

IN THE MATTER of the Gambling Act 2003

AND on an application by **SKYCITY AUCKLAND LIMITED** and **SKYCITY CASINO MANAGEMENT LIMITED** for a series of approvals relating to the redesignation of the level 2 Gambling Area at the Auckland casino

BEFORE THE GAMBLING COMMISSION

Members: P Chin (Chief Gambling Commissioner)
M M Lythe
P J Stanley
G L Reeves

Date of Application: 29 October 2010

Date of Decision: 10 December 2010

Date of Notification
of Decision: 21 December 2010

**DECISION ON AN APPLICATION BY SKYCITY AUCKLAND LIMITED
AND SKYCITY CASINO MANAGEMENT LIMITED FOR A SERIES OF APPROVALS
RELATING TO THE REDESIGNATION OF THE LEVEL 2 GAMBLING AREA
AT THE AUCKLAND CASINO**

Introduction

1. SKYCITY Auckland Limited ("**SCAL**") and SKYCITY Casino Management Limited ("**SCML**") (together the "**Applicants**") applied to the Gambling Commission (the "**Commission**"):
 - (a) under section 139(1)(d) of the Gambling Act 2003 (the "**Act**") to amend conditions 9 and 9A of SCAL's venue licence, to redesignate the Gambling Area of the Auckland casino (to include the areas on level 2 currently occupied by the Fortuna Buffet and the Deck Bar) The proposed new conditions are shown, in mark-up, as follows:

Gambling Area

9. The current Gambling Area for the casino venue is delineated in the plan attached as Schedule 1 to these conditions. ~~The~~An additional Gambling Area ~~for the casino~~ is delineated in the plan attached as Schedule 2 and in the plan attached as Schedule 3 to these conditions (each an "Alternative Gambling Area").

9A ~~The~~An additional Gambling Area will ~~take~~ come into effect ~~subject to only when~~ the Licence Holder has ~~provided~~ provided the Commission and the Inspectorate with a minimum of 10 working days prior notice in writing of its intention to adopt that Alternative use the designated ~~additional~~ Gambling Area.

- (a) for approval of construction and design changes to levels 2 and 3 of the casino, under conditions 6 and 7 of the venue licence. (The proposed changes include developing the Fortuna Buffet and Deck Bar into Gambling Area on level 2, and developing a new Fortuna Buffet on level 3); and
 - (b) for approval to temporarily exceed the 15:1 ratio of gaming machines to tables, under condition 7 of SCML's operator's licence for the Auckland casino, from January to July 2011.
2. Submissions were sought on the Applicants' proposal from the Secretary for Internal Affairs (the "**Secretary**"), Ministry of Health, Problem Gambling Foundation ("**PGF**"), Salvation Army ("**SA**") and Gambling Helpline ("**GH**"). Submissions were received from GH, the Secretary, PGF and SA.
3. The relevant sections of the Act are as follows:

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 the 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. The relevant licence conditions are:

SCAL's venue licence

- 6 The Licence Holder must notify the Executive Director of any proposed changes to the construction or design of the Ground Floor, Level 2 or Level 3, including the Gambling Area but excluding SKYCITY Theatre and foyer area, restaurant and bar areas outside the Gambling Area, and the back of house areas used by staff. Notification must be accompanied by relevant drawings and an assessment of any impacts the alterations may have on:
 - (a) the integrity and fairness of games;
 - (b) the effectiveness of security and surveillance;
 - (c) harm prevention, harm minimisation and responsible gambling;
 - (d) potential access to the Gambling Area by persons under 20 years of age; and
 - (e) compliance by any person with the Act, including section 11.

The Executive Director may approve the proposed changes to the construction or design if he or she is satisfied that there are no adverse impacts in relation to the matters specified in (a)-(e) above. If the Executive Director is not satisfied, he or she will refer the proposal to the Commission for determination

- 7 The Licence Holder must notify the Executive Director of any proposed changes to the construction or design of Levels 2, 3, 5 and 6 of the casino venue, including the Gambling Area but excluding SKYCITY Theatre and foyer area, restaurant and bar areas outside the Gambling Area, hotel rooms and the back of house areas used by staff. Notification must be accompanied by relevant drawings and an assessment of any impacts the alterations may have on:
 - (a) the integrity and fairness of games;
 - (b) the effectiveness of security and surveillance;

- (c) harm prevention, harm minimisation and responsible gambling;
- (d) potential access to the Gambling Area by persons under 20 years of age; and
- (e) compliance by any person with the Act, including section 11

The Executive Director may approve the proposed changes to the construction or design if he or she is satisfied that there are no adverse impacts in relation to the matters specified in (a)-(e) above. If the Executive Director is not satisfied, he or she will refer the proposal to the Commission for determination

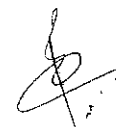
- 9 The current Gambling Area for the casino venue is delineated in the plan attached as Schedule 1 to these conditions. The additional Gambling area for the casino is delineated in the plan attached as Schedule 2 to these conditions
- 9A The additional Gambling Area will come into effect only when the Licence Holder has provided the Commission and the Inspectorate with a minimum of 10 working days notice in writing of its intention to use the designated additional Gambling Area

SCML's operator's licence (Auckland)

- 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

Submissions by the Applicants

- 5. The Applicants stated that:
 - (a) They want to redesignate and extend the Gambling Area at the Auckland casino to include the areas currently occupied by the Fortuna Buffet and the Deck Bar on level 2. They propose amendments to conditions 9 and 9A to allow this to happen.
 - (b) They are not yet in a position to submit exact floor layouts showing the position of their gambling products in the new area, but it is likely that it will be used as a membership only area for Diamond Action Loyalty players and will accommodate approximately 200 gaming machines.
 - (c) They also propose to construct two external smoking decks.
- 6. The Applicants submitted, in summary, as follows:
 - (a) The current Gambling Area becomes congested at peak times. This detracts from the guest experience and the attraction of the venue. They need to decongest the Gambling Area and have identified an area that could be used as additional gambling area – the Fortuna Buffet and Deck Bar.



