

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 ANDREW LEONARD GRAY

October 2025

Lee Salmon Long

Barristers and Solicitors

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AFFIDAVIT OF ANDREW LEONARD GRAY

I, **Andrew Leonard Gray**, of Queenstown, manager, solemnly and sincerely affirm:

Introduction

1. I am the Gaming and Cage Manager at SkyCity Queenstown.
2. I report to the General Manager, Amanda Youell, and I manage 25 employees. I am responsible for the Table Games, Gaming Machine and Cashier departments.
3. I have over 29 years' experience in the Casino industry. I was originally employed with SkyCity Entertainment Group at their Auckland Casino in January 1996 as a Table Games Supervisor, gaining promotion to Pit Manager in December 1998. In June 2000 I was promoted to Acting Table Games Shift Manager, where I stayed until December 2002 when I transferred to SkyCity Queenstown Casino as a Casino Shift Manager. This was about two years after SkyCity Queenstown opened. However, prior to that I did a secondment to Queenstown.
4. I was promoted to my current role of Gaming & Cage Manager in 2007. During this time, I have also assisted as Interim/Acting General Manager whilst waiting for the appointment of General Manager Amanda Youell.
5. My affidavit discusses:
 - (a) My role and team;
 - (b) Host Responsibility at SkyCity Queenstown Casino;
 - (c) AML; and
 - (d) Auditing and compliance.

My role and team

6. My role as Gaming & Cage Manager means that I operate the business as the Gaming Manager. My duties involve overseeing the Gaming and Cashiering side of the business, which includes:
 - (a) communication with customers;
 - (b) observation of customer behaviour; and
 - (c) ensuring that staff and customers comply with all policies including Table Games, Gaming Machines, Responsible Service of Alcohol (**RSA**), Problem Gambling, Cashiering, Anti-Money Laundering (**AML**) and the Gambling Act (**Act**).
7. I have received training in all of these areas in online and classroom-led form to ensure that I have an understanding of both SkyCity's obligations and the requirements on me in assuring that these are complied with.



8. My team of staff supports the work done by Robert Nicholls (Rob) and his team. Everyone across both of our teams is trained in host responsibility, identifying problem gambling indicators, and taking action accordingly under the Host Responsibility Policy (**HRP**) and Act.
9. Rob and I are on site Monday to Friday, 11 am to 5 pm for casino operations. A second-in-charge staff member is on site for the night shift and weekends.
10. Generally, the staff on the floor from my team include table staff, a supervisor, a dealer, and one person supervising the gaming machines. The table staff needed vary depending on how busy we are. There are also cashiers at the cash desk.
11. We have management level meetings about host responsibility on a weekly basis. I attend alongside Rob, and the senior staff attend. We discuss, for instance, persons of interest and any issues that have arisen throughout the week. Minutes are taken for these meetings.
12. We have six-monthly meetings with external stakeholders, which Rob and I both attend. Our closest service provider is the Problem Gambling Foundation. We have a good rapport with them.
13. I was acting General Manager for about two months after Jono Browne left and before Amanda Youell started. Because I have been with SkyCity Queenstown for so long, I am very familiar with the business. I handled both the General Manager and Gaming & Cage Manager roles (with assistance from my managerial staff) during this interim period.

Host responsibility at SkyCity Queenstown – Gaming and Cashier Staff

14. I am aware of and very familiar with the Queenstown HRP and associated Problem Gambler Identification Policy (**PGIP**), and the supporting Standard Operating Procedures (**SOPs**). I understand Rob will describe his and his team's role relating to Host Responsibility. My team plays a supporting role, and while trained in and able to undertake Host Responsibility processes themselves, more often than not, Rob and his team will conduct the work and any necessary interactions under the HRP and Act.

Host responsibility training

15. My staff complete all five Host Responsibility training modules. For the "Advanced Host Responsibility" session, the key message for my staff is to always report any Problem Gambling Indicators (**PGIs**) observed to their supervisor or manager.
16. Both my staff and I also receive annual refresher training in Host Responsibility Policy, RSA, AML, amongst other training, to ensure our knowledge is up to date and any new or updated processes are known. I am, and my staff are, trained in advanced host responsibility, alongside Rob and his team. Front-line staff in other teams are also trained in advanced host responsibility.



