

**Further submission on application by Dunedin Casinos Limited for Renewal of
Casino Venue Licence under section 134 Gambling Act 2003**

To: The Gambling Commission

From: Dunedin Casinos Limited

INTRODUCTION

- 1 This further submission is made on behalf of the applicant, Dunedin Casinos Limited (*DCL*).
- 2 DCL wishes to be heard in support of its further submissions.
- 3 DCL has reviewed in detail all of the submissions on the application and wishes to thank the community for providing its views and offering its support to DCL.
- 4 DCL would like to take the opportunity to respond to some of the submitters and provide comments on the key themes raised in their submissions including:
 - 4.1 safe gambling; and
 - 4.2 DCL's economic contributions and community involvement.
- 5 This further submission will also respond to the requests and recommendations of:
 - 5.1 Dunedin City Council (*DCC*);
 - 5.2 National Māori Gambling Harm Minimisation Public Health Collective (the *Collective*);
 - 5.3 PGF Services;
 - 5.4 National Public Health Service Te Waipounamu, Health New Zealand (*Te Whatu Ora*); and
 - 5.5 Asian Family Services (*AFS*).
- 6 To avoid repetition, the requests and recommendations of these organisations have been grouped in the following categories:
 - 6.1 DCC's request to increase mandatory charitable contributions;
 - 6.2 harm minimisation efforts; and
 - 6.3 vulnerable population groups.
- 7 These matters will be more fully addressed in evidence at the hearing.

SAFE GAMBLING

Safe environment

- 8 A number of submitters commented on how safe they feel spending time at the Grand Casino. For example:
- 8.1 Sharon Mollison - *"[the Grand Casino] is a safe place to come especially on your own."*¹
- 8.2 Holly Thomas - *"it is a safe place for locals to come and be treated with dignity and friendliness"*.²
- 9 Several others have also expressed similar views.³
- 10 The significance of the Grand Casino particularly for elderly people in the Dunedin community as safe space for socialising was also raised by many submitters. For example:
- 10.1 Dawn Rowena Kruishoop - *"as I am a Senior Citizen living alone, I come to the Casino to spend time with friends + to see the friendly staff. It is a safe place for me to come to socialise"*.⁴
- 10.2 Ashely Ryan - *"[the Grand Casino] provides a safe and secure place for senior citizens to go and socialise"*.⁵
- 10.3 Eileen Smith - *"great protocols in place for bad behaviour and intoxication. I am an older person and find the Casino a safe and secure environment"*.⁶
- 11 DCL is pleased to hear that so many of its patrons feel safe when using the Grand Casino. DCL aims provides a safe environment with strict door security and policies that deal with undesirable patrons. DCL upholds itself to high standards and takes its responsibility to provide a safe gambling environment and promote the responsible consumption of alcohol very seriously. As a result, the Grand Casino is a safe, secure and welcoming environment for those seeking entertainment and is an excellent place for friends, whānau and business colleagues alike.

Harm prevention

- 12 As noted by DCC *"the Casino takes its role as a responsible host seriously and recognises the Casino has an important role to play in preventing and minimising gambling-related harm for its customers and staff, as demonstrated through its Host Responsibility Programme."*⁷

¹ Submission of Sharon Elizabeth Mollison dated 3 May 2024.

² Submission of Holly Thomas dated 3 May 2024.

³ See for example, submission of Wendy Claire Hanson 3 May 2024; submission of Robin Lindsay Rowling dated 3 May 2024; submission of Glenys Stanley dated 3 May 2024; submission of Lydia Peipi dated 5 May 2024; submission of Alistair Murray Smith dated 4 May 2024; submission of Tony Collins 5 May 2024; and submission of Lennos Sharp dated 6 May 2024.

⁴ Submission of Dawn Rowena Kruishoop dated 3 May 2024.

⁵ Submission of Ashley Ryan dated 23 May 2024.

⁶ Submission of Eileen Margaret Smith dated 4 May 2024.

⁷ Submission of Dunedin City Council dated 28 May 2024.