- (b) The Fortuna Buffet and Deck Bar are very under-utilised, and as they are located adjacent to the main gaming floor, they are ideal for redevelopment as Gambling Area
- (c) To address the challenge of fitting out the new level 2 area the building works will be carried out in stages, with work done first around the Deck Bar and Fortuna area, before constructing a new Fortuna Buffet restaurant on level 3 in the area currently occupied by the Poker Zone
- (d) As the new restaurant will be housed in the Gambling Area, it would not be open to minors. The Poker tables currently located in this area will be relocated to other parts of the gaming floor to facilitate this work.
- (e) As the Fortuna Buffet and Deck Bar area are within the defined casino venue, the Commission has the discretion to specify them as an area where gambling is permitted.
- (f) The current conditions attached to SCAL's venue licence require them to obtain Commission approval for any construction and design changes to levels 2 and 3 of the casino. They are required to assess any impacts on the proposed construction and design changes on condition 7 of its venue licence. They do so as follows:
 - (i) Integrity and fairness of games – no adverse impact.
 - (ii) The effectiveness of security and surveillance – this will be the same as for all gambling areas in the casino.
 - (iii) Harm prevention, harm minimisation and responsible gambling – no adverse impact and as the area will be reserved for Diamond customers, complete with a staff reception desk, it will be easier for their staff to identify, monitor and intervene with customers
 - (iv) Access to the Gambling Area by persons under 20 years of age – no adverse impact. The sole point of access would be via the main entry which has security officers to ensure that patrons are of age.
 - (v) Compliance by any person with the Act including section 11 – no adverse impact. While Gambling Area would expand, there will be no increase in table numbers, gaming machines, player spaces or the size of tables



- (vi) Section 139(2) provides that a condition of a casino licence specified or varied under section 139(1) must comply with the requirements set out in section 139(2). It does this.
- (g) Between January and July 2011, they anticipate difficulty in finding enough space to locate all of their tables and machines while the building works are undertaken. Pursuant to condition 7 of SCML's operator's licence, "the ratio of gaming machines to gaming tables shall not exceed 15:1, except with the approval of the Commission" It will need to remove up to 12 machines from the gaming floor, which would see the ratio increase from 15:1 to 16 80:1 for this period.

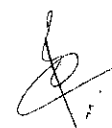
GH's submissions

7. GH submitted, in summary, as follows:

- (a) It does not object to increasing the Gambling Area on level 2 *per se*, but has concerns that there is potential for increased harm.
- (b) While the proposal will not increase opportunities for casino gambling, it will increase opportunities for Diamond members as they would have access to the new area, which would presumably be less congested than the main gaming floor. They would therefore have an increased ease of access to gaming machines. This would increase the opportunities to gamble through the availability of gambling for those individuals.
- (c) It is also concerned that the Applicants are proposing to construct two external smoking decks and a cashiering facility on the new level 2 gambling area. A very high proportion of regular gamblers are smokers so creating smoking decks in easy access of the gambling floor will encourage gamblers to return after a smoking break, whereas if the gambler had to walk outside the casino, or to another floor for a cigarette, it would give them the opportunity to take a slightly longer break and assess whether they should terminate the gambling session or continue.
- (d) The presence of a cashiering facility may also assist in causing harm to some gamblers. It fails to see why a new cashiering facility would be necessary when other facilities and ATMs exist in relatively close proximity.

The Secretary's submissions

8 The Secretary submitted that he is comfortable with the Applicants' changes.



PGF's submissions

9. PGF submitted, in summary, that:
- (a) It opposes the proposal as the additional space will increase opportunities for casino gambling contrary to sections 11, 12 and 139(2) of the Act.
 - (b) Eliminating congestion also increases opportunities. What is proposed is very close to an increase in total player space at a table game and ought to be included in the definition of increased opportunities.
 - (c) As the proposed area is for Diamond Club members, the area will be used by more high-spend gamblers. High-spend gamblers include among them a higher proportion of problem gamblers, and higher spend gamblers, where there are inevitably larger gambling losses, tend to have a more harmful consequence than for other casino gamblers. Therefore as a consequence of approving this application, there would be an increase in the number of gamblers at most times, in the amount that they gamble, in the time spent gambling, and the proportion of gamblers who are problem gamblers. The opportunities for casino gambling will clearly have increased as will the gambling related harm.
 - (d) The proposal would be contrary to purpose (b) of the Act, namely "to prevent and minimise the harm caused by gambling, including problem gambling."
 - (e) One of the harms associated with casino gambling is money laundering. Providing a substantial new area for gambling activities would increase the opportunities for money laundering unless considerably more skilled supervisory staff were employed to look out for, and stop, such activity.

SA's submissions

10. SA submitted, in summary, that:
- (a) Enlarging the Gambling Area will provide an increase in casino gambling opportunities as there are likely to be more guests, even though there are no more gaming products. The gaming products are not utilised fully at all times, therefore more guests can come in and gamble comfortably for longer periods than previously.
 - (b) The downsizing and removal of the Fortuna Restaurant on level 2 will reduce easy access to convenient harm minimisation and host responsibility activities for level 2 guests. Although a lounge bar will be available, it is not the same as having a dedicated restaurant option.



- (c) The use of the extended Gambling Area to an exclusive membership only area could be considered an enticement to attract more custom and increase gambling opportunities
- (d) The proposal to construct two external smoking decks and a cashiering facility will be contra to minimising harm as guests will not be required to break their gambling for longer periods with smoking decks and cashiering facilities more conveniently located
- (e) Enlarging the Gambling Area can provide room in the future for further gambling products to be installed (even though this proposal is considering the relocation of existing gaming machines only). It does not agree that the number of gaming products remaining unchanged is the only aspect that could increase harm and gambling opportunity – an increased number of guests that stay longer could also increase gambling opportunities, especially as not all products are fully utilised at times.

Submissions in reply

11. The Applicants submitted, in reply, as follows:

- (a) PGF submits that the decongestion of the Gambling Area may increase the total player space at table games contrary to the requirements of section 12(2)(c). In decision GC27/10, the Commission commented that a PGF submission that an increase in the total player space at table games would arise from an application for construction and design changes at Christchurch casino "is one which would have potential merit in circumstances where more room were being created around tables which are not subject to maximum player rules, such as Roulette". Whether more room might be created around certain tables arising from their proposed expansion to the Gambling Area can only be determined by an assessment of the proposed changes to the floor layout. This application does not seek approval for a revised gambling area floor plan. In order to use the proposed new gambling area for gambling purposes, they first need to seek Commission approval for floor layouts showing the position of gaming tables and gaming machines. That would be the opportune time to consider how any expansion to the floor area might be used for the relocation of product and what, if any, impact that might have on the available space surrounding tables which are not subject to maximum player rules.
- (b) At this stage, they are not in a position to submit floor plans for the Commission, but can submit that the expanded Gambling Area is not designed to create more

space around Roulette or any other tables which are not subject to maximum player rules.

