

BEFORE THE NEW ZEALAND GAMBLING COMMISSION

under the Gambling Act 2003

in the matter of an application by SkyCity Queenstown
Limited for renewal of its Casino Venue Licence

AFFIDAVIT OF AMANDA YUELL

October 2025

LeeSalmonLong

Barristers and Solicitors

LEVEL 34 VERO CENTRE 48 SHORTLAND STREET

PO BOX 2026 SHORTLAND STREET AUCKLAND NEW ZEALAND

TELEPHONE 64 9 912 7100

EMAIL: tim.mullins@lsl.co.nz SOLICITOR ON RECORD: TIM MULLINS

EMAIL: bella.rollinson@lsl.co.nz SOLICITOR ACTING: BELLA ROLLINSON

KA 3/2

AFFIDAVIT OF AMANDA YUELL

I, **Amanda Youell** of Queenstown, General Manager, solemnly and sincerely affirm—

Introduction

1. I am the General Manager of the SkyCity Queenstown casino site. The SkyCity Queenstown casino is part of the business of the overall SkyCity group, which owns the venue licence holder, SkyCity Queenstown Limited (**SkyCity Queenstown**).
2. Within the group, my position reports to Michelle Baillie. My predecessor, Jono Browne, is referred to in the organisation structure diagram included in SkyCity Queenstown's application.¹ I took over the role on 10 February 2025.
3. Prior to taking up this role, I was the Head of Marketing & Sustainability at Millbrook Resort in Queenstown, for a little over 7 years. While there, I led major brand initiatives, guest experience projects, and commercial partnerships. I moved to Queenstown in 2017 from Darwin. In Darwin I held a range of sales, marketing, and commercial leadership roles in both the public and private sectors through my working life since about 2004.
4. I am relatively new to the casino industry, but since stepping into my role, I have quickly immersed myself in its operational, regulatory, and compliance requirements. I have enjoyed a high level of both structured and "real-time" support from my immediate colleagues and the wider SkyCity group.
5. I have completed several structured gambling and compliance-related training modules including: Host Responsibility Level 1, Host Responsibility Refresher, Our Code of Conduct, Suspicious Activity Reporting, Protecting Privacy and Personal Information, Risk Management for People Leaders, Cyber Security Fundamentals, Customer Due Diligence and several Mandatory Carded Play modules. I have also completed the Advanced Host Responsibility workshop.
6. Since February 2025, I have overseen key projects such as the Queenstown leg of the national rollout of Mandatory Carded Play (**MCP**) across the group, FY26 refurbishment planning, and strengthening community partnerships including sponsorship of the Queenstown Business Awards.
7. My background in hospitality and stakeholder engagement provides me with a strong platform to lead the operation at SkyCity Queenstown, ensuring we continue to operate responsibly, deliver excellent guest experiences, and contribute positively to the local community.
8. In my affidavit I discuss:

¹ [Organisational Structure of SkyCity Entertainment Group \(in respect of SkyCity Queenstown\)](#)

- (a) My role and responsibilities as General Manager of SkyCity Queenstown;
- (b) The SkyCity Queenstown venue itself and the business as it stands today;
- (c) Governance and staffing of the site and its operation
- (d) Visitation at the venue;
- (e) Host Responsibility;
- (f) Charitable Trust and other contributions; and
- (g) SkyCity Queenstown's compliance record..

My role as General Manager for the Queenstown site

9. As General Manager of SkyCity Queenstown, I am responsible for the overall leadership and performance of the Casino – encompassing table games, electronic gaming machines (**EGMs**), food and beverage operations, security, host responsibility, compliance, marketing, events and community engagement. I am employed by another company in the group, SkyCity Management Limited (**SML**).
10. The SkyCity Queenstown venue is operated by SkyCity Casino Management Limited (**SCML**). SCML is the operator of all the group's New Zealand casinos, and holds a casino operator's licence for that purpose. SCML manages the SkyCity Queenstown venue under a management agreement approved by the Commission. My employer, SML, is also a party to this management agreement. SCML is owned by the same group as SkyCity Queenstown of course.
11. I work closely with the Senior Leadership Team of the group – both nationally across all SkyCity sites and locally in Queenstown with my department managers – to ensure we meet or exceed all legislative, regulatory, and licence obligations while maintaining a safe, engaging, and responsible environment for all guests. My role is to manage the Queenstown Casino as part of the wider SkyCity group. We strive to ensure consistency and best practice across sites. This includes participating in AML/CFT enterprise site assessments, control testing for gaming, marketing and host responsibility procedures, and maintaining alignment with group Health & Safety and Risk standards. Cross-site collaboration is strong too – for example, we partnered with the Hamilton Food & Beverage team during our recent Queensland Lakes District Council (**QLDC**) Kitchen Inspection and Audit, aligning Health & Safety processes with group protocols.
12. In addition, I am actively engaged in group-level working groups and governance forums, including the recent MCP roll-out, the Host Responsibility Senior Management Group, the AML Senior Management Group, and marketing/customer experience initiatives such as ethnographic research. Ongoing reporting and strategic support are shared through the Senior Leadership Team, ensuring compliance, Host



