

**IN THE MATTER OF A ROYAL COMMISSION INTO
THE PERTH CASINO**

AMENDED SECOND WITNESS STATEMENT OF JODIE ELIZABETH MEADOWS

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Filed on behalf of: The Gaming and Wagering Commission of
Western Australia

Prepared by:

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I, Jodie Elizabeth Meadows 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 30 April 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 14 May 2021 (GWC.0003.0007.0015).

3. In this witness statement, I do my best to address the list of questions provided to me late last week. Because of the limited time, I have been able to consider only a limited number of documents to assist me in preparing this statement and otherwise rely upon my unaided recollection.
4. As described in my first witness statement, I am a current member of the Gaming and Wagering Commission of Western Australia (**GWC**). My appointment commenced in August 2018.
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

6. In answering the question(s) under this topic, I have had regard to the following documents: GWC.0001.0007.0187_0001, GWC.0002.0016.0367_0214, GWC.0003.0014.0018.

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

7. I have not been offered the opportunity to undertake AEDM training in my capacity as a Commissioner of the GWC, though I was provided with a copy of the “Board Essentials – Good Governance for Public Sector Boards and Committee” (**PSB Guidelines**) (GWC.0001.0007.0187_0001) as part of my induction which provides some guidance on this topic.
8. The PSB Guidelines identifies six key types of boards relevant to government. GWC combines elements of the fourth and sixth of those types. Consequently, a number of aspects of that guidance are of limited relevance to the GWC. As examples:
 - 8.1 Statements of expectations or statements of corporate intent in the sense used in some government boards (in particular of trading enterprises) have not been used in connection with GWC during my time on the GWC. However, on or about 30 June 2021, the Minister wrote to the Acting Director-General of the Department in her capacity as Chair of the GWC (GWC.0003.0014.0001;

GWC.0003.0014.0006; GWC.0003.0014.0010; GWC.0003.0014.0015; GWC.0003.0014.0017). The letter was titled “Ministerial Expectations for Government Boards and Committees”. That letter was subsequently sent by the Department to me and the other members of the GWC by email with other related materials. Before receiving that letter, the Minister had not provided the GWC with a “statement of intent” or “statement of expectation” as contemplated by the PSB Guidelines during my time on the GWC.

- 8.2 The Minister has not directed the GWC under section 6 of the *Gaming and Wagering Commission Act 1987* during my time on GWC. I would not have contemplated that a Minister would seek to direct me on how I perform my functions in relation to regulatory oversight, in making regulatory decisions, across the range of GWC’s activities nor to state expectations or intentions in relation to those matters. Until receiving the letter described in paragraph 8.1 above, it was not suggested to me by any officer of the Department, including the Chair of the GWC, that such intent or expectations have been expressed by the Minister, at any time.
- 8.3 The GWC does not conduct a business on behalf of the government. Much of the PSB Guidelines which relates to the conduct the business, and the considerations relevant to that, are not applicable to the activities of the GWC. GWC is a regulator. It does not have a strategy to achieve a specific business purpose or outcome. It has a purpose to regulate, and it has policies established by practice, informed by Departmental procedures, and implemented within its resource constraints to conduct that regulation effectively. However, I and a number of other GWC members have pressed for a couple of years to have a “strategic planning” session where we had the opportunity to step back from our monthly meetings, which can be, and mostly are, very hectic. We were finally able to hold that on 21 June 2021 facilitated by Peter Fitzpatrick AO, AM (Mil), FSAE, GAICD, JP. The result of session was the identification of a number of objectives and issues in relation to governance of GWC and its relationship with the Department, regulatory capability, stakeholder engagement and some process improvements for GWC’s decision-making processes across the whole spread of GWC’s activities. A summary table of

actions from the August 2021 GWC Agenda, flowing from the strategic planning session held 21 June 2021, is at GWC.0003.0014.0018.

- 8.4 GWC is constituted so that its chair is, under its legislation, the Director-General of the Department which supports it in the undertaking of its functions. The selection and appointment method for GWC members, and its relationship with the Department which provides support and advice in relation to its operational issues, has not been consistent with the self-evaluation, self-selection and self-generation of a mix of skills, knowledge and experience. GWC has been dependent upon the Minister, the Minister's advisers and to the extent it is involved the Department, to constitute GWC. The statement of expectations received from the Minister, referred to above, suggests the possibility of a greater level opportunity for GWC as a whole to be involved in these matters in the future, and that is one of the matters that the GWC sought in its strategic planning session on 21 June 2021.
- 8.5 GWC does not have a CEO. It has never selected the Chief Casino Officer or been consulted on their selection, during my time with the GWC (see below).
- 8.6 Until very recently, the GWC has not had a dedicated executive officer or a board secretary. A resource having some of those functions has been provided by policy officers of the Department.
9. I have no hesitation in saying that in my own case, and in my observation, the members of the GWC appointed by the Minister have, in all my dealings with them and so far as I have been able to observe, acted honestly and have exercised their powers for their proper purposes, managed conflicts of interest, acted in good faith, and exercised diligence, care and skill (given the extreme workload that we have been subject to, and the limited remuneration and resources that we have) in a manner consistent with the accountability principles in the PSB Guidelines.

10. I recall that at our meeting on 11 March 2021, and the minutes of that meeting record that the Chair noted that “The Public Sector Commissioner’s Instruction No. 8 requires all public sector bodies to provide employees (including boards established under their own legislation) with training on accountable and ethical decision-making. The Human Resources team will arrange for this training to be undertaken by Commission members in the coming months.” (GWC.0002.0016.0367_0214). I look forward to that training being arranged.

TOPIC 2: FINANCIAL MATTERS

11. In answering the question(s) under this topic, I have had regard to the following documents: GWC.0002.0016.0306_0053-0056; GWC.0002.0016.0309_0007.

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.