- (c) If this application is approved, they will address the implications arising from any proposed changes to the gaming layout when they apply to have new gaming layouts approved in the future.
- (d) PGF also submits that the proposal would be contrary to the harm prevention and minimisation provisions of the Act because it is likely to lead to an increase in the amount of high end gambling. The Commission has already considered this in decision GC25/10, where it noted that increased expenditure does not necessarily mean that such gamblers are at greater risk of harm, either individually or as a group.
- (e) PGF submits that expanding the Gambling Area would increase the opportunities for money laundering. PGF does not articulate how this would be so, but they have systems in place to manage the risk of money laundering and the expansion of the Gambling Area has no relevance whatsoever to the management of those risks. Further, the DIA is responsible for monitoring and assessing the level of risk of money laundering in the casino sector, and the Secretary has indicated he is comfortable with this proposal
- (f) GH submits that it has concerns by making the new area a members' only area as there is potential for the increased harm. The development of such areas is not driven by particular membership groups having difficulty in accessing machines or tables. In reality there would be very few occasions when all of gaming products are fully utilised, and even when the floor becomes very congested, it is generally possible for a player to find machines available to play. The real issue with a congested floor is that it can detract from the guest experience in terms of comfort and general service across the floor.
- (g) Creating exclusive areas for the use of different membership tiers allows SCML to generally enhance its customer service and deliver benefits acceptable to particular tiers.
- (h) Further, their host responsibility executives say that there are advantages in having regular customers game in exclusive areas as it generally assists staff in monitoring individuals and detecting potentially problematic behaviour.
- (i) GH also opposes the construction of two smoking decks and an additional cashiering facility on the basis that the convenience of such facilities is likely to

discourage those from taking what might otherwise be a longer break from gambling. This does not represent a justifiable rationale for not proceeding with redevelopments.

- (j) In relation to the cashiering area, it is important to recognise that these are not just designed to facilitate participation in gaming; they are also designed to facilitate cash-outs following the conclusion of a gaming session. Denying easy access to such a facility could discourage guests from completing a gaming session.
- (k) SA oppose the downsizing and relocation of the Fortuna restaurant. However there are a variety of other restaurant offerings both in and within easy walking of the Gambling Area. There is no evidence to indicate that persons using the Gambling Area on level 2 take a break from their gambling sessions to eat at the Fortuna restaurant.

Analysis

- 12. The Applicants applied to extend the Gambling Area at the Auckland casino. As it has noted recently (see decision GC25/10), the Commission has the power to reconfigure the Gambling Area of the casino provided that the extended area remains within the casino venue (as that is defined in SCAL's venue licence) and the amended licence conditions defining the new area are consistent with section 139(2) of the Act.
- 13. The Commission was satisfied that the proposed redesignation would not extend the casino venue. SCAL's venue licence defines the casino venue as the block bounded by Hobson Street, Wellesley Street West, Federal Street and Victoria Street West (except for the underground carpark, the Sky Tower, the bus station and the walkway between the Sky Tower and the casino complex). Level 2 is clearly well within the casino venue.
- 14. The Commission was also satisfied that the proposed licence conditions were consistent with section 139(2) as they are consistent with the Act and its purpose, and they would not increase opportunities for casino gambling.
- 15. One of the purposes of the Act is to prevent and minimise harm caused by gambling, including problem gambling. The Commission thought that the proposal may have harm minimisation benefits in that it would be easier to locate and identify potential problem gamblers in a less congested environment.
- 16. Further, the extended Gambling Area is intended to be used by Diamond customers only. The provision of an exclusive area for these patrons will in itself likely result in better



monitoring and supervision of those customers by the Applicants as they ensure that the Diamond patrons are adequately catered for.

17. PGF, SA and GH all submitted that the proposal would increase opportunities for casino gambling as it would create more space resulting in greater ease of access to gambling product. The Commission's thinking on this issue is now well settled – the mere extension of a gambling area will not usually increase opportunities for casino gambling, rather it will increase the attractiveness of the existing opportunities. The Commission noted PGF's submission that decongestion within a gambling area could result in an increase in the total player spaces at certain table games, but it concurs with the Applicants that this consideration is best determined on an assessment of a proposal to change the floor layout. Indeed, the issue is purely hypothetical without consideration of specific proposed changes in the approved floor plans which potentially affect table games which are not subject to rules limiting the maximum number of players. The Commission will remain cognisant of PGF's submission and will consider it carefully as part of its analysis of any forthcoming application for approval of a revised floor plan.
18. The Commission made a number of minor amendments to the proposed licence conditions. The Commission considered it unnecessary to notify affected parties of its amendments as they are minor, do not alter the substance of the proposal, and are made to clarify the conditions. The Commission's amendments are shown in mark-up as follows:
- 9. The current Gambling Area for the casino venue is delineated in the plan attached as Schedule 1 to these conditions. ~~An additional~~A first alternative Gambling Area is delineated in the plan attached as Schedule 2, ~~and~~ A second alternative Gambling Area is delineated in the plan attached as Schedule 3 ~~to these conditions (each an "alternative Gambling Area")~~.
 - 9A ~~An change of additional~~ Gambling Area will take effect subject to the Licence Holder providing the Commission and the Inspectorate a minimum of 10 working days prior notice in writing of its intention to adopt ~~that Alternative Gambling Area~~one of the approved Gambling Areas referred to in Condition 9 and shown in Schedules 1, 2 or 3

Approval under conditions 6 and 7

19. The Commission considered the application for approval of the necessary design and construction changes to undertake the redevelopment of levels 2 and 3. The Commission considered the same factors that applied to the variation of conditions 9 and 9A were relevant to an assessment of impacts the alteration might have on the condition 7 factors.
20. The Commission did not consider that the construction and design changes would have an adverse impact on the factors listed in condition 7.