Responsibility, and customer experience improvements are prioritised and delivered consistently across the business.

The SkyCity Queenstown Casino today

13. The Queenstown Casino first opened in December 2000 as a boutique entertainment venue in the heart of Queenstown. Since then, it has become a cornerstone of the region's hospitality and tourism sector, proudly serving international visitors alongside the local community.
14. Growing up in Darwin, Australia, I was already familiar with the SkyCity brand through our local casino there, which reflected a five-star entertainment precinct and set a high standard in my mind for what the brand represented. SkyCity operated that casino from 2004 to 2019. When I later moved to Queenstown, I knew that a smaller, boutique version of this experience operated in the city centre.
15. Although I had not been a customer prior to my appointment as General Manager, I had visited the venue with overseas family and observed it from the perspective of a guest. That awareness has shaped my leadership style – I bring both the curiosity of an outsider and the accountability of someone who now stewards the brand.
16. For more than two decades, the Casino has contributed significantly to the region's economy by creating local employment, attracting tourists, supporting major events (including Stampede Ice Hockey and Winter Pride), and distributing grants through the SkyCity Queenstown Community Trust. Michelle Baillie, to whom I report, was General Manager from 2008 until 2014. I understand that she will set out some further detail about the history of the Casino in her evidence.
17. The site today remains of a boutique size, offering a single floor with 86 EGMs and 7 table games. The hospitality offerings comprise the Wild Thyme Bar & Kitchen and a newly opened cocktail bar and events space, the Peacock Lounge.
18. The patron demographic in Queenstown remains largely comprised of tourist visitors.
19. The current opening hours are from 11am until 1am each day (excluding Christmas Day, Good Friday and between 12am - 1pm on Anzac Day).
20. Our goal is to provide a premium yet intimate entertainment experience that reflects Queenstown's position as a world-class resort destination. We continue to invest in our property to maintain high standards and have a significant refurbishment project planned for FY26. This project will include a complete refresh of interior walls and flooring, the creation of a new "hero" destination bar, an enhanced main entrance, and the introduction of a dedicated customer loyalty station – all designed to further elevate the overall guest experience.

Governance

21. SkyCity Queenstown operates within a robust governance framework that is fully aligned with SkyCity group's policies, systems, and oversight



mechanisms. This ensures that even as a boutique operation, our standards remain consistent with those of the wider group and the operation benefits from the resources available across it.

