unless and until the witness statement and/or the documents are admitted into evidence

IN THE MATTER OF A ROYAL COMMISSION INTO THE PERTH CASINO

SECOND WITNESS STATEMENT OF COLLEEN PATRICIA HAYWARD, AM

Date of Document:

Filed on behalf of:

The Gaming and Wagering Commission of

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Western Australia

Prepared by:

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Reference: 10659-00001 Contact: Paul D Evans/Peter Sadler

I, **COLLEEN PATRICIA HAYWARD**, AM of c/o Quinn Emanuel Urquhart & Sullivan, Level 41, 108 St Georges Terrace, Perth, Western Australia, say as follows:

INTRODUCTION

1. This statement is provided in response to the summons dated 16 August 2021 and issued pursuant to section 9 of the *Royal Commissions Act 1968* (WA), which is directed to me by the Perth Casino Royal Commission (**PCRC**).

- 2
- This is my second witness statement provided to the PCRC. My first statement is dated 12 May 2021 (GWC.0003.0004.0001).
- 3. In this witness statement, I do my best to address the list of questions provided to me late last week. I expressly list out the documents that I have had regard to in answering the questions in my answer.
- As described in my first witness statement, I am a former member of the Gaming and Wagering Commission of Western Australia (GWC). My appointment commenced in 2006 and ended on 31 December 2020.
- 5. This statement is true and correct to the best of my knowledge and belief. The facts and matters set out in this statement are from my own knowledge, except where I indicate otherwise. Any views I express are my own except where I indicate otherwise.

TOPIC 1: ACCOUNTABLE AND ETHICAL DECISION MAKING (AEDM) TRAINING PROGRAM

In your capacity as a Commissioner of the GWC, were you offered the opportunity to undertake and did you undertake the AEDM training program?

6. I do not recall being offered the opportunity to undertake AEDM training.

TOPIC 2: FINANCIAL MATTERS

The adequacy of briefing papers and any oral briefings received by the Commission from the Department concerning the Commission's finances, including the service fee charged by the Department.

7. The Department's financial reporting was satisfactory. The financial reporting from the Department to the GWC followed a standard format (that is, standard for the GWC). Departmental officers have always been open to responding to questions from

GWC members. This has included the Chief Financial Officer of the Department attending GWC meetings as requested.

 I am aware of the Department's service fee; but I do not recall it being the subject of discussion at a GWC meeting.

Your understanding of the Commission's responsibility to review and approve the Commission's finances, including the service fee charged by the Department, and how this responsibility was discharged by the Commission.

- The GWC was required to review and approve its finances, which it did on a monthly basis.
- 10. The GWC took comfort from the fact the finances were prepared by a government department, with all the rigour and oversight we understood comes with that. For this reason, in reviewing and approving financial statements, the GWC was more focused on the figures that looked 'out of kilter' rather than interrogating the numbers, changing the content and form of the reports, or specifically interrogating the level of service fee charged by the Department.
- I do not have any specific recollection of the GWC interrogating the level of service fee charged by the Department.

TOPIC 3: DELEGATIONS

Your understanding of the Commission's intention in delegating all of its powers other than the power of delegation to Departmental officers and the effect of a delegation of that kind.

12. The GWC used Delegations to facilitate the smooth and timely approvals for routine matters (of which, there are hundreds a year) or items where the GWC had given in-

principle support. I understand that delegations are expressly provided for in section 16 of the GWC Act.

13. While different decisions about delegations were made over time, my recollection is that the position to which a delegation was approved was specified and that this pertained expressly to positions rather than persons. Accordingly, I recall that at least some decisions by the GWC to delegate it powers were associated with departmental re-structures.

Your understanding of how the Departmental officer would exercise delegated powers. Specifically address:

(a) whether you understood that the Departmental officer would exercise the powers delegated by the Commission unfettered by any control or oversight by the <u>Commission; or</u>

(b) whether you understood the delegation to reserve a power to the Commission to ratify or reject any exercise of delegated power.

- 14. Any exercise of power under delegation was required to be reported to the subsequent meeting of the GWC and to my knowledge, this happened. My recollection is that the advice so received would be in the form of decisions taken rather than a request for GWC ratification, which would undermine the purpose of the delegation of powers in the first place.
- 15. There are a range of options available to the GWC if delegated decisions were not in keeping with GWC policy or if the delegate had dealt with a matter that should have been left to the GWC. The GWC could remove all or some of the powers of delegation. The GWC could also take steps to review or change the exercise of delegated power, but those steps may be limited. However, I do not recall there having

been any exercise of delegated power that caused concern for the GWC. We trusted the Department delegates to exercise their delegated powers properly.