Increase in gaming machine:table ratio

21. The Commission has previously allowed operators to temporarily exceed the table games:gaming machine ratio while refurbishments are taking place. It was of the view that doing so for this refurbishment raised no issues of regulatory concern.

Decision of the Commission

22. The Commission:
- (a) amended licence conditions 9 and 9A of SCAL's venue licence under section 139(1)(d) of the Act. Licence conditions 9 and 9A now read as follows:
9. The current Gambling Area for the casino venue is delineated in the plan attached as Schedule 1 to these conditions. A first alternative Gambling Area is delineated in the plan attached as Schedule 2. A second alternative Gambling Area is delineated in the plan attached as Schedule 3.
- 9A. A change of Gambling Area will take effect subject to the Licence Holder providing the Commission and the Inspectorate a minimum of 10 working days prior notice in writing of its intention to adopt one of the approved Gambling Areas referred to in Condition 9 and shown in Schedules 1, 2 or 3.
- (b) approved SCAL's proposed construction and design changes under conditions 6 and 7 of SCAL's venue licence; and
- (c) approved SCML exceeding the 15:1 ratio of gaming machines to gaming tables from January 2011 to July 2011, under condition 7 of SCML's operator's licence. The ratio may not exceed 16.8:1.

Right of Appeal

23. 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.

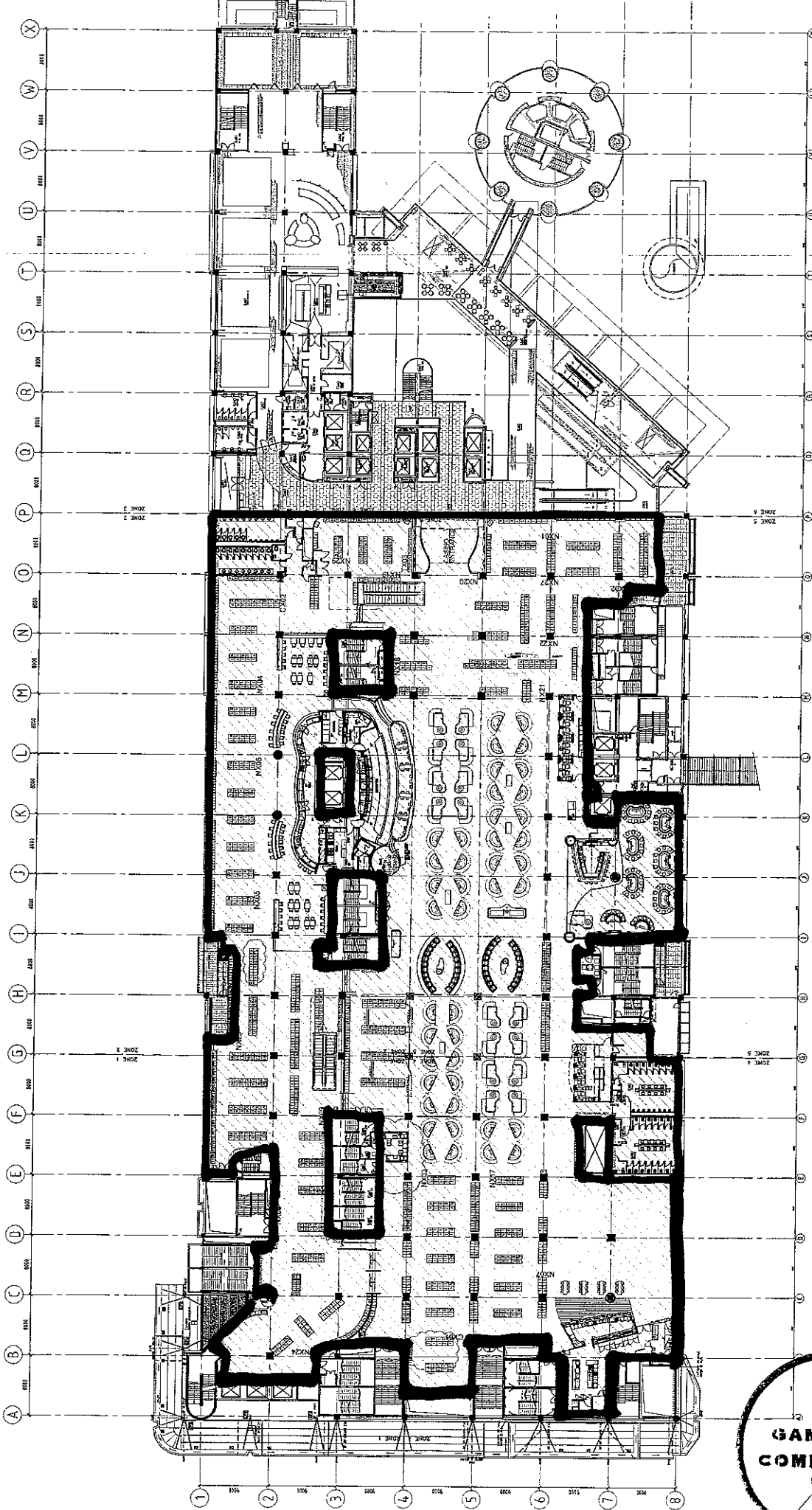


Peter Chin
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

21 December 2010

Schedule 1



SCHEDULE

GAMING TABLES	
PLAY	1/1
PACING	1/4
TOTAL	1/5
TOTAL	1/5
AVAIL	1/5
AVAIL	1/5
COND	1/5

GAMING MACHINES	
TOTAL	3000
TOTAL	3000
AVAIL	3000
COND	3000

GAMING AREA: 6,023m² (64,831 SQ. FT)



CLIENT AND PROJECT

SKY CITY ENTERTAINMENT GROUP
GAMING LAYOUTS

SKY CITY ENTERTAINMENT GROUP

202-392-8200
1000 13th Street
Las Vegas, NV 89101
www.skycity.com

Moller Architects®

202-392-8200
1000 13th Street
Las Vegas, NV 89101
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DRAWING INFORMATION

Drawn: [Name] (N) 250
Checked: [Name] (N) 500
Approved for Construction: [Name]
Date: [Date]

