



4 June 2025

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Dear Blair

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

Thank you for your letter of 22 November 2024 requesting the Department of Internal Affairs' (the Department's) views on the compliance records and suitability of Queenstown Casinos Limited (QCL) and persons with a significant influence on QCL, 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 QCL's compliance record. We have included a review of the associated person status of the individuals and companies requested by the Gambling Commission. This includes checking our own internal databases, New Zealand 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.

QCL operates the smallest casino in New Zealand and follows the same harm minimisation procedures implemented in SkyCity Auckland Casino. Due to the Queenstown Casino's limited size, there are a small number of gaming machines and tables which afford most staff at the casino a clear line of sight to almost all visitors. This contributes to more effective oversight and adherence to identifying and responding to gambling harm signs. The Queenstown Casino generates relatively low revenue, especially since COVID and the end of junkets.

The Department has no compliance concerns with QCL. The Department visits the Queenstown Casino every three months and has found QCL to be responsive to any matters raised by the Department. Interviews of staff showed they had a clear understanding of harm prevention and minimisation, and we receive few complaints about the Casino.

Persons with a significant influence on QCL

As requested by the Commission, we have undertaken our standard checks of the persons and companies identified as having a significant influence at QCL. This includes checking our own internal databases, New Zealand 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.

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

Yours sincerely

A handwritten signature in black ink, appearing to be 'Vicki Scott', written in a cursive style.

Vicki Scott
Director Gambling
Regulatory Services
Department of Internal Affairs

Queenstown Casino Licence Renewal – November 2024

Kōtare search of Natural Persons with Significant Influence

Associated Person Check, and Compliance History

Natural person	Outcome of Associated Person Checks	Compliance History
Jason Bevan WALBRIDGE	Associated Person Personal Information Form – May 2024 Chief Executive Officer – SkyCity Entertainment Group since May 2024 Approved as an Associated Person in July 2024.	No record of non-compliance/infringements for the individual in Kōtare.
Julian Bradwell COOK	Associated Person Personal Information Form – April 2021 <ul style="list-style-type: none"> • Director of SkyCity Entertainment Group in April 2021 • Executive Chairman Approved as an Associated Person for SkyCity Auckland from April 2021.	No record of non-compliance/infringements for the individual in Kōtare.
Chadwick William Cable BARTON	Associated Person Personal Information Form – April 2021 <ul style="list-style-type: none"> • Former Chief Financial Officer for The Star Entertainment Group Limited (2015-2019) • Director of SkyCity Auckland since June 2021 Approved as an Associated Person for SkyCity Auckland in April 2021	No record of non-compliance/infringements for the individual in Kōtare. Mr Barton’s previous engagement as Chief Financial Officer of Star Entertainment Limited (Sydney) has been considered by the Gambling Commission.
Katherine HUGHES (Previous other names - Katherine SAUNDERS. Katherine CUMMINGS)	Associated Person Personal Information form – June 2022 <ul style="list-style-type: none"> • Director of SkyCity Auckland since July 2022 Approved as an Associated Person - Director of SkyCity Entertainment Group in September 2022	No record of non-compliance/infringements for the individual in Kōtare for current or other names.

Glenn Stuart DAVIS	<p>Associated Person Personal Information form – July 2022</p> <ul style="list-style-type: none"> Appointed key person (Director) for SkyCity Adelaide Pty Limited (SkyCity Adelaide Casino) in August 2022 Director of SkyCity Auckland since September 2022 <p>Approved as an Associated Person in September 2022</p>	No record of non-compliance/infringements for the individual in Kōtare for current or other names.
Robert David Henry ATTENBOROUGH (David Robert Henry ATTENBOROUGH in Kōtare)	<p>Associated Person Personal Information form – February 2023</p> <ul style="list-style-type: none"> Director Sky City Auckland since March 2023 <p>Approved as an Associated Person in February 2023</p>	No record of non-compliance/infringements for the individual in Kōtare for current or other names.
Donna COOPER	<p>Associated Person Personal Information form – August 2023</p> <ul style="list-style-type: none"> Director Sky City Auckland since September 2023 <p>Approved as an Associated Person in September 2023</p>	No record of non-compliance/infringements for the individual in Kōtare.
Peter James FREDRICSON	<p>Associated Person Personal Information form – July 2024</p> <ul style="list-style-type: none"> Chief Financial Officer – SkyCity Entertainment Group Limited. <p>Approved as an Associated Person for SkyCity Entertainment Group since September 2024</p>	No record of non-compliance/infringements for the individual in Kōtare.
Shaun Mark PHILP	<p>Associated Person Personal Information Form – July 2023</p> <ul style="list-style-type: none"> Chief People and Culture Officer – SkyCity Entertainment Group. <p>Approved as an Associated Person in August 2023.</p>	No record of non-compliance/infringements for the individual in Kōtare.
Carolyn Mary KIDD	<p>Associated Person Personal Information Form – March 2023</p> <ul style="list-style-type: none"> Chief Risk Officer <p>Approved as an Associated Person in September 2023.</p>	No record of non-compliance/infringements for the individual in Kōtare.