22. As General Manager of SkyCity Queenstown, I report directly to the General Manager of SkyCity Hamilton, who as I mentioned is Michelle Baillie, through weekly "1:1" meetings. These help ensure oversight, alignment with group strategy, and escalation of any issues as needed. Within the Queenstown site's local team, I chair a weekly management meeting with my Heads of Department (Security, Surveillance & Host Responsibility (Rob Nicholls), Food & Beverage, Marketing, People & Culture, Gaming & Cage Operations (Andrew Gray)) to review performance, compliance, and upcoming business priorities. A weekly Host Responsibility forum is also held internally to manage any exclusions, persons of interest, and related compliance matters. This meeting is also attended by Rob Nicholls, Andrew Gray and Samrat Chibba (the Security & Host Responsibility Shift Manager).
23. Both Rob Nicholls and Andrew Gray have a lot of experience, and will be providing affidavits on the operations of the casino day to day, especially concerning compliance matters.
24. At the site level with respect to the crucial issue of Host Responsibility, I have regular catch ups with Rob every Wednesday (including Rob's Host Responsibility shift manager and Andrew Gray), and a fortnightly "1:1" meeting with Rob. In the wider compliance field, Health and Safety, AML/CFT, and responsible service of alcohol, are all on the regular agenda for our weekly management meetings too.
25. With respect to business performance at the site level, there are monthly meetings with the finance team for end of month reporting and forecasting, which is presented to the group CFO and senior management team.
26. As General Manager, I am directly accountable for ensuring that these frameworks are not only in place but are actively lived through our daily operations and individual performance objectives. This means engaging my leadership team in regular discussions and reviews, participating in group-led assessments such as AML/CFT testing and enterprise audits, and maintaining open reporting lines into senior group governance forums. We report regularly to the Board of the group company, SkyCity Entertainment Group Limited, and maintain close engagement with the Department of Internal Affairs (**DIA**) to ensure all regulatory compliance requirements, particularly under the Gambling Act 2003 (**Act**) and related requirements, are met. We undergo regular internal and external audits – including AML/CFT, financial, and host responsibility reviews – and act promptly on any recommendations to maintain best-practice standards.
27. I maintain weekly "1:1"s with each of the people directly reporting to me to support leadership, performance, and accountability. At the group level, reporting flows through the Senior Leadership Team and formal governance forums (eg. AML Senior Management Group, Carded Play Working Group).
28. Alongside these formal structures, I encourage real-time support through open communication, floor engagement, and informal discussions,



allowing quick response to issues and fostering a transparent, supportive culture.

29. All our practices are guided by the SkyCity Code of Conduct and governance charters, which are actively applied to decision-making, compliance, and Host Responsibility. We have frequent ongoing meetings at the site outside of routinely scheduled meetings.
30. I recently actively engaged with the SkyCity group risk team to deliver an onsite Code of Conduct refresher for Queenstown employees last month, and also reviewed and refreshed all Code of Conduct posters in back-of-house areas to keep our team inspired and engaged.
31. We strive to ensure all staff understand and apply the Code in their day-to-day roles. To reinforce this, a bi-annual "Game Plan" meeting is held across the group. A recent example of this consistent approach was an additional session delivered across all sites, during which I facilitated the Queenstown team's session to support the rollout of MCP.

The staff at the Queenstown site

32. At the time of preparing this affidavit, we employ approximately 58 team members across gaming, food and beverage, cleaning & facility services, security, and business support onsite. Our workforce is highly diverse, representing several nationalities. We are committed to creating a safe, inclusive, and supportive workplace.
33. We have relatively good staff retention despite having a number of staff on work visas (as is the norm in Queenstown). The front-line staff in hospitality roles who are unfamiliar with the gaming industry are all inducted and trained as appropriate. The people who are working on the gaming floor will have gaming experience from overseas, and on occasion from having worked at the SkyCity sites at Auckland and Hamilton.
34. We invest in our people through comprehensive training programmes covering compliance, Host Responsibility, customer service, and health and safety. We celebrate and recognise achievements through our monthly Quest for the Best awards and offer a range of benefits, including staff housing, free daily meals, local business discounts, and professional development opportunities to support retention and wellbeing.
35. Host Responsibility and compliance training is delivered through online modules and onsite learning. A level of Host Responsibility training is mandatory for all staff. Staff training is monitored so that everyone's training is kept up to date. I am notified if someone on the team is coming up to a deadline and has not completed their training requirements.
36. Our Queenstown team is highly integrated within the wider SkyCity group, following the same compliance frameworks, policies, and training programmes as other sites. While local processes are adapted to suit our smaller operation – where team members are multi-skilled and more hands-on – we remain fully aligned and engaged with group-wide People & Culture initiatives, which are actively delivered locally.