TOPIC 4: MEDIA ALLEGATIONS

As regards the allegations and reports listed below:

(i) the media allegation in the ABC Four Corners program 'High Rollers, High Risk? Australian casinos and the threat posed by organised crime' which aired on 15 September 2014;

(*ii*) the media reports of Crown employees being arrested in China in October 2016;

(iii) the media reports of the allegations made by Andrew Wilkie MP in Federal Parliament in October 2017;

(*iv*) the allegations of tampering with Electronic Gaming Machines made in the Guardian between April and July 2018; and

(v) the allegations of money laundering and criminal infiltration made during the 60 Minutes program 'Crown Unmasked' which aired on 28 July 2019 and in Fairfax media in July 2019.

(a) whether you were aware of the allegations and reports at or around the time they were published;

(b) whether you recall the information provided by Crown Perth to the Commission and the Department about them and, if so, your view as to the accuracy and sufficiency of that information; and

(c) whether you recall what, if any steps were taken by the Department or the Commission in respect of the allegations and reports.

In general

16. As a general comment in response to this Topic:

- 16.1 the media articles and programs about Crown generally (or the Perth or Melbourne Casinos specifically) contain a number of allegations, some of which are an elaboration of allegations made in earlier articles or programs.
 For these allegations, it is difficult to recall if I was aware of a particular allegation at or around the time of publication; and
- 16.2 my recollection is that all of the media allegations were discussed at GWC meetings. From a personal perspective, there were some allegations of which I was aware prior to those discussions because I read the article or watched the program, and others where I was not aware. Given the passage of time, I am not able to be specific about particular allegations and whether or not I had an awareness of those specific examples.

ABC Four Corners program

- 17. With respect to the media allegations in the ABC Four Corners program "*High Rollers, High Risk? Australian casinos and the threat posed by organised crime*", I recall that I did not see the program. I have refreshed my memory from the Minutes of the GWC meeting on 23 September 2014 (GWC.0002.0016.0134_0006), and I recall the GWC was provided with written and verbal reports about matters apparently covered in the program. Specifically, the Deputy Chairman advised he would prepare an information paper in relation to junket operators at the Perth Casino for the October meeting. I believe that report was delivered at the 16 December 2014 GWC meeting (GWC.0002.0016.0121_0053), at which the GWC were advised:
 - 17.1 international players who attend Crown Perth are assumed to be legitimate visitors to Australia who have been met all requirements for entry into Australia;

- 17.2 to protect its own commercial interests the Casino Licensee does conduct its own due diligence on players. This includes credit and character checks generally conducted through credit agencies and other specialist casino risk organisations;
- 17.3 the Casino Licensee is required to comply fully with AUSTRAC reporting requirements and provisions of the *Anti-Money Laundering and Counterterrorism Financing Act 2006* in respect of all financial transactions; and
- 17.4 GWC officers have no role in: (a) assessing the suitability of junket groups or premium players; (b) determining the source of gaming funds; or (c) monitoring the level of inducements or incentives provided to players.
- I do not have any specific recollection beyond what is recorded in the Minutes and the Agenda Papers.

Crown employees being arrested in China

- With respect to the media reports of Crown employees being arrested in China, I recall the reports but not in any specific detail.
- 20. I have refreshed my memory from the Minutes of the GWC meeting on 25 October 2016 (GWC.0002.0016.0194_0004), and see that the GWC discussed the China arrests, but the Chairman was unable to provide any additional information.
- 21. I have refreshed my memory from the Minutes of the GWC meeting on 22 August 2017 (GWC.0002.0016.0225_0035), and see that Mr Preston attended the GWC meeting and presented. I do recall the verbal presentation on this matter, with the overwhelming sentiment being one of surprise on Crown's part that arrests had been

made. Crown claimed to regularly review risks associated with trying to attract gamers to Crown Perth while staying within the requirement of Chinese laws.

- 22. I recall that in mid to late 2018, the GWC received the VCGLR's "Sixth Review of the Casino Operator and Licence". I have refreshed my memory from the Minutes of the GWC meeting on 28 August 2018 (GWC.0002.0016.0239_0298), and see that the VCGLR excluded from consideration the arrest of 19 Crown staff in China in October 2016.
- 23. I do not believe any further steps were taken by the Department or the GWC in respect of these reports, save for the Department monitoring the outcome of the forthcoming VCGLR report (discussed in paragraph 30 below).

