



19 March 2024

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Dear Blair

Application by Dunedin Casinos Limited for approval of a casino venue licence

Thank you for your letter of 15 September 2023 requesting the Department of Internal Affairs' (the Department) views on the compliance records and suitability of the Dunedin Casinos Limited (DCL) and persons with a significant influence on DCL, under section 124 of the Gambling Act 2003 (the Act).

Attached as an Appendix is the result of a search of the Department's database of complaints/investigations and a summary of DCL's compliance record. We have included a review of the associated person status of the individuals and companies submitted by the DCL.

DCL proactively provides full information to the Department whenever breaches or system errors have occurred, and actively seeks the Department's view on issues they are uncertain of. When breaches or other compliance issues have arisen, DCL has carried out its own internal investigations to a thorough standard and focused on how to prevent a recurrence by improving its systems and practices. Player disputes are addressed via its own internal investigation process and the Department is advised of the outcome promptly. The thoroughness of internal investigations has meant that the Department has rarely reached a different conclusion.

DCL has always been very responsive to any issues raised by the Department and meet every expectation placed on them. Internal policies have been amended to meet best practice requests following audits and investigations conducted by the Department, which has contributed to a positive relationship. Overall, the Department considers DCL's compliance record to be good and has no concerns to bring to the Commission's attention.

All casino inspections of Grand Casino have been compliant, and staff have been knowledgeable of all requirements when asked.

Persons with a significant influence on DCL

As requested by the Commission, we have undertaken our standard checks of the persons and companies identified as having a significant influence at DCL. This includes checking our own internal databases, companies office records, insolvency, credit and NZ Police checks. We have not identified any matters of concern relating to the suitability of any of these persons.

Significant compliance issues

In 2006, the Department was successful in its application to the Commission seeking the suspension of DCL's operator's licence (GC29/06). The Commission was satisfied that DCL breached:

- licence condition 12.4 by failing to afford a client with a problem gambling pack as required by its Responsible Gambling Programme; and
- section 309 of the Gambling Act 2003 by failing to approach the client and offer information or advice about problem gambling.

The Commission concluded that the consequences should be a modest suspension of the operator's licence for two consecutive days.

If you need any further information or have any questions about the above, please don't hesitate to contact me.

Yours sincerely



Vicki Scott
Director Gambling
Regulatory Services

Dunedin Grand Casino Licence Renewal – September 2023

Kōtare search of Persons with Significant Influence

Natural Person	Outcome of Associated Persons Checks	Compliance History
Grant Hylton HENSMAN	Associated Person PI Form – July 2017 <ul style="list-style-type: none"> • \$18,000,000 shares in Skyline Enterprises Ltd • Director of Skyline Enterprises Ltd – was not directly involved in casino operations but received info in capacity of Director Approved as Associated Person for Christchurch Casinos Limited in October 2017	No record of non-compliance/infringements for the individual in Kōtare
Donald Neil JACKSON	No PI form available Approved as Associated Person for Christchurch Casinos Limited in July 2015	No record of non-compliance/infringements for the individual in Kōtare
Sarah Christine OTTREY	Associated Person PI Form – July 2017 <ul style="list-style-type: none"> • Director at Skyline Enterprises Ltd Approved as Associated Person for Christchurch Casinos Limited in October 2017	No record of non-compliance/infringements for the individual in Kōtare
Richard Barry THOMAS	Associated Person PI Form – July 2017 <ul style="list-style-type: none"> • Director of Skyline Enterprises Ltd Approved as Associated Person for Christchurch Casinos Limited in October 2017	No record of non-compliance/infringements for the individual in Kōtare
Bruce John THOMASEN	Approved as Associated Person for Dunedin Casinos Limited <ul style="list-style-type: none"> • Records being added to Kotare 	No record of non-compliance/infringements for the individual in Kōtare