DRAWING TITLE

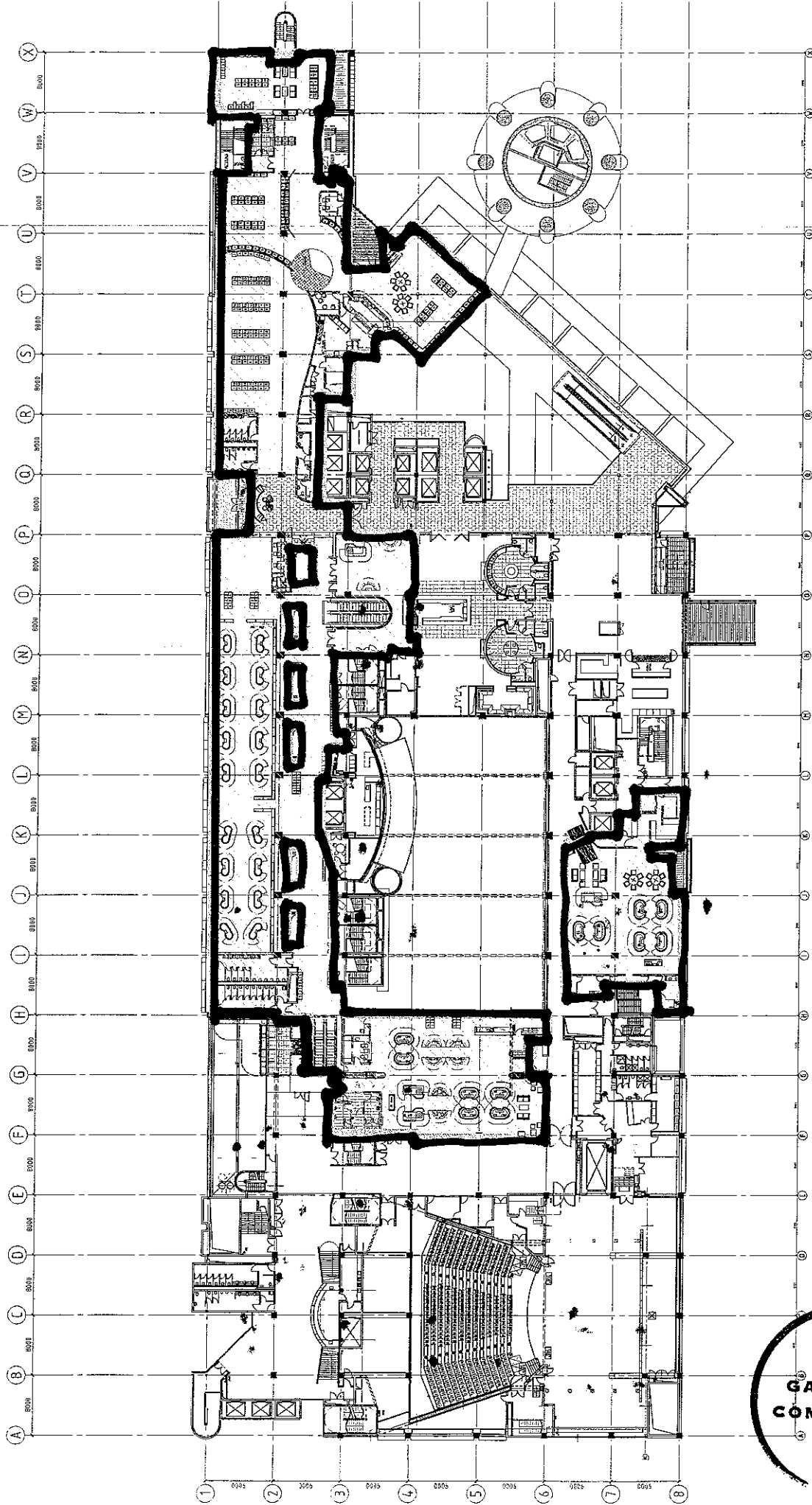
Level 2 Gaming Layout
SKY CITY
GAMING AREAS