- 13 DCL takes pride in its approach to host responsibility. Several submitters have commended DCL for its approach to avoiding gambling harm. These submissions speak to the effectiveness of DCL's Host Responsibility Programme (HRP) particularly the monitoring of gambling behaviour, staff training and exclusion and re-entry policies:
- 13.1 Sharyn Parkin - *"Dunedin Casino has consistently demonstrated a commitment to responsible gambling practices. The staff members are vigilant in ensuring that patrons gamble responsibly and adhere to regulatory guidelines. From my personal experience, I have always felt safe and supported while enjoying the various entertainment options available at the casino."*⁸
- 13.2 Rachael Inch - *"The environment created by the venue is a highly regulated and safe entertainment venue and has demonstrated a commitment to responsible gambling practices and community engagement. From implementing stringent age verification measures to supporting local charities and initiatives, the casino has consistently shown dedication to fostering a safe and inclusive environment for all patrons. I have visited the casino on numerous occasions and believe that it is well managed and provides an excellent opportunity for safe entertainment for all patrons."*⁹
- 13.3 Adrian Clifton - *"Dunedin Casino is well managed and has the controls in place to ensure that the effects of problem gambling are minimised."*¹⁰
- 13.4 Lynn Kelly - *"Im encouraged to not spend what I don't have."*¹¹
- 13.5 Dawn Marie Barnes - *"the staff look after patrons and know us by sight/name. I know that there is no risk of having to deal with intoxicated people in this environment. They also take an interest and check in to make sure you are not putting yourself in financial difficulty playing the machines"*¹²
- 13.6 Margaret Pearce - *"I support this application as I have been a member approximately 21 years. In this time, it has been my choice to go to / attend the Casino. It has also been made very clear to me and other members what the rules are and why staff speak to each of us from time to time re our spending, our length of time at a machine and check our credentials."*¹³
- 14 Many submitters also expressed that they feel safer at the Grand Casino than other venue. The Grand Casino provides a safer and more responsible gaming environment than other less regulated gaming venues and services (i.e., pub pokies, TAB and Lotto). Gamblers are much safer in the Grand Casino than in a bar with gaming machines effectively unmonitored:
- 14.1 Mitchell Wallace-Abernathy - *"[the Grand Casino] provides a safer venue for gambling than that of pubs & clubs, by providing an environment where*

⁸ Submission of Sharyn Parkin dated 5 May 2024.

⁹ Submission Rachael Inch dated 6 May 2024.

¹⁰ Submission of Adrian Clifton dated 3 May 2024.

¹¹ Submission of Lynn Kelly dated 3 May 2024.

¹² Submission of Dawn Marie Barnes dated 3 May 2024.

¹³ Submission of Margaret Pearce dated 4 May 2024.

intimidating or undesirable persons are kept away ... Grand casino also monitors players for signs of gambling harm in ways that [pubs & clubs] struggle to and to a much higher standard.”¹⁴

14.2 Jamie Priemus - *“In relation to safe gaming, I game at class four venues across Dunedin and in my opinion the Casino provides superior safe gaming policies. Staff will check in regularly while gaming and have talks with patrons about gaming where harm may be occurring. This is done in a safe and informative manner. It is my concern that increased gambling in class four venues would lead to greater community harm”*

14.3 Peter Uitermark - *“I support the application as I believe this is the best place to gamble providing security and help with those problems who else would go unchecked in class 4 venues”¹⁵*

ECONOMIC CONTRIBUTIONS AND COMMUNITY INVOLVEMENT

15 It is apparent that DCL is a vital part of the community and the social and economic fabric of Dunedin generally.

16 DCL’s significance in the Dunedin community was helpfully summarised in the submission of Business South:¹⁶

Grand Casino Dunedin has been an integral part of the Dunedin business community for over two decades, serving as a cornerstone of entertainment and economic activity in the region. The casino's longstanding presence has not only contributed to the local economy but has also provided thousands of individuals with employment opportunities, fostering career growth and development throughout the region. Furthermore, we commend Grand Casino Dunedin and its shareholders for their unwavering commitment to the Dunedin community. Through initiatives such as the Dunedin Casino Charitable Trust, the Grand Casino Business Awards and various sponsorships within the Arts, Sports, and Business sectors, they have demonstrated a genuine dedication to giving back and enriching the lives of those within our community.

The contributions made by Grand Casino Dunedin, both economically and philanthropically, are undeniably significant and have positively impacted the social fabric of Dunedin and wider region. The casino's support of local charities, cultural endeavours, and community projects has helped to enhance the quality of life for residents and visitors alike.