Peter Anthony TREACY	<p>Associated Person PI Form – July 2008</p> <ul style="list-style-type: none"> • General Counsel at SkyCity Entertainment Group Ltd <p>Approved as Associated Person for Sky City Entertainment Group’s New Zealand Casinos in March 2007</p> <p>Associated Person PI form – February 2021</p> <ul style="list-style-type: none"> • Director at PT Advisory Ltd • Director Christchurch Casinos Limited <p>Approved as an Associated Person for Dunedin Casinos Limited in July 2021</p>	No record of non-compliance/infringements for the individual in Kōtare
Graham John DOCKRILL	<p>Approved as Associated Person for Dunedin Casinos Limited</p>	No record of non-compliance/infringements for the individual in Kōtare
Bruce Herbert ROBERTSON	<p>Associated Person PI Form – April 2018</p> <ul style="list-style-type: none"> • Director <p>Approved as an Associated Person for Christchurch Casinos Limited in May 2018</p>	No record of non-compliance/infringements for the individual in Kōtare
Lianna-Merie HAGAMAN	<p>Approved as Associated Person for Dunedin Casinos Limited</p> <ul style="list-style-type: none"> • Records being added to Kōtare <p>Endorsed as Director of Scenic Circle Hotels Limited since 2009</p>	No record of non-compliance/infringements for the individual in Kōtare
Warren Peter LESLIE	<p>Approved as Associated Person for Dunedin Casinos Limited</p> <ul style="list-style-type: none"> • Records being added to Kōtare <p>Endorsed as Director of Scenic Circle Hotels Limited since 2009</p>	No record of non-compliance/infringements for the individual in Kōtare
Stuart James McLAUHLAN	<p>Approved as Associated Person for Dunedin Casinos Limited</p> <ul style="list-style-type: none"> • Records being added to Kōtare <p>Endorsed as Director of Scenic Circle Hotels Limited since 2009</p>	No record of non-compliance/infringements for the individual in Kōtare
Geoffrey Read THOMAS	<p>Approved as Associated Person for Dunedin Casinos Limited</p>	No record of non-compliance/infringements for the individual in Kōtare

<p>Geoffrey Joseph PURDON</p>	<p>Approved as an Associated Person of Dunedin Casinos Limited in June 2006</p>	<ul style="list-style-type: none"> Individual recorded in Kōtare as an associated subject of an investigation conducted by the Department into an alleged breach of standard operating procedures/improper conduct in 2013 (CM-310290-C6Z7H9). The allegations not proven. Recorded in Kōtare as an associated subject of a case involving Dunedin Casino staff members playing poker at a private address. No other information provided in case records (CM-311334-M2D3G).
<p>Gerard Francis BOLGER</p>	<p>Approved as Associated Person for Dunedin Casinos Limited 15/03/24 Issued a COA (COA2063398) on 17 December 2012</p>	<p>No record of non-compliance/infringements for the individual in Kōtare</p>
<p>Dominique Fiona DOWDING</p>	<p>Approved as Associated Person for Dunedin Casinos Limited</p> <ul style="list-style-type: none"> Records being added to Kotare <p>Issued COA (80010253) on 3 June 2020 Clear Police vetting on 18th March 2020</p>	<p>No record of non-compliance/infringements for the individual in Kōtare</p>
<p>Derek James MATHESON</p>	<p>Approved as Associated Person for Aspinall (NZ) Limited in the capacity of Financial Controller at Dunedin Casinos Limited - August 2001</p>	<p>No record of non-compliance/infringements for the individual in Kōtare</p>
<p>Stacey Aroha Emma MURRAY</p>	<p>Approved as Associated Person for Dunedin Casinos Limited 15/03/24 Issued COA (COA2024680) on 26 February 2007 Issued COA (80007959) on 31 May 2019 COA Application PI form – May 2019</p> <ul style="list-style-type: none"> Involvement in C4 Gambling since 2006 (Aus & NZ) <p>Clear Australian Police vetting May 2019</p>	<p>No record of non-compliance/infringements for the individual in Kōtare</p>