REVISION

NO.	DATE	BY	CHK.	REV.
1				
2				

JOB NO. 0000
DRAWING NO. 0000

Schedule 1

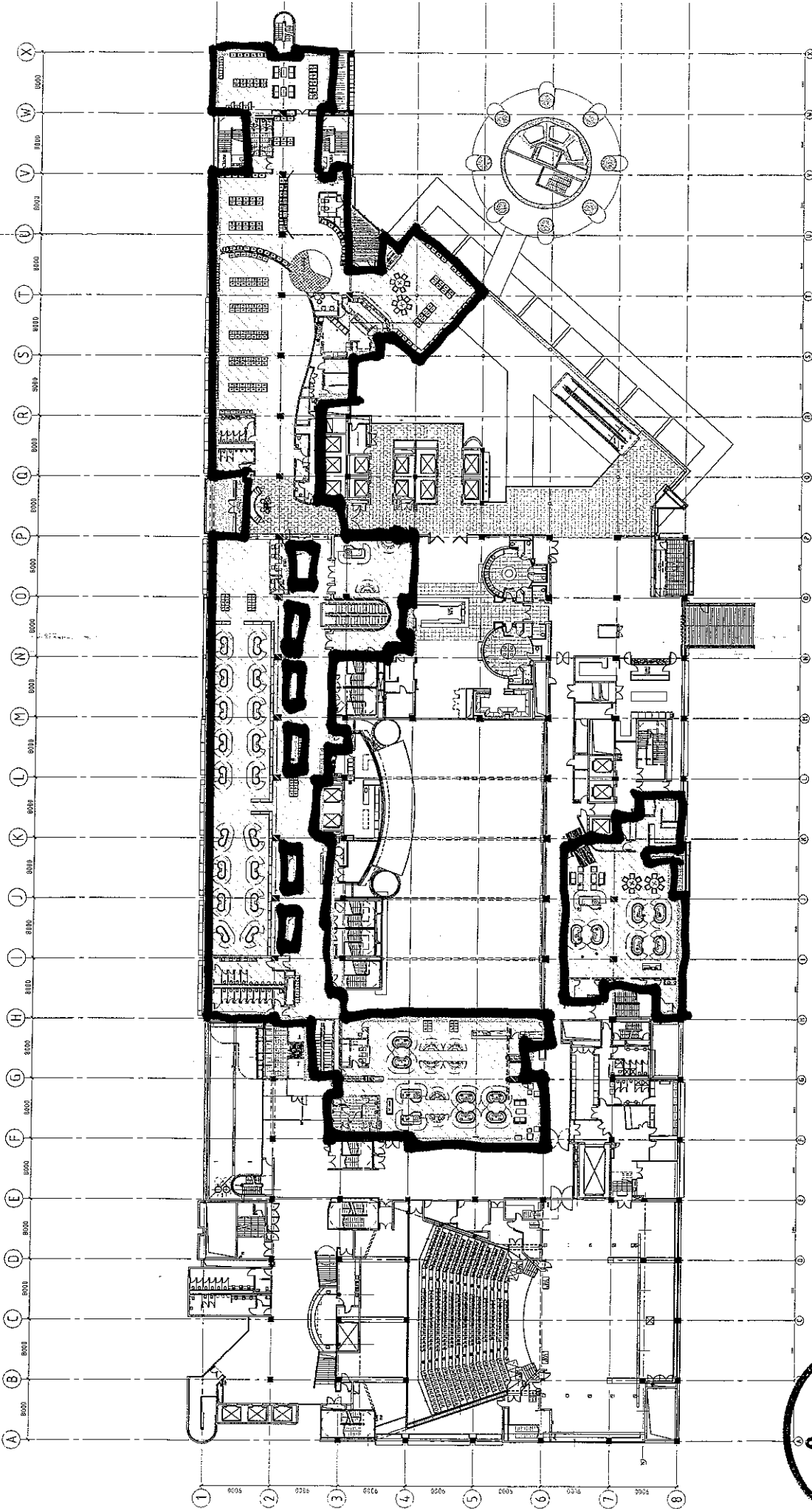


GAMING AREA: Approximately 3,140.8m² (33,807 SQ. FT)



<p>CLIENT AND PROJECT</p> <p>Call: 604 8 3270888 Fax: 604 8 3270889 Level 13 West Tower 100 West 10th Street Vancouver, BC V6C 2B5 www.mollerarchitects.com</p>	<p>SKYCITY ENTERTAINMENT GROUP</p>	<p>DRAWING INFORMATION</p> <p>Sheet: 031 250 Revised Sheet: 031 200 Eng. Date: 02/04 Date: 02/04</p>	<p>DRAWING TITLE</p> <p>Level 3 Gaming Layout SKYCITY</p>	<p>REVISION</p> <table border="1"> <tr> <th>No.</th> <th>Description</th> <th>Date</th> <th>By</th> <th>App'd</th> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </table>	No.	Description	Date	By	App'd					
		No.	Description	Date	By	App'd								
<p>1. Refer to Revision 1 for General Situations 2. All Contractor shall verify all dimensions before commencing work. 3. All dimensions shall be in accordance with all relevant documents. 4. All dimensions shall be in accordance with all relevant documents. 5. All dimensions shall be in accordance with all relevant documents.</p>	<p>SKYCITY GAMING LAYOUTS</p>	<p>DATE: 02/04 DRAWN BY: [Name] CHECKED BY: [Name] APPROVED BY: [Name]</p>	<p>0000</p>											

Schedule 2

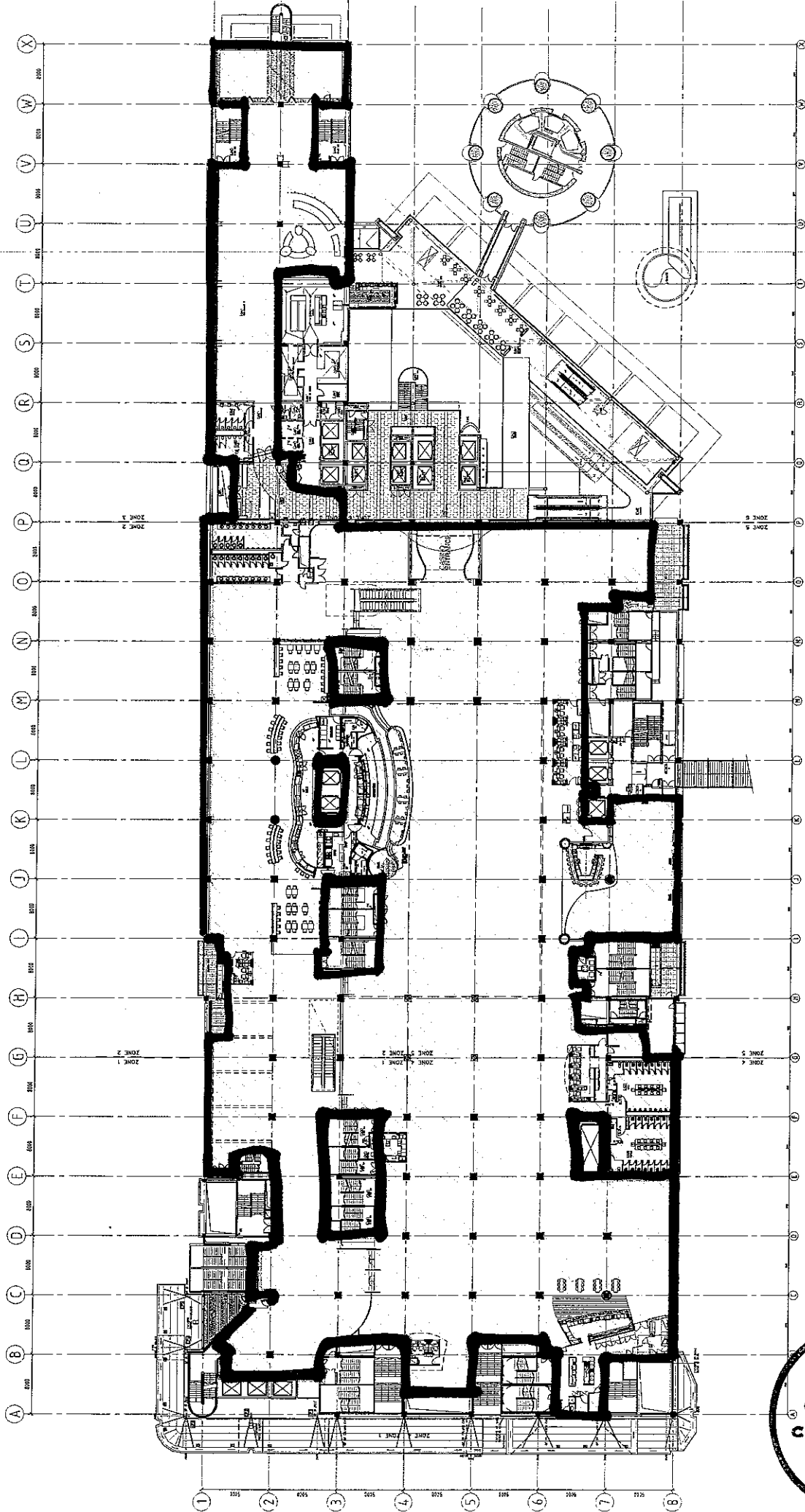


GAMING AREA: Approximately 3,140.8m² (33,807 SQ. FT)