As a prominent business organisation in the region, Business South recognises the importance of maintaining organisations like Grand Casino Dunedin, which not only provide entertainment but also play a vital role in supporting the local economy and community development.

17 Other submitters that commented more generally on the role of DCL in the community include:

¹⁴ Submission of Mitchell Wallace-Abernethy dated 3 May 2024.

¹⁵ Submission of Peter Uitermark dated 3 May 2024.

¹⁶ Submission of Mike Collins on behalf of Business South dated 6 May 2024.

- 17.1 Norcombe Barker (Larnach Castle Limited) - *"Having a Casino in Dunedin means we are a city, and not a town. We need infrastructure such as the Casino to keep Dunedin relevant."*¹⁷
- 17.2 Sharyn Parkin *"I believe that granting the casino a license will not only benefit the local economy but also contribute positively to the cultural and social fabric of Dunedin."*¹⁸
- 17.3 Rachael Inch - *"Through job creation, tourism, and direct revenue generation, it has played a significant role in stimulating business activity and providing livelihoods for countless individuals and families."*¹⁹
- 18 DCL is pleased that so many submitters recognise the value and support the Grand Casino provides to the community. Overall, DCL provides a net benefit to economic and social wellbeing of a significant number of people in local and regional communities and in New Zealand generally.
- 19 In addition to those listed above, submissions relating to DCL's charitable contributions, employment and the tourism sector will be addressed in more detail below.

Charitable Contributions

- 20 The Grand Casino is a vital part of the community that supports a range of community organisations including charitable organisations, local businesses and sports clubs. Several submitters expressed their gratitude for DCL's generous contributions to the community and their respective organisations:²⁰
- 20.1 Orokonui Ecosanctuary - *"The Dunedin Casino is a vital contributor to our budget. We do not see any conflict in their support of us. In addition there are a sizable body of people who gain considerable enjoyment from the services offered by the Dunedin Casino. And without a doubt they provide one of the best restaurants in Dunedin."*
- 20.2 Zonta Club of Metropolitan Dunedin - *"their philanthropic efforts through the Dunedin Casino Charitable Trust have made a tangible difference in our community, with grants exceeding \$4 million and numerous sponsorships across the Arts, Sports, and Business sectors."*
- In particular, I wish to highlight the invaluable support extended by Grand Casino to the Zonta Club of Metropolitan Dunedin. Their generous contribution to our recent International Women's Day event, which raised \$5,000 for STEM scholarships benefiting young women in Dunedin, exemplifies their commitment to empowering our community's future leaders. Their full support, encompassing venue, catering and staff assistance, was instrumental in the success of our initiative."*
- 20.3 Firebrand - *"Grand Casino enriches our community through the Dunedin Casino Charitable Trust, with philanthropic endeavours exceeding \$4 million."*

¹⁷ Submission of Norcombe Barker on behalf of Laranch Castle Limited dated 30 May 2024.

¹⁸ Submission of Sharyn Parkin dated 5 May 2024.

¹⁹ Submission of Rachael Inch dated 6 May 2024.

²⁰ Also see submission of Brian Treanor dated 3 May 2024; submission of Alexander Christopher Kelley dated 3 May 2024; and submission of Christopher M Villalabos dated 4 May 2024.

Their unwavering support for various initiatives in the Arts, Sports, and Business sectors underscores their commitment to fostering a vibrant and inclusive community. Having worked closely with Grand Casino, we attest to the integrity and ethical standards upheld by the organisation. Their leadership is dedicated to conducting business responsibly and ethically, with the well-being of the community as a top priority.”²¹

20.4 Leighton Grey – *“The Grand Casino is highly valued within the Otago community and wider regions. Their ongoing support for local charities and support of local sports has been immense over the years.”²²*

20.5 Gareth Evans – *“The Grand is a responsible local business, and get behind a lot of socially important events. Them continuing in business is good for the whole city.”²³*

Employment

21 The Grand Casino is a key local employer for Dunedin city. DCL prides itself on offering a diverse range of opportunities to help employees grow and develop and is pleased that this has been recognised by so many submitters:

21.1 Derek Matheson – *“The Casino has been part of the community for the past 25 years. During that time it has proven to be an excellent employer providing employment opportunities for over 1500 staff. That in turn has enabled many to learn new skills and enhancing their opportunities to travel overseas with these skills”.*²⁴