Andrew Wilkie MP allegations

- 24. With respect to the media reports of the allegations made by Andrew Wilkie MP in Federal Parliament in October 2017, my recollection is that Mr Wilkie made a number of varied allegations. I have refreshed my memory from the supplementary Agenda of the GWC meeting on 24 October 2017 (GWC.0002.0016.0214_0002), and specifically recall the allegations regarding tampering with poker machines, which were discussed by the GWC among other allegations. From that Agenda paper, I see that the Department advised that it was confident that its audit programs are suitably robust to minimise any risk of machine tampering and will monitor an investigation being undertaken the VCGLR.
- I recall that updates were provided to the GWC. After reviewing the Agendas and Minutes for GWC meetings on 28 November 2017 (GWC.0002.0016.0216_0055;
 GWC.0002.0016.0201_0003) and 22 May 2018 (GWC.0002.0016.0252_0042;

GWC.0002.0016.0231_0002), and see that updates were provided at those meeting. In particular:

- 25.1 the Department advising that the Perth Casino has a controlled contract in place for EGM maintenance to be conducted by an independent contractor whereas the Melbourne Casino had, until recently, employed maintenance staff; and
- 25.2 Crown advising that the differences between the Perth Casino processes and those previously used at the Melbourne Casino reduced the likelihood of any similar matters occurring at the Perth Casino.

EGM tampering allegations

26. With respect to the allegations of tampering with Electronic Gaming Machines made in the Guardian between April and July 2018, I did not read the articles, and do not recall if these allegations were discussed independent of the Andrew Wilkie MP allegations of EGM tampering.

60 Minutes program 'Crown Unmasked'

- 27. With respect to the allegations of money laundering and criminal infiltration made during the 60 Minutes program 'Crown Unmasked' which aired on 28 July 2019 and in Fairfax media in July 2019. I cannot recall if I watched the program when it aired. I recall it was extensively discussed by the GWC, and after reviewing the Agenda and Minutes for GWC meeting on 27 August 2019 (GWC.0002.0016.0286_0006), see that Crown presented on the allegations at the meeting (GWC.0004.0014.0002).
- 28. Having refreshed my memory of that presentation, I see that Crown described the various regulatory investigations that it was subject to, including the:

28.1 ILGA / Bergin inquiry;

- 28.2 the Australian Commissioner for Law Enforcement Integrity (ACLEI) investigation; and
- 28.3 a further VCGLR investigation.
- 29. Having refreshed my memory from the Agenda paper, I also see that Mr Connolly presented a paper on that day entitled "Junket Processes" (GWC.0002.0016.0286_0003), in which he:
 - 29.1 confirmed that the Department and the GWC was not able to monitor either alleged money laundering or criminal infiltration, the former being the responsibility of AUSTRAC and the latter of Border Security; and
 - 29.2 recommended that the GWC rely on the work conducted by other regulatory authorities whilst requiring regular reporting and progress updates. This was because the Department did not have the level of resourcing and specific investigation expertise available to the VCGLR, ILGA and Federal Authorities and because the work of those regulators could be relied on as a basis to make decisions in respect of suitability and enforcement.
- 30. I note that at the meeting on 27 August 2019, a Matter to be Actioned was amended for the Department to monitor the VCGLR investigation on issues in China (GWC.0002.0016.0286_0002; confirmed by the Agenda for the September 2019 GWC meeting GWC.0002.0016.0287 0013).

TOPIC 5: JUNKETS

Your knowledge of concerns about junket operators operating at the Perth Casino raised by Compliance Inspector Vanessa Webb and conveyed to Mr Michael Connolly in February 2017.

31. I have no recollection of this.

Your knowledge of communications between Mr Connolly and AUSTRAC between March 2017 and October 2017.

32. I recall Mr Connolly discussing with the GWC conversations that he was having with AUSTRAC, as he did when he had noteworthy conversations with other regulators, but I do not recall the dates of those discussions.

Your knowledge of the AUSTRAC Information Report - Casino Junkets Campaign dated 14 July 2017 and any enquiries made, investigations undertaken or other response by the Commission or the Department following the release of that Report.

33. I have no recollection of this.

Your knowledge of the amendment made by Mr Connolly to the Casino Manual (Operations) on 11 April 2017 to delete Part 16 of Section 03A of the Casino Manual (Operations), which was headed "Junket Programme".

