 and NTP-010: Category 2 for further detail.	
NTP-007: Category 11	All communications or notes of communications between Crown Resorts and the Berkeley Research Group, CPH and James Packer concerning the contents of any interim, draft or final report.		Not in current production	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.
NTP-007: Category 12	Any report or advice that addresses how Crown Resorts or Crown Melbourne should deal with the findings or conclusions in any draft, interim or final report provided by the Berkeley Research Group.		The Minter Ellison memoranda provided in response to NTP-001: Category 12 above were prepared as part of Crown's renewed due diligence efforts following the final Berkeley Research Group Report.	As above in response to NTP-007: Category 11.
NTP-007: Category 13	The report by the Promontory Australasia regarding money laundering vulnerabilities and customer due diligence.		Crown is yet to receive Promontory Australasia's final report in relation to anti-money laundering vulnerabilities and customer due diligence. A draft report was provided to the Commission on 16 April 2021.	Crown intends to produce to the Commission the final Promontory Australasia report regarding anti-money laundering vulnerabilities, when it is received.
NTP-007: Category 14	Any other report prepared by Promontory Australasia.		Crown has produced to the Commission the 25 September 2014 report prepared by Promontory Australasia and titled 'Implementation of AML Controls: VIP International Segment.' This was included in	Complete. Nothing further to produce.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
			Crown's production to the Commission dated 1 April 2021.	
NTP-007: Category 15	Any document that constitutes or records the instructions provided to Promontory Australasia for the purposes of preparing its report(s).		The current production includes: <ul style="list-style-type: none"> • Crown's agreement with Promontory Australasia dated 3 December 2020, including a scope of work in relation to Promontory Australasia's report; and • a draft document recording a proposed scope of work regarding Promontory Australasia's report. 	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.
NTP-007: Category 16	Any draft or interim report(s) provided by Promontory Australasia.	On 16 April 2021 Crown produced to the Commission the draft Promontory Australasia report regarding money laundering vulnerabilities and customer due diligence.	The current production also includes drafts of the report provided by Promontory Australasia in relation to its 2014 report referred to above.	Complete. Nothing further to produce.
NTP-007: Category 17	All communications and notes of communications between Crown Resorts and Promontory Australasia, CPH and James Packer concerning the contents of any interim or draft or final report.		Not in current production.	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.
NTP-007: Category 18	Any report or advice that addresses how Crown Resorts or Crown Melbourne should deal with the findings or conclusions in any draft,		Not in current production.	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates

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Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
	interim or final report provided by the Promontory Australasia.			being in a position to provide an update to the Commission shortly.
NTP-007: Category 19	Any report or other document that records the result of any investigation into: (a) money laundering at Crown Casino; (b) the involvement, or possible involvement, of persons with a criminal background in gambling at Crown Casino.		See response to NTP-001: Category 12 above.	See response to NTP-001: Category 12 above.
NTP-007: Category 20	Any Report that addresses illegal activities or potentially illegal activities that occur or might occur at Crown Casino.		See response to NTP-001: Category 15 above.	See response to NTP-001: Category 15 above.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-007: Category 21	Any report or advice that addresses how Crown Resorts or Crown Melbourne should deal with the findings or conclusions in the Bergin Report.	See response to NTP-001: Category 5 above.	Not in current production	See response to NTP-001: Category 5 above.
NTP-007: Category 22	Any communications or notes of communications between a director, officer or employee of Crown Resorts and CPH or James Packer that addresses the Bergin Report.		Not in current production	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.
NTP-007: Category 23	Any communications or notes of communications between a director, officer or employee of Crown Melbourne and CPH or James Packer concerning changes (if any) that should be made to the management structures and management of Crown Melbourne or Crown Resorts.		Not in current production	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.
NTP-007: Category 24	Any report or advice obtained by Crown Resorts relating to the China arrests.		See response to NTP-001: Category 32 above.	Crown is currently reviewing documents it considers may be responsive to this category and anticipates being in a position to provide an update to the Commission shortly.

