

**Before Hearing Commissioners**

*Under:* the s134 of the Gambling Act 2003

*In the matter of:* Application for renewal of casino licence

*between:* Christchurch Casinos Limited  
*Applicant*

and: Gambling Commission  
*Respondent*

**Statement of Evidence of Sybil Lisa Campbell  
The Salvation Army Oasis**

Dated: 19 November 2018

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**STATEMENT OF EVIDENCE OF LISA CAMPBELL,  
THE SALVATION ARMY OASIS**

**INTRODUCTION**

1. My full name is Sybil Lisa Campbell, but prefer Lisa Campbell.
2. I am the National Operations Manager of The Salvation Army Oasis, a role I have held since 2008.
3. The Salvation Army is an international Christian and social services organisation that has worked in New Zealand for over one hundred and thirty years. The Salvation Army Oasis, formally established in 1997, offers free outpatient services for gamblers, their families, and affected others, alongside public health services, and is staffed by qualified and experienced clinical and public health practitioners.
4. My Statement of Evidence summarises the key points of the Submission made by The Salvation Army Oasis to the Application made by Christchurch Casino Limited ('CCL'), responds to the Statements of Evidence provided by CCL and has regard to the Professor Delfabbro Peer Review ('**Delfabbro Peer Review**') and his Comments on Responses by CIR Authors ('**Delfabbro Responses**').
5. I am familiar with the Application, the Submission made by The Salvation Army Oasis, the Statements of Evidence provided by CCL, Delfabbro Peer Review and Delfabbro Responses. I am authorised to give this evidence for The Salvation Army Oasis.

## **SUMMARY OF SALVATION ARMY OASIS SUBMISSION**

6. A Submission was made by the Salvation Army Oasis to the Application by Christchurch Casino Limited ('CCL') for an extension of its casino licence ('**Salvation Army Oasis Submission**').
7. The Salvation Army Oasis Submission covered the following:
  - a. General Comments and Position regarding Licence Renewal
  - b. The Licence Renewal Process
  - c. Insufficient Data regarding Community Attitudes to the Casino
  - d. Insufficient data regarding views of Māori, Pacific, and Asian Communities
  - e. Gambling Harm
  - f. Specific Recommendations
    - i. Formal Liaison Groups
    - ii. Mandatory Counselling for Excluded Patrons
    - iii. Returns to the Community
  - g. Summary
8. Rather than repeat all the matters raised in the Salvation Army Oasis Submission, my Evidence summarises the main points.

### **General Comments and Position regarding Licence Renewal**

9. The Salvation Army Oasis neither supports nor opposes CCL's application, although we believe that reducing the availability of gambling products is a worthwhile strategy for preventing and minimising gambling harm. Our submission has a focus on advocating for the attachment of new conditions to the current venue licence and other policy instruments (e.g. the Host Responsibility Programme and operator's licence).

### **The Licence Renewal Process**

10. The Salvation Army Oasis has some concerns about the level of consultation undertaken in preparing the Casino Impact Report ('CIR'). We believe that the views

of the local community are crucial in determining the social and economic impact of the Casino, and as such, should be thoroughly sought. We believe that higher significance should be placed on robust community consultation during licence applications. As noted later in my evidence, this concern is also one still held by Professor Delfabbro in his Comments on Responses by CIR Authors.

### **Insufficient Data regarding Community Attitudes to the Casino**

11. The CIR uses data from the National Gambling Study ('NGS') to gauge local attitudes towards the Casino. The implied conclusion is that Christchurch residents are supportive of the Casino as a business and as their preferred operator of electronic gaming machines. However, we do not believe the results can be extrapolated to make an assessment of the local community's views towards the Christchurch Casino itself. We support Professor Delfabbro's view that a formal survey specifically asking about the Casino would have been a better way to have assessed such views.

12. As it stands, the data contained in the CIR is neither sufficient nor robust enough to make any claims regarding the attitudes of Christchurch residents to the Casino.

### **Insufficient Data regarding views of Māori, Pacific, and Asian Communities**

13. In their assessment of the adverse social effects of the Casino, Mr Baines and Mr Butcher say that they were largely unsuccessful in their attempts to consult representatives from diverse communities.