21.2 Andrew Whiley (Dunedin City Councillor – Chair of Economic Development) – *“The Grand Casino Dunedin is also seen as a leading employer. They have an environment where employees are well catered for with strong trainee programmes. They look after their staff especially when many are new to hospitality or the gaming industry which creates a pathway for long term career opportunities here in Dunedin and beyond.”*²⁵

21.3 Laura Dixon – *“Grand Casino provides may jobs for the Dunedin community!”*²⁶

21.4 Gaetano Di Bò – *“Creates jobs/employment and support to local business.”*²⁷

21.5 Christine Boyd – *“A good employer of hospitality workers”*²⁸

²¹ Submission of Bex Twemlow on behalf of Firebrand dated 4 May 2024.

²² Submission of Leighton Grey dated 3 May 2024.

²³ Submission of Gareth Evans dated 3 May 2024.

²⁴ Submission of Derek Matheson sated 7 May 2024.

²⁵ Submission of Andrew Whiley (Dunedin City Councillor – Chair of Economic Development) dated 20 May 2024.

²⁶ Submission of Laura Dixon dated 3 May 2024.

²⁷ Submission of Gaetano Di Bò dated 3 May 2024.

²⁸ Submission of Christine Boyd dated 4 May 2024.

21.6 Sharyn Parkin – *“the employment opportunities provided by the casino contribute to the livelihoods of many individuals in Dunedin.”*²⁹

22 DCL is also a significant consumer of goods and services in Dunedin. Several businesses are reliant on its continued operation and support:

22.1 Nigel Primmer – *“as contractor the work that is provided by the casino gives the company that i work for regular work through out the year in which we can rely on.”*³⁰

22.2 Michael Carstairs – *“Dunedin Casinos Limited have been a valuable long standing supporter of our business, and many other local businesses. We have been providing plumbing services to them for many years, and their business helps us to keep trading, especially in the current economical climate. We would like to continue to service the casino, and without their licence, I assume they would be forced to close, and not only would our service to them then cease, but many jobs of the staff would be lost.”*³¹

Tourism

23 DCL also contributes to the local economy through the tourism sector. The Grand Casino is an iconic entertainment venue that attracts people to Dunedin city:

23.1 Adrian Clifton – *“The casino offers a pathway for employees to gain valuable experience in the industry, not just in Gaming but also general hospitality and many skilled staff members have either been attracted to Dunedin or encouraged to stay here because of what the Casino can offer them.”*³²

23.2 Sharyn Parkin – *“Dunedin Casino plays a significant role in promoting tourism and boosting the local economy. Visitors are drawn to Dunedin by businesses in the area, including hotels, restaurants, retail establishments, sporting and musical events. The casino's continued operation will undoubtedly have a positive impact on Dunedin's economic prosperity”*³³

23.3 Christian Biligan – *“To help local business and city economy, attract foreign tourist to play and enjoy the beautiful city of Dunedin, help local employment.”*³⁴

23.4 Craig Whale – *“Dunedin Casino has proven to be a significant asset to Dunedin by providing a high class entertainment opportunity for thousands of tourists for many years.”*³⁵

²⁹ Submission of Sharyn Parkin dated 5 May 2024.

³⁰ Submission of Nigel Primmer dated 3 May 2024.

³¹ Submission of Michael Carstairs 6 May 2024.

³² Submission of Adrian Clifton dated 3 May 2024.

³³ Submission of Sharyn Parkin dated 5 May 2024.

³⁴ Submission of Christian Biligan dated 6 May 2024.

³⁵ Submission of Craig Whale dated 6 May 2024.