12. I have generally found the adequacy of the briefing papers and oral presentations given by the Department with regard to financial matters to be satisfactory.
13. If the GWC had queries that could not be answered within the course of a meeting, those questions were referred to the Chief Financial Officer (**CFO**) and responded to either by email or at the next meeting.
14. Regarding the service fee charged by the Department, I understood this to be an allocation of costs incurred by the Department for providing services to the GWC. Those obviously included inspection and licensing functions, some policy support and administrative support. A briefing paper related to KPIs was provided to the GWC in the July 2020 meeting setting out the allocation of the total cost of running the Department’s Licensing Team (\$10.28M) split between Racing, Lottery, Gaming, Casino, & Liquor based on the number of inspections undertaken (GWC.0002.0016.0306_0053-0056). The share for GWC of \$4.140M equals the amount that the Department allocates to the GWC in their financial statements. The GWC does not have visibility on the make-up of the overall Departmental licensing cost of \$10.28M.

15. The GWC has been requesting information about the calculation. Accordingly, a paper has been included in the GWC Agenda for 27th August 2021 setting out the background to the calculation of the service fee (GWC.0003.0014.0019). I now understand that the calculation was established based on a request from the Department of Treasury in 2017, at the time of the Machinery of Government changes. I have attached a copy of that paper.

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.

16. The members of the GWC have a responsibility to read, understand and interpret the financial information presented, ensure good financial management practices are followed and to form an opinion as to whether the annual Financial Statements and Notes are prepared in accordance with the accounting standards and provide a 'true and fair' view.
17. This duty is discharged in 3 ways:
- 17.1 Input into, review and then approval of, the appropriateness of the annual budget.
 - 17.2 Undertaking a monthly review of the CFO's report, Profit and Loss, Balance Sheet and Cashflow Statement included in each month's Board Papers. This involves analytical review versus budget, making appropriate inquiries and, on occasion, inviting the CFO to attend a meeting.
 - 17.3 Reviewing and approving the annual Financial Statements prepared by the CFO and finance team of the Department and subsequently audited by the Office of the Auditor General (**OAG**). In July 2020, the Assistant Director Finance and a Divisional Accountant attended the GWC meeting to answer specific questions relating to the June 2020 Financial Statements (GWC.0002.0016.0309_0007).

18. With regard to satisfying ourselves as to the reasonableness of the service fee, we did this by analytical review including comparison to budget and comparison to prior year results as well as reliance on management controls, processes and CFO sign off. The key expense for GWC in the budget is the cost of services provided by the Department. The basis for the determination of that cost was set before I joined the GWC and those costs have not, until this year when there was a change due to activity levels, changed from year to year.
19. Comparison to prior year was particularly relevant in this situation as the service fee is the only material expense for the GWC, other than pass through items (e.g. racing bets levy collected on behalf of Racing and Wagering Western Australia). Because of the materiality of the service fee, I would expect that this would be a key focus for the OAG when completing the audit of the Financial Statements in previous years. If there was little or no variation from the prior year audited figure, it is not unreasonable to consider (and I did consider) that figure to be materially correct.

TOPIC 3: DELEGATIONS

20. In answering the question(s) under this topic, I have had regard to the following documents: GWC.0002.0016.0298_0351, GWC.0002.0016.0299_0010, GWC.0002.0016.0306, GWC.0002.0016.0309 GWC.0012.0001.2559 GWC.0012.0001.2546.

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.

21. I am aware from my participation in meetings of the GWC since my appointment, that for a number of years GWC has had a delegations in place. I have learned through the proceedings of the PCRC that some of those delegations were made in effectively the same terms to the same person in different guises e.g. the Deputy Director-General, Deputy Chair of the GWC and Chief Casino Officer. I am also aware that specific delegations were made for particular purposes to some officers or positions within the Department, in particular in relation to licensing matters.

22. So far as I can recall, the only consideration of a new instrument of delegation with which I have been involved is a delegation to the Deputy Director-General which was given in April 2020. My understanding of the intention behind delegating these powers in April 2020 was to allow the Deputy Director-General/(Agenda: GWC.0002.0016.0298_0351; Minutes: GWC.0002.0016.0299_0010):
- 22.1 to act on behalf of the GWC in the event that an urgent, but minor issues arose between meetings;
- 22.2 to finalise formal requirements to implement approvals given “in principle” by the GWC, such as the execution of formal instruments which may take time to prepare or not be available at the time “in principle” approval is considered.
23. That was consistent with how I generally understood that general delegations in place were in fact used.
24. The GWC are a part time Board attending one meeting per month whereas the Deputy Director-General is a full time employee of the Department, and was therefore more available than GWC members in respect of urgent but minor out of session matters and ministerial matters. The intention was to ensure harm was not caused by holding up urgent but minor matters that arose, or attendance to matters of formality.
25. I did not understand that it was ever the intention of the GWC to delegate material decision making power, and in my observation and experience that is not how the delegation was exercised.
26. There was a different kind of delegation to other Departmental officers of much more routine approvals work for relatively minor permits and approvals – some of which might run into hundreds per year. Delegations of this kind are, in my experience in corporate life, a very normal way of conducting operational activities for the exercise of decision-making authority, at an appropriate level, according to the nature of the decision to be made.

