

**To:** Tracy Shen [REDACTED]  
**From:** Jason Cremona [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1BA6BB88F273419A99B93FB3D2582E0F-JASON CREMO]  
**Sent:** Tue 2021/06/08 12:56:19 PM (UTC+10:00)  
**Subject:** FW: Crown

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**From:** Jason Cremona  
**Sent:** Monday, 4 June 2018 10:15 AM  
**To:** Catherine Myers [REDACTED]  
**Cc:** Alex Fitzpatrick [REDACTED]  
**Subject:** RE: Crown

Catherine,

Just an update, I spoke to Michelle Fielding and Peter Herring last week to confirm my understanding of how loyalty points and bonus jackpots are treated by Crown. My views were a little different that expressed by Cate in her email, ie; different accounting treatment of 'bonus jackpots'. I have emailed Crown asking them to validate our discussion and my views.

I expect a response early this week, and then I will come back to you with some advice,

regards

**Jason Cremona CPA**  
*Manager, Licence Management & Audit*  
Licensing Division  
Phone: [REDACTED]  
Mobile: [REDACTED]

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**From:** Catherine Myers  
**Sent:** Tuesday, 29 May 2018 9:01 AM  
**To:** Jason Cremona [REDACTED]  
**Cc:** Alex Fitzpatrick [REDACTED]  
**Subject:** Fwd: Crown

Hi Jason

As discussed this is the information Cate sent through to me. Can you please review and provide me with some advice?

Thanks

Catherine  
Begin forwarded message:

**From:** [REDACTED]  
**Date:** 28 May 2018 at 5:44:41 pm AEST  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Crown

Catherine

Further to our telephone conversation this evening, I think it goes like this:

Crown wants to give a benefit to a high value gaming machine player. They award them "free loyalty points", which can then be converted by the player

into gaming machine credits when the player inserts his or her card into an EGM.

Crown accounts for this as a "bonus jackpot" - see below - even though the amount is not related to gaming machine play as would be the case with other jackpots (which are 'won' at the gaming machine - I don't see how it could be considered to be a "prize")

Because it is deemed a 'bonus jackpot' the amount is not taxable as "Gross Gaming Revenue" under the Casino Management Agreement because jackpots are considered winnings (ie total revenue minus winnings = taxable GGR)

I think this is worthy of investigating.

Technical Requirements for Gaming Machines  
and Electronic Monitoring Systems  
in the Melbourne Casino

#### 7.1.5 Bonus Jackpot

A Bonus Jackpot is one where an EGM is instructed by an external device to pay additional bonus prizes where the amount/multiplier, bonus eligibility criteria and time period are specified by the external device.

Cate Carr  
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