<p>Moller Architects</p> <p>200 West 13th Street PO Box 10000 Las Vegas, NV 89102 www.mollerarchitects.com</p>	<p>SKY CITY ENTERTAINMENT GROUP</p>	<p>DATE: 07/20/2014</p> <p>TIME: 10:00 AM</p> <p>BY: [Signature]</p>	<p>PROJECT: SKY CITY</p> <p>DATE: 07/20/2014</p> <p>TIME: 10:00 AM</p> <p>BY: [Signature]</p>
		<p>CLIENT AND PROJECT</p> <p>SKY City Entertainment Group Gaming Layouts</p>	<p>DRAWING INFORMATION</p> <p>Drawn: [Name]</p> <p>Checked: [Name]</p> <p>Approved: [Name]</p> <p>Date: [Date]</p>

Schedule 3

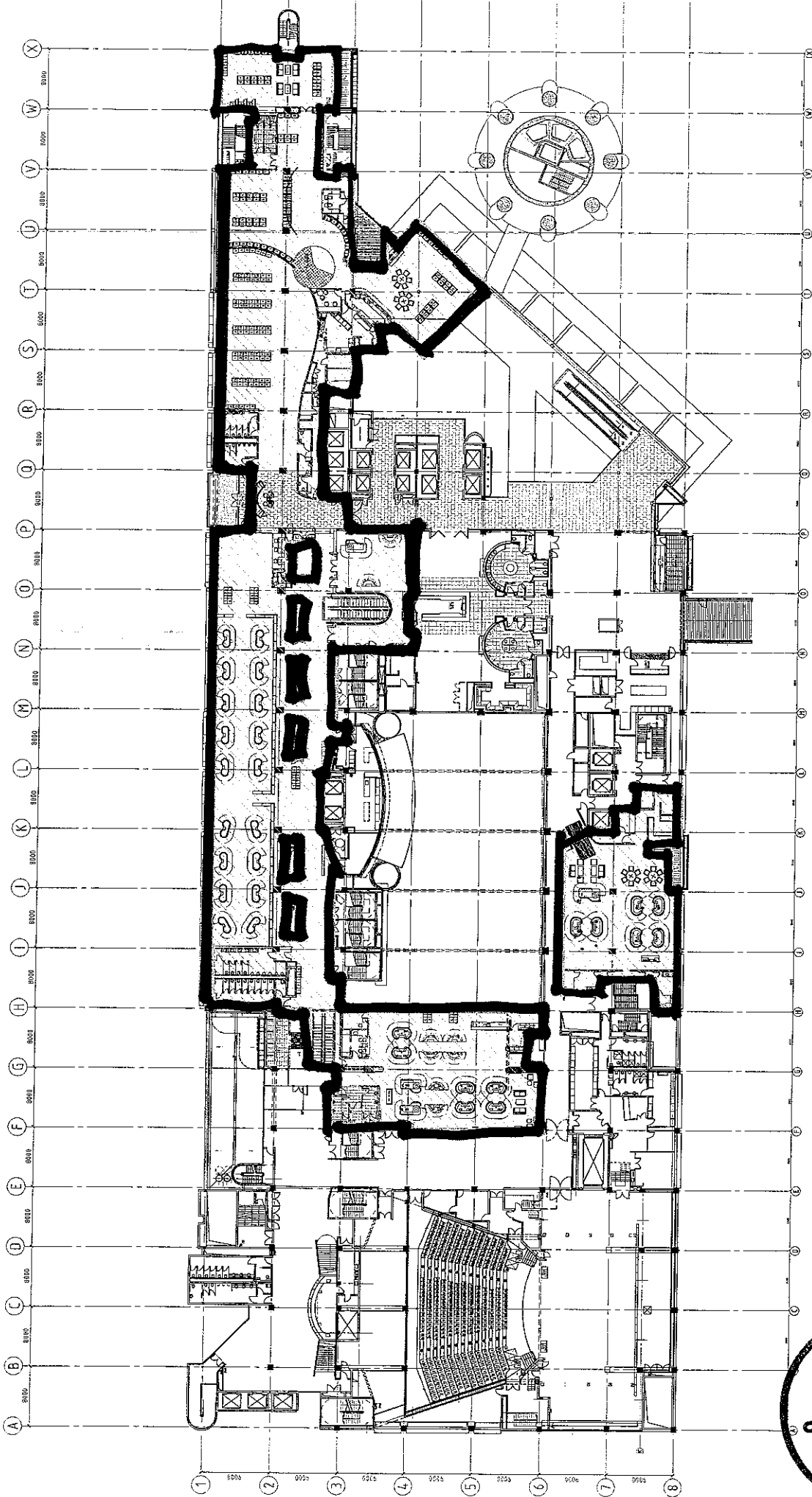


GAMING AREA: 6,843m²



<p>Call 66 9 9370688 Fax 66 9 9370689 Level 13 Macquarie PO Box 1000 Sydney NSW 2000 www.mollerarchitects.com</p>		<p>CLIENT AND PROJECT Sky City Entertainment Group ENTERTAINMENT GROUP</p>		<p>REVISION</p> <table border="1"> <tr> <th>No.</th> <th>By</th> <th>On</th> <th>Rev</th> <th>Desc</th> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </table>		No.	By	On	Rev	Desc					
No.	By	On	Rev	Desc											
<p>Drawn: _____ Checked: _____ Approved for Construction: _____ Scale: _____</p>		<p>DATE: _____</p>		<p>DRAWING NO. PD1121</p>											
<p>Project: PODIUM Drawing No: (A) 120 Sheet No: (A) 006 Approved for Construction: _____ Scale: _____</p>		<p>* Refer to Section 1 for Detail Structures Non-Structural steel work of dimensions before commencing work. All items shall be read in conjunction with all relevant standards. Copyright © Moller Architects Pty Ltd</p>		<p>DATE: _____</p>											
<p>Prep: _____ Draw: _____ Rev: _____</p>		<p>DATE: _____</p>		<p>DATE: _____</p>											