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 Commission; or

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

27. Whilst the delegation to the Deputy Director-General is expressed in terms that are broad, any use of these powers is required to be reported to the GWC at the next meeting for consideration. The use of the delegations are reported (generally under “Item 11 - Commission Matters”, though the numbering may change from meeting to meeting) in the Board Papers and considered at each meeting. The exercise of power under delegation is normally noted rather than actually ratified.
28. In a paper presented at the April 2020 GWC meeting to grant the Deputy Director-General these powers whilst the proposed sale of the TAB was in full swing, the requirement to report any use of the delegations to the GWC at the next meeting for ratification was confirmed (GWC.0002.0016.0298_0351). As the minutes for that meeting record (GWC.0002.0016.0299_0010):
 - 28.1 the delegation was for a specific purpose to “expediate approvals required as part of transitioning to a new wagering licensee to operate the WA TAB...”, and to “enable the position holder to exercise, in a timely manner, matters that they require tension between Commission meetings”,
 - 28.2 members of the GWC identified issues with another delegation put forward at that meeting, and sent it back to the Deputy Director-General for further consideration and resubmission at a later date
29. The sort of situation in which I would expect, and have observed, delegations to be exercised can be seen in the papers for our 28 July 2020 meeting dealing with three issues:
 - 29.1 The first item was the consideration of the instrument approval for a rule change in relation to Mississippi stud poker which had already been approved in principle by resolution 99/2020 and then brought back for final approval of the rules and the applicable instrument (item 5.2).
 - 29.2 The 2nd item was brought forward for approval in principle – in which case formal instrument would likely be approved under delegation as there would be nothing more of substance to approve. In fact it was not approved but deferred – see resolution 119/2020 in GWC.0002.0016.0309_0005 because of a concern identified by GWC members (I can’t now recall who) in the meeting about the

similarity of a prize square to a spinning wheel contrary to the poker machine definition in the poker machine policy (item 6.4).

- 29.3 The 3rd, which dealt with established forms of lottery as a result of changes to legislation, proposed full delegation to the Manager Licensing and Industry Services and a Director Licensing and Industry Services for determination where the lottery was established form of lottery that is a “standard lottery application where the lottery is being conducted nationally”. GWC agreed to grant a delegation only to the Director position and subject to the Director determining that application in accordance with the same protocol is currently applied to state-based applications (item 7.2).

(Agenda: GWC.0002.0016.0306, Minutes: GWC.0002.0016.0309)

30. In the two latter instances a departmental recommendation was overridden by GWC, in detail, even in relation to a relatively minor matter.
31. I am not aware of any situation where the use of the delegations was not reported or where there has been any inappropriate use of the delegations.
32. However, as a result of the information obtained in the course of this Royal Commission as to the multiple and apparently overlapping delegations in place GWC requested in its meeting on 25 May 2021 (GWC.0012.0001.2559, item 5) that those delegations be revoked with a view to reconsidering the delegation structure. The then Deputy Director-General (Ms Roche) was to prepare a paper in relation to that and bring it back to GWC members out of session. At our meeting on 22 June 2021 (GWC.0012.0001.2546) we were briefed on the status of this review, including the delegations currently in place and a new and narrower delegation to the Chief Casino Officer was approved. The report on delegations forms part of the papers for our meeting on 27 August 2021.

TOPIC 4: MEDIA ALLEGATIONS

33. In answering the question(s) under this topic, I have had regard to the following documents: GWC.0002.0016.0286_0006, GWC.0004.0014.0002, GWC.0002.0016.0239.

As regards 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.

34. In July 2019 the GWC members received an email from the Department advising that a story related to Crown was being advertised as being on 60 minutes that Sunday night. I was unable to tune in at that time so I watched an online version of the program the following day.
35. I also recall the full-page advertisement taken out by the Board of Crown refuting the claims.
36. I do not recall seeing or reading any Fairfax news articles. I do not watch the news/current affair programs or read new articles unless they are specifically brought to my attention. However, I understood the content to be generally the same as the 60 minutes episode.
37. An email was sent by the Deputy Chair/Deputy Director-General outlining a list of questions that should be answered by Crown. At the August 2019 meeting (GWC.0002.0016.0286_0006) a detailed, 45-page presentation was given addressing those questions and more generally China, Junkets, Visas, the Melco transaction, other investigations underway and AML by Josh Preston and Claude Marais (GWC.0004.0014.0002). Questions were also raised by members and answered by the Crown representatives. The session went for around 90 minutes. At the time I considered the presentation and responses given to be very thorough and credible.

38. During the August 2019 meeting an action item was added (Item 5.1.1) for the Deputy Director-General to be responsible for monitoring the outcome of a new Victorian Commission for Gambling and Liquor Regulation's (**VCGLR**) investigation into the China arrests.
39. With the VCGLR's investigation into the China arrests, the Independent Liquor and Gaming Authority (**ILGA**) Inquiry in NSW which had been commissioned in August 2019 (to which the GWC through the Department provided some assistance at the request of ILGA) and an Australian Criminal Intelligence Commission all underway (GWC.0004.0014.0002_0034-0037), the GWC took a wait and see approach.
40. At this time the position of the GWC was that federal border protection agencies process and approve the issuing of visas to overseas players, that AUSTRAC was the federal agency responsible for administering anti-money laundering legislation, and that there were a number of inquiries being conducted in relation to Crown and broader junket activity by state and federal agencies that could be relied upon as a basis to make suitability and enforcement determinations. I understood from discussion between GWC members at the time, in particular those who had a much longer history with the GWC than me, that a consistent position had been taken by GWC (on advice from the Department) that money-laundering and related criminal exploitation issues were issues for federal authorities, not GWC.
41. With multiple inquiries underway in relation to activities by Crown which were fundamentally focused upon Melbourne, we collectively thought that awaiting the progression of those enquiries was an efficient way for GWC to proceed.
42. By this time GWC was aware from the activity reports which it routinely receives and considers in relation to "casino gaming action" as part of its monthly meeting papers (usually under agenda item 6) that international commission business at the Perth Casino, which includes junket operations, had considerably diminished over time, and by August 2019 was barely 20% of the "gross drop" at the Perth Casino. While still significant, it was much smaller than the level of international commission business at Crown Melbourne. When COVID-19 hit in the first quarter of 2020, and international borders closed, international junkets and international VIP players were no longer able to attend the Perth Casino and International Commission Business effectively ceased in any event.