14. While Christchurch might be less ethnically diverse than New Zealand generally, as our Māori, Pacific, and Asian communities are disproportionately burdened by gambling harm, we believe that all steps should have been taken to ensure these groups were fully involved in the development of the CIR. This point stands double for Māori, who as Te Tiriti o Waitangi partners are owed consultation, especially given the magnitude of CCL's application.

15. The Salvation Army Oasis says that more robust data is required before an assessment of the social and economic impact can be properly made. In its present condition, the CIR does not contain sufficient evidence to demonstrate that renewing the Casino's licence will result in a net benefit for the local community and New Zealand in general.

### **Gambling Harm**

16. Overall, the Salvation Army Oasis is of the view that the Christchurch Casino is committed to providing a safe gambling environment for its patrons.

17. However, the Salvation Army Oasis remains concerned that casino gambling carries particular risks, such as money laundering and loan sharking that must be addressed through appropriate host responsibility measures.

18. The Salvation Army Oasis notes from research that the Christchurch region has a relatively high level of gambling participation compared to other centres (82.5% versus 75% in Auckland and 81% in Wellington)<sup>1</sup> and a higher proportion of people seeking help for gambling than New Zealand in general.<sup>2</sup>

19. Statistics from the Christchurch Salvation Army Oasis centre over the 2017 calendar year show that 30.8% of clients within the Christchurch City Council catchment area sought help with us specifically regarding casino-related gambling harm. This in itself suggests that the Christchurch community is experiencing tangible harm related to casino gambling.

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<sup>1</sup> Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2014). *New Zealand 2012 National Gambling Study: Overview and Gambling Participation. Report Number 1*. Auckland, New Zealand: Auckland University of Technology, p. 22.

<sup>2</sup> Based on the Ministry of Health's intervention client data for July 2016 to July 2017, 1207 people (0.32% of the Christchurch population) sought help for gambling in Christchurch, against 11,609 people (0.25% of the population) in total across the country.

20. Another concern is that the Christchurch Casino was the worst performing casino in the Department of Internal Affairs' 2016 mystery shopper exercise, meeting expectations for only one out of three enacted scenarios.<sup>3</sup> Although I note that CCL has more recently implemented its own 'mystery shopper' exercises, I prefer to rely on the results of the DIA ones.<sup>4</sup>

### **Specific Recommendations**

21. Based on the concerns set out above, the Salvation Army Oasis makes the following recommendations concerning the Commission's decision and licence conditions.

#### Formal Liaison Groups

22. One of the ways that the Salvation Army Oasis believes the Casino could prevent and minimise gambling harm is by establishing a formal liaison group.

23. Four out of the five other casinos in New Zealand have provisions for a formal liaison group set out in their venue licences. Currently the Christchurch Casino is required under its Host Responsibility Policy ('HRP') to convene a regular "liaison meeting" with Ministry of Health treatment providers, Christchurch City Council, and government agencies such as the Department of Internal Affairs and the Police.

24. The Salvation Army Oasis asks that this requirement be formalised within the Casino's venue licence, and include the following provisions:

- a. CCL will meet the costs of the establishment and operation of the group;
- b. The group will meet at a minimum of four times per year; and

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<sup>3</sup> Department of Internal Affairs. (2017). *Sector Report: Gaming Machine Mystery Shopper Exercise Results*. Wellington, New Zealand: New Zealand Government.

<sup>4</sup> See Statement of Evidence of Brett Keith Anderson, paras 42-43.

- c. Group membership will include representatives from local specialist gambling treatment providers (such as The Salvation Army Oasis and the Problem Gambling Foundation), other local health and social service providers, Christchurch City Council, government agencies (such as the Department of Internal Affairs and Police), relevant community organisations, and local hapū and iwi (such as Ngāi Tahu).

25. The Salvation Army Oasis believes that expanding membership to include such organisations and community groups would better align with the purposes of the Ministry of Health’s integrated problem gambling strategy (as enabled by section 317 of the Gambling Act 2003), which emphasises community ownership and empowerment as key aspects of a public health approach to gambling harm.

#### Mandatory Counselling for Excluded Patrons

26. Christchurch Casino’s HRP stipulates that excluded patrons must meet certain conditions before they are granted re-entry to the venue, but it does not detail these conditions.<sup>5</sup> The Casino website states that one of the re-entry requirements is “verification that counselling was completed with a problem gambling counsellor”, although the 2012 Problem Gambler Identification Policy (‘PGIP’) states that this is only the case for exclusions of 12 months or more.<sup>6</sup>

27. The Salvation Army Oasis submits that the conditions of re-entry be made clear, and easy to locate (appended to the HRP, for example). For many people contemplating reducing their gambling, internet research is the first step. It would be helpful if the relevant information was simple to find.

