

IN THE MATTER of the Gambling Act 2003
AND on an application by
QUEENSTOWN CASINOS LIMITED and **SKYCITY CASINO MANAGEMENT LIMITED** to redesignate the Gambling Area at the Queenstown casino and to introduce substitute gaming tables

BEFORE THE GAMBLING COMMISSION

Members: G L Reeves (Chief Gambling Commissioner)
P J Stanley
L M Hansen
R D Bell
A K Foote

Date of Application: 2 April 2013

Date of Decision: 10 May 2013

Date of Notification
of Decision: 31 May 2013

DECISION ON APPLICATION BY QUEENSTOWN CASINOS LIMITED AND SKYCITY CASINO MANAGEMENT LIMITED TO REDESIGNATE THE GAMBLING AREA AT THE QUEENSTOWN CASINO AND TO INTRODUCE SUBSTITUTE GAMING TABLES

Introduction

1. Queenstown Casinos Limited ("**QCL**") and SKYCITY Casino Management Limited ("**SCML**") (together the "**Applicants**") applied to the Commission:
 - (a) to redesignate the Gambling Area at the Queenstown casino, under condition 9 of QCL's venue licence and section 139 of the Gambling Act 2003 (the "**Act**");
 - (b) to vary licence conditions 9 and 10 of QCL's venue licence, pursuant to section 139 of the Act, to incorporate the additional Gambling Area and to reduce the period of notification; and
 - (c) to add a new licence condition, 6A, to SCML's operator's licence for the Queenstown casino, to allow them to introduce substitute gaming tables.
2. The Commission sought submissions on the proposal from the Secretary for Internal Affairs (the "**Secretary**"), Problem Gambling Foundation ("**PGF**"), Salvation Army and the Wakatipu Casino Liaison Committee, receiving submissions from the Secretary and PGF.



Act and licence conditions

3. The relevant sections of the Gambling Act 2003 (the "Act") are as follows:

Gambling Act 2003

3 Purpose

The purpose of this Act is to—

- (a) control the growth of gambling; and
- (b) prevent and minimise the harm caused by gambling, including problem gambling; and
- (c) authorise some gambling and prohibit the rest; and
- (d) facilitate responsible gambling; and
- (e) ensure the integrity and fairness of games; and
- (f) limit opportunities for crime or dishonesty associated with gambling; and
- (g) ensure that money from gambling benefits the community; and
- (h) facilitate community involvement in decisions about the provision of gambling.

139 Conditions of casino licence

- (1) The Gambling Commission may specify the conditions of a casino licence or vary or revoke the conditions of a casino licence in the following circumstances:
 - (a) on granting a casino operator's licence:
 - (b) on renewing a casino venue licence:
 - (c) on approving a casino venue agreement or an amendment to it:
 - (d) on application by the holder of the casino licence:
 - (e) on its own initiative or on the request of the Secretary.
- (2) A condition of a casino licence specified under subsection (1)—
 - (a) must be consistent with this Act; and
 - (b) must contribute to achieving the purposes of this Act; and
 - (c) must contribute to the efficient and effective administration of this Act; and
 - (d) must not permit an increase in the opportunities for casino gambling; and
 - (e) may relate to any matter, including the matters specified in Schedule 1, within the confines of paragraphs (a) to (d).

140 Procedure for specifying, varying, or revoking casino licence conditions

- (1) The Gambling Commission must notify the holder of the relevant casino licence, the Secretary, and any other person who it considers is affected by a proposal to specify, vary, or revoke the conditions of a casino licence.
- (2) Notification under subsection (1) must include—
 - (a) the reason for the proposal; and
 - (b) the procedure to be followed before the Gambling Commission makes a decision relating to the proposal.
- (3) The holder of the casino licence, the Secretary, and any other person affected may make written submissions to the Gambling Commission concerning the proposal within 20 working days after the date of the notice under subsection (1) or within any longer period that the Gambling Commission allows.
- (4) The Gambling Commission must consider any submissions made under subsection (3) and may, if it considers it appropriate, seek comment from the casino licence holder on the submissions received from the Secretary or other persons affected.
- (5) The Gambling Commission must notify the holder of the casino licence, the Secretary, and other persons affected of—

- (a) its decision concerning the proposal and the reasons for the decision; and
- (b) the right to appeal the decision and the process for an appeal.