43. In August 2018, the GWC received and reviewed the VCGLR's 6th Review of Crown's suitability to hold a casino license (GWC.0002.0016.0239_0277). GWC decided to invite Crown Perth to present on various matters raised in that review and actions to address them which the Department then arranged. Other than the VCGLR's investigation into the China arrests and some areas for improvement (which did include AML/CTF procedures), the VCGLR were standing by its assessment that Crown Melbourne remained a suitable person to hold a casino licence under the very similar Victorian licensing regime (GWC.0002.0016.0239_0299). This gave the GWC comfort that there was no need for urgent action whilst the investigation into the suitability assessment of Crown to hold the New South Wales license, progressed and the other investigations developed.
44. On 18 December 2018, Mr Preston presented to the GWC in respect of Crown Perth's responsible service of gaming framework and also gave an update to members in relation to the 20 recommendations that came out of the VCGLR's 6th Review, identifying which recommendations were relevant to operations at Crown Perth and further actions proposed by Crown as a result of the recommendations, as requested by the GWC several months earlier. (GWC.0002.0016.0250_0002).

TOPIC 5: JUNKETS

45. In answering the question(s) under this topic, I have had regard to the following documents GWC.0002.0016.0286, GWC.001.0010.0006, GWC.0002.0016.0315_0016 GWC.0002.0016.0315_0017 GWC.0002.0016.0312 and GWC.0002.0016.0318.

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]

46. My 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.” was because the GWC was following the various inquiries around Australia. The general view of GWC members in the meeting that day was that if there was any validity in the allegations (and maybe even if there wasn’t) there would most likely be some sort of movement for a national framework going forward – for the various regulators, Border Force, AUSTRAC, Federal Police etc to work together to monitor junket activity. The approval was given to be pro-active in this regard and also to ensure that the GWC was represented as part of the process, rather than later being required to be part of a solution developed by ILGA and/or VCGLR.
47. In this respect, on 20 August 2019 and ahead of the August 2019 GWC meeting, the Deputy Director-General prepared a paper (included at item 6.4 of the agenda for the meeting: GWC.0002.0016.0283_0043) titled “Junket Processes”. In that paper, the Deputy Director-General, amongst other things, described the background to the regulation of junkets and explained the broader federal regulation of junkets and issues like money laundering by federal border protection agencies and AUSTRAC.
48. In the context of a national framework, the Deputy Director-General observed:

I see a model like this as being able to provide reduced risks, standardise reporting and practice, facilitate mutual recognition, clearly identify who is doing what and why, make it easier for the Casino Licensees to understand requirements and conduct their business and to give the public confidence that issues and risks are being managed. To date, at least in my observation, regulators are to some degree doing their own thing without any real consideration of the interests of other authorities. This has some potential to be detrimental to all if there are inconsistent findings or different standards applied and can have agencies competing when a far more beneficial outcome could be achieved through collaboration and cooperation.

(GWC.0002.0016.0283_0045)

49. The Deputy Director-General's ultimate recommendations (GWC.0002.0016.0283_0043) were, as reflected in the minutes, accepted (GWC.0002.0016.0286_0003).
50. The idea of a national framework has been an ongoing conversation. In October 2020, the Deputy Director-General's paper, and the recommendations which were adopted as resolutions by the GWC at its August 2019 meeting, were the subject of further consideration. A paper prepared for the October 2020 meeting (GWC.0002.0016.0315_0016) referred to and attached the paper dated 20 August 2019, and observed that "that jurisdictions will be participating in regulatory round table sessions commencing 28 October 2020" and that "The Deputy Director General Regulation intends to raise during the round table session the proposal of establishing a national framework for the approval and management of junket activities." (GWC.0002.0016.0315_0017). An outline of the proposed framework was also provided.

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?

51. My 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, is very limited.
52. Until I heard the name of the report mentioned at the PCRC I was not aware of it.
53. In preparing this statement my lawyers located an email dated 15 September 2020 from the Department to GWC members including me which attaches a letter from Crown Perth to the then-Chief Casino Officer (GWC.001.0010.0006).

54. The email is in most respects a generic email in a form which I receive every month enclosing (via Dropbox link) the agenda papers for GWC meetings. While I am sure I received the email (as that is how I obtain agenda papers for GWC meetings) I do not specifically recall receiving it, nor do I recall receiving or reading the attached letter from Crown Perth.
55. This may be because:
- 55.1 the email was sent to my @gamingandwageringcommission email account which, for technical reasons, I do not use;
 - 55.2 the email was cc'd to my ordinary work email and, because I am cc'd to a large number of emails in my principal employment, I have a rule setup to automatically file emails to which I am cc'd;
 - 55.3 my practice is to have regard to the agenda papers supplied by the Department, and downloaded from the link supplied in emails like this email, and the letter was not contained in the agenda papers for the September 2020 meeting (GWC.0002.0016.0312); and
 - 55.4 I have no recollection of the letter being discussed at the September 2020 meeting, and there is no reference to it in the minutes (GWC.0002.0016.0318).
56. As mentioned at paragraph 36 above, the news materials I generally refer to are collated for me on the basis that they're necessary for me to undertake my professional activities – whether in my principal employment or in relation to GWC.

TOPIC 6: MINIMISATION OF HARM FROM CASINO GAMING

57. In answering the question(s) under this topic, I have had regard to the following documents: GWC.0002.0016.0248, GWC.0002.0016.0298_0191

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.

58. As stated in my first appearance at the PCRC, I am very familiar with the nature and extent of harm caused by Casino gambling based on a personal relationship over several years with a problem gambler.
59. The nature of harm falls into several categories
 - 59.1 Individual mental health
 - 59.2 Relationships, marital and family •
 - 59.3 Financial
 - 59.4 Employment and productivity
 - 59.5 Related legal problems/offences.
60. At its most extreme the extent of harm can result in suicide, domestic violence, child neglect, bankruptcy, unemployment, homelessness and theft/criminal activities.
61. While I am aware that there is a large body of research in relation to gambling and problem gambling generally, I am unaware of any research specifically prepared pertaining to Crown Perth other than pending research/reporting into the impact of the recent introduction of EFTPOS at the Perth Casino (see below).