28. The Salvation Army Oasis also has significant concerns regarding the requirement to complete counselling. We believe this is a crucial harm minimisation measure. Only a

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<sup>5</sup> It is stated that the conditions are “contained in the Exclusion SOP” but we were unable to locate this.

<sup>6</sup> The most current PGIP does not detail the re-entry conditions but again states they are provided in the “Exclusion and Re-Entry” standard operating procedures.

small proportion of problem gamblers seek formal help for their gambling problems. Research shows that although participation in gambling is reducing over time, rates of problem gambling are remaining static due to high rates of relapse.<sup>7</sup> The Salvation Army Oasis therefore supports policies that direct problem gamblers to engage with treatment providers.

29. In light of SKYCITY Auckland recently relaxing the mandatory counselling requirement for re-entry within its own HRP, the Salvation Army Oasis is concerned that other casinos may drop their own standards as well.
30. If the CCL licence is renewed, the Salvation Army Oasis asks that it be a condition of re-entry that counselling is completed (for example, by adding a condition to the Casino operator's licence).

#### Returns to the Community

31. Section 138 of the Gambling Act 2003 stipulates that for a casino venue licence to be renewed, the Gambling Commission must be satisfied that renewing the licence will result in a net benefit to the local and regional communities around the casino, and to New Zealand generally.
32. In its application, CCL points to its support for community organisations through the Christchurch Casino Charitable Trust ('CCCT') as evidence of this "net benefit".
33. However, CCL contributes far less to its charitable trust relative to most other casinos in New Zealand. At present, CCL is not required by its venue licence to provide a minimum level of funding to the CCCT. All other New Zealand casinos must provide a minimum level of funding to an independent charitable trust, as set out in their venue licences. The minimum payment requirements vary, but in simple terms, most range from around 1-1.5% of revenue or 2.5% of net profits.

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<sup>7</sup> Abbott, M., Bellringer, M., & Garrett, N. (2018). *New Zealand National Gambling Study: Wave 4 (2015). Report Number 6*. Auckland, New Zealand: Auckland University of Technology, p. 12.

34. According to the Skyline Enterprises Annual Report, in 2017 the Christchurch Casino generated around \$62 million in revenue, for an operating profit of over \$17 million (before deducting interest and taxes), and contributed \$180,000 to the CCCT. That is a contribution of less than 0.3% of revenue. The Salvation Army Oasis has compared Christchurch Casino’s contributions to that of other New Zealand casinos in Table 1.

**Table 1: Annual revenue vs. charitable trust contributions for New Zealand casinos**

<b>Casino</b>	<b>2017 revenue</b>	<b>Trust contributions</b>	<b>Revenue contributed</b>
SKYCITY Auckland	\$566.7 million	\$3,185,198	0.56%
SKYCITY Hamilton	\$59.4 million	\$694,136	1.17%
SKYCITY Queenstown & Wharf Casino	\$11.9 million	\$109,734	0.92%
Christchurch Casino	\$62 million	\$180,000	0.29%

*These figures are intended to be illustrative only and may not be exact. All SKYCITY revenue figures are taken from SKYCITY's 2017 Financial Report, and SKYCITY contribution figures are taken from the casinos' respective websites. Christchurch figures are taken from the Skyline Enterprises 2017 Financial Report. We were unable to locate contribution data for Dunedin Casino.*

35. Christchurch Casino’s contributions to the community could also be compared to those made by Class 4 venues. It is implied in the CIR that the increase in Class 4 gambling that occurred in Christchurch when the Casino closed for three months following the February 2011 earthquake suggests that failing to renew the Casino licence would result in Casino gamblers transferring to gaming machine venues with “less diligent host responsibility procedures” and a greater association with harm, at an apparent cost to the community.

36. The CIR also states that the Casino generates an annual average of \$36.5 million in gaming machine revenue. Based on last year’s figures, a Class 4 venue with that level of revenue would have allocated about \$1.36 million for community purposes (because class 4 venues are required to allocate a minimum of 40% of the net proceeds from gaming to their various authorised purposes under the current Gambling (Class 4 Net Proceeds) Regulations 2004).