Visitation

37. SkyCity Queenstown attracts a mix of local residents, domestic travellers, and international visitors. Peak visitation aligns with ski season and major local events, with strong participation from Australian and Asian markets. We monitor our visitation patterns and guest feedback to ensure our offerings remain relevant and aligned with community expectations. Throughout 2024/25, weekly site visitation averaged in the low 3,000s during off-peak months, increasing to more than 4,500 per week during the peak winter period.
38. In general, the Queenstown Casino has very low numbers for guests who present with any issue at all. Since I have been General Manager so far, the handful of incidents that required intervention have been dealt with efficiently and safely by the team, reported on as required, and where appropriate reviewed with the team.
39. At the busiest times of the week, Thursday, Friday and Saturday nights, we have four security staff on shift. The ratio of staff to guests is relatively high and ensures that the environment is as safe as possible.
40. Despite having a number of people under the age of 20 years presenting at the site to gain entry (nearly 2,800 people were refused entry on this ground in the year ended June 2025), there have been no incidents of minors actually accessing the gaming floor recorded for the past three years. The security staff are rightly proud of that record.
41. People excluded from the Casino for Host Responsibility reasons over the most recent year (ending June 2025) were just 9 "self-excluded" and 15 excluded by SkyCity. I should note that strictly speaking this is done by SCML, the operator's licence holder, rather than by SkyCity Queenstown, as the venue licence holder.
42. Over that last full year period, there have been only 17 "Gambler of Interest" files opened at the Queenstown site and I understand only a relatively small number are open at the time of preparing this affidavit.

Host Responsibility

43. Host Responsibility is central to everything we do. SkyCity Queenstown operates under a comprehensive Host Responsibility Programme (HRP) and associated Problem Gambler Identification Policy (PGIP) approved by the Commission and updated regularly. They form part of the SCML operator's licence for Queenstown.
44. In my induction and onboarding, these were introduced as a foundation of our SkyCity operating model. Procedures are embedded at site level through weekly Host Responsibility meetings, all staff training facilitated by my Security & Host Responsibility Shift Manager, and daily monitoring, supported by online training modules facilitated by the SkyCity Learning & Development team (a group team).
45. The HRP provides for bi-annual stakeholder meetings with organisations directly involved in casino host responsibility – including Asian Family Services, QLDC, DIA, and Te Kāiika. The purpose is to share statistics,



programme updates, particular issues, and important initiatives such as the MCP implementation.

46. These are reinforced by group resources such as the AML and Risk teams, compliance working groups, and enterprise reporting. Our locally based team members bring essential on-the-ground expertise (and several decades combined industry working experience), ensuring consistency, responsiveness, and alignment with both regulatory requirements and community expectations.
47. The current HRP has been in place from July 2025 (an update to the HRP at the time of the renewal application). The major update from the earlier HRP was the introduction of MCP. The Queenstown site was the first place it was implemented. In FY24, the group (including Australia) invested about \$22 million on resources and technology to continuously improve compliance measures. This commitment is evident through initiatives such as MCP, major system upgrades within the AML/CFT framework, and increased investment in compliance staffing and training.
48. Rob will set out more detail and produce the now current HRP/PGIP documents themselves.
49. Our commitment is to provide a safe entertainment environment, where harm is prevented and minimised, while ensuring guests have a positive experience.

Charitable Trust and other contributions

The Charitable Trust

50. SkyCity Queenstown is proud to support the local community through the SkyCity Queenstown Community Trust. Since its inception in 2002, the Trust has distributed 709 grants, totalling more than \$2.73 million to local charities, not-for-profit organisations, and community initiatives throughout the region.
51. The venue licence for Queenstown provides for a contribution to the Trust of 2.5% of the net profit of the Casino operation.²
52. I understand that the Commission has been considering the terms of the various venue licences for casinos in New Zealand and indicated a preference for consistency amongst them and the purpose in the Act connected with gambling activity, namely that "Casino Win" be used as a base measure with a percentage applied to that, rather than other metrics. I understand that three casinos now calculate community trust contributions by reference to "Casino Win" – namely Auckland, Christchurch and Dunedin. In the case of Auckland and Christchurch, a minimum threshold contribution also applies.
53. Under the current licence condition SkyCity contributes not less than 2.5% of the net profit from the operation of the Casino, or \$100,000 per annum,

² [Consolidated Deed of Charitable Trust - SkyCity Queenstown Casino Community Trust.](#)



whichever is the greater. In most years, I understand that 2.5% of the net profit is less than \$100,000, so that sum has been paid to the Trust. That has been the case for the last three complete financial years. Various additional payments are also made to the Trust from "found money", customer donations of residual sums, and one-off items such as decommissioned jackpots on top of the \$100,000 payment. The totals are set out in the last column of Table 1 below.

54. I have had the data extracted for the last three financial years for SkyCity Queenstown's "Casino Win" and have added it to Table 1 below. I have also had a calculation of a contribution of 0.7% of "Casino Win" included. It is broadly similar to 2.5% of net profit, though a little less (noting that neither calculation exceeded the current minimum contribution of \$100,000 for the last three years).