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.
62. The Problem Gamblers Support Services Committee (**PGSSC**) assists to fund Gambling Research Australia (**GRA**). GRA is a national gambling research program funded by all State, Territory and Commonwealth Governments through a Memorandum of Understanding.
63. The PGSSC is made up of representatives from GWC, Crown Perth, Racing and Wagering Western Australia, Lotterywest, WA Bookmakers Association and Department of Communities. It is funded by voluntary donations from the representative organisations
64. As well as funding GRA the PGSSC funds:
 - 64.1 Problem Gambling Helpline (\$179,000)
 - 64.2 Gambling Help WA (\$534,000)

- 64.3 Gambling Help Online (\$100,000)
- 64.4 Responsible Gambling Awareness Week
- 64.5 Gambling Aware Website
- 64.6 Other awareness initiatives

65. I am also aware that unclaimed winnings go into a fund known as the Gaming Community Trust, which is administered by the Minister, and from which monies are distributed for various social purposes including to fund responsible gambling initiatives.

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;

66. In addition to the contribution Crown Perth make to PGSSC I am aware that they run an internal responsible gambling program.
67. Crown Perth's responsible gambling program includes a 24/7 Responsible Gambling Information Centre and dedicated Responsible Gambling officers
68. Crown's responsible service of gambling framework, as presented to the GWC by Crown Perth (GWC.0002.0016.0248) includes:
- 68.1 Systems & Process
 - (a) Staff training (attended by GWC member Katie Hodgson Thomas who reported back to GWC)
 - (b) training and education on observable signs
 - (c) Exclusion programs – principally for self-exclusion
 - (d) Play Safe Limits which can be set by players and Player Activity Statements which can be obtained by players – this is based on players becoming a “carded” member of Crown Perth so that their gaming activities are recorded by Crown's management systems
 - (e) Facial recognition software which is now used to assist in the enforcement of exclusion programs and banning orders

68.2 Policies & Procedures which have been adopted in accordance with GWC requirements:

- (a) ATM Policy
- (b) Gaming Machine Standards
- (c) Advertising Restrictions (Regulation 43)
- (d) How to Play Information

68.3 Community & Professional Engagement with a number of problem gambling and gambling studies organisations including:

- (a) Gambling Help WA
- (b) Problem Gambling Support Services Committee Working Group
- (c) National Association for Gambling Studies
- (d) Australasian Casino Responsible Gaming Group
- (e) Australasian Gaming Council

(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.

69. Under s 7(ba) of the *Gaming and Wagering Commission Act 1987* it is the GWC's responsibility to, amongst other things:

formulate and implement policies for the scrutiny, control and regulation of gaming and wagering, taking into account the requirements and interests of the community as a whole and the need to minimise harm caused by gambling.

70. Although Crown is effectively self-regulating from a responsible gambling perspective, the GWC take a very keen interest in Crown's program to minimise the harm caused as part of that function. It informs our decision-making, and it is taken into account in making decisions on issues that come before GWC, but it is just one aspect of GWC's regulatory role. It may be relevant, for example, to the approval of a new game, to changing the rules of the game, to considering a complaint from a patron of the Perth Casino, to assessing whether to uphold a banning order, or to directing changes to Crown Perth's responsible service of gambling program (for example) to limit gaming time for players. Ultimately, it may go to considering the suitability of the licensee or an associate of the licensee, if that issue arises for GWC to consider.
71. I can't stress enough that both because of my own experience, and the experience and perspectives of other members of the GWC, responsible gambling and harm minimisation are things that we think and talk about at pretty well every meeting. That may not be minuted because the minutes are not "narrative" minutes and depending upon who is taking them, they may do no more than merely record the formal resolutions. That doesn't mean that we don't discuss elements or issues of harm minimisation and responsible gaming as an aspect of most of the approvals that we consider in relation to the Perth Casino.
72. The GWC also receives periodic updates from Crown on its responsible gambling program and the GWC are provided with statistics and reports each month relating to things like self-exclusions, barring, the number of people ejected, and quite detailed information about "concerning behaviour reports" referred by Perth Casino employees and the reasons for those reports which include such things as how long people had been gambling for ("play period") (see for example agenda item 6.2 in GWC.0002.0016.0298_0191). The minimisation of harm is considered, whenever relevant, in all decisions the GWC makes. However, that has to be balanced against an element of personal responsibility by players at the casino (and in any other gambling context) that also has to be considered.

73. Further, responsible gambling and harm minimisation is only one of the considerations that we have to think about. As I observed when giving evidence before the PCRC on 17 May 2021, it would be easy for GWC to regulate Crown Perth out of business, including under the guise of harm minimisation, or mire our approvals and directions in a welter of litigation with Crown over those approvals I suspect we could think of many ways if we wanted to put them out of business given our powers to direct, and given our ability to grant and withhold approvals. Since I have been on the GWC we have collectively discussed that as a potential consequence of regulation, but we have not considered regulating in that way.
74. The overall effectiveness of the Crown program is difficult to measure.
75. There will always be more that can be done to reduce gambling harm at Crown and in the community. It is an ongoing issue for our society. The risk of harm is not limited to casinos, and one of GWC's principal areas for concern at the moment is the proliferation of online gambling outlets offering a range of gambling opportunities, including casino like games, which are harder to regulate and may be impossible regulate if offshore, posing even greater risk of harm with negligible offsetting benefits.

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.