DUNEDIN CITY COUNCIL'S REQUEST TO INCREASE MANDATORY CHARITABLE CONTRIBUTIONS

- 24 DCL would like to thank DCC for their continued support and would like to take the opportunity to address DCC's request to the Gambling Commission to increase the turnover percentage and maximum DCL must pay to the Dunedin Casino Charitable Trust (the *Trust*) each year.
- 25 Under the current venue license, DCL is required to pay "in respect of each full year of the operation of the Grand Casino, a sum equivalent to 1% of the turnover of the gambling machine machines in the Grand Casino after deducting goods and service tax, to a maximum of \$110,000".³⁶ DCL asks that in considering DCC's request to increase this amount, the Gambling Commission take into account the following factors:
- 25.1 DCL is considered a small casino and is located in a city with a low population and small casino compared to other casinos in New Zealand;
- 25.2 DCL pays a series of taxes, including company, GST, gaming duty and Problem Gambling levies on top of its contribution to the Trust;
- 25.3 The anti-money laundering (*AML*) and HRP regulatory requirements that DCL must comply with have undergone significant change in the last five years. Significant investment has been required to ensure DCL can comply with these requirements; and
- 25.4 DCL, in addition to the funds it is required to provide to the Trust, also has its own discretionary grants and sponsorship programmes. In 2023, DCL granted \$146,000 in sponsorships distributed across sport, cultural and community entities. Recent affiliated partners receiving sponsorships have includes he Wildlife Hospital Dunedin, Orokonui Ecosanctuary, Otago Cricket and various local business, sports teams and charities. The significance of DCLs community contributions was addressed at paragraphs 15 to 23.4 above.
- 26 Although the Grand Casino contributes to the economy in many ways, including by bringing in over 2,500 people to Dunedin each year, this comes at a cost to DCL. Significant investment is involved in the marketing, selling, accommodating and entertaining of visitors. With the market vagaries and recession, further increases will not be sustainable of DCL especially given the significant in retraction in consumer spending and the investment required to comply with AML requirements.

HARM MINIMISATION EFFORTS

- 27 DCL would like to address the submissions of PGF Services and Te Whatu Ora that relate to harm minimisation.

Affected persons

- 28 PGF Services has raised concern that the Casino Impact Report (*CIR*) has "applied a reductive approach to estimate those experiencing gambling harm".³⁷

³⁶ Condition 14(b).

³⁷ Submission of PGF Services dated 30 May 2024.

- 29 DCL acknowledges that gambling is a wide-spread public health issue but does not agree that the CIR has taken a reductive approach. The CIR was prepared by a person approved by the Gambling Commission as independent of DCL (as required by s 134(3) of the Gambling Act 2003) and thus, would have no interest in minimising the harm caused by the Grand Casino.
- 30 DCL also note that PGF Services refer to the findings of the Strategy to Prevent and Minimise Gambling Harm 2019/20 to 2021/22 report by the Ministry of Health to support its submission.³⁸ While the figures provided in this reports are helpful, it is not representative of the actual state of problem gambling throughout all forms of gambling and how the lack of monitoring within channels outside of casinos is inadequate.
- 31 DCL believes that the Problem Gambling Levy should fund a New Zealand-wide study by an independent expert to deliver a comprehensive report of all gambling channels (casinos, class 4 venues, TAB, Lotto and online gambling services). The report should cover the harm and mitigation landscape in New Zealand and how harm prevention funding is being utilised and what outcomes are being achieved.

Host Responsibility Programme

- 32 PGF Services and Te Whatu Ora both encourage DCL to reflect upon stronger harm minimisation strategies in the HRP.
- 33 DCL entered its HRP in August 2022 for review by the Gambling Commission. The Gambling Commission requested amendments to the HRP in February 2024. DCL made all amendments requested and received the Commission's decision on the HRP on 19 June 2024. The approved HRP outlines the harm minimisation strategies (including continuous play period and breaks) as agreed by all casinos and the Gambling Commission and will take effect 22 July 2024.
- 34 With regards to the lack focus in the HRP on those experiencing mild to moderate harm, DCL wishes to assure PGF Services that although the current HRP focuses primarily on those experiencing severe gambling harm, DCL is committed to continuing to monitor harm across the spectrum and takes pride in its efforts to identify early signs of harm. If required, DCL is happy to further elaborate how mild to moderate harm is managed. However, the following examples illustrate DCL's commitment to managing and preventing harm:
- 34.1 placing Salvation Army information stands around the casino for a week to allow those experiencing harm access to information and support;
 - 34.2 ensuring all staff monitor patrons closely and carry information and pamphlets to help to identify gambling harm;
 - 34.3 ensuring all machines are labelled with critical message stickers reminding people to gamble responsibly; and
 - 34.4 the development of a system generating daily, weekly and monthly reporting of all gamblers that allows any changes to spending, visits losses etc to be immediately actioned. This system helps facilitate immediate interactions,

³⁸ Submission by PGF Services dated 30 May 2024 at [8]. It is noted that this is not the most recent version of this report.

interventions and/or discussions to address or prevent potentially harmful gambling.