Corporate Persons	Outcome of Associated Persons Checks	Compliance History
<p>Dunedin Casinos Limited (Company no. 837525)</p>	<p>Kōtare note dated 27/10/21 that Dunedin Casino now trading as Grand Casino, business is still run by Dunedin Casinos Limited.</p> <p>Approval of Change of Associated Licences Casino Operator – 12 March 2004</p> <ul style="list-style-type: none"> • Dunedin Casinos Limited listed as holder of casino premises licence • Dunedin Casinos Management Limited listed as the new associated licensed casino operator (formerly Maxims Management Limited). 	<p>Two substantiated breaches recorded in Kōtare against Grand Casino (Dunedin Casinos Limited):</p> <ul style="list-style-type: none"> • 10/06/22 – Breach of Licence Conditions Casinos – Section 24 of the Casino Operators Licence <ul style="list-style-type: none"> - Grand Casino had not conducted annual refresher training for harm minimisation duties as listed in the Harm Responsibility Programme, it was instead done bi-annually. - Compliance action taken by the Department was a recommendation to Grand Casino to conduct refresher training for any staff that had not had training in the past year • 17/04/21 – Breach of section 308(4) of the Gambling Act 2003 to take all reasonable steps to ensure that the policy for identifying problem gamblers is used to identify actual or potential problem gamblers <ul style="list-style-type: none"> - Grand Casino was found to not have identified, monitored, or intervened with a patron who displayed clear signs of problem gambling (withdrawing cash 6 times within a 30-minute period). - Compliance action taken by the Department was a recommendation to Grand Casino that they create and implement a policy for staff members to intervene with patrons that engage in frequent transactions/withdrawals within a short period of time (Kōtare case ID: CM-01940-D0H6S2) <p>Recorded compliance cases in Kōtare (Grand Casino being the Primary Subject)</p> <ul style="list-style-type: none"> - 6/8/05 – Breach of Casino Licence condition 8.3 for failure to have two game tables open by 12 o'clock. Incident escalated to investigation. No further action taken by the Department. - 14/2/08 – Casino failed to notify the Department of a breach of self-exclusion. No further compliance action taken by the Department.

		<ul style="list-style-type: none"> - 7/8/08 – Minor identified on game floor. Incident escalated to investigation. Educational letter sent to Grand Casino requesting operational changes to be made. - 31/1/12 – On two occasions (29 Dec 2011, 4 Jan 2012) minors were able to gain access to the gaming floor at the Grand Casino and gamble. Incident escalated to investigation. No further compliance action taken by the Department against the Casino - 4/2/08 – Casino failed to notify the Department instance of patron stealing another patrons’ chips, as per the Minimum Operating Standards R&N 5(6)(b). No further compliance action taken by the Department. - 16/3/09 – Casino found to be in breach of Game Rules with regards to dealing in Blackjack after complaint made to the Department by a patron. The Department investigated, complaint was withdrawn, and no further compliance action was taken by the Department. - 5/9/23 – Public complaint received by the Department regarding patron not being paid out his winnings by the Casino due to refusing to declare his gender of the AML form. Action taken by Department was to advise Casino that the gender title field was not mandatory on the AML form. Casino removed this as a mandatory field on their form. - 2/3/23 – harm minimisation related public complaint received by the Department. Complainant claimed Casino did not prevent a patron losing a large amount of money gambling. The Department investigated and found that no breach had occurred. Educational letter sent to Casino, no further action taken. <p>Investigation by the Department into Dunedin Casino’s Standard Operating Procedures with regards to counterfeit money, and daily log requirements. No breach (CM-310290-C6Z7H9).</p>
Christchurch Casinos Limited (Company no. 523984)	Approved as Associated Entity for Dunedin Casinos Limited	Decision on Application by Christchurch Casinos Limited to renew casino venue licence - GC05/19 (29 March 2018)

Skyline Enterprises Limited (Company no. 156225)	Approved as Associated Entity for Dunedin Casinos Limited	Responses from Police, New Zealand Companies Office and Department of internal Affairs regarding persons of significant influence – Christchurch Casinos Limited venue licence renewal
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