37. The Salvation Army Oasis believes that the community benefits of the Casino remaining open are significantly overstated. With one of the purposes of the Gambling Act being to “ensure that money from gambling benefits the community” and Schedule 1 of the Act allowing the Gambling Commission to achieve this when setting conditions, The Salvation Army Oasis believes the distribution of CCL electronic gaming machine (‘EGM’) proceeds for community purposes must be brought into line with the Class 4 sector if the licence is to be renewed.
38. A lot of money is invested into the Christchurch Casino by residents and visitors to the city, and a significant proportion of this money is likely to come from people experiencing gambling harm.
39. The Salvation Army Oasis does not believe that the Casino’s very small contribution to the community provides a net benefit when considered against the gambling harm generated by the casino (as evidenced by clients of The Salvation Army Oasis, the Problem Gambling Foundation, and many other health and social services throughout Christchurch). At the very least, we believe that the Casino should provide returns to the community at a level sufficient to mitigate this harm in line with the Class 4 sector (or a minimum of 40% of the net proceeds from their EGMs).
40. If CCL’s application is successful, The Salvation Army Oasis recommends amending the venue licence to include a minimum level of funding to be paid to the Casino’s independent charitable trust, at a rate in line with the Class 4 sector (or a minimum of 40% of the net proceeds from their EGMs). If this is not accepted by the Commission, then the rate should be no less than that required by other casino venues in New Zealand. The rate should also be set at a level sufficient to ensure that, balanced against social and economic harms attributed to the Casino, the Casino’s continued operation would still constitute a “net benefit” for the local community, and New Zealand more generally.

## ISSUES ARISING FROM THE BAINES AND BUTCHER EVIDENCE AND PROFESSOR DELFABBRO

41. As the Commissioners know, Mr Baines and Mr Butcher prepared the CIR for the Gambling Commission. In addition, Professor Delfabbro prepared a peer review of the CIR for the Gambling Commission that included a number of comments critical of both the methodology and content of the CIR. The Salvation Army Oasis welcomed this initiative of the Gambling Commission to have a peer review prepared by an independent expert.

42. In their Evidence for CCL, Mr Baines and Mr Butcher responded in some detail to the Delfabbro Peer Review and finally Professor Delfabbro prepared Comments on these Responses.

43. I have read all those documents.

44. In my view, while Professor Delfabbro accepts many of the responses of Mr Baines and Mr Butcher contained in their Evidence for CCL, there are several differences between these three experts:

- a. The use of the National Gambling Survey data;
- b. Relative proportion of statements in support or not in support;
- c. Capturing the views of the wider community;
- d. Australian or International Research; and
- e. Narrow Range of Public Submissions and Community Consultation.

### **The use of the National Gambling Survey data**

45. At paragraphs [3.2] to [3.5] of his Response, Professor Delfabbro states:

- 3.2 Paragraphs 38-44 relate to the question raised about the validity of the National Gambling Survey (NGS) data and whether they were a sufficient basis to draw conclusions about the Christchurch region.
- 3.3 JB referred to estimates of the number of visitors to the casino in a 12 month period (Appendix K) and to the NGS figures. The clarification provided around the visitor estimates lead me to conclude that they are reasonable, but my issue was more specifically with the use of the NGS figures.
- 3.4 In relation to the NGS figures, he confirmed that, of the 6251 people included in the national NGS sample, 402 were from the Christchurch region. In paragraph 40, he says that the number is "totally unreliable for ethnic sub-populations". I concur. In my view, the total of 402 is a reasonable number for examining gambling generally in the region. What I question is whether the sample size enables one to say anything useful about gambling at the Casino, as opposed to gambling in all gambling venues.
- 3.5 I agree with the logic outlined in paragraph 41. It is reasonable to adjust the estimates of gambling risk based on differences between the ethnic profile of the region and the national profile. Such an adjustment involves identification of elevated (or diminished) rates of problem gambling for minority groups and then adjusting the local Christchurch estimates on the basis of the representation of those groups in the area. It should be noted that PGSI scores or classifications are NOT measures of harm per se. The PGSI contains only 4 of 9 items which come close to measuring harm, although I accept that higher scores would usually correlate with higher scores on dedicated harm measures (e.g., Browne et al., 2016). My point does not challenge the validity of the conclusions drawn, but it should be noted that references to the distribution of PGSI scores is more about the prevalence of riskier patterns of behaviour which may lead to harm than about measures of harm.

46. At paragraph [3.4], Professor Delfabbro concurs with the acknowledgement of Mr Baines that because only 402 people in the NGS figures are from the Christchurch region, the number is "totally unreliable for ethnic sub-populations".

47. Professor Delfabbro goes on to say that he questions whether the sample size of 402 enables one to say anything useful about gambling at the Casino, as opposed to gambling in all gambling venues.

48. I am concerned about the conclusion of Professor Delfabbro and believe this is a significant deficiency in the CIR.

49. As noted earlier in my Evidence, as our Māori, Pacific, and Asian communities are disproportionately burdened by gambling harm, we believe that all steps should have been taken to ensure these groups were fully involved in the development of the CIR and this point stands double for Māori, who as Te Tiriti o Waitangi partners are owed consultation.

50. The Salvation Army Oasis says that more robust data of the effects on these ethnic sub-populations must be undertaken before a decision on the social and economic impacts can be properly made.

51. At paragraph [3.5], Professor Delfabbro re-enforces his view that PGSI scores or classifications are NOT measures of harm per se and that the distribution of PGSI scores is more about the prevalence of riskier patterns of behaviour which may lead to harm than about measures of harm.

52. I am also concerned about this point made by Professor Delfabbro and believe this is a deficiency in the CIR.

### **Relative proportion of statements in support or not in support**

53. At paragraph [3.9] of his Response, Professor Delfabbro states:

3.9 Paragraphs 53 and 54 summarised the proportion of responses which fell into each thematic category. While the analysis tells us little about the relative proportion of statements in support or not in support (e.g., Casino's role in the city generally: good or bad?), the evidence is quite consistent and my earlier criticisms of the clarity of presentation do not undermine the general validity or direction of the findings. I observe, however, that the respondents, who were consistently positive about the ongoing operation of the Casino, were supply chain partners, charitable trusts and corporate sponsorship recipients, all of whom benefit from the Casino's operation.

54. Here Professor Delfabbro raises a concern that the respondents who were consistently positive about the ongoing operation of the Casino were supply chain partners, charitable trusts and corporate sponsorship recipients, all of whom benefit from the Casino's operation.

55. I am also concerned about this point made by Professor Delfabbro and believe this is a deficiency in the CIR.

## **Capturing the views of the wider community**

56. At paragraph [3.12] of his Response, Professor Delfabbro states:

- 3.12 Paragraph 70 refers to my criticism of the presentation of isolated quotes. I agree that the point would not have been reflected in different conclusions because the community organisations that were interviewed were generally very positive about the Casino. I have already observed the common features of the organisations interviewed. As a result, it is questionable that the CIR adequately captured the views of what might be called the 'broader community'.

57. Here Professor Delfabbro reinforces his concern that it is questionable that the CIR adequately captured the views of what might be called the 'broader community'.

58. Again, I am also concerned about this point made by Professor Delfabbro and believe this is a significant deficiency in the CIR.

## **Australian or International Research**

59. At paragraphs [3.14] and [3.15] of his Response, Professor Delfabbro states:

- 3.14 Paragraph 74 dismisses the possible benefits of drawing on Australian research. In my view, it is perfectly reasonable to draw on research conducted in a country as similar as Australia as well as on the results of other international research to advance the hypothesis that the Casino is likely to attract a higher proportion of higher risk gamblers. The hypothesis arises from the point already made that the size of the NGS Christchurch sample does not allow separate analysis of casino patrons, as opposed to gambling patrons in Christchurch generally.
- 3.15 My point is that national Australian research (a major report by the S.A. Centre for Economic Studies on casino gambling in Australia in 2016 produced for Gambling Research Australia) showed that the risk-profile for casino gamblers is generally higher than for other venue types. This is due to the demographic profile of gamblers who tend to choose casinos as a place to gamble. In other words, when one is considering the social impact of gambling in the region with reference to where higher risk gamblers are likely to be found gambling, the casinos may have a disproportionate number of these people. To be clear, it does not imply an exposure effect (casinos cause problems), but rather a selection effect (casinos are likely to attract more of these sorts of people). This is an area of social impact which I consider that the CIR could have mentioned, even though appropriate data to conduct analyses of the risk profile of the Casino's patrons was not available.