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Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-007: Category 25	Any Report that assesses the financial impact on Crown Melbourne of the loss of income or potential income from junkets by any Crown company.		See response to NTP-001: Category 19 above.	Crown considers that further relevant information in response to this category will be provided as part of Crown's response to RFS-005 and RFS-010. Where the Commission requires further information in relation to particular issues raised in that response, Crown would be happy to provide it.
NTP-007: Category 26	Any advice provided by Crown Melbourne to, or correspondence or communications between Crown Melbourne and, a Crown company, CPH or James Packer on or after 1 February 2021 regarding: (a) the Controlling Shareholder Protocol; (b) the provision of any information regarding the affairs of a Crown company to CPH or James Packer.		See response to NTP-001: Category 20 above.	See response to NTP-001: Category 20 above.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-007: Category 27	Any communications or notes of communications between a director, officer or employee of Crown Resorts and CPH or James Packer regarding the affairs of Crown Melbourne.		Not in current production.	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly.
NTP-007: Category 28	Any advice received since 1 February 2021 that addresses who should become a director of Crown Melbourne.		See response to NTP-001: Category 21 above.	See response to NTP-001: Category 21 above.
NTP-007: Category 29	Any Report that addresses how to attract premium players to Crown Casino.		See response to NTP-001: Category 23 above.	See response to NTP-001: Category 23 above.
NTP-007: Category 30	The statements of the directors and officers of Crown Melbourne and Crown Resorts, together with the exhibits or attachments to those statements, that were tendered into evidence at the hearings of the Bergin Inquiry.		See response to NTP-001: Category 27 above.	See response to NTP-001: Category 27 above.
NTP-007: Category 31	Drafts of the statements of the directors and officers referred to above.		See response to NTP-001: Category 28 above.	See response to NTP-001: Category 28 above.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-007: Category 32	Any document that will identify: (a) the mobile phone number; (b) the account number for each mobile phone provided to Guy Jelland and to Michael Roy Johnston.		No such documents exist as no mobile phones were provided to these individuals.	Complete. Nothing further to be provided
NTP-007: Category 33	The board papers, reports and presentations provided to: (a) members of the board of Crown Resorts; (b) members of the Audit Committee; and (c) members of the Compliance Committee held on and after 1 June 2017.	The previous production included the following documents: • minutes of the Crown Resorts Limited Audit & Corporate Governance Committee from 1 January 2014 to 23 July 2020. • all papers, reports and presentations provided to and minutes of the Crown Resorts Limited Board from 1 January 2012 to date.	Nothing further in this production.	Outstanding documents to be produced shortly.
NTP-007: Category 34	The minutes of the meetings of the: (a) board of directors of Crown Resorts; (b) Audit Committee; and the (c) Compliance Committee held on and after 1 June 2017.			

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3 NTP-009 and NTP-010 – Current Status

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-009: Category 1 NTP-010: Category 1	Any advice regarding the establishment, operation or affairs of: (a) Southbank Investments Pty Ltd; or (b) Riverbank Investments Pty Ltd.		Documents responding to this request were included in Crown's response to Summons 2020-059 issued by the Bergin Inquiry and are included in Crown's response to NTP-009 and NTP-010: Category 2 below.	Crown is conducting searches among relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials and anticipates being in a position to provide an update to the Commission shortly on these.
NTP-009: Category 2 NTP-010: Category 2	All statements, documents and submissions to the Bergin Inquiry (irrespective of who produced those statements, provided those documents, and submissions).	Crown has previously produced: <ul style="list-style-type: none"> all documents which were produced in response to Summons 2019-015 and Summons 2020-107 issued by the Bergin Inquiry; The balance of the remaining documents produced in response to summonses with the exception of those marked as privileged or containing redactions for secrecy reasons or obtained from other parties. 	Crown is in the process of producing the balance of documents marked as privileged or containing redactions for secrecy reasons. Crown is currently in discussions with Corrs as to the production of these documents. Crown is separately producing documents with other part prefixes, with the exception of CPH documents. Crown is currently in discussions with CPH as to the status of documents with a CPH prefix.	Statements are captured by NTP-007: Category 30 above and will be provided in due course. Submissions will also be produced in a further tranche. In our letters dated 1 and 8 April 2021, we sought clarification in relation to correspondence with the Commission. Please confirm if this is intended to be captured by this category.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
<p>NTP-009: Category 3</p> <p>NTP-010: Category 3</p>	<p>Documents that identify since 1 January 2015:</p> <p>(a) each committee or sub-committee of the board of Crown Melbourne / Crown Resorts; and</p> <p>(b) the members of each such committee or sub-committee.</p>		<p>The current production includes correspondence from Minter Ellison on behalf of Crown to the Bergin Inquiry that identifies the committees of the boards of Crown Resorts and Crown Melbourne, and their respective members, from October 2017 to 13 May 2020.</p> <p>Crown has also provided further detail in relation to the committees of the Crown Resorts and Crown Melbourne boards, in its response to RFI-010 from the Commission.</p>	<p>Crown does not presently intend to produce anything further in response to this category.</p> <p>If the Commission requires anything further on receipt of the documents, Crown would be happy to discuss this further.</p>
<p>NTP-009: Category 4</p> <p>NTP-010: Category 4</p>	<p>Any current or historical:</p> <p>(a) charters; or</p> <p>(b) similar documents outlining the objectives and powers, of the committees and sub-committees referred to in paragraph 3 [above].</p>		<p>The current production includes the current and historical charters of the Crown Resorts Limited and Crown Melbourne committees.</p> <p>The following versions of the Crown Melbourne Compliance Committee charters are contained within papers for committee meetings and can be identified at the following document IDs:</p> <ul style="list-style-type: none"> • For the August 2015 charter, document CRW.502.003.0374 at .0498; and • For the August 2016 charter, document CRW.502.003.0511 at .0621. 	<p>Complete. Nothing further to produce.</p>