Schedule 3

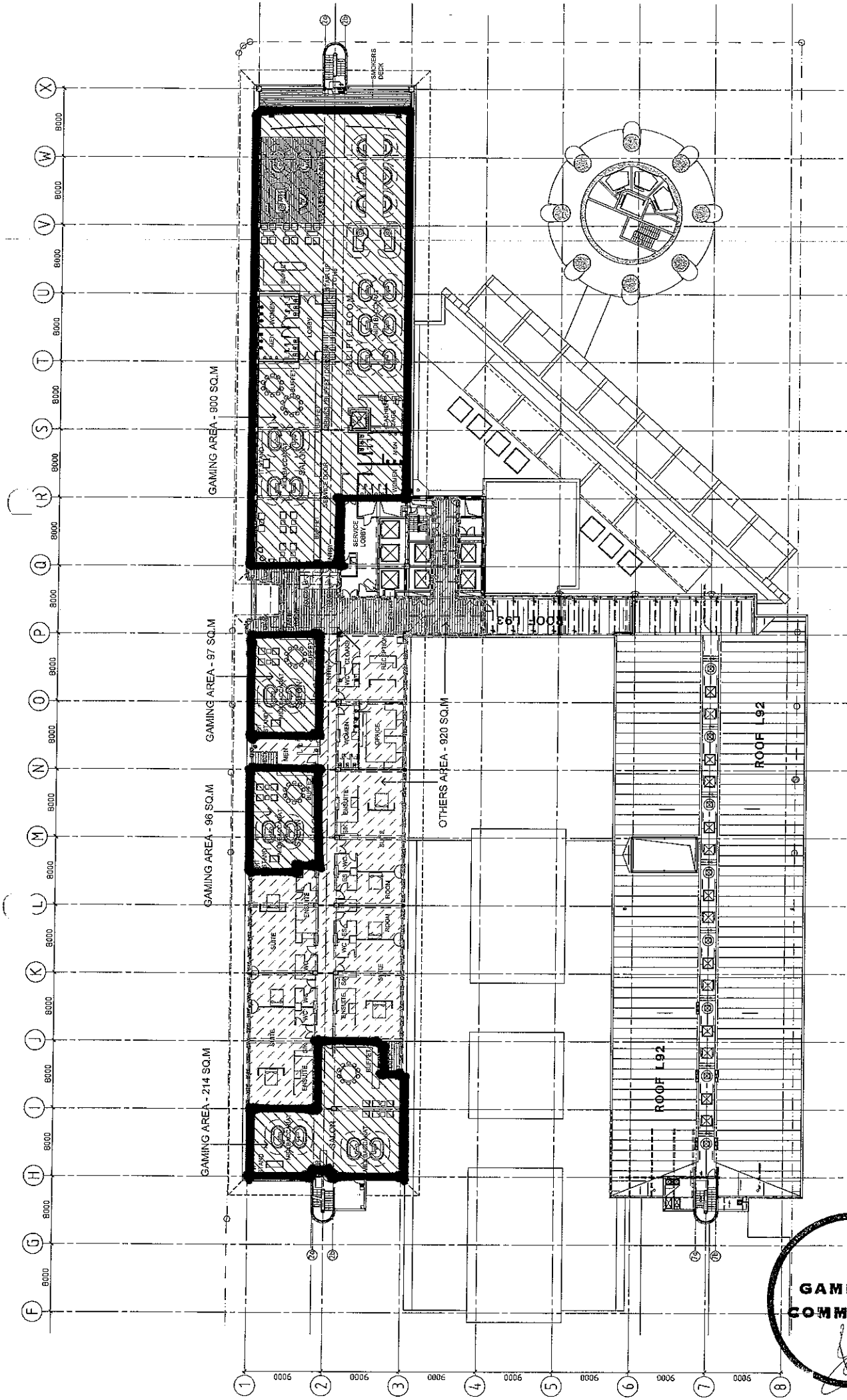


GAMING AREA: Approximately 3,140.8m² (33,807 SQ. FT)



<p>CALL: 416 935 7088 FAX: 416 935 7089</p> <p>Level 3 West Plaza PO Box 101 001 Aurora, Ontario L4R 4Y7 www.moller-architects.com</p>	<p>Moller Architects</p>	<p>CLIENT AND PROJECT</p> <p>Sky City Entertainment Group Gaming Layouts</p> <p>SKY CITY ENTERTAINMENT GROUP</p>	<p>DATE: 03/20/2007 PROJECT NO: 03/2007 ISSUED FOR: CONTRACT</p> <p>DATE: 03/20/2007 PROJECT NO: 03/2007 ISSUED FOR: CONTRACT</p>	<p>DRAWING TITLE</p> <p>Level 3 Gaming Layout SKY CITY</p> <p>GAMING AREAS</p>	<p>REVISION</p> <p>No. Description</p> <p>1. 01/11/07</p>	<p>0000</p>
					<p>DATE: 03/20/2007 PROJECT NO: 03/2007 ISSUED FOR: CONTRACT</p>	<p>0000</p>

Schedule 3



REVISION	BY	CHK	APP	DATE

DRAWING NO. A5255
 SK05-AREAS

DRAWING TITLE
 SKYCITY VIP GAMING
 LEVEL H5
 AREAS CALCULATION

* Refer to Section 1 for Object Symbols
 Note: Contractor shall verify all dimensions before commencing work.
 Note: Drawing shall be used in conjunction with all relevant documents.
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 Original Size: A1
 Scale: 1:400

DRAWING INFORMATION	
Sheet No.	01
Drawn By	
Checked By	
Approved By	
Scale	1:400
Proj. No.	
Rev. No.	
Proj. File	
Proj. No.	

CLIENT AND PROJECT
 Sky City Entertainment Group
 VIP Gaming

SKYCITY ENTERTAINMENT GROUP

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