34. I have refreshed my memory by reference to the Agenda for the GWC meeting on 23 May 2017 (GWC.0002.0016.0222_0093), and see that the amendment was reported to the GWC, but have no specific recollection of this matter.

Your knowledge of whether a review of junket regulation as part of a broader Gambling Compliance Review was conducted by the Department in 2017 or subsequently.

- 35. I have refreshed my memory by reference to the Agenda and Minutes for the GWC meeting on 28 February 2017 (GWC.0002.0016.0202_0013; GWC.0002.0016.0203_0002), and see that a review was commenced by Mr Connolly of the Department's compliance practices (including in relation to junket operations), but I am not aware whether this review was completed.
- 36. With reference to my answer in paragraph 29 above, I note that in Mr Connolly's "Junket Processes" paper, he requested (and the GWC accepted) that the Department

explore the idea of a national framework for the approval and management of junket activities.

Your knowledge of an investigation commenced by Victorian authorities in 2017 into Crown's junket activities in China and any decision about junket regulation made by the Commission relating to the investigation.

- 37. With reference to my answer in paragraph 30 above, I note that the Department was tasked with monitoring the VCGLR investigation on issues in China.
- 38. I am not aware of the outcome of the VCGLR's investigation and whether it was eventually reported to the GWC.

Your understanding of why, on 27 August 2019, the Commission resolved to, among other things, "authorise the Department to explore the idea of a national framework for the approval and management of junket activities." (Resolution 145/2019) [GWC.0002.0016.0286]

39. I do not specifically recall what was discussed at the meeting on 27 August 2019; however I expect that because the alleged issues with junkets were multijurisdictional, and the regulation of junkets involved Federal Authorities (Border Force and AUSTRAC), a national consistent and co-ordinated approach to the approval and management of junkets was desirable.

Your knowledge of the Australian Commission for Law Enforcement Integrity investigation known as Operation Angove, which was an investigation into possible corruption issues regarding the Department of Home Affairs and its interactions with Crown Casino. Specifically, did the Department provide the Commission with a copy of the Investigation Report (Report 08/2020) and did the Department give the Commission any briefing about that report? 40. I have no recollection of this. With reference to my answer in paragraph 28.2 above,
I note that reference was made to an ACLEI investigation in the Crown Presentation
of 27 August 2019, but do not recall if Operation Angove was discussed at that time.

TOPIC 6: MINIMISATION OF HARM FROM CASINO GAMING

The topics in this section relate to your knowledge and understanding of the relevant matters during the period during which you were a member of the GWC.

Your knowledge and understanding of the nature and extent of harm, if any, caused by casino gaming at Crown Perth and of any research that has been conducted to identify and assess the nature and extent of harm, if any, caused by casino gaming at Crown Perth.

- 41. I have only anecdotal evidence of the harm caused by casino gaming at Crown Perth, but I am aware that gambling has the potential to cause great harm to problem gamblers and their families.
- 42. I am not aware of any research that has been conducted to identify and assess the nature and extent of the harm caused by casino gaming at the Perth Casino. I am aware of the Australian Gambling Research Centre and the Victorian Responsible Gambling Foundation, and recall that their research was discussed from time-to-time by the GWC, but I do not recall if those discussions specifically related to the Perth Casino.

Your knowledge and understanding of any sources of funding to mitigate any harm caused by casino gaming at Crown Perth, how that funding is applied and whether, and if so, how the effectiveness of that application of the funding is evaluated.

43. I am aware of the Problem Gambling Support Services Committee, which was constituted to address problem gambling. I believe that they are funded by gambling

industry stakeholders (i.e. the GWC, Crown, Lotterywest, Racing and Wagering Western Australia).

Your knowledge and understanding of;

(a) Crown Perth's responsible gaming program and any other activities undertaken by Crown Perth to minimise any harm from casino gaming;

(b) the Commission's role in overseeing or regulating that program and any such activities; and

(c) how the Commission has performed its role in overseeing or regulating that program and any such activities.

- 44. I am aware that Crown Perth ran a responsible gaming program. I do not recall the specifics of that program, but remember it involved a 24 x 7 presence at the Perth Casino, the ability of patrons to self-exclude, and enforced breaks in play.
- 45. I cannot recall when it started, but statistics regarding the responsible service of gambling at the Perth Casino were provided to the GWC each month. These statistics were discussed, in particular any increasing trends in concerning behavior.
- 46. Problem gambling and the responsible service of gambling was front and center in all decisions the GWC made about gaming at the Casino. The consideration of these issues was not always recorded in the minutes, but in my view, the GWC was very aware of them.

Your understanding of the Commission's policies about or regulation of ATM placement at Perth Casino and the use of EFTPOS machines at gaming tables.

47. I recall that both the ATM policy, and the EFTPOS policy imposed a cap on the amount people could withdraw in a single transaction. I also recall the ATM policy

required the ATMs to be a certain distance away from the main Casino floor to create a break in play.

48. I have refreshed my memory by reference to the Agendas and Minutes for the February 2019 (GWC.0002.0016.0266_0218; GWC.0002.0016.0270_0004) and May 2019 (GWC.0002.0016.0275_0001; GWC.0002.0016.0276_0003) GWC meetings, and I recall being aware that the introduction of the EFTPOS machines would mean there was no longer a break in play when patrons visited the ATM machines, but community expectation was that contactless payment should be available at the Perth Casino.

TOPIC 7: DETERMINATION OF APPLICATIONS BY CROWN PERTH

Your understanding of the circumstances in which the Commission will seek independent expert reports in order to assist the Commission to determine applications by Crown Perth.

- I do not recall the GWC commissioning an independent expert report in respect of applications by Crown Perth.
- 50. I believe that the GWC requires Crown Perth to commission an expert report when it submits an EGM for approval to the GWC certifying that the EGM complies with the WA Appendix to the Gaming Machine National Standard.

Your understanding of the process that the Commission should follow in deciding whether to declare a game, including a game played on an Electronic Gaming Machine, to be an authorised game for the purposes of the Casino Control Act 1984 (WA) and in deciding whether to alter the approved rules of any game.

- 51. My understanding of the process during my time on the GWC is as follows:
 - 51.1 Crown Perth prepare a written submission for consideration by the GWC. As noted above, with respect to EGMs, the submission should also include

GWC.0003.0018.0016

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independent certification of compliance with the WA Appendix to the Gaming Machine National Standard.

- 51.2 Crown Perth then attend a GWC meeting and present the game to the GWC.Typically that is a full demonstration with a dealer for table games; however with EGMs, Crown generally play a video.
- 51.3 GWC will then ask questions about the proposed game. In particular, the house advantage, rules, and Crown Perth's reasons for the introduction of the new game. With EGM's the GWC makes its own evaluation of whether the machine is too much like a poker machine.
- 51.4 If the game is approved, it is then gazetted.

Your understanding of the effect of the phrase "except for a game played with poker machines" in s 22(2) of the Casino Control Act.

52. The government has a longstanding policy that there are not to be poker machines in Western Australia. The distinction between an EGM and a poker machine is set out in the WA Appendix to the Gaming Machine National Standard. To my mind, the key differences are that EGMs are not permitted to use spinning reels displays and must be started using a start button.

TOPIC 8: POLICY ON ELECTRONIC GAMING MACHINES

Your knowledge of the consideration given to increasing the minimum speed of play to 6 seconds for Electronic Gaming Machines in 2014.

I have refreshed my memory by reference to the Minutes of the 25 March 2014 (GWC.0002.0016.0129_0002) and 24 June 2014 (GWC.0002.0016.0115_0009)
 GWC meetings and do not specifically recall the consideration given to increasing the minimum speed of play for EGMs.

Your understanding of the intended effect of resolution 120/2019 recorded in the minutes for the Commission's meeting on 23 July 2019 [DLG.8001.0054.0622] and, specifically, whether it was intended to approve all of the amendments to the Commission's Policy on Electronic Gaming Machines shown at Attachment 5 of the agenda paper for agenda item 5.3 [GWC.0002.0016.0281_0032].

54. My understanding was that the in-game features of EGMs was extending the overall game speed in excess of the 5 seconds that was required by the WA Appendix to the Gaming Machine National Standard. Therefore, at the request of Crown Perth, for EGMs which included in-game features, the GWC permitted the game speed to be reduced to 3 seconds. I have refreshed my memory from the Minutes of the GWC meeting on 26 November 2019 (GWC.0002.0016.0292_0003), and see that the methodology for confirming the speed of a game on an EGM was discussed, and that the GWC resolved to "adopt a methodology for establishing the average game speed for gaming machine games that have been approved to operate with an average five second game speed (base game plus bonus features)", which accords with my recollection that the average game time still needed to be 5 seconds.