- 35 DCL's approach to host responsibility is described in detail in the application. The HRP outlines harm minimisation strategies to be implemented by DCL as approved by the Gambling Commission. The HRA includes requirements around staff training, alcohol consumption, exclusion and re-entry.
- 36 The submissions referred to at paragraphs 12 to 14.3 above show that DCL takes its role as a responsible host very seriously. Te Whatu Ora has taken a neutral position on the license renewal given DCL's "*track record of good performance*".³⁹
- 37 DCL intends to continue engaging with PGF Services, service providers and stakeholders through its Community Liaison Group Meetings and engaging with the friends, family and broader groups related to potentially affected persons to ensure harm minimisation is implemented effectively.

VULNERABLE POPULATION GROUPS

- 38 The following submitters have addressed the need for DCL to protect vulnerable population groups from gambling harm:

- 38.1 the Collective;
- 38.2 PGF Services;
- 38.3 Te Whatu Ora; and
- 38.4 AFS.

- 39 DCL recognises the important role that the above-mentioned organisations play in protecting the health of all New Zealanders and thanks the organisations for providing its views.
- 40 DCL acknowledges the need to consider the nuances within culture to prevent harmful gambling. Although gambling-related harm affects all ethnicities, ages and genders, DCL pays particular attention to groups of people who have been identified as being the most at-risk (including Māori, Pacifica, Asian, young people, and women over 50).

Māori or Pacific Peoples

- 41 Within its customer base, parties identifying as Māori or Pacific peoples is extremely low, and of those parties monitoring has shown them to be very responsible. The CIR recorded:
- 41.1 in contrast to the population share (9%), people identifying as Māori comprised just 4% of those in the patron survey completed for the social impact assessment.⁴⁰ Between November 2018 and May 2022 staff excluded

³⁹ Submission of the National Public Health Service Te Waipounamu Region, Health New Zealand - Te Whatu Ora dated 4 June 2024.

⁴⁰ Casino Impact Report – An assessment of the social and economic impacts of the Grand Casino Dunedin (December 2022) at page 84.

just eight Māori patrons and reported low levels of at-risk gambling activity by Māori;⁴¹ and

41.2 in contrast to the population share (3%), people identifying as Pacific peoples comprised just 1% of those in the patron survey completed for the social impact assessment.⁴² Casino staff also report low levels of at-risk gambling activity by Pacific peoples.⁴³

42 DCL have identified the need to replace the vacancy of our Māori Health Voice on its Community Liaison Group. A representative from Te Kaiaka has replaced the past Māori gambling representative who sits alongside other representatives from other gambling harm foundations (i.e., Salvation Army, PGF Services and AFS).

43 DCL remains committed to working with the Community Liaison Group and whānau to ensure that its policies and procedures are suitable to address the needs of all patrons, including Māori or Pacific peoples. DCL welcomes further engagement with the organisations that have submitted on this issue and will do its utmost to incorporate its suggestions where possible and as approved by the Commission.

Asian Population

44 AFS have made several recommendations aimed to address the unique needs of Asian New Zealanders. As mentioned, DCL recognise that Asian gamblers are disproportionately at-risk to experiencing gambling harm and pay particular attention to prevent harm from occurring.

45 DCL values diversity and utilise the diverse backgrounds of its staff to overcome situations involving cultural or language barriers. All staff receive training on the HRP and the Problem Gambler Identification Programme.

46 It is noted that AFS has taken a neutral position on the application and has commended DCL for its ongoing engagement with AFS, and that some efforts have been made to consider cultural differences. DCL remains committed to the ongoing learning about the needs of Asian gamblers through ongoing consultation with AFS.

CONCLUSION

47 DCL is grateful for the time and effort the community have put into providing submissions on the application. It looks forward to responding further and providing evidence at hearing.

⁴¹ Casino Impact Report – An assessment of the social and economic impacts of the Grand Casino Dunedin (December 2022) at page 85.

⁴² Casino Impact Report – An assessment of the social and economic impacts of the Grand Casino Dunedin (December 2022) at page 86.

⁴³ Casino Impact Report – An assessment of the social and economic impacts of the Grand Casino Dunedin (December 2022) at page 86.