60. Here Professor Delfabbro reinforces his view that it is perfectly reasonable to draw on research conducted in a country as similar as Australia as well as other

international research, especially that concerning the hypothesis that the Casino is likely to attract a higher proportion of higher risk gamblers.

61. I agree with Professor Delfabbro that this is an area of social impact which the CIR could have mentioned, even though the appropriate data to conduct analyses of the risk profile of the Casino's patrons was not available.

### **Narrow Range of Public Submissions and Community Consultation**

62. At paragraphs [3.17] to [3.20] of his Response, Professor Delfabbro states:

- 3.17 My remaining observation of concern relates the narrow range of public submissions in addition to the narrowness of the community consultation responses for the CIR.
- 3.18 The vast majority of the submissions are very brief and generally contain little more than an endorsement or disapproval of the licence continuation. Around 90% of the submissions appear to be in support of licence renewal.
- 3.19 The submissions strongly reflect the vested and personal experiences of the parties concerned. Endorsement of licence renewal comes from parties who work at the Christchurch Casino, have dealings with the Casino, who receive financial support or other benefits from the Casino's operation (e.g., community groups and sporting clubs); or people who work in tourism, hospitality and entertainment. In contrast, the smaller number of adverse submissions came from parties who have been affected by problem gambling or whose principal organisational mission is to address the problems caused by problem gambling.
- 3.20 The result is a relative lack of feedback from the wider community, who presumably do not experience such direct benefits or detriments from the Casino as the parties who were consulted for the CIR or who made submissions. This is unsurprising; unless members of a community feel directly affected by something, they seldom feel compelled to file submissions.

63. Here Professor Delfabbro's remaining concern relates to the narrow range of public submissions in addition to the narrowness of the community consultation responses for the CIR. He is especially concerned that the submissions strongly reflect the vested and personal experiences of the various submitters. The result he says is a relative lack of feedback from the wider community.

64. I hold similar concerns to Professor Delfabbro and believe that the relative lack of feedback from the wider community is a deficiency both of the CIR and the overall feedback from submissions.

65. I support Professor Delfabbro's view that a formal survey specifically asking about the Casino would have been a better way to have assessed such views.

## CONCLUSIONS

66. In conclusion, although The Salvation Army Oasis neither supports nor opposes CCL's application, we hold the following outstanding concerns:

- a. there was a deficiency in the level of consultation undertaken in preparing the CIR, especially regarding the broader Christchurch community;
- b. there were limitations in using NGS to gauge local attitudes towards the Casino and a formal survey should have been undertaken;
- c. there was a deficiency in the level of consultation with ethnic communities and especially Māori (who as Te Tiriti o Waitangi partners are owed consultation);
- d. there was deficiency in the information used for the CIR suggesting that the results have under-represented harm related to casino gambling in the Christchurch community;
- e. that the Christchurch Casino was the worst performing casino in the Department of Internal Affairs' 2016 mystery shopper exercise;
- f. there is an over-representation of respondents from supply chain partners, charitable trusts and corporate sponsorship recipients, all of whom benefit from the Casino's operation;
- g. there was a reluctance on the part of the authors of the CIR to use relevant Australian or other international research;

- h. there was a narrow range of public submissions in addition to the narrowness of the community consultation responses for the CIR, such that there has not been sufficient feedback from the wider community.

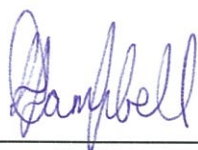
67. The Salvation Army Oasis believes that many of these concerns are such that there is insufficient information on which the Commissioners can make an informed decision.

### **Specific Recommendations**

68. In addition to these concerns, The Salvation Army Oasis has made recommendations concerning the licence conditions as detailed earlier in my Evidence:

- a. establishing a formal liaison group;
- b. requiring mandatory counselling for excluded patrons; and
- c. ensuring a minimum level of funding be paid to the Casino's independent charitable trust, at a rate in line with the Class 4 sector (or a minimum of 40% of the net proceeds from their EGMs) or if that is not accepted, at a rate no less than that required currently by other casino venues in New Zealand.

Dated 19 November 2018



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Sybil Lisa Campbell