76. There is a policy in place that ATMs need to be 40 metres from the entrance to the main gaming floor and have a \$400 withdrawal limit per 24 hours. I understand from my time sitting with the GWC that the rationale for this is to force patrons to physically exit the gaming floor to gain access to their own funds from an ATM to continue to gamble, which enforces a "break" from gambling.
77. As for EFTPOS, at the Perth Casino it is a debit card only facility with a \$500 daily limit and a \$400 per transaction limit. PayWave/tap-and-go is not permitted – the debit card must be inserted and a PIN must be entered, and the narration that appears on your debit card statement says something like "casino".
78. Use of EFTPOS at gaming tables has also given dealers more opportunities to see how much people are withdrawing and employ their responsible gaming training to put limits on those withdrawals. It also provided an opportunity to collect more data that might over time be used to fashion responsible gaming policies.

79. The EFTPOS machines used at gaming tables are also required to have a responsible service of gambling message on them. The GWC requested this and Crown confirmed it was provided.

TOPIC 7: DETERMINATION OF APPLICATIONS BY CROWN PERTH

80. In answering the question(s) under this topic, I have had regard to the following documents: None.

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.

81. The GWC would seek independent expert reports in any circumstance where a determination needed to be made where the GWC felt that they didn't have satisfactory evidence provided or skills amongst themselves to make the determination or that that expertise was not available within the Department. By s 9(2)(b) of the *Casino Control Act 1984*, Ministerial approval for such an engagement would probably be required in each case.
82. It is my understanding that wherever possible Crown Perth should meet the cost of any independent expert reports required thus not be at the expense of the taxpayer.
83. The GWC runs its own tests as part of the audit programmes on things like return to player and electronic gaming machine (EGM) integrity, but if Crown Perth want something for their benefit GWC require them to obtain independent third party reports on things like the underlying mathematical logic of the game, and its compliance with our policies on return to player and the gaming machine standards (if applicable). Because this is a well-established requirement very often when Crown Perth come to the GWC with a new game they will already have all the mathematician reports etc attached to it as a package in order to obtain approval. .

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.

84. Under the *Casino Control Act 1984* the GWC can declare any game to be an authorised game, except a Poker Machine which is specifically excluded under 22(1)(a).

85. EGMs have additional requirements that need to be met which are included in the WA Appendix to the Gaming Machine National Standard 2016. For example; no handles, no spinning wheel mechanisms, the direction the symbols move in, the shape of the symbols etc.
86. For EGMs the GWC also considers game speed, human involvement, return to player, and ensures there is no skill element to the game (so as to ensure that it is a game of “chance” rather than a game of “skill”).
87. With regard to other games, for example table games, GWC seeks to understand the rules of a new game or any changes to the rules of an existing game and the impact that that would have on the return to the house/player. The GWC also considers the reasons for wanting to change the rules of a game. Responsible service of gaming will be a consideration in our evaluation.
88. When a new game or rule change is requested by Crown Perth, representatives of Crown will invariably attend a GWC meeting and demonstrate the game or the change to the game and often if not usually provide mathematical reports prepared by third party experts indicating the return to house/player. Unlike EGMs which are a game of chance, table games are game of skill. Therefore, any mathematical calculations in relation to table games provided by third party experts are only indicative of results that players will actually achieve, individually.
89. Should the GWC be satisfied with a new game or a change of rules to an existing game the GWC approves the application, which 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.

90. There is no definition of poker machines within the *Casino Control Act 1984*.
91. My understanding of the effect of this is that the GWC is not permitted to approve an EGM that isn't in accordance with the WA Appendix to the Gaming Machine National Standard 2016. The criteria set out in the WA Appendix is what differentiates the definition an EGM from a poker machine in Western Australia. Poker machines are not permitted in Western Australia.

92. There has been a long-standing set of factors applied by GWC to differentiate EGMs from Poker Machines, established well before I joined GWC. I am not aware of what (if any) advice was obtained at the time those factors were adopted.

TOPIC 8: POLICY ON ELECTRONIC GAMING MACHINES

93. In answering the question(s) under this topic, I have had regard to the following documents: GWC.0002.0016.0281, GWC.0002.0016.0285, GWC.0002.0016.0173, GWC.0002.0016.0195

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].

94. I was an apology at the meeting held on 23 July 2019. However, having read the agenda paper, the minutes and attending the meetings which followed, I set out below my attempt to answer this question.
95. The GWC did not accept the recommendation in the paper provided by Mr Connolly to accept a change to game speed. When the GWC wants to make modifications to a recommendation it is recorded in the minutes. In this case the paper recommended a reduction in game speed from 5 seconds to 3 seconds (based on in-game features extending the overall game speed). The GWC has tightened the resolution to state that games without in-game features still need to have a game speed of 5 seconds. Accordingly, Attachments 4 and 5 would need to be updated.
96. The GWC also approved the change to the Independence of Outcomes based on the Gaming Labs International (GLI) Report confirming that removing items 1(4) and 10 of the WA Appendix to the Gaming Machine National Standard 2016 does not alter the determination of an EGM being a Poker Machine. I infer that the impact of removing these items would have been explained in the meeting to determine if the GLI Report seemed reasonable.
97. I am unable to answer why the item in Attachment 5 relating to Winning Outcomes is modified. It may have been explained in the meeting.

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.

98. In March 2019, Barry Felstead wrote to the GWC requesting 3 changes to EGM rules claiming Crown was experiencing a downturn in business, despite the significant investment in Crown Towers. The requests were made to “contain revenue losses and retain current employment levels” in a “soft economic environment”.
99. The first change requested was for a reduction in Return to Player % to 87.5% as other casinos or venues around Australia had lower Return to Player % and Mr Felstead claimed that Crown was disadvantaged. This request was not approved by GWC which has had a long-standing position, as I understand it, that the minimum return to player on EGMs should be 90% and that Crown Perth has a monopoly in WA which comes at a “premium” in the sense that they should get a lower return from the revenue stream for having a monopoly over that revenue stream.
100. The second requested change was a reduction in game speed from 5 seconds to 3 seconds. Amongst others, Crown’s main arguments were that games had changed since the 5 second rule was created, to include in-game features and that eastern states and overseas visitors complained about the game speed in WA being too slow. In-game features are popular, non- gambling rewards received during a game. The in-game features increase the overall time it takes to play a game giving the punter more entertainment value for their money. Reducing the game speed to 3 seconds, but including the popular in-game features meant the game speed was still above the current 5 seconds. This was seen as having a benefit to both players and Crown

101. ~~[Not used] The third was a change in “Independence of Outcomes” criteria. The requirement for “Independence of Outcomes” was something specific to Crown Perth EGMs only. That meant that sourcing new games from international suppliers was problematic. An independent report from GLI demonstrated that removing this requirement did not change the determination of the EGMs as being Poker Machines. Making this change would expand the options that Crown had to change EGMs to provide variety for the players in WA at a reduced costs. Since the change the number of EGMs has remained at 2,500—that is, this change added variety but did not result in an increase in machines. With Return to Player % maintained this change didn’t really impact players negatively.~~

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

102. My essential knowledge and understanding of the rationale for the 90% return to player requirement for EGMs originally stems from the 3 years that I at worked on the Burswood Resort Casino audit for Price Waterhouse from 1990 to 1992. Part of that audit included validating that the Casino met the return to player requirement.
103. The 90% return to player requirement is now set by the GWC through its adoption of the WA Appendix to the Gaming Machine National Standard 2016. The outcome of this is that 90% of the overall dollar value of all bets placed via the EGMs is returned to the player and the maximum amount the house/casino can win is 10%. I note that—the odds for a skilled player on table games are much better than the odds on an EGM.
104. The 90% return is the average return across all the EGMs over time. An individual EGM that delivers a big payout or a jackpot may take months or even years to return to 90%.
105. The software that operates the EGMs is programmed to achieve the 90% return to player outcome in the long run (that is over many, many game cycles) and games are required to be certified by a 3rd party testing facility (see e.g. GWC.0002.0016.0173_0047)

106. The GWC reviews the 90% return to player requirement, by game type, twice a year upon receipt of a report prepared by a third party testing laboratory which is contracted to undertake these tests (see e.g. GWC.0002.0016.0195_0034). The inspectors select one game per month to test for the return to player requirement and report to the GWC on that each month.

TOPIC 9: REGULATION AND OVERSIGHT OF PERTH CASINO

107. In answering the question(s) under this topic, I have had regard to the following documents: GWC.0002.0016.0298_0186 GWC.0012.0001.0250 GWC.0012.0001.2333.

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

108. The GWC sees reports on the fact of the audit activity, and the results of audit every month. These are usually reported in part 6 of the agenda papers. As example, from the March 2020 agenda papers (GWC.0002.0016.0298_0186) there were 81 audit and inspection activities reported in February 2020 ranging from audits of cage transactions through EGM software and configuration audits, revenue verification and table audit procedures. It's not feasible that the GWC would have the time to get into the trenches and go line by line through the audit reports themselves.
109. My understanding is that the number of audits to be completed in 2020/2021 by the inspectors relating the Perth Casino was 2,181, approved by the GWC as part of the KPI setting process in the GWC December 2020 meeting (GWC.0002.0016.0336_0472).
110. If one looks at many of the inspections that are performed, they are essentially the same as what I did back in 1990 when I was conducting audits with Price Waterhouse. They're testing the revenue, and testing closing of table and chip collections, etc, to ensure revenue is correctly reported and casino tax is correct. EGM auditing has changed since I was involved in 1990 – a report is provided to the GWC about EGMs every month – but the method of audit for chip and tables hasn't changed.

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

111. It is based around the risk of revenue error, and integrity errors in the gaming process itself. There are people on the ground some of the time, though much of the audit programme is completed without attending the Perth Casino through the use of surveillance footage. I was quite surprised to find out how little time the 12 inspectors actually spend at the Perth Casino and how much is spent on liquor inspection activities. The allocation is one inspector for 9.5 hours per day on site at Crown Perth. Liquor is about 2/3 of the activity undertaken by the inspectors. Perth Casino inspections are done either online (mostly for revenue) or in one place (at the Perth Casino). Liquor licensing inspections takes a lot longer because one needs to travel between premises which are spread all over the metropolitan area and beyond.

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.

112. The taxable revenue attributable to EGMs is provided by Crown Perth using a report generated from the electronic gaming system. The report is generated by Crown Perth. Officers. Employees of the Department ensure the report is authorised by two of Crown Perth's internal audit staff before it is uploaded via a portal to the Department. The software that generates the report was last independently audited in 2017. This came to the attention of the GWC recently and a request to have that audit re-performed has been made. That is not to say the figures are not audited in other ways. The inspection team audit EGM revenue quarterly. The revenue generated from EGMs has steadily increased since the last independent audit of the software, therefore there is nothing to indicate that the software is not functioning properly. This same software is used to run reports to validate the 90% return to player. The return to player reports agree to the taxable revenue reports, which also provides comfort that the revenue is not understated as the return to player calculation would be impacted by a lower revenue figure.
113. In the July 2021, GWC meeting a request was made to invite Crown Perth internal audit to attend a GWC meeting to understand what procedures they undertake to validate the same information. (August 2021 agenda - GWC.0012.0001.0250, item 4a)

114. I understand from a recent meeting that an exercise was recently undertaken by the Department at the request of the GWC to ensure Crown Perth was not deducting expenses (e.g. promotional benefits) from the EGM taxable revenue. The outcome of that request indicates that is not the case. (GWC Agenda July 2021, GWC.0012.0001.2333)
115. With regards to other forms of taxable revenue (e.g. table games, Keno, Trackside) the inspectors conduct audits to ensure that the flow of revenue through the Perth Casino is correctly recorded. This includes audits of table opening and closing procedures, chip re-fills, chip audits, and chip credits. The results of these audits, along with the taxable revenue figure, are reported to the GWC on a monthly basis.

TOPIC 10: DEPARTMENTAL EMPLOYEES AND OFFICERS

116. In answering the question(s) under this topic, I have had regard to the following documents: None.

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

117. At the November 2020 GWC meeting the Deputy Chair Mr Connolly declared a friendship with Claude Marais, who was an employee of Crown. I was not previously aware of this relationship. I have subsequently become aware of further relationships between Mr Connolly and Crown employees through the PCRC and recent media reports.

118. In the June 2021 GWC Meeting a paper was presented explaining that the Department had identified several relationships between inspectors and Crown staff, including a greyhound syndicate. The paper set out actions that had been taken to address any conflicts arising from these relationships. The GWC accepted the measures put in place.

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.

119. I am not aware of any gifts or benefits (including hospitality) provided by Crown to Departmental staff officers or employees. I note in passing that in the meeting room in which we have GWC meetings there is a poster on the wall detailing what is acceptable for a departmental officer to accept for hospitality. I assume that is replicated elsewhere in 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.

120. I am not aware of any travel provided by Crown to Departmental staff other than the trip for the then Director General, Barry Sargent, to travel to Macau, about which I learned from the PCRC and recent media reports.

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

121. I am not aware of any functions at the Perth Casino attended by Departmental staff officers or employees during my term with the GWC. I understand that at least Duncan Ord and a few members of the GWC attended the opening of Crown Towers.

TOPIC 11 – RISKWEST REVIEW

The current status of the RiskWest review

122. The GWC initially believed it was commissioning a risk assessment specifically to address GWC Risks and KPIs. It is my understanding, however, that the Department has taken the process on a different path commencing at a Departmental level.
123. The review has not reached GWC level. Accordingly, the GWC did not pay for the report nor has the GWC seen it. Instead, the Department is now preparing a risk assessment specifically for the GWC, which the Acting Director General has advised will not be available until December 2021.

TOPIC 12 – CHANGES TO PROCESS OR PRACTICES

Whether the Commission has made or intends to make any changes to its processes or practices in light of the findings and recommendations of the EY review.

124. The GWC is yet to receive the final version the EY Report.

125. The GWC initially believed it was commissioning a report on a certain basis, but again the Department's Internal Audit committee took the report on a different path for their own purposes. Accordingly, the GWC are not paying for the report - it is now a Departmental engagement for Departmental purposes.
126. No member of the GWC was interviewed or contacted by EY in preparing the report which has led to errors and omissions.
127. The GWC has concerns that EY are conflicted in undertaking the report and should not have accepted the engagement in the first place as they were the Auditors for Crown Group during much of the period where financial issues have now been identified – presumably including auditing the bank account of the subsidiary Riverbank Investments Pty Ltd.
128. Accordingly, the EY Report is not specifically being used by the GWC as the basis for change.
129. Having said that a number of the items raised by EY are being addressed either because they have been previously identified by the GWC or raised by GWC members more recently. (Refer the Attachment 1 to this submission from GWC Agenda August 2021 – GWC.0012.0001.0250).

TOPIC 13 – WA POLICE

Your knowledge of the any interaction between the Commission and the WA Police.

130. During my time on the GWC I can recall three situations where the GWC has had interactions with WA Police.
 - 130.1 The first was when Deputy Commissioner Blanche attended the 16th February 2021 emergency board meeting at which the GWC along with representatives of the State Solicitor's Office discussed the intention to request that the Minister launch an inquiry into Perth Casino.
 - 130.2 The second was in recent months when the GWC requested that WA Police investigate whether a community poker organisation -“Shark Poker” - had committed fraud or any other offence. In the July 2021, the GWC was advised that WA Police did not consider there to be any issue to investigate.

- 130.3 Thirdly, when TAB applications are received WA Police provide a report on the impact they believe a TAB will have in that location/community. The GWC consider that information before approving or denying the application.
131. WA Police are also involved with GWC activities in providing police clearance certificates for the licensing of Perth Casino employees, an activity carried out at the Departmental level by members of the licensing staff.
132. I am not aware of WA Police ever supplying confidential police information under section 20A of the *Gaming and Wagering Commission Act 1987* or any operational information in relation to the activities of the Perth Casino. Nor am I aware of WA Police ever requesting assistance from GWC in connection with their operational activities.

TOPIC 14 – APPOINTMENT OF CHIEF CASINO OFFICERS

Your knowledge of the process for the selection and appointment of Nicola Perry and Germaine Larcombe as Chief Casino Officers.

133. The GWC has had no involvement with the selection of either Nicola Perry or Germaine Larcombe as Chief Casino Officers. It did, however, support the appointment of Nicola Perry, formally at its meeting on 22 June 2021, when informed by the Acting Director-General and Chair, that she intended to appoint her as Chief Casino Officer.
134. We have queried these appointments and whether there was to be any consultation the current Acting Director General advised the GWC that these are Departmental appointments and not for the GWC to consider. Having said that the Acting Director General did answer questions regarding Germaine Larcombe's casino related experience in the July 2021 Board Meeting. (GWC.0012.0001.2573- GWC Minutes July 2021)

TOPIC 15: HISTORICAL RISK ASSESSMENT OF CASINO LICENSEE

135. In answering the question(s) under this topic, I have had regard to the following documents: GWC.0002.0016.0250_0002.

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.

136. I am not aware of whether the GWC conducted a risk assessment in relation to the Perth Casino licensee or its conduct prior to November 2020.
137. However, as described at paragraph 43 above, in August 2018, the GWC did receive and review the VCGLR 6th Review of Crown's suitability to hold a Casino license.
138. The review and assessment included GWC inviting Crown Perth to present on various matters raised in that review that could be relevant to Crown Perth and provide actions to address them, which happened on 18 December 2018 (GWC.0002.0016.0250_0002).

Contains sensitive information



Jodie Elizabeth Meadows

Place: Perth

Date: ~~27~~ 30 August 2021