Table 1: Casino Win / Trust Contribution Comparison³

Year end	Casino Win	0.7% of Casino Win	2.5% Net Profit	Actual
2023	\$11,681,765	\$81,772	\$74,491	\$117,675
2024	\$12,131,471	\$84,920	\$72,201	\$163,163
2025	\$11,541,859	\$80,793	\$80,497	\$118,403

55. While SkyCity Queenstown is not averse to a change to the formula for charitable contributions in the licence conditions, we do not see a particular need to change it. The application has simply proposed that that condition remain part of the venue licence.

56. I will be appointed as a Trustee, effective November 2025, following a comprehensive independent recruitment process that included applying for the advertised position on SEEK and participating in interviews with the Chair, Joanne Conroy, and the Community Trust & Investment Manager, Racheal Monks.

57. The grants from the Trust support a wide range of projects, including youth development programmes, social services, arts and culture initiatives, environmental conservation, and health and wellbeing services.

Sponsorships and other support

58. Beyond the Trust, we provide direct sponsorships, in-kind support, and event partnerships – including Winter Pride, Stampede Ice Hockey, Queenstown Trails Trust, and the Chamber of Commerce Queenstown Business Awards – further strengthening our connection to the local community.

³ It should also be noted that the "Casino Win" figures include international business customers.

59. To date in FY26, SkyCity Queenstown's monetary contributions to local sponsorship beneficiaries total \$50,000, supporting organisations such as the SkyCity Stampedes, Queenstown Trails, Wakatipu Wild Ice Hockey Team, and Winter Pride.

Problem gambling levy and other duties

60. SkyCity Queenstown pays the problem gambling levy as set by the Ministry of Health, contributing its share to national problem gambling prevention and treatment services. Also specific to the Casino operation is the casino duty paid, being 4% of "Casino Win".
61. SkyCity Queenstown also pays a range of other duties and taxes, including GST, local rates, and employer contributions such as PAYE and ACC levies as do other businesses. Collectively, these payments contribute several million dollars annually to the New Zealand economy and help fund public services.

Compliance record

62. SkyCity Queenstown maintains a strong compliance record, with robust systems in place to meet all requirements under the Act, the Anti-Money Laundering and Countering Financing of Terrorism Act 2009, and other relevant legislation and rules (noting that many of these are strictly speaking concerned with SCML's operation of the venue).
63. We undergo regular internal audits as well as inspections by the DIA and have been found to have good compliance. Where recommendations have been made, we have responded promptly with system improvements, additional staff training, or policy updates to ensure full alignment with regulatory expectations.
64. The wider group has invested substantial resources in the continuous improvement of compliance measures. This ongoing commitment has been demonstrated through initiatives such as the implementation of MCP, major system upgrades within the AML/CFT framework, and increased investment in compliance staffing and training. I understand some of these investments have followed and been informed by some compliance issues raised within the wider group concerning historic issues with continuous play monitoring and AML/CFT procedures.
65. I understand that none of the regulators consulted as part of the renewal application process has expressed any concerns with SkyCity Queenstown.


Conclusion

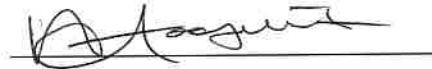
66. Following the public submission process, we were pleased to see that all published feedback was supportive of SkyCity Queenstown's licence renewal. We are grateful for their recognition of the safe and well-managed environment the Casino provides; the positive economic and community contributions it makes; and its place as part of Queenstown's entertainment and social connection offerings for both locals and visitors.



67. SkyCity Queenstown is a well-governed, responsible, and community-focused operation. We contribute meaningfully to Queenstown's economy, provide secure local employment, invest in community initiatives through our Charitable Trust, and operate to the highest compliance and Host Responsibility standards.
68. We respectfully seek the renewal of our casino venue licence so we can continue to provide safe, world-class entertainment, deliver strong community benefit, and contribute to the economic vibrancy of Queenstown for years to come.

AFFIRMED at Queenstown this ^{24th} day
of October 2025 before me:


Amanda Youell



A solicitor of the High Court of New Zealand

Alice Victoria Hoogvliet
Solicitor
QUEENSTOWN