Callum James MALLETT	Associated Person Personal Information Form – November 2020 <ul style="list-style-type: none"> • Chief Operating Officer, New Zealand & Australia Approved as an Associated Person in February 2021	No record of non-compliance/infringements for the individual in Kōtare.
Andrew Murray MCPHERSON (previous name Andrew Michael GRANT)	Associated Person Personal Information Form – November 2023 <ul style="list-style-type: none"> • Chief Information Officer Approved as an Associated Person in August 2024	No record of non-compliance/infringements for the individual in Kōtare under current or previous names.
Michelle Lee-Ann BAILLIE	Associated Person Personal Information Form – March 2008 <ul style="list-style-type: none"> • General Manager (Hamilton) • 28 years with SkyCity. Approved as an Associated Person in 2008.	No record of non-compliance/infringements for the individual in Kōtare.
Amanda YOUELL	Associated Person Personal Information Form – February 2025 <ul style="list-style-type: none"> • General Manager Approved as an Associated Person in April 2025	No record of non-compliance/infringements for the individual in Kōtare.
Elaine CAMPBELL	Associated Person Personal Information Form – December 2024 <ul style="list-style-type: none"> • Chief Legal, Governance and External Relations Officer Approved as an Associated Person in February 2025	No record of non-compliance/infringements for the individual in Kōtare.

Kōtare Search of Corporate Persons with Significant Influence

Associated Person Check, and Compliance History

Queenstown Casinos Limited (Company no. 157340)

Outcome of Associated Persons Check

- Queenstown Casinos Limited hold the venue licence for SkyCity Queenstown (SCQ).
- Below is the compliance history recorded against the SkyCity Queenstown entity in Kōtare.

Compliance History

Recorded compliance cases in Kōtare connected to SCQ under the Gambling Act 2003 (the Act):

- Section 303 (age restriction on gambling in casinos)
 - September 2022 - the Department sought information from SCQ in relation to a suspected breach. No breach was recorded, and no further action was taken.
 - April 2021 - A breach was recorded, and the Department issued the security guard with a warning letter.
 - April 2019 – Breach recorded and no further compliance action taken by the Department.
 - March 2019 - Breach recorded and a warning letter issued to Security Officer on 26 March 2019.
 - July 2013 - Breach recorded in relation and educational compliance action taken.
 - March 2010 - Breach recorded and educational compliance action taken by the Department.
 - July 2006 - A breach recorded and a warning was included as part of the monthly compliance report to SCQ.
 - A further four breaches were recorded, one of which resulted in a warning letter to a staff member. However, the date of these breaches is unknown due to data migration issues.
- Sections 308 and 309A

- June 2020 - the Department investigated a period of long play by a VIP Black Ultra patron who had a high expenditure. No breach was recorded against SCQ.

Breaches of the Gambling (Harm Prevention and Minimisation) Regulations 2004

- Regulation 9(2)
 - February 2008 - A breach was recorded due to SCQ advertising jackpots in visitor brochures and educational action taken by the Department.

Breaches of Casino Game Rules

- Game Rule 3.0 of Division 1A – General Rules of Casino Keno, Racing Game and Gaming Machines
 - February 2023 - SCQ informed the Department of an incident involving staff accepting a gratuity which resulted in staff member being issued with a final warning. A breach under Game Rule 3 was recorded against SCQ and no further action taken by the Department.

Breaches of Casino Minimum Operating Standards (MOS)

- MOS Table Games
 - June 2006 - a blackjack table opened with one more \$25.00 chip than the closer had recorded. Surveillance was reviewed, however, no reason for discrepancy was noted. Insufficient evidence to substantiate the breach.

Miscellaneous

- Enquiry regarding relinquishment of part of the Queenstown Casino
 - April 2023 - Gambling Commission directed the Department to make inquiries to support their consideration of a variation of a casino licence application from SCQ. On 19 April 2023, a letter from Dave Robson, Director of Gambling was sent to the Gambling Commission as part of the application to vary a licence application from SkyCity.