4 NTP-016 – Current status

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-016: Category 1	Any document that addresses what information concerning the affairs of Crown Resorts or Crown Melbourne should be provided to CPH or James Packer.		See response to NTP-007: Category 6 above.	See response to NTP-007: Category 6 above.
NTP-016: Category 2	Any advice that addresses whether or not it is appropriate for Crown Resorts to provide information concerning the affairs of Crown Resorts or Crown Melbourne to CPH or James Packer.		See response to NTP-007: Category 7 above.	See response to NTP-007: Category 7 above.
NTP-016: Category 3	All communications or notes of communications between Crown Resorts and the Berkeley Research Group, CPH and James Packer concerning the contents of any interim, draft or final report.		See response to NTP-007: Category 11 above.	See response to NTP-007: Category 11 above.
NTP-016: Category 4	All communications and notes of communications between Crown Resorts and Promontory Australasia, CPH and James Packer concerning the contents of any interim or draft or final report.		See response to NTP-007: Category 17 above.	See response to NTP-007: Category 17 above.
NTP-016: Category 5	Any communications or notes of communications between a director, officer or employee of Crown Resorts and CPH or James Packer that addresses the Bergin Report.		See response to NTP-007: Category 22 above.	See response to NTP-007: Category 22 above.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-016: Category 6	Any communications or notes of communications between a director, officer or employee of Crown Melbourne and CPH or James Packer concerning changes (if any) that should be made to the management structures and management of Crown Melbourne or Crown Resorts.		See response to NTP-007: Category 23 above.	See response to NTP-007: Category 23 above.
NTP-016: Category 7	Any advice provided by Crown Melbourne to, or correspondence or communications between Crown Melbourne and, a Crown company, CPH or James Packer on or after 1 February 2021 regarding: (a) the Controlling Shareholder Protocol; (b) the provision of any information regarding the affairs of a Crown company to CPH or James Packer.		See response to NTP-001: Category 20 and NTP-007: Category 26 above.	See response to NTP-001: Category 20 and NTP-007: Category 26 above.
NTP-016: Category 8	Any communications or notes of communications between a director, officer or employee of Crown Resorts and CPH or James Packer regarding the affairs of Crown Melbourne.		See response to NTP-007: Category 27 above.	See response to NTP-007: Category 27 above.
NTP-016: Category 9	Reports to, agendas for, minutes of the meetings of, and the current and historical charter of, the Responsible Gaming Committee.		Not in current production.	Further documents to be provided in a subsequent production.

5 NTP-018 – Current status

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-018: Category 1	Any communications between a director, officer or employee of Crown Melbourne and CPH or James Packer that addresses the appointment of directors to Crown Resorts or Crown Melbourne.		See response to NTP-001: Category 9 above.	See response to NTP-001: Category 9 above.
NTP-018: Category 2	Any communications between a director, officer or employee of Crown Melbourne and CPH or James Packer that addresses the Bergin Report.		See response to NTP-001: Category 10 above.	See response to NTP-001: Category 10 above.
NTP-018: Category 3	Any communications between a director, officer or employee of Crown Melbourne and CPH or James Packer concerning changes (if any) that should be made to the management structures and management of Crown Melbourne or Crown Resorts.		See response to NTP-001: Category 11 above.	See response to NTP-001: Category 11 above.
NTP-018: Category 4	Any advice provided by Crown Melbourne to, or correspondence or communications between Crown Melbourne and, a Crown company, CPH or James Packer on or after 1 February 2021 regarding: (a) the Controlling Shareholder Protocol; (b) the provision of any information regarding the affairs of a Crown company to CPH or James Packer.		See response to NTP-001: Category 20, NTP-007: Category 26 and NTP-016: Category above.	See response to NTP-001: Category 20, NTP-007: Category 26 and NTP-016: Category above.

6 NTP-020 and NTP-021 – Current status

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-020:Category 1 NTP-021: Category 1	A copy of Crown Resort's current joint AML/CTF Program, including any proposed changes to the program		The current production includes: <ul style="list-style-type: none"> • Crown Resorts' current joint AML / CTF Program and related Policy and Procedures. • Drafts of the above documents showing changes under consideration by Crown. 	Complete. Nothing further to produce.
NTP-020:Category 2 NTP-021: Category 2	Any document comprising a policy/process or draft policy/process to exit critical risk customers		The Crown Resorts AML / CTF Policy and Procedures noted above responds to this request. In addition, the current production includes: <ul style="list-style-type: none"> • Crown Resorts' Person of Interest (POI) Charter and POI Process document, which sets out Crown's processes for assessing and exiting persons of interest (who may also be critical risk customers). • Crown Resorts' AML / CTF Policy Statement for the Escalation of Critical Risk customers. 	Complete. Nothing further to produce.
NTP-020:Category 3	Any document containing a definition or draft definition for 'critical risk customer'.		See documents provided in response to NTP-020 Category 1 above.	Complete. Nothing further to produce.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-021: Category 3				
NTP-020: Category 4 NTP-021: Category 4	Any document created in the last five years which refers to or concerns the performance of Sentinel		Documents included in this production include selected Crown memoranda and slide decks regarding Sentinel for the period 2018 to 2021 regarding Sentinel.	Crown is conducting extensive searches across relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials. These documents will be produced in a subsequent tranche.
NTP-020: Category 5 NTP-021: Category 5	A document that evidences or records: (a) what steps have been taken to implement the suggestions or recommendations of the Promontory report; and/or (b) the timing of the implementation of those steps.		See response to NTP-007: Category 18 above.	See response to NTP-007: Category 18 above.
NTP-020: Category 6 NTP-021: Category 6	A document that contains the duties of the Chief Compliance and Financial Crimes Officer (Mr Steven Blackburn)	The Crown Resorts employment contract for Mr Steven Blackburn, which contains the duties of his position, was produced by Crown on 2 April 2021 in response to NTP-034.	Not in current production.	Complete. Nothing further to be produced.
NTP-020: Category 7 NTP-021: Category 7	A document describing the reporting lines for the role of Chief Compliance and Financial Crimes Officer		Document included in this production.	Complete. Nothing further to be produced.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-020: Category 8 NTP-021: Category 8	A document that addresses the process of recruiting a Chief Compliance and Financial Crimes Officer		Documents are included in this production.	Complete. Nothing further to be produced.
NTP-020: Category 9 NTP-021: Category 9	Copies of advertisements for the role of Chief Compliance and Financial Crimes Officer		No such documents exist. Crown engaged an executive recruitment services firm to recruit for this role and the role was not publicly advertised.	Complete. Nothing further to be produced.
NTP-020: Category 10 NTP-021: Category 10	Documents that set out the annual budget for AML/CTF in each of the financial years since and including the financial year ending 30 June 2013		The current production includes the annual Crown AML / CTF budget for the financial year ending 30 June 2021.	Crown is identifying further documents in response to this request and will be in a position to update the Commission shortly.
NTP-020: Category 11 NTP-021: Category 11	Any document that evidences or records what steps have been taken to implement Recommendation 17 of the VCGLR Sixth Review		The current production includes documents evidencing Crown's steps to implement Recommendation 17 of the VCGLR Sixth Review, including the following: <ul style="list-style-type: none"> • Correspondence with Initialism, AUSTRAC and the VCGLR; and • Relevant Crown Internal Control Statements evidencing changes following Recommendation 17 and advice provided by Initialism. 	Crown is conducting further searches across relevant Crown repositories (including restoring and searching Crown employee mailboxes) for any further responsive materials. These documents will be produced in a subsequent tranche.
NTP-020: Category 12 NTP-021: Category 12	Any document that evidences or records what steps, if any, have been taken in response to the VCGLR's observation, at page 138 of the Sixth		The current production includes various training materials provided to Crown employees since 2019 on AML/CTF obligations	Crown is currently identifying whether there are any further materials to provide in response to this request and anticipates