4. QCL's relevant licence conditions, with proposed amendments in mark-up, are as follows:

QCL's venue licence

- 9. The Gambling Area within the Casino Venue comprises the areas specified in plans marked "Schedule 1" and "Schedule 2", Schedule 3 and Schedule 4 attached to this licence and dated 19 November 2004, attached to Commission decision GC04/04. The standard Gambling Area for the Casino Venue is delineated in Schedule 1. ~~The~~ An alternative Gambling Area for the casino is delineated in Schedule 2, Schedule 3 and Schedule 4.
- 10. ~~The One of the three alternative~~ Gambling Areas will take effect subject to the following:
 - (a) the Licence Holder providing the Commission and the Inspectorate with a minimum of ~~210 working~~ 210 days notice in writing of its intention to use one of the alternative Gambling Areas; and
 - (b) the Licence Holder specifying in that notice the dates and times at which the alternative gambling area will apply and terminate. At termination the Gambling Area will revert to the area delineated in Schedule 1.

5. SCML's proposed new licence condition is as follows:

SCML's operator's licence (Queenstown)

- 6A. In addition to the gaming tables specified in condition 6, the Licence Holder may install up to five gaming tables in the alternative gambling area which is also used as a restaurant facility to be used as substitutes for five tables elsewhere on the gaming floor when some or all of those tables are not in use. The location of the substitute tables will be defined in approved floor plans. The substitute tables are subject to the following requirements:
 - (a) they must be clearly identified by the letters "ST" in the approved floor plans;
 - (b) each substitute table must be paired with a table shown in an approved floor plan;
 - (c) a substitute table may only be opened for play when the paired table is closed;
 - (d) each substitute table can only deploy casino games in compliance with an approved game mix for the paired table that is not in use; and
 - (e) they must be entered on the casino system as substitute tables.

The Applicants' submissions

6. The Applicants submit, in summary, as follows:

- (a) The casino's Gambling Areas are currently depicted in two Schedules. The standard Gambling Area is delineated in Schedule 1 (the MGF and the Summit Room) while the alternative Gambling Area is delineated in Schedule 2 (the MGF only).

- (b) They are placing more emphasis on their international business in Queenstown. As a consequence they want the Summit Room (which will be re-branded as the Horizon Room) to be available to host visiting international players at short notice. This means that the Horizon Room is unlikely to be available for domestic play, particularly when hosting the casino's annual Poker tournament. Accordingly they want more flexibility with regard to alternative gambling areas within the casino venue, and on occasion want to use the restaurant facility for gambling purposes.
- (c) Therefore they want to amend licence conditions 9 and 10 of QCL's venue licence to create two further alternative gambling areas to encompass the restaurant facility, which may be activated by written notification.
- (d) The 10 day notice period currently required by condition 10 is overly restrictive. It wants to reduce the notice period to 2 days.
- (e) Creating an alternative gambling area will enable them to host their annual Poker tournament in the restaurant facility. This would involve the installation of five Poker tables in that area.
- (f) The logistics of deploying five tables in the restaurant becomes more challenging if they are required to remove five tables elsewhere on the gaming floor. On the occasions in which this option might be adopted it would like to use the tables as substitutes for tables housed elsewhere in the casino. That is, while the five Poker tables in the restaurant are in operation, five matching tables elsewhere in the casino would be closed and unavailable for use. They therefore want to attach a new licence condition, 6A, to SCML's operator's licence to allow them to do this. A similar condition exists at the Auckland casino.

The Secretary's submissions

7. The Secretary submitted that, in general, he has no significant regulatory or operational concerns with the proposal. However, he had the following comments:
- (a) The introduction of five tables in the restaurant area will mean that, at times, the casino may be allowed to open only three tables on the main gaming floor once the tables in the Summit/Horizon Room are taken into account.
 - (b) The notification time sought should be two *working* days, to ensure that his Inspectorate has sufficient time to carry out the appropriate checks before the tables are put into play, and to ensure that tables not open for play have been correctly decommissioned.



- (c) Section 2.5 of QCL's HRP states that "SKYCITY shall in its environmental design seek to ensure other non-gambling entertainment options are available." This should be considered by SKYCITY on the occasions when the restaurant area is in use as a Gambling Area, particularly if the casino intends to close off the restaurant to the general public when it is used for Poker tournaments. The application does not make it clear whether the restaurant will still be fully functional while being used as a Gambling Area but, if it is not, he is of the view that this still leaves the bar and music entertainment area available for non-gambling activities.