The factors or considerations you took into account, and your understanding of the factors or considerations that the Commission as a whole took into account, in passing resolution 120/2019.

55. I have refreshed my memory by reference to the Agenda and Minutes for the 23 July 2019 (GWC.0002.0016.0281; GWC.0002.0016.0285_0002) GWC meeting, and do not specifically recall what factors and considerations the GWC as a whole took into account. I do recall there was robust discussion about this issue, and would expect that the GWC discussed responsible service of gambling issues, current trends in EGM technology and design, cost of EGM development, and the perceived benefits to

Crown Perth (as these were topics addressed in Agenda Item 5.3 and Crown's letter of 7 March 2019).

Your knowledge and understanding of the rationale for the 90% return to player requirement for Electronic Gaming Machines.

56. I do not recall if I was ever aware of the rationale for the 90% return to player requirement for EGMs. My own understanding is that it provides a better outcome for patrons of the Perth Casino and may be an inducement to gamble at the Perth Casino over interstate casinos.

TOPIC 9: REGULATION AND OVERSIGHT OF PERTH CASINO

Your knowledge and understanding of how the scope and content of the audit and inspection program at Perth Casino is determined and reviewed.

- 57. My understanding is that the Department determined the scope and content of the audit and inspection program at the Perth Casino, and also when that program was reviewed.
- 58. I recall that the audit and inspection program was reviewed and updated by the Department with improvements at the Perth Casino over time. For example, the introduction of electronic surveillance of a number of elements associated with the gaming process brought about a change in the approach to inspection.
- 59. The GWC receives monthly reports of audits and inspections, although in my view these are mostly numerical and do not provide particularly useful information.

Your knowledge and understanding of how the audit and inspection program at Perth Casino is implemented.

60. The audit and inspection program is implemented by the Department inspectorate.

Your understanding of the basis for the Department changing from the 'RG system' to the 'Sharperlight' or 'Navigate' system to calculate the taxable revenue of the Perth Casino.

61. I have no recollection of this.

Your understanding of the steps taken by officers or employees of the Department since 2015 to confirm the veracity of the calculation by Crown Perth of taxable revenue of the Perth Casino.

62. I have no recollection of this.

Your understanding of the reasons for the decision to remove a dedicated casino inspector presence at the casino in 2015.

- 63. While I do not have a clear recollection of the specifics presented to the GWC on this question, my general understanding is that inspectors would carry out their work on a roster basis rather than being essentially based at the Perth Casino. I recall that this change caused some staff unrest which included union involvement and I have an understanding that at least some of this concern was based on reduced penalty rates for inspectors.
- 64. Additionally, I am uncertain as to the timing of improved electronic surveillance measure introduced at the Perth Casino, but the demonstration of that system was positively received by members of the GWC.

TOPIC 10: DEPARTMENTAL EMPLOYEES AND OFFICERS

Your knowledge of any personal relationships and friendships between employees and officers of the Crown Group,² on the one hand, and employees and officers of the Department, on the other.

- 65. For clarity, I consider personal relationships and friendships to mean relationships that went beyond cordiality in passing. Examples would include such things as partaking of meals, social activities, visiting one's home.
- 66. During my time as a member of the GWC, I was not aware of particular personal relationships or friendships.

Your knowledge of any gifts or benefits, including hospitality, provided by the Crown Group, including by its officers or employees, to officers and employees of the Department.

67. During my time as a member of the GWC, I was not aware of any gifts or benefits provided by the Crown Group to officers and employees of the Department.

Your knowledge of travel undertaken by Departmental officers and employees in circumstances where Crown has reimbursed some or all of the cost of the travel.

68. During my time as a member of the GWC, I was aware that Mr Sargeant's trip to Macau that was paid for by Crown. I do not recall specifically when I was made aware of this.

Your knowledge of functions at a venue at Crown Perth, for example, a retirement function or Christmas meal, attended by Departmental officers and employees.

69. During my time as a member of the GWC, I was not aware of any of functions at a venue at Crown Perth attended by Departmental officers and employees. Department officers and employees may have attended the opening of Crown Towers, but I do not recall.

TOPIC 11: HISTORICAL RISK ASSESSMENT OF CASINO LICENSEE

Your knowledge as to whether the Commission conducted a risk assessment in relation to the Perth Casino licensee or its conduct prior to November 2020. 70. I do not recall a risk assessment being conducted by the GWC in relation to the PerthCasino licensee or its conduct prior to November 2020.

Contains sensit	ive informatio	on	

Date: 27 August 2021