17. My staff are all up to date with their refresher training completion at the time of preparing this affidavit.
18. About once a month, I will also refresh my staff on red flags at our daily briefing (e.g. by asking staff to list them).

Implementation of Host Responsibility on site at Queenstown

19. My staff are trained in having conversations with customers about problem gambling and giving them information packs, if necessary. As I mentioned, in general we prefer to hand those steps over to Rob's team as it is properly their role. But my staff can do this if needed.
20. All my staff members proactively talk to customers while carrying out their gaming or cashiering duties, to be on the lookout for PGIs. The specific host responsible for supervising the gaming machines will walk the floor and be on the lookout for PGIs for customers using the machines.
21. Observations of PGIs, or any concerns about a customer, are reported to the shift manager (which includes me, if I am on site). The shift manager then relays this information to the Host Responsibility/Security Team. Alternatively, my staff can report any concerns directly to Rob or a manager of the Host Responsibility/Security Team. Once reported to Rob's team, they take over and progress to any customer interactions or interventions that are needed under the HRP, PGIP and Act.
22. Additionally, there is constant contact with the Food & Beverage team concerning any RSA issues.
23. Whenever a manager takes a break or ends a shift, there is a verbal handover and report to the incoming manager. This handover will identify any Host Responsibility issues that have arisen and require observation or attention. Managers will normally show the incoming manager who the customer(s) of concern are so that they can visually identify them.
24. Before the implementation of Mandatory Carded Play (MCP) in the middle of this year, gaming and cashier managers would give out 'take a break' cards when people have been on site gaming up to the hourly thresholds in the then HRP. Because the electronic card now automatically locks a person out after five hours on gaming machines, we now verbally inform customers about why their card has locked them out, tell them to take a break, and log the interaction. On table games, MCP processes operate via a combination of the automatic system and staff action. Cashiers can hand out "Helping Hand" cards if they observe any problem gambling indicators, such as three declined ATM transactions, or call the Host Responsibility staff to come speak to them.
25. There has been very little resistance from customers about adopting MCP, despite the fact that we often have new, tourist customers. There has been good education throughout all staff about carded play, so there is very little friction in customers being signed up and given a card. The system is working well.




AML

26. I am responsible for carrying out "source of wealth" checks when a new customer from a "high-risk jurisdiction" (per AML requirements) attends the casino. These forms are scanned onto the customer profile, and are reviewed by the customer compliance team in Auckland.
27. Additionally, I carry out the "extra due diligence" checks for high-value transactions. I complete the relevant form with the customer and send it to the SkyCity Group-level customer compliance team (who are based in Auckland). The compliance team then approves or declines the transaction, or asks me for further information. The customer must await approval before they can start gaming.
28. My team members (both gaming and cashier staff) do training for AML, consisting of a three-module E-learning programme, and an AML workshop. The three E-learning modules address Customer Due Diligence, Suspicious Activity Reporting, AML & CFT Significant & Unusually Large Transactions. If any of the cashier staff have concerns about transactions taking place, they report to me.
29. We submit a monthly report of transactions for AML review to the Group customer compliance team in Auckland. Given the relatively low volume of transactions for Queenstown, we provide all of our transaction data. The report identifies all transactions that attract an AML review in accordance with the relevant rules in SkyCity's programme.

Auditing and compliance

30. SkyCity Queenstown is required to report to the Gambling Commission and DIA. AML compliance reports are prepared in Auckland by the compliance team and sent to me for review and comment in respect of Queenstown. Similarly, Rob (who has the principal role) and I give input into the Host Responsibility reports, which are also put together by the Auckland team.
31. The most recent relevant audit by the DIA of the Casino that was in the area of my direct responsibility was the Cashiering procedures and handling of money 2021/2022, issued May 2022.¹ I was responsible for providing documents and other information to the DIA about our policies and processes. I gave two interviews to the DIA as part of this process. The results were that the required standards were being met in practice, with a few recommendations to update documented procedures, which we took on board.

¹ [SkyCity Queenstown Cashier Audit Report - 2021-2022.](#)



Conclusion

32. Since commencing operations, SkyCity Queenstown Casino has been a good employer, contributing to Queenstown's community, economy and its status as a destination location.

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



Andrew Leonard Gray

A solicitor of the High Court of New Zealand

Alice Victoria Hoogvliet
Solicitor
QUEENSTOWN