Department inspections of SkyCity Queenstown

Unannounced Casino Inspections to review harm minimisation practice

- 25 September 2024 - the Department conducted an unannounced casino inspection at SCQ. Good practice was demonstrated, and no concerns identified.
- 30 November 2023 - the Department conducted an unannounced casino inspection at SCQ. Good practice was demonstrated, and no concerns identified.
- 30 September 2023 - the Department conducted an unannounced casino inspection at SCQ. Good practice was demonstrated, and no concerns identified.
- 30 June 2023 - the Department conducted an unannounced casino inspection at SCQ. Good practice was demonstrated, and no concerns identified.
- 13 March 2023 - the Department conducted an unannounced casino inspection at SCQ. Good practice was demonstrated, and no concerns identified.

- 13 October 2022 - the Department conducted an unannounced casino inspection at SCQ. Good practice was demonstrated, and no concerns identified.
- 20 July 2022 - the Department conducted an unannounced casino inspection at SCQ. Good practice was demonstrated, and no concerns identified.

Department Audits of SkyCity Queenstown

- Casino Audit – Cashiering Processes – April 2022
 - An audit was conducted on SCQ regarding Cashiering processes. The Department was satisfied that SCQ has sound cashiering processes in place and no required actions were identified during the audit. The Department made the following recommendations -
 - *Transfer of money -*
 - A step be added to the Money Exchange Machine cashier procedure for security or the licenced person to notify surveillance that money is being moved to or from the CRT machine as this is occurring in practise.
 - The Banking Cashier procedure be updated to advise that security will escort ACM and the funds to the lift rather than the van as this is occurring in practise
 - *Cash Handling and Management Procedure -*
 - The Recording and Viewing Cashier Variances Cashier Procedure document be updated to include wording that any variance considered suspicious be reported to DIA as soon as practicable to capture the requirements of Section 62 of the MOS.
- Casino Audit - Breach of Exclusion Notifications – December 2020
 - An audit was conducted SCQ regarding Breach of Exclusion notifications. The Department was satisfied that SCQ was making the initial notification and sending out the breach paperwork within the required timeframe. The Department recommended SCQ include a form of identification for the patron along with the breach paperwork, if available.

SkyCity Entertainment Group Limited (Company no. 610568)

Outcome of Associated Persons Check

No current concerns identified with SkyCity Entertainment Group Limited, associated persons application has been approved by the Department.

SkyCity Casino Management Limited (Company no. 863698)

Outcome of Associated Persons Check

SkyCity Casino Management Limited (SCML) holds the operator's licence for SCQ.

- No current concerns identified with SkyCity Casino Management Limited, associated persons application has been approved by the Department.

Compliance History for SCML

The following cases are connected to SkyCity Auckland but refer to SCML processes.

Audit

July 2024 – Junkets. Case is connected to the SCA, however, as SCA provides the staff for junkets conducted at Queenstown, SCML's processes were being assessed. An audit was conducted to review SCML's reporting and vetting of "Junkets" and group commission play according to requirements under Casino Minimum Operating Standards. SCML found to be compliant in all areas.

Suspension

February 2022 – The Department received a complaint alleging SkyCity had failed in their duty of care by not identifying the complainant as a problem gambler at its Auckland casino. The Secretary for Internal Affairs (the Secretary) identified 22 incidents of continuous play between 1 July 2018 to 27 February 2021 where the complainant had gambled continuously for 300 minutes (five hours) or more without an alert being generated and/or staff interaction as required by SkyCity's Host Responsibility Programme (HRP).

The Secretary applied to the Gambling Commission to suspend SkyCity's operator's licence under section 144 of the Act. SkyCity had acknowledged that it had breached its licence conditions and HRP and agreed to a five-day voluntary closure of its Auckland casino. This closure took place from Monday 9 September to Friday 13 September 2024.

SkyCity Action Management Limited (Company no. 112406)

Outcome of Associated Persons Check

No concerns identified with SkyCity Action Management Limited, associated persons application has been approved by the Department.

Compliance History

No recorded compliance cases in Kotare connected to SkyCity Action Management Limited.

Trojan Holdings Limited (Company no. 274579)

Outcome of Associated Persons Check

No concerns identified with Trojan Holdings Limited, associated persons application has been approved by the Department.

Compliance History

No recorded compliance cases in Kotare connected to Trojan Holdings Limited.