PGF's submissions

8. PGF submitted, in summary, as follows:
- (a) It opposes the application and seeks significant amendments.
- (b) Its opposition is based on the Act's requirements (sections 11 and 139(2) in particular) that the licence conditions ensure that there is no increase in opportunities for casino gambling and that harm from gambling is minimised.
- (c) It has the following concerns:
- (i) The application is too vague, too general and potentially ambiguous in the wording as proposed. The wording should be tightened as indicated below to ensure that the specific objectives sought are met, without also allowing for possible increases in opportunities for casino gambling or harm to emerge.
- (ii) It does not agree that the 10 day notice requirement is too onerous. Ten days notice should continue so that the Inspectorate is able to ensure that licence conditions are being met on these occasions.
- (iii) Although the only example given is for licence conditions to be changed to facilitate an established Poker tournament, the Applicants are seeking the right for any kind of table games to occur in the restaurant space. This unspecified new general power might allow more harmful games to take place there.
- (iv) Although the actual number of table games being operated at any particular time will not increase, the space in which gambling is occurring will. This will increase the potential harm from gambling at that time, so



the maximum approved overall gambling space should be reduced accordingly.

(d) The proposed variation to condition 9 should be amended for clarity and to ensure that when the restaurant is being used, that at least an equivalent gambling area is closed. The last sentence of the condition should read "The Alternative Gambling Areas for the casino are delineated in Schedules 1, 2 and 4." That is, the maximum sized configuration set out in schedule 3 is not permitted.

(e) The proposed wording of condition 10 should be amended to read:

10. One of the alternative Gambling Areas, namely those set out in Schedule 2 or Schedule 4, will take effect subject to the following:

(a) the Licence Holder providing the Commission and the Inspectorate with a minimum of 10 days notice in writing of its intention to use the specific alternative Gambling Area they request; and

...

(f) The proposed wording of new condition 6A should be amended in (d) to read as follows:

(d) each substitute table can only be utilised for the game of Poker in compliance with the approved use for Poker for the paired table that is not in use; and ...

Applicants' submissions in reply

9. In response to the Secretary's submissions, they submitted as follows:

(a) They will continue to operate the restaurant facility when it is designated as gambling area, but with reduced seating. The casino's bar would continue to operate in the normal manner.

(b) They have no objection to providing two *working days* notice.

10. In response to PGF's submissions, they submitted as follows:

(a) The proposed changes do not increase opportunities for casino gambling.

(b) The wording of the proposed conditions is neither vague nor ambiguous. The drafting in respect of the activation and termination of the alternative gambling areas is based upon the existing wording. Similarly, the drafting in respect of the substitute tables is based upon a similar condition for the Auckland casino.

- (c) They are unclear about PGF's concern with regard to the notice period. The Secretary requires only two working days notice, which they have no objection to.
- (d) While the application is designed to facilitate the conduct of a Poker tournament, it is correct that they could potentially deploy other games in this area. The restriction on the deployment of games for which rules have been gazetted and in accordance with the game mix approved by the Commission provides adequate protection from any potential adverse impacts associated with gambling.
- (e) To the extent that any potential issues may arise around the space in which games are deployed which could give rise to an increase in casino gambling opportunities, those issues will be addressed at the time that they apply for approval of relevant floor plans. They noted, however, that the player spaces associated with Poker tables are dictated by game rules so deploying Poker in a more spacious area will have no impact on casino gambling opportunities.
- (f) They are not agreeable to changing the proposed wording of the licence conditions, as suggested by PGF.

11. The Applicants also provided the following, more general, submissions in reply:

- (a) While the creation of further alternative gambling areas is primarily designed to provide additional flexibility in managing an annual Poker tournament, the proposal, as framed, would enable them to use the alternative area more frequently if they so chose. The fact that the alternative area houses the venue's only restaurant facility may give rise to a concern that the restaurant might be closed or operated on such a reduced scale that some of the benefits associated with that facility might be lost.
- (b) Under the terms of Queenstown casino's liquor licence, the casino is obliged to serve food so there is no intention to close the restaurant facility. In fact, food and beverage are an important component of Queenstown casino's operations, and they would not wish to see this area adversely impacted as a result of activating the alternative gambling area.
- (c) In reality, the alternative gambling area encompassing the restaurant is only ever likely to be used on rare occasions and in circumstances where it did not cause undue disruption to other parts of the operation. If the Commission considered it necessary, they would be comfortable with a restriction which allowed them to operate the alternative gambling area encompassing the restaurant facility on no more than four occasions per year of up to 8 days in duration. (Eight days was

sought as its annual Poker tournament normally runs from a Monday to a Sunday with an additional day required for the installation and removal of tables.) On each such occasion, they would continue to operate the restaurant facility. While they may temporarily relocate some of the restaurant seating to the foyer area in front of the restaurant, it is possible that the restaurant would be operated with reduced seating. Again, if the Commission considered it appropriate, they would be comfortable with the requirement that any reduced seating was not less than 50% of restaurant seating normally available.

Analysis

12. Queenstown casino has two approved Gambling Areas comprising the main gaming floor, and the main gaming floor plus the Summit/Horizon Room. The Horizon Room is used infrequently for gambling purposes, but the Applicants want to make it permanently available for international visitors, meaning that it would then be unavailable for more general use, including hosting of the casino's annual Poker tournament. The Applicants therefore sought Commission approval to incorporate the restaurant facility into the approved Gambling Areas, and to deploy up to 5 substitute gaming tables in the restaurant facility.
13. In previous decisions, the Commission has considered whether it has the power to redefine a casino's Gambling Area, holding that it can do so provided that the amended area does not extend beyond the casino venue as defined in the casino venue licence, and the amended licence condition defining the new area is consistent with section 139(2) of the Act.
14. QCL's venue licence defines the casino venue as:

Cnr Beach Street and Cow Lane, Queenstown, being part of the first floor and all of the second floor as outlined in red on the plans, contained in the First Schedule to this licence, of a building to be constructed on the corner of Beach Street and cow Lane, Queenstown and as more fully described as ...
15. The Commission is satisfied that the proposed new gambling area is within the defined casino venue.
16. The Commission next considered whether proposed condition 9 is consistent with section 139(2) of the Act. Section 139(2) provides that a licence condition which is specified or varied under section 139(1) must be consistent with the Act; contribute to achieving the purpose of the Act; contribute to the efficient and effective administration of the Act and must not permit an increase in opportunities for casino gambling.

17. The purpose of the Act, set out in section 3, is to:

3 Purpose

The purpose of this Act is to—

- (a) control the growth of gambling; and
 - (b) prevent and minimise the harm caused by gambling, including problem gambling; and
 - (c) authorise some gambling and prohibit the rest; and
 - (d) facilitate responsible gambling; and
 - (e) ensure the integrity and fairness of games; and
 - (f) limit opportunities for crime or dishonesty associated with gambling; and
 - (g) ensure that money from gambling benefits the community; and
 - (h) facilitate community involvement in decisions about the provision of gambling.
18. PGF submitted that the proposal ran counter to sections 11 and 139 of the Act, suggesting that if approved, there would be an increase in opportunities for casino gambling and an increase in harm. PGF did not specify how the proposal would increase opportunities, but submitted that harm would follow as a result of the increase in size of the Gambling Area, and because the Applicants could deploy games other than Poker in the new gambling area.
19. As the Commission has noted in previous decisions, increasing the size of a Gambling Area does not, of itself, increase opportunities for casino gambling. This is because a redesignation which increases the size of the Gambling Area does not allow operators to place gambling products in the extended area; this requires the Applicants to seek approval of new floor plans. Assessment of whether an increase in the Gambling Area produces an increase in the opportunities for casino gambling depends on changes in table positions, especially for games whose player numbers are not limited by game rules.
20. Similarly, it is difficult to see how the enlargement of the Gambling Area could itself generate more harm (and PGF's submission does not explain the reasoning behind that assertion). SCML must operate the same approved game mixes pursuant to the same regulatory requirements that apply to a smaller Gambling Area.
21. The Commission will further consider whether it has concerns about increased opportunity or harm when the Applicants seek approval of floor plans that provide for the placement of gambling products into the newly designated area.
22. The Secretary also raised an issue about the inclusion of the restaurant into the Gambling Area, stating that if the restaurant facility were used for gambling, the non-gambling options at the casino would be reduced (although, in concluding his submission, he appeared to be comfortable that the remaining non-gambling options would be sufficient, even if the restaurant were closed). This tied in with a submission made by the PGF; namely that, although the application is put forward on the basis that the restaurant will be

used infrequently for gambling, the proposed drafting does not limit the Applicants' deployment of the restaurant as gambling area. This means that, on the Applicants' initial proposal, the restaurant could be utilised extensively for gambling purposes, with a corresponding reduction in the non-gambling options available at the casino.

23. In their submissions in reply, the Applicants noted the expressed concerns, explaining that the restaurant can never close pursuant to the terms of its liquor licence, and saying that, in any event, it does not want the restaurant to be adversely impacted by the activation of the alternative Gambling Area as the restaurant is an important part of the casino's business.
24. The Applicants sought to address the concerns by proposing a limit on the number of occasions per year that the restaurant can be used for gambling purposes, the duration of those occasions, and by proposing that the number of restaurant seats can never be less than 50% of normal capacity.
25. The Commission shared the concerns expressed by the Secretary and PGF, noting that the Applicants' stated (limited) use of the restaurant for gambling was not reflected in its proposed licence conditions. Further, a significant reduction in the non-gambling options at the casino is arguably inconsistent with the Act's purpose to facilitate responsible gambling.
26. However, on balance, the Commission was satisfied with the Applicants' proffered response, deciding that a partial reduction in the restaurant facility on only four occasions per year would not exacerbate harm, nor be inconsistent with the Act's purpose. The Commission amended the proposed licence conditions to incorporate the subsequently proposed limitations.
27. The Commission did not agree with PGF's submission that the notice period should be retained at 10 working days, when the Secretary, whose Inspectorate would be the most affected by a reduction in notice, indicated that he was content to receive two working days notice. The Commission considered that two working days notice is sufficient.
28. The Commission also did not agree with PGF's submission regarding games other than Poker being deployed in the restaurant area. The Applicants can only ever deploy approved games and approved game mixes in the casino's Gambling Area and the specific deployment of tables and substitute tables is yet to be the subject of a floor plan approval application. Further, the Applicants have now limited the use of the restaurant area for gambling purposes.

29. Finally, the Commission considered the application to deploy substitute tables. The Commission has considered this matter previously, allowing an application by SCML for the Auckland casino in 2011 (see decision GC24/11). In that decision, the Commission permitted SCML to install additional gaming tables at the Auckland casino, with those tables to be used as substitutes for tables on level 5 of the Auckland casino, when some or all of these level 5 tables are not in use. The Commission was satisfied that the deployment of the substitute tables would not increase opportunities for casino gambling as no more than the permitted maximum number of tables would ever be deployed, and because the table games deployed would be pursuant to an approved game mix.
30. The Applicants propose operating a similar system at the Queenstown casino, with up to five tables being deployed in the restaurant facility when the same number of paired tables on the MGF are closed. As with decision GC24/11, this raised no issues of regulatory concern for the Commission. However, the Commission noted that there is a difference between the Auckland approval and the current application in that the substitute tables are unlikely to be permanently deployed in Queenstown due to the importance of the restaurant to the casino's business. It is probable that the Applicants will deploy the substitute tables only on the four occasions that they are required each year. In any case, in addition to the casino's "regular" floor plan, the Applicants will need to seek approval of an alternative floor plan which depicts the gaming tables and the substitute tables.
31. The Commission has amended licence conditions 6 and 7 of SCML's operator's licence to accommodate the introduction of substitute tables at the Queenstown casino, as follows:

SCML's operator's licence (Queenstown)

6. The number of gaming tables in the Gambling Area shall not exceed 12, except as permitted by condition 6A.
7. The ratio of gaming machines to gaming tables in the Gambling Area, excluding the tables permitted by condition 6A, shall not exceed 15 to 1, except with the approval of the Commission.
32. In addition to limitations proposed in paragraph 26 above, the Commission has made a number of minor amendments to conditions 9 and 10 of QCL's venue licence and 6A of SCML's operator's licence, as follows:
9. (a) The Gambling Area within the Casino Venue comprises the areas specified in plans marked Schedule 1, Schedule 2, Schedule 3 and Schedule 4 attached to this licence. The standard Gambling Area for the Casino Venue is delineated in Schedule 1. ~~An Alternative Gambling Area~~ for the casino ~~are~~ in Schedule 2, Schedule 3 and Schedule 4.
- (b) The Licence Holder can use the alternative gambling areas shown in Schedules 3 or 4 on no more than four occasions, each of no more

than 8 duration in each calendar year. On each occasion that the area in Schedule 3 or 4 is used, the available seating in the casino's restaurant can never be less than 50% of normal availability.

- 10 One of the three alternative Gambling Areas will take effect subject to the following:
- (a) the Licence Holder providing the Commission and the Inspectorate with a minimum of 2 working days notice in writing of its intention to use one of the alternative Gambling Areas; and
 - (b) the Licence Holder specifying in that notice the dates and times at which the alternative gambling area will apply and terminate. At ~~termination~~the end of the notified period the Gambling Area will revert to the area delineated in Schedule 1.
- 6A. In addition to the gaming tables specified in condition 6, the Licence Holder may install up to five gaming tables in the alternative gambling area which is also used as a restaurant facility to be used as substitutes for five tables elsewhere on the main gaming floor when some or all of those tables are not in use. The location of the substitute tables will be defined in approved floor plans. The substitute tables are subject to the following requirements:
- (a) they must be clearly identified by the letters "ST" in the approved floor plans;
 - (b) each substitute table must be paired with a table shown in an approved floor plan;
 - (c) a substitute table may only be opened for play when the paired table is closed;
 - (d) each substitute table can only deploy casino games in compliance with an approved game mix for the paired table that is not in use; and
 - (e) they must be entered on the casino system as substitute tables.

Decision

33. The Commission:

- (a) approved the redesignation of the Gambling Area in the manner proposed, under condition 9 of QCL's venue licence and section 139 of the Act;
- (b) approved (with amendments) a variation to conditions 9 and 10 of QCL's venue licence, under to section 139 of the Act. Conditions 9 and 10 now provide as follows:

- 9. (a) The Gambling Area within the Casino Venue comprises the areas specified in plans marked Schedule 1, Schedule 2, Schedule 3 and Schedule 4 attached to this licence. The standard Gambling Area for the Casino Venue is delineated in Schedule 1. Alternative Gambling Areas for the casino are delineated in Schedule 2, Schedule 3 and Schedule 4.

- (b) The Licence Holder can use the alternative gambling areas shown in Schedules 3 or 4 on no more than four occasions, each of no more than 8 days in duration in each calendar year. On each occasion that the area in Schedule 3 or 4 is used, the available seating in the casino's restaurant can never be less than 50% of normal availability.
10. One of the three alternative Gambling Areas will take effect subject to the following:
- (a) the Licence Holder providing the Commission and the Inspectorate with a minimum of 2 working days notice in writing of its intention to use one of the alternative Gambling Areas; and
- (b) the Licence Holder specifying in that notice the dates and times at which the alternative gambling area will apply and terminate. At the end of the notified period the Gambling Area will revert to the area delineated in Schedule 1.
- (c) varied conditions 6 and 7 of SCML's operator's licence for the Queenstown casino, under to section 139 of the Act. Conditions 6 and 7 now read as follows:
6. The number of gaming tables in the Gambling Area shall not exceed 12, except as permitted by condition 6A.
7. The ratio of gaming machines to gaming tables in the Gambling Area, excluding the tables permitted by condition 6A, shall not exceed 15 to 1, except with the approval of the Commission.
- (d) approved a new condition 6A to SCML's operator's licence for the Queenstown casino, pursuant to section 139 of the Act. Condition 6A reads as follows:
- 6A. In addition to the gaming tables specified in condition 6, the Licence Holder may install up to five gaming tables in the alternative gambling area which is also used as a restaurant facility to be used as substitutes for five tables elsewhere on the main gaming floor when some or all of those tables are not in use. The location of the substitute tables will be defined in approved floor plans. The substitute tables are subject to the following requirements:
- (a) they must be clearly identified by the letters "ST" in the approved floor plans;
- (b) each substitute table must be paired with a table shown in an approved floor plan;
- (c) a substitute table may only be opened for play when the paired table is closed;
- (d) each substitute table can only deploy casino games in compliance with an approved game mix for the paired table that is not in use; and
- (e) they must be entered on the casino system as substitute tables.
34. Schedules 1, 2, 3 and 4 are **attached**.



Right of appeal

35. Pursuant to section 235 of the Act, a person affected by this decision may appeal that decision to the High Court. An appeal must be made within 15 working days of the date of notice of the Commission's decision, or any longer period that the High Court may

allow


Graeme Reeves
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

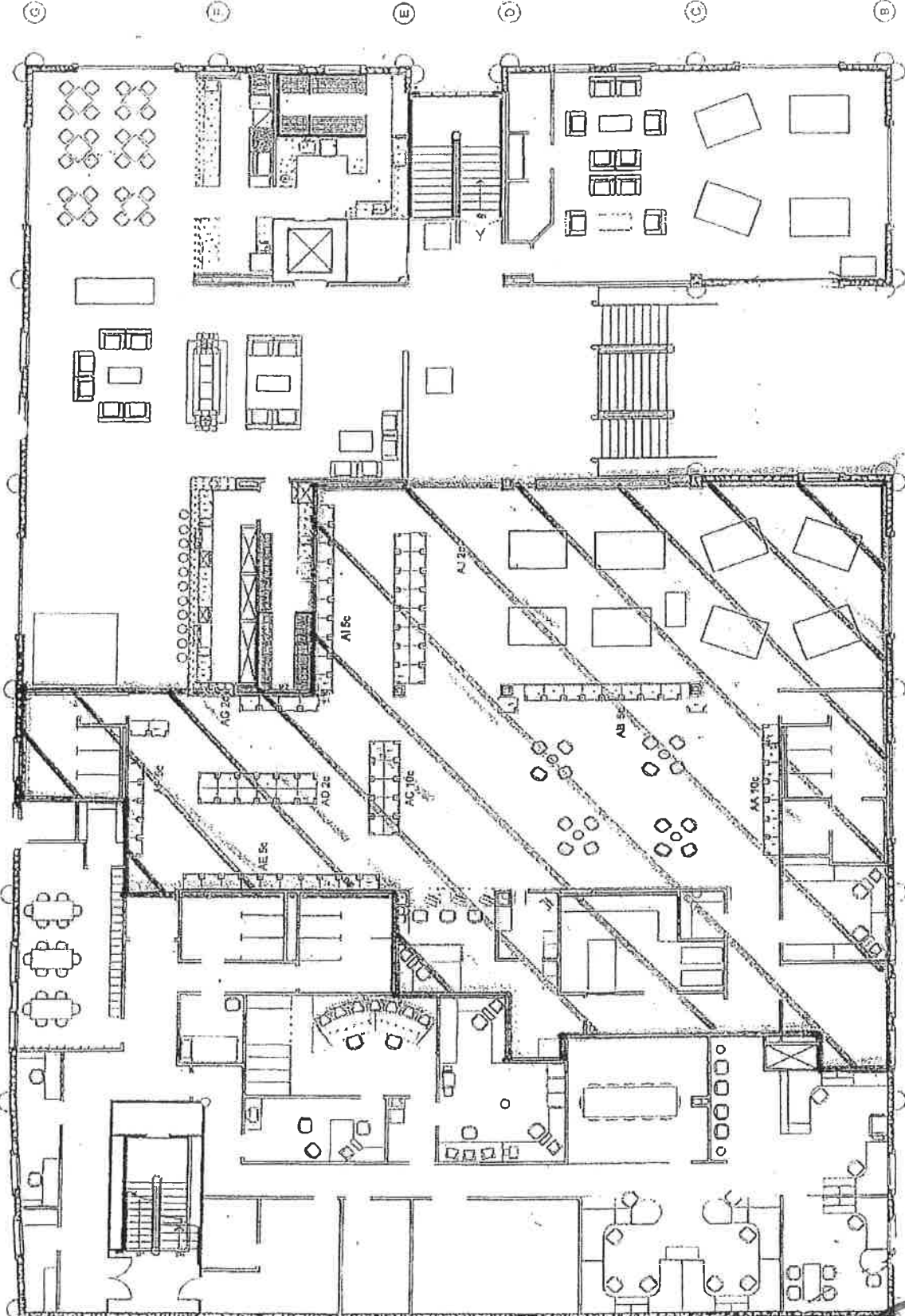
31 May 2013



SCHEDULE 2

LEVEL 2
FIXTURES &
FITTINGS

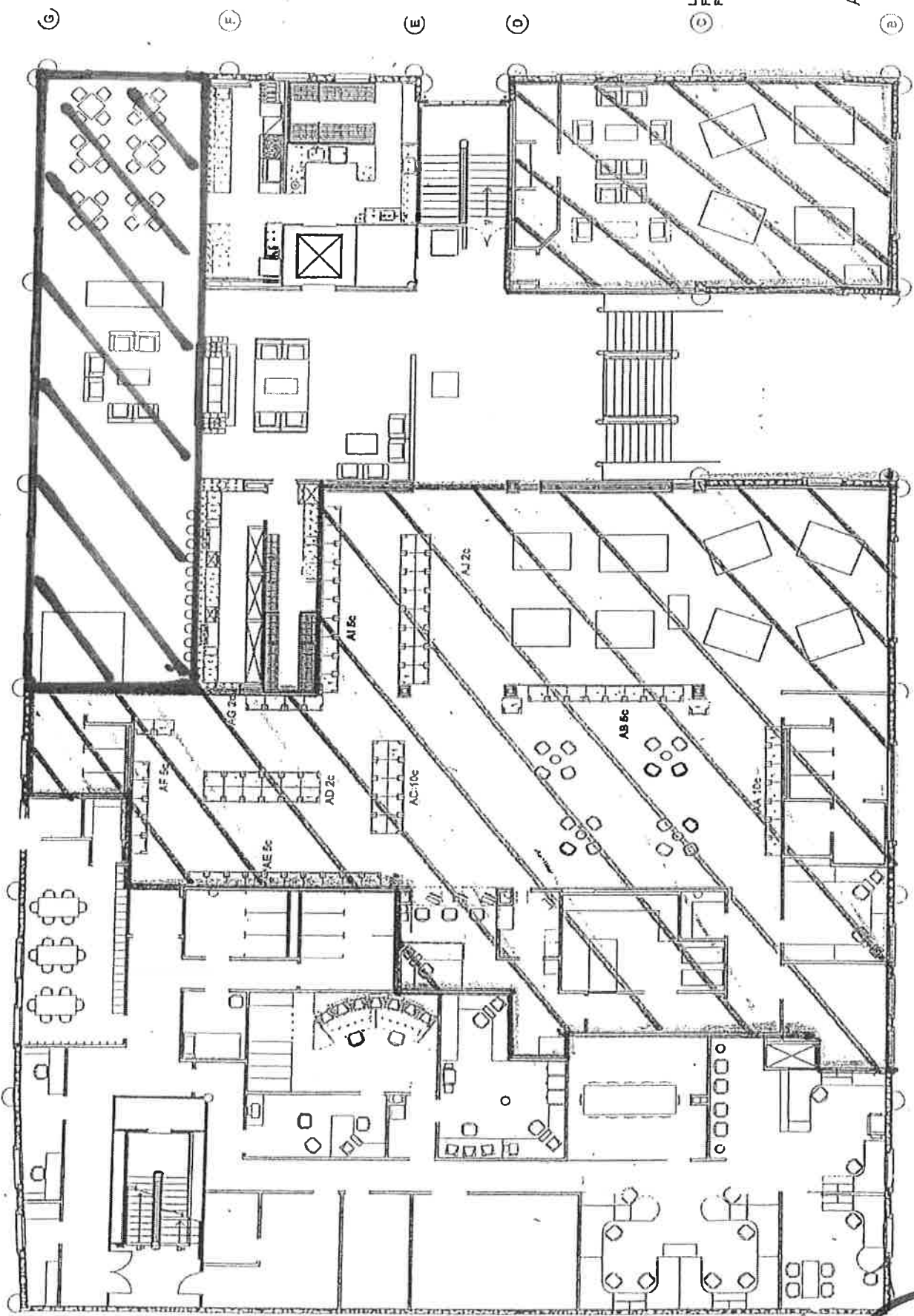
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SCHEDULE 3

LEVEL 2
FIXTURES &
FITTINGS

A1.3.7



SCHEDULE 4

LEVEL 2
FIXTURES &
FITTINGS

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