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Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
	Review, that there is scope for additional training of relevant casino staff to increase staff awareness of the applicable reporting obligations and the behavioural activity indicative of money laundering			being in a position to provide an update to the Commission shortly.
NTP-020: Category 13 NTP-021: Category 13	Any document that evidences or records what steps, if any, have been taken in response to the VCGLR's observation, at page 138 of the Sixth Review, that it would be beneficial if Crown Melbourne identified opportunities for regulators and law enforcement agencies to assist in delivering enhanced AML/CTF training for casino staff.		The current production includes a letter from AUSTRAC from 28 June 2019 where it states that it does not provide training to reporting entities.	Crown is currently identifying whether there are any further materials to provide in response to this request and anticipates being in a position to provide an update to the Commission shortly.

7 NTP-029 and NTP-031 – Current status

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-029:Category 1 NTP-031:Category 1	Any written agreement or document recording any arrangement between a Crown company and Simon Pan.		Documents are included in this production.	Complete. Nothing further to produce.
NTP-029:Category 2 NTP-031:Category 2	Any written agreement or document recording any arrangement between a Crown company and a corporate entity which Simon Pan controls, or in which he is a director and/or a shareholder.		No responsive documents.	Complete. Nothing further to produce.
NTP-029:Category 3 NTP-031:Category 3	Any written agreement or document recording any arrangement between a Crown company and the Kim Teng Jong junket.		Documents are included in this production.	Complete. Nothing further to produce.
NTP-029:Category 4	Any document recording the results of any investigation conducted by or on behalf of a Crown company into Simon Pan.		The current production includes documents recording the results of investigations conducted by or on behalf of a Crown company in connection with	Crown is in the process of identifying and reviewing further materials to provide in response

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-031:Category 4			Mr Pan's conduct in relation to Crown Melbourne.	to this request and these can be provided in a subsequent tranche.
NTP-029:Category 5 NTP-031:Category 5	Any document recording the results of any investigation conducted by or on behalf of a Crown company into the Kim Teng Jong junket.		No responsive documents.	Complete. Nothing further to produce.
NTP-029:Category 6 NTP-031:Category 6	Any document recording payment(s) by a Crown company to Simon Pan, from 1 January 2010.		The current production includes documents recording payments by all Crown companies to Simon Pan except for Burswood Limited.	Crown is in the process of identifying and reviewing further materials to provide in response to this request and these can be provided in a subsequent tranche.
NTP-029:Category 7 NTP-031:Category 7	Any document recording payment(s) by a Crown company to any corporate entity which Simon Pan controls, or in which he is a director or shareholder, from 1 January 2010.		No responsive documents.	Complete. Nothing further to produce.
NTP-029:Category 8 NTP-031:Category 8	Any document recording payment(s) by a Crown company to the Kim Teng Jong junket from 1 January 2020.		Documents are included in this production.	Complete. Nothing further to produce.

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Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-029:Category 9 NTP-031:Category 9	Any document prepared by a Crown company or provided to a Crown company that identifies the known associates of Simon Pan.		Documents are included in this production.	Complete. Nothing further to produce.
NTP-029:Category 10 NTP-031:Category 10	Any document that sets out the names of the employees, agents or representatives of the Kim Teng Jong junket.		Documents are included in this production.	Complete. Nothing further to produce.
NTP-029:Category 11 NTP-031:Category 11	Any document that records any investigation conducted by or on behalf of a Crown company, concerning the sex trafficking allegations.		Documents are included in this production.	Complete. Nothing further to produce.
NTP-029:Category 12 NTP-031:Category 12	Any document that records or describes the steps, if any, taken by or on behalf of a Crown company in response to the sex trafficking allegations.		Documents are included in this production.	Complete. Nothing further to produce.
NTP-029:Category 13	Any document that records legal advice obtained by a Crown company in respect of the sex-trafficker allegations.		Documents are included in this production.	Complete. Nothing further to produce.

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Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-031:Category 13				
NTP-029:Category 14 NTP-031:Category 14	Any document recording or describing enquiries made by or on behalf of a Crown company of: (a) Simon Pan; or (b) the Kim Teng Jong junket regarding the sex trafficking allegations.		No responsive documents.	Complete. Nothing further to produce.
NTP-029:Category 15 NTP-031:Category 15	Any document recording or describing any response to the enquiries referred to in paragraph 14 above.		No responsive documents.	Complete. Nothing further to produce.
NTP-029:Category 16 NTP-031:Category 16	Any document that records or describes the result of any enquiry made of a law enforcement agency regarding the sex trafficking allegations.		Documents are included in this production.	Complete. Nothing further to produce.
NTP-029:Category 17 NTP-031:Category 17	Any document that records or describes a response, if any, to the enquiries referred to in paragraph 16 above.		Documents are included in this production.	Complete. Nothing further to produce.

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
<p>NTP-029:Category 18</p> <p>NTP-031:Category 18</p>	<p>Any Report that considers the impact or potential impact of the Proposed Sydney Casino on the Melbourne Casino and its operations, including (without limitation) whether:</p> <p>a. the Melbourne Casino would remain the dominant commission based player casino in Australia; or</p> <p>b. the Melbourne Casino would remain the flagship casino of Crown Resorts in Australia.</p> <p>c. future revenue of the Melbourne Casino is likely to be diverted to the Proposed Sydney Casino.</p> <p>d. future revenue of the Melbourne Casino is likely to be less than it would otherwise receive if the Proposed Sydney Casino is not established.</p>		Not in current production	Crown is currently identifying whether there are any materials to provide in response to this request and anticipates being in a position to provide an update to the Commission shortly
<p>NTP-029:Category 19</p> <p>NTP-031:Category 19</p>	<p>Any Report that considers the impact or potential impact of the Proposed Sydney Casino on tourism, employment and economic development in the State of Victoria.</p>		Not in current production	Crown is currently identifying whether there are any materials to provide in response to this request and anticipates being in a position to provide an update to the Commission shortly

8 NTP-039 – Current status

Notice and category number	Notice category	Previously produced (date and production details)	Documents produced now	Future items to be reviewed for production
NTP-039: Category 38	Documents that set out the annual budget for the Compliance and Financial Crime team in each of the financial years since and including the financial year ending 30 June 2013.		See response to NTP-020 and 21: Category 10 above.	See response to NTP-020 and 21: Category 10 above.
NTP-039: Category 80	A copy of the new AML/CTF Program.		See documents provided in response to NTP-020 and 021 Category 1 above.	Complete. Nothing further to produce.
NTP-039: Category 96	A document that contains the duties of the Chief Compliance and Financial Crimes Officer (Mr Steven Blackburn).	See response to NTP-020 ad NTP-021, Category 6 above.	See response to NTP-020 ad NTP-021, Category 6 above.	Complete. Nothing further to produce.
NTP-039: Category 97	A document describing the reporting lines for the role of Chief Compliance and Financial Crimes Officer.		See documents provided in response to NTP-020 and 021 Category 7 above.	Complete. Nothing further to produce.
NTP-039: Category 98	A document that addresses the process of recruiting the Chief Compliance and Financial Crimes Officer.		See documents provided in response to NTP-020 and 021 Category 8 above.	Complete. Nothing further to produce.