



THE LORD MAYOR OF SYDNEY  
CLOVER MOORE MP



26 July 2006

David Brearly  
Casino Control Authority  
GPO Box 3970  
Sydney NSW 2001

To whom it may concern

### **Investigation of the Sydney Casino Operator and Licence**

I write on behalf of City of Sydney residents in the Pymont and Ultimo areas, concerned about some impacts from the Sydney Casino operation.

The City acknowledges the work Star City Pty Ltd has done over the past three years to improve compliance and reduce alcohol related incidents. However, we still receive complaints about intoxicated and disruptive persons moving from the casino through the residential streets of Pymont to access transport or other entertainment options.

The City encourages Star City and the Casino Control Authority, as part of this review process, to ensure there are adequate courtesy bus services to accommodate patrons during peak times such as Friday and Saturday nights.

The City has also received complaints from residents about noise from the open rooftop area of Star City, as late as 1am. The City recommends this entertainment venue's arrangement be re-evaluated so the local community no longer has to deal with the impacts of its noise pollution.

The City also notes that the casino is not a member of the Sydney CBD Licensing Accord, which covers the City Central Command. The City strongly encourages all licensed venues to participate in this initiative, which seeks to improve safety and decrease alcohol-related crime.

The City strongly recommends that these responsibilities, directly related to preserving neighbourhood amenity and ensuring responsible service of alcohol, be conditions of the casino's liquor licence.

Yours sincerely

Clover Moore  
Lord Mayor of Sydney

R OLM 2006/05123 BREARLEY



# CLUBS NSW

26 July 2006

Chief Executive Officer  
Casino Control Authority  
Level 17, 309 Kent Street  
SYDNEY NSW 2000



Dear Sir,

ClubsNSW would like to thank the New South Wales Casino Control Authority for the opportunity to present a number of matters for consideration in its inquiry into the casino licence.

It is our understanding that under Section 31 of the Casino Control Act 1992, the NSW Casino Control Authority is required to investigate and form an opinion as to whether or not:

- a) Star City Pty Ltd, the operator of the Sydney casino, is suitable to continue to give effect to the casino licence and the Act; and
- b) it is in the public interest that the casino licence should continue in force.

It is also understood that the exclusive casino licence will expire in September 2007 and in our view this inquiry together with any exclusive licence renewal considerations by Government present an opportunity to conduct a review of the gaming environment in which Star City casino operates and to implement changes in the public interest.

This submission deals with "public interest" considerations surrounding the casino licence and requests that a number of measures be implemented that in our view are necessary if the casino licence is to remain in force.

By way of background, for well over forty years the operation of gaming machines in New South Wales was restricted to not for profit, community owned gaming represented by clubs.

Despite opposition from clubs at the time, Government granted a twelve year exclusive licence and 99 year non exclusive licence to operate a casino in New South Wales.

The temporary casino opened on 13 September 1995 with 500 gaming machines and 150 gaming tables followed by the permanent casino on 26 November 1997 with approval for operating 1,500 gaming machines and 210 tables.

The opening of the casino was touted as a major tourist attraction that a modern city such as Sydney must have.

At the time, clubs argued that the introduction of a casino would impact on the revenue base of community owned gaming. Subsequent events and experience has clearly illustrated that despite the description of the casino as a tourist attraction and a destination for overseas "high rollers", the reality is that the major proportion of gaming revenue for the casino is sourced from the local New South Wales and in particular Sydney population. Indeed, evidence from clubs indicates that Star City casino passenger buses target strategic metropolitan locations for the purpose of acquiring patrons. Additionally, the high roller operation was suspended for some time leaving the gaming focus only on the general gaming floor operation, that is, Star City casino openly targets and relies on the local population for gaming revenue and as such is in direct competition with community owned gaming interests.

ClubsNSW has consistently argued that legislation governing gaming operations at the casino should mirror those under which clubs operate. In our view there is no justification for any differentiation between the gaming operating environments available to the casino and clubs. It is further our view that given the nature of patronage at the casino, that is, predominantly local population, the operating environment for table gaming should also be consistent with that imposed on gaming machines. Formal acknowledgement and establishment of these principles in legislation is in the public interest.

Recent gaming related legislation affecting clubs, driven primarily by problem gambling considerations, has resulted in a raft of initiatives that impacted on the gaming environment of clubs. While many of these initiatives were also translated to casino legislation, some of the exceptions include:

- Casino problem gambling legislation does not specifically address table games. This is significant because it fails to impose the same restrictions on advertising and promotions that are applied to gaming machines and means advertising and certain promotional activity considered unacceptable for gaming machines is permitted in the case of table games. In this respect it is worth noting that casino legislation ("Official Rules of NSW Casino Games") specifically permit the use of a "casino promotional voucher" issued for the purpose of promoting table games. In our view it is in the public interest that a consistent approach is established across all forms of gaming and particularly table games and gaming machines within the casino.
- Payment of gaming machine prizes by cash is subject to restrictions in clubs. Amounts in excess of \$2,000 must be paid by means of a crossed cheque made out to the player. In the case of the casino the player is asked whether they wish to be paid by cash or cheque, that is, cheques are not mandatory.

Feedback from clubs indicates that payment by means of cash is generally preferred by patrons and a situation has now developed where only the casino can operate using cash payments without restrictions. This is a significant operating consideration particularly for those clubs that regularly deal with interstate visitors and tourists generally. The inability to pay the patron by cash in such situations causes significant and in our view unwarranted difficulties.

- Legislation was enacted that requires a compulsory shutdown of gaming machine operations in clubs. The shutdown is six hours duration which can be reduced to three hours on selected days by special application. After research initiated by Government and a review by the Independent Pricing and Regulatory Tribunal there is still no evidence as to the effectiveness of this measure in reducing problem gambling. In our view this is an ineffective measure and only serves to limit the ability of clubs in providing a complete range of facilities to their members.

The casino is not subject to a similar shutdown requirement despite the fact that this initiative was introduced for problem gambling reasons and as noted above the local nature of casino patrons. There is no justification for such differentiation and ClubsNSW believes that the same requirements should apply to the casino and clubs.

- While not specifically related to gaming it is noted that recent legislation dealing with the phased-in prohibition of smoking inside licensed premises has specifically exempted casino "high roller" areas. This again serves to highlight an emerging disparity between the operating environments for the casino as opposed to clubs which in our view is not in the public interest.
- Access to gaming machines in clubs was restricted by legislation which effectively capped the number of gaming machines in individual clubs and on a statewide basis. The largest clubs have had to reduce their machine numbers.

While the number of gaming machines and tables available in the casino was originally determined by the Minister following an inquiry, there is no corresponding legislation that clearly caps or limits the number of gaming machines or tables at the casino.

In a second reading speech on the Casino Control Amendment Bill (7 June 2000) the then Minister for Gaming and Racing, the Hon. Richard Face stated *"This amendment will extend to the casino an entitlement which Parliament approved for registered clubs in 1998. It is established policy for casino gaming machine entitlements to be tied to club gaming entitlements, and vice versa."*

While the "entitlement" referred to in this case was an option to pay prizes in a non-monetary form, there is a clear acknowledgement by Government of a policy to ensure equal access to gaming machine entitlements generally.

It is our view that this also includes access to gaming machine numbers and that it is essential for capping principles applied to clubs to be extended through appropriate legislation to cover casino gaming machines and tables.

The Casino Control Act 1992 permits a single casino (Section 6, "One casino only").

ClubsNSW strongly supports a single casino policy and is heartened by a recent response from the Premier's Office reported in the Daily Telegraph (29 December 2005 – David Fisher) that Sydney will remain a "one casino town" and that there are no plans to allow a casino in a regional area.

As indicated earlier in this submission, the existing casino clearly draws a major portion of its revenue from the local population and is therefore in competition with community owned gaming interests. Any further erosion of those interests through the introduction of a second casino will simply exacerbate this situation and is viewed by ClubsNSW as not being in the public interest.

In conclusion, ClubsNSW notes that at the time the casino was under consideration and following considerable public debate, the then Government formally wrote to the then Registered Clubs Association (now known as ClubsNSW) advising that it was proceeding to set up the casino under arrangements that included the following:

- After the installation of the central monitoring system the casino will be free to move from 500 gaming devices up to 1,500 gaming devices.

It is noted that the casino does not yet have a central monitoring system of the type imposed on clubs.

- The tax rate for casino devices will be at least the same as the tax rate for clubs.

It is noted that the recent tax increases imposed on clubs and particularly the largest clubs, have resulted in a violation of this "level playing field principle" and substantially favour the casino gaming operations.

- There will be a level playing field for casino and club gaming devices i.e. they will:
  - be the same type of devices with the same range of games as operated by clubs;
  - have "coin of the realm" devices of the same denomination as available to clubs;
  - have the same bet limits and prize limits.

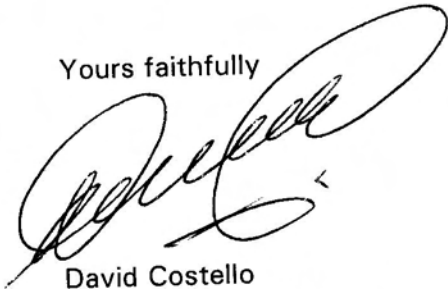
- Any innovative gaming device feature granted to the casino will be granted to clubs and vice versa.

These principles were developed because of public interest considerations. While in broad terms there has been general adherence to these principles and successive Governments have referred to a need for a "level playing field" during Parliamentary debate, a number of exceptions have been identified and listed.

In our view these exceptions need to be addressed and the general "level playing field principles" re-affirmed. This is best achieved through appropriate legislative change or possibly mechanisms such as the licence renewal process.

Thank you again for the opportunity to comment.

Yours faithfully

A handwritten signature in black ink, appearing to read 'David Costello', written in a cursive style with a large loop at the end.

David Costello  
Chief Executive Officer



# The Council of Churches in N.S.W.

Incorporated  
ABN 24 348 552 048

**Advancing a Christian Perspective**

Website <http://www.nswchurches.com>



Representing the Anglican Church (Diocese of Sydney), Baptist Church,  
Christian Reformed Churches, Churches of Christ, Fellowship of Congregational  
Churches, Presbyterian Church and The Salvation Army.

Secretary: Rev Bruce Thornton OAM

President: Mr David Crawford

27 July, 2006

The Casino Control Authority  
GPO Box 3970  
SYDNEY NSW 2001

Dear Sir/Madam,

## Re 2006 Investigation under Section 31 of the Casino Control Act 1992.

Thank you for the invitation to make a submission to the Investigation as above.

Having reviewed the Terms of Reference the NSW Council of Churches has determined that to comment on many of them would require a level of knowledge about the Casino's operations which is not available to the Council and would require considerable time and expertise to acquire.

Council is also of the opinion that to comment on Terms of Reference (items 1 to 4 and item 6) would be extremely difficult for anyone other than persons who have a close and continuing association with the Casino and who have made a specific study of it.

Having regard for the above, Council has declined to comment on item (a) in the Call for Submissions - ...whether or not (a) "Star City Pty Ltd. the operator of the Sydney Casino, is suitable to continue to give effect to the casino licence and the Act".

In respect of (b)... whether or not (b) "it is in the public interest that the casino licence should continue in force" the NSW Council of Churches views in respect of gambling are generally well known. Council opposes gambling in any form and is in strong opposition to the provision of gambling facilities with the endorsement of governments which give the impression of gambling having moral legitimacy. This, the Council **does not** accept.

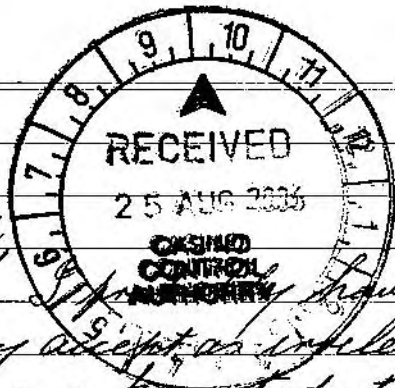
Having stated the above, Council understands that a comprehensive submission is being made by The Salvation Army which is a member body of the NSW Council of Churches. Please advise the review body that the NSW Council of Churches supports this submission.

Yours sincerely,

Rev. I.B. Thornton.  
Council Secretary.

**Contact - President:** Tel: (02) 9645 4951 Email: [dmccrawford@bigpond.com.au](mailto:dmccrawford@bigpond.com.au)  
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16 Norfolk St  
Mt Druitt N.S.W  
2770

Dear David,

I have sent you information that you may accept as irrelevant.

How-ever as a ~~been~~ student of economics I'm concerned as to how M.S.Ws can confront the next State Election when John Howard (see his enclosed remarks) that he would have nothing etc out to ensure Labor will not win next State Election.

Please send me back what you don't want and enclose a photo-stat copy of all you require.

Please also ensure that Capex is reduced to ensure covering all that I've went over accepted border.

There is so much that has to be done with change to allow us to compete with overseas products.

I'll do all that I believe I must do to block John Howard & Costello efforts to undermine our State Government.

I believe that Morris Gemma requires all of Our Support.

If things don't pick up for Labor, I'm (not that I want to) inclined to stand again for Londonderry.

The Matrix Sheet is a kept secret as to how its allowed to established a Winning Means in all 1/1 Games of Chance plus commission charges.

It'll win over the long term around \$11-00 at \$1-00 v/F/Us, \$55-00 and \$5-00 v/F/Units and \$2.75 per hour on \$25-00 v/F/Us.

Such has been proven over  $1920 \times 2.0 = 3840$  x 8 Columns each of For and Against inclusively as  $-8 \times 5 =$  oscillating in kind  $\frac{3}{8}$  of total to simulate legalised Casino Two. Up.

Last year I tried method at Star City's Roulette Tournament. I was disqualified when 350 in front in 1st game I won next week to just miss making the final obtaining a \$571-00 Executive Suite Booking. Same occurred on the following week. On as in One Game after 20 results I successfully



won quality heat with \$20,000-00 chips.

Though as Final Went, I believe I would have won such if I'd qualified on the results that were arrived at in the event.

I allway had saved on Zero which would have allowed me to finish on \$4,800-00.

Such was a lucky outcome. I won 2 x \$571-00 Executive Suites.

I've no doubt the World will hear of Hoopers © Matrix comprising of Variations of events by © Hooper Grid like formula.

Thanks for your assistance as I've had a rough previous 4 weeks.

I'll survive, All The Best and Thanks.

My only consideration at the present is to do my utmost to assist M.S.W's.

Yours Sincerely  
Norm Hooper.

P.S. Enclosed 40 Pure Random Outcomes inverted to any of 1 Game of Chance demonstrates a How neutralisation aspects allows for variations of 3 in each line of 8.

Such will go up as high as 700 events with One of Two Chances in each column failing to win on occasions.

How ever its partner consistently wins to come up with a Reduction overall to 80.0 outcomes costing  $80 \times 7 = 560 \times \frac{1}{36}$  as Roulette Commission expected on averaged within two x 128 Wins from  $1-0 \times 2^7 p = 128-0$ .

I believe eventually such will compel Casinos to Go To American Roulette, even then I doubt if they can win over Long Term.

Such keeps me active and puts life back into my Bones.

Regards.

Norm H.

Those who think I'm essential I'll give them betting against me in Casino I will 1-2 & their vt stake of \$0-80 Roulette only vs other 90%  
M.H.





RECEIVED

25 AUG 2006

CASINO CONTROL AUTHORITY

From N.H. Hooper ABN 91102 550 802

16 Norfolk St M<sup>+</sup>urrill

N.S.W 2770

25<sup>th</sup> July

To N.S.W. Casino Control Authority  
2006 Investigation Under Section 31 of the Casino Control Act  
G.P.O. Box 3970 Sydney N.S.Ws 2001.

Matters I desire to draw attention to are,

- 1. The Contributions of The Casino Community Trust Fund
- 2. The Allowing of Computerised Version of Animated Roulette.
- ★ 3. The Slack Method as To How Certain Coupiers are not following 'Strict Procedure' by calling a Place Your Bets, b. hart Bets and c. Indication that "No more bets" is about to be called. Also for Ball and Wheel to be spun in opposite direction

I was the person who called for a levy to be placed on Casino Licenses for specifically "Gambling Education and Awareness Within Our School System and, agreeing to Sir Lawrence Streets Addition to include "Also within The Work Place" (I used Casino Two 1/2% Reason for Education)

Such levy of 2.0% of expenditure was, after giving my reason as to "How Actual Proportion Representation as to The Rate of Commission, due to such oscillating away from "Pure Random", re the in - addition "Nullgar Fraction Unit" based on The 5<sup>th</sup> x One in a Sequence, when "Pure Random" Applies, as similar by "A Random Number Generator" or, if such was possible to have All 64-0 Attempts at Losing The 2-0 Pair (as unbiased). pennies allowed to become a Result, as with from  $1-0 \div 0.5 \div 0.5 \times 5 = 64-0 \div 2-0$  for Establishing a Odds and b Evens, allowing for b Evens forming  $16-0 \times H/H$  (as Heads and d  $16-0 \times T/T$  (as Tails, with from a Odds, with "At Pure Random", with  $1-0 \times 5-0 \times$  consecutive Ones eventuating within an Over-All on average from the  $32-0 \times$  Odds, within the 64-0 "Pure Random Attempts", for "the 5<sup>th</sup> Ones" in the sequence of  $1-0 \times 5-0$  consecutive forming as The 33<sup>rd</sup> Accepted Event within the area of the experiment as  $100-0 \div 33-0 = 3.0303\%$  of total tabled stakes, due to the in addition of a Plus  $1/32$  added to equation establishing a plus  $33-0 \times 1-0$

From preceding time in accordance with Hoyle

as  $32.0 + \frac{1}{32} = 33.0$ . With 100.0 as total tabled  
 staked  $\div$  by 33.0 = 3.0303% rate of commission  
 charged. Such would be correct © if Banned Jones were included.

I'm fully aware after 32 years endeavouring to rectify the error associated with "How The Rate of Casino Two-Up" consists of the Banned on averaged of 26.0 of 69.0 Attempts. Having to revised my © (as World's Copyrights of my total 33 years of research) from research based on "proportional representations" from three weeks at Wrest Point Casino in Tasmania back in 1972/73 when I'd toned around 30.0 x 1.0 sets of 1.0 x 5.0 x consecutive 'Ones', to be paid 30/1 against, when due to my now departed good friend and tutor John Rafferty's insistence that I continue on with my conviction, that legalised Casino Two-Up was other than a 3.0303 (or as accepted as a 3.125% rate of commission), of combined overall.

Though academics ranging from N.S.W's Treasury, Productivity Commission, Dept. of Gaming and Racing, Sydney University, N.S.W's Dept of Education and Wellington University, plus all that advised Sage HoPo, who endeavoured to accept a 'credence' to my research to up-grade a gambling awareness within Society as had Peter Anderson, Guy Matherson, Senator John Tierney, as well as back in 1974 when Tony Luchetti accepted my © Copyrights relating to - "Why should Australians be compelled to pay (as then I'd accepted 5.88235%) whilst to-day especially when A. Mr Ray de'ville who also had attended (Sir Lawrence Street's 'Public Day Of Hearing' within his inquiry) had informed Sir Lawrence - "That professional gamblers wanted a Sydney Casino for Roulette, whilst, would not consider playing legalised Casino Two-Up, due to the around 5.0% rate of commission charged, was by far too severe. (With all in percentage of 100% on Win Bet: ©.)

Sir Lawrence glanced in my direction and gave an acknowledged nod, as to, "At least some one does agree with me". Such is Why Awareness (within community) by Educators will allow all to benefit from Awareness from even a Public School Education

My reasoning in pushing for the now well in excess of \$130-0 million collected from the 2-0% levy " earmarked " for " Education In Schools and in The Work Place " was no doubt snow-balled under by those academics who specifically are accepted to being sufficiently qualified within their own disciplines in areas where they no doubt are both a 'qualified' and b 'accepted' who over the past 30 years had convinced politicians who were aware of my credence; who as Peter Anderson who allowed Tony Sutton one of his senior staff to seek assurance amongst academics; as to my credibility (back in 1984/86) so as, "If I was correct Peter ensured me that he'd have my "Hooper's Ins" and "Cuts To" and "In Gambling" published.

Basically I'd to "Back Off" from persevering of those who willingly were prepared to assist my determination, who would be informed by those who we accept as "the guiding light" to take us into the future, to even have an associate professor from "The Sydney University" answering my question; in relation to the lost of commission against players in "legalised casino two-up" as; any 2nd year student could inform me, being 3.125%.

All who took up my challenge when "Sydney Harbour Casino" began operation, all would've lost their \$100-00 rds in dollars by accepting my \$1-20 on both a Tabled Stakes against their \$0-80° on each occasion I placed my tabled stakes, which when I lost, I'd replace a further 1-2 vulgar fraction unit (some wanted "to set" \$1-60 on first bet against my \$2-40.) regardless, for them when I won, prepared to placed their stakes at the 1/1 stakes academics considered as 32-0 x 1-0 v 1-0 x 32-0

My research and confidence continued and never 'waned' as I was aware (as 'One' amongst people who previously had accepted me as an 'accredited statistician' and 'amongst World Experts' in relation

William Hamilton's hold opening from 2.25% in relation to some accepted records.

As by Proportional Representation.

to gambling calculations and probabilities, would  
"Rob", "What do the academics think?" Such is why gambling has increased to 40%.  
With John Rafferty an acute mathematical  
buffon, though unable to obtain backing\* for  
my proportional representations which contin-  
uously agreed with results of Ray de Villies  
three weeks study of Casino Two-Up; even though  
Ray accepted that around 5.0% was the on an  
averaged rate of commission, Ray could not  
agree that at 5.0% commission as recorded, then  
5.0% as  $\frac{1}{20}^{th} = 19/1$  against odds. Such which was  
consistently recorded of both a 1.0 x 5.0 x consec-  
utive Odds and b 1.0 x 5.0 x consecutive Evens.

Research assistance given to me by both Steve  
Mallam and his sister Magleen Mallam who were  
from Fiji, who unfortunately endeavouring to  
gain permanent residence were made to "Go  
Back to Fiji to re-apply". (They're still awaiting for my help)

Without boths assistance, with Magleens insistence  
to Record a H/Hs, as H for Heads, b T/Ts, as T for Tails,  
with O for Odd Events and though not required to  
do so, marked Banned Jones as X.

A year after, Magleen was compelled to "Go Back to  
Fiji to re-apply". (Magleen had found employment as  
a Nurse's Aide). I happened to "re-look" over her  
recorded events and realise "Why" and "How" legalised  
Casino Two-Up's "Banned Jones", though accepted as  
ties actually were still a part as integrals within  
64-0 as 1-0 integer. (As Spiritual within Pure Random ©)

As such © by N.H. Hooper through Magleens assist-  
ance "by a Fluke" I accepted in September that though  
 $1.0 \times 2 \times 2^5 p = 64-0$  as Pure Random and 26-0 Banned  
Outcomes was 1.684210526 of 64-0 to = 38-0 Accepted  
Outcomes from 64-0 Attempts at tossing by player.

Actually I easily accepted, as Pure Random are Assump-  
tions, that "Banned Jones" in general were relevant  
with  $1.0 \div 1.684210526 \div 0.5 \div 0.5 \times 5 = 38.0 \div 2.0$   
= a 19-0 x Odds and b 19-0 x Evens within Infinity.

(+) Due to Campbell's speakers not coming to David (3 years ago) possibly were leaving. To help David win the  
\* John's god son is David Murray (of Commonwealth Bank's evidence) David could not do anything  
about standing within Bank, his David's comment, "Bank's were about making Murray not discussion."  
David, did not, when I could establish how much would make a profit on that time (+).

IF Results are removed by Pure Random, through only for in social domain.

Such is Why I could bet on my 1st tabled Stake 1.2 x 0.80 to overall Win 0.40.

As gambling areas of experiment requires a finite completion as finish (to allow for payout at allocated point)

Such then requires a 1-0 v/F/U as re Casino Two-Up, with 26-0 Batted on averaged being 50/50 from a Odds 19-0 + 13-0 (from 26-0 Batted as 0.5 = 32-0, with similar applied also to b, Evens also 19-0 + 13-0 = 32-0.

As all on averaged at levelled staked wagering, when toning two fair (as unbiased) pennies, regardless as to how many tones are Batted the accepted events remain actually in general, similar prevalent as in other forms of wagering.

I'd found throughout my research, that a more of an 'evenness' of results appear to eventuate in Casino Penny Toning game than on Roulette over Short Term.

How ever as 1-0 = 1.684210526 ÷ 0.5 ÷ 0.5 x 5 = 38.0, due to "The Anti-Martingale" method being actually the lead-in bet required, The Martingale player wins "The Anti-Martingale" players 1-0 v/F/U as their tabled staked to equally win 19-0 x 1-0 x Odds from, due mainly to academics accepting,

That Casino Two-Up remains a base 1/1 chance between both players (One Wins only when obtaining Over the Odds.)

Whilst it is also possible to obtain also 1-0 x 5-0 x consecutive Evens on "The Anti-Martingale" Method, due to Casino Two-Up becomes a means of following patterns (Pure Random is also based on Patterns)

★ As whilst The Anti-Martingale player should speculate, 20-0 x 1-6 Lost 1-0 x 32-0 Returned for all to be Even, The "Anti-Martingale" player Wins the 0-6 Saved, due to being allowed to 'Get Set' for 1-0 losses on each lost event of 19-0 lost for +1-0 for 32-0 on Win.

Such suits The Martingale player, who 'doubles up' when losing. How ever when losing 5-0 x consecutive placed bets loses 31-0 v/F/U and returns The Anti-Martingale players 1-0 tabled stake.

As such as explained in Hoopers 'Winning Lining and Cheating' The normal accepted 64-0 Pure Random is reduced by 'Batted Events' to allow variation to the norm and, though the m/p/e normally sequence

As in 1-0 of 2<sup>5</sup> = 32, On the occasion 10 x 2<sup>5</sup> (in 1024 becomes 2 (in Pure Random) The Anti M. obtains their 31-0 + 1-0 Returned whilst not having to pay the Martingale 31 x 1-0 losses normally.) ©





One Witnesses Rapid Roulette Introduced into Clubs Rejected By Players

Additional Taxes from "Clubs," "Pubs" and "Casinos" along with those providing and manufacturing products that allow for, a spiritual assumed based cumulative of events derived from those who desire to "Have a Flutter" on to be formed "Patterns" within "Pure Random," Technically, never ever did require enormous funds that those who're prepared to "Back" with "Cash," as even greater than (as for Original Sydney's Casino License) the \$366 or \$377 million to obtain the "Rights," to then establish from other "Public Funding" provided by those who'd accepted by purchasing of "Shares" in "To Be Casino" would allow them to obtain profits from the ignorance of those, who, if all such "expenditure" paid out from both a "Business People" who, at some time or another, "witness," or became awared as to "How" by certain means, they could, increase their "wealth" by using either their own, or even "embezzled" funds from others, along with those who feel that their "is a much easier means to accumulate Cash," even to borrowing (as I've myself done to fund my research,) in an "Effort," to "Educate" our present and future generations, even though there are means to defeat "The Institutions" that is prepared to allow you, to gamble and lose, how-ever "If by luck" you happen to "Come Across" "Patterns" within "Gambling" that "Allows One" "Short Term Advantages" to even as I'd done, when I'd without actually being "aware" of realized even when discovering "The Holy Grail" in one of numerous means to "Win," Such naturally, means of allowing one to "Win" by obtaining "Over The Real Odds," due to, in considering "long Term" to eventuate within an "establishing" of a "Proportional Representations,"

Such which is impossible to achieve as by © Hooper's Spiral of Probability, in association with © Hooper's Rings of Possibilities as © by N.H Hooper September 1975, though with proof from in excess of 3.0 million established outcomes. to prove that actual Casino Two-Up Events are calculated to Odds

of  $1-0 \times 5-0 \times$  consecutive Ones overall to come up with, in ever each on an averaged of 64-0 Pure Random Attempts the One of each 32-0 as spaced to be from 32-0  $\times$  Ones, one averaged to dictate, Sure there re 32-0  $\times$  Odds and 32-0  $\times$  Evens as provided (information) by Tony Corke who claimed (quite correctly)  $\odot$  as World Copyrights as to the 3.125% calculated of an averaged  $16 \times H/H$  and  $16 \times TT$  in Even 32-0, along with  $16 \times H/T$  and  $16 \times T/H$  combined to come up with a 3.125%, as Tony's Proof that Academics were actually correct in stating 3.125% as the overall rate of commission in "Casino Two-Up." (But Only on Total Toss.)

It was due to the inquisitive minds of the likes of Tony Corke, who was the expert within the Commonwealth, Bank who accompanied David Murray to meeting with me, arranged by David's God Father who was my friend and tutor (into effort to allow me to come to terms in relation with modern mathematics.) John recognised my Reasoning (in 2Up) due to his research as a Veterinary Scientist as a "Genetic Scientist" employed in C.S.I.R. before the  $\odot$  was added.

As with Calculus relevant with Casino Two-Up, most if not all of numerous situations I would provide the answer, to which John would come up with The Alternative answer, as example as to How One is able to, identify "All" 53, including Joker, within A Queen Slipper deck of cards - from Back.

Formulas often occur when a calculation eventuate on other eventualities (as in Exchange Rates and within breeding.)

Why people win as I'd done throughout most of my life (along with sustaining heavy losses, when Probabilities eventually "Even Out") is by awareness of Probability Expectations.

Such will occur over The long Term unless as, "What I'd achieved at West Point Casino back in 1972/74 When I'd consistently obtained 30/1 against  $1-0 \times 5-0 \times$  consecutive Ones eventuating, instead of Real Odds by proportional representations, of 19/1 against  $\odot$

© 66 in Fibonacci Sequential of Numbers in breeding of Rabbits  
 The Bored Events in Casino Two-Up simulates breeding seasons  
 with two seasons of birth of a pigeon pair © by Hooper & Hutton.

Such comes up with The "Sleazy Means" as to How All Casinos that I'd attended, though ignoring my information that due to "Strict Set Rules," including, ensuring that both pennies had to be spinning in appearance or "Be Barred" (averaging 26. Barred)

Though after my win of \$35,000-00 at West Point Casino, no doubt research was conducted by "Proportional Representations" and with such as my © information had established that such occurrences could be obtained by a small number of old experienced Two-Up players who accept, when in Casino Two-Up by Spinning both Pennies in Unison with each other, (due to a "One penny placed on 'hip' with 'H' Head' Showing 'Uppermost' with 6 'The Other' placed on 'hip' with 'H' Tail' Showing 'Uppermost' (Add's room to reasoning)

I've no doubt if such rules (as original) applied to-day, I would throughout the last the greater portion of the past thirty years would of continued playing Two-Up "The Legalised Way".

I've no doubt how ever I most probably would had departed this World prior to to-day and as such, "would've failed to, attempt to ensure," that the greatest proportion of Gambling Expenditure be returned to State Governments, for Societies within the areas where gambling funds are "deprived of," to obtain "Benefits from a Social-ist Minded Government".

Surely over 30 years of endeavouring to obtain a by far better Deal for, "recreational Two-Up Gamblers" some one, must have "blued onto" as I had, that The Tossing of Two Pennies without manipulations (in general), with Fair (as unbiased) pennies, that other than unfortunately though due to "New Chem's spinning efforts not being 'perished exhibitions', there would have been still quite a number of 'Barred' accepted (as ties) Tosses, as are in Craps Games when either a 1-1 or

b 6-6 are Banned to delete 'The Wrong Better' advantage of 1.414% ; With such 'The Wrong Better' is disadvantaged by 1.402%.

Similiar relates to in Baccarat when the Banker's Hand holds a 1.34% advantage over the Player's Hand. Such is rectified by the Banker's Hand paying commission.

Such is evened out proportionally on a pro-rata basis, with Banker's Hand paying a Tax, which use to be 5.0% on their winnings only

It is due to such that Baccarat is accepted to be favourable to the Anti Martingale Method (as was Casino Two-Up on establishing 1-0 x 5-0 x consecutive 'Ones' only) when Banked Outcomes as in Two-Up. Exchanges ratios from 32 x 1 = 1 x 32 to 20 x 1.6 = 1.0 x 32.0.

By being given an such 'Legalised Casinos Took A Yard' by implementing 1-0 ÷ 1.684210526 ÷ 0.5 ÷ 0.5 = 380.

As such instead of at Pure Random as in similiar to Roulette, without additional loading of the 2.7027% by 'Croupiers' timing the spinning of the Wheel, as does a Lawn Bowler, when placing their Bowl either 'before' or 'after' the Jack. (Vigilance is essential to ensure a Quality of Equity prevails)

© In Roulette croupier with experience, will eventually simply Spin mostly for 0.5 of area containing the Zero, when Table is heavily loaded against. What is On The Zero and alternatively 'Vice Versa' when Zero is heavily loaded with bets. Such is Why 3, ★ 'Must abide by Strict Set Rules'.

★

Yet overall, On The Majority of Count Backs the Zero will be close to 1/37 whilst by a simple manipulation, at times, players are facing a 5.555% loading on their table stakes. (as 11.11% on Wins)

© As such with 'Legalised Casino Two-Up', the deliberate Barring of every possible top as with normal accepted 3.125% loading when over the accepted required 64-0 Attempts at turning, with an averaged of 26-0 Banned (as 13-0 each of both a 'Odds' and a 'Evens', decreases the area within

© Note pattern as in W/S at 1/580.625 to dist \$1.00

and Fibonacci Sequential of Numbers as (1.1-1) 2-3-5-8 = 20 x 1.6 = 32.0 x 1.0.

12.0 + 1.0 by m/p/e = 13.0 x 1.0 = 13.0  
 Only x m/p/e + 1.0 final = 20 x 1.6 reduced, when allocated to get set for 10 x 1.0 = 10.0  
 10 x 1.3 = 13.0. Banned from both a, and b, the Anti-Martingale Player to be taken by the Martingale Player @ K.H. Heper's 1900?

Copy

the experiment from 64-0, as 32-0 x Odds and 32-0 x Evens as 1-0 ÷ 0 as in Outcomes established by a Random Number Calculator, ÷ 0.5 ÷ 0.5  
 $4 \times 5 = 64-0$  as 32-0 x Odds and 32-0 x Evens to 19 v 19 = 38.

© Such from Evens at pure random, one obtains 16-0 x H/H as Heads and 16-0 x T/T as Tails. From 32-0 x combined H/T and T/H, 1-0 in 64-0 tones will eventuate to being 1-0 x 5-0 x consecutive Odds; with such becoming the 33<sup>rd</sup> accepted Attempt; as now each of a Heads and b Tails have - Each will speculate over 32-0 occasions to obtain 16 x 2-0 returns proportional wise by m/p/e for 32-0 of each 33-0 return over an area of  $\sqrt{N}$  of 1024 = 32-0 with 1-0 (as 33<sup>rd</sup> Tailed stake ÷ 32-0 = 0.03125 x 100 = 3.125% additional loading. (I dare all who as academics accept 3.125% is correct rate of commission to accept my offer of 1.2 v their 0.80 offer)

© How-ever within "Legalised Casino Two-Up" with "inverse relationship", with 26-0 of 64 Banned is now 64-0 ÷ 38.0 = 1.684210526 deleted from the equation, with "The Anti-Martingale" player, due to a natural behaviour within "Pure Random" as illustrated in Heper's "Winning Gambling and Cheating" established a decreased version of © Heper's "Spirit of Probability" in association with © Heper's "Kings of Possibilities" to enable as when placed over Heper's © "Give" by a mathematical equation to establish © 1-0 ÷ 1.684210526 ÷ 0.5 ÷ 0.5  $4 \times 5 = 38.0$ .

As such with "The Anti-Martingale" chances in "Legalised Casino Two-Up" of 19-0 x (Note such is adaptable to both a 1-0 x 5-0 x consecutive Odds as well when forming a separate both ways of "Wins" and "Losses", within each of two possible formations of different means, in the one area of the experiment, both can be winners, when a losing 19-0 of 20-0 to the Martingale player to have the 20<sup>th</sup> on averaged to win on 1-0 x 5-0

Note Pure Random = 32 x 1 = 1 x 32  
 whilst Casino Two-Up with 26 Banned From 10 when One Wins come Only

to Opponent (as Casino) were prepared to allow me to speculate 20 x 1-0 instead of 20 x 1-6 - 1-0 x 32-0 returned. It's the 24 x 0-6 Saved that Establishes the 12-1 = 11 in Casino Two-Up Proper. A Roulette die's commission such is decreased to 1/3

cumulative doubled-up of bets on Odds - (Note Also on Odds on Even.)

Though I am in favour of providing work for Workers, I don't believe that a small minority of croupiers who have "no interest in providing other than what is required to obtain a wage for providing sub normal service.

Certain croupiers do not fall to players to place their bets nor give notice of "Last Bets" before indicating "No More Bets".

The Ball is placed in play from other than what was the last outcome. Players (if allowed) would tip Efficient Croupiers (which should be so, in line with tipping other services.

Rapid Roulette the game that I thought would draw players away from pokies, due to computer controlled when "Animated Croupier" is a pre-arranged instance as provened to my amazement, proves my point (when people still play Pokies as in Mt. Stuart Workers and not R. Roulette).

24\* On one of my numerous visits to 'Star City Casino' to obtain record of events as at 'The Coal Face', when able to record 'Rapid Roulette' version with an 'animated croupier', which from past awareness, as to 'How and Why', with experience, able to note the 'variable' in 'difference of noise', and able to note the 'variation' in 'splicing of video' as similar to 'Record' sold over 20 years ago which allowed for the 'random selection' of any of the possible 8 to 12 tracks that came up with, on the majority of occasions a different 'Winning Outcome'.

On the one occasion whilst observing how certain outcomes on numerous occasions eventuate on the same pattern, I was astounded, to hear a 'The animated voice' call 'Red 27' when 'The Ball' was at least '4 Spaces (Cones) away from - eventual 'Red 27' being 'Called' to be 'Win Result'. Even though was to ensure my/pe. eventuating 'Players would lose'.

\* As similar to 'Inter linked Pokier Machines' in 'Clubs' when it was possible for an accomplice in contact with 'Central Control', could be guided to a 'certain Machine' where money would be credited to come up with a 'Jack-Pot' within a stipulated number of times.

Player win due to extreme sequences of events that is formed by Spinal of probability of in excess of 200-1024 x 9 = 1033. © by N. H. Hooper 1979. Has been assumed by High Quality and experienced that splicing is to ensure that the house is spared from losing. Such receipt is 'Repugnant' as some has to when a Casino refused to pay out a Jack-Pot due to Machine was not programmed to pay such??

Due to 'The Lack Of Awareness' to Even 'Omnipotent Attitude' I decided to Wait. At the time, I was prepared to wait until Casino Two-Up would eventually be played in to eventually legalised Casinos in N.S.W's been then other than Steve Mallon all qualified in Australia's accepted my research 'void'.

Though All Academics who were approached by considerate politicians from Tony Luchetti, Peter Anderson, Guy Matherson, Jaye Lo Po, and Senator John Tierney with Guy Matherson and Senator John Tierney "Liberal Politicians and Tony, Peter and Jaye Lo Po 'Labor' I kept on researching to ensure the previous would be spared from doubt:

It was possibly highly likely my fault that academics as the few only who were prepared to listen overall to my explanation as to 'How' Banned Events were a Part of Pure Random 'Spiritual Related, with  $1-0 \div 0.5 \div 0.5 \times 5 = 64-0$ , as  $\div 1.684210526$  (to represent the 26-0 Banned Jones as within the proportional pro-rata of,  $1-0$  as,  $\div 1.684210526 \div 0.5 \div 0.5 \times 5 = 38-00$  as  $19-0 \times$  Odds and  $19-0 \times$  Events due to the deletion of  $13-0$  (as  $0.5$  of  $26$ ) from both a  $32-0 \times$  Odds and  $32-0 \times$  Events. Such deletes the area of experiment to,  $1-0 \times 2^4 + 3 = 19-0 \times 2-0 = 38-0 \sqrt{F/16}$ .

As John Rafferty accepted, that time would allow for sufficient Academics to accept my 'hypothetical' reasoning which is based on assumptions, (as also are 'Pure Random Eventualities'. Within such at Pure Random errors will Even-Out by compensating for Each Other. PAGE 383-384.)

It is unfortunate that my going onto 60 years of research (ever since Shiraji (or Herigi) won The Melbourne Cup in relation to Probability Expectancies (which incidently replaced "Music" as a discipline within mathematics) has not been accepted by academics in general.

As such my position is in life, "I've but less than 15 years to 'Give Towards Social Benefits', who as a Firm Socialist, Accepting Hospitals, Education, Water Conservation, Public Transport, Power (

Mathematics and the Physical World by Morris Kline.





players is how by Computer results are added to "be Come By", to ensure that a profit is maintained. People involved in deceit, when asked to take any more to save their soul, "rebulge their guilt to others".

As such one had over the last ten years witness the House's Means to 'delete' in general, the chances of players opportunities to win by deceit which are as "discreditable" against players as, are, "Marked Cards", "Loaded Dice", "Cook Two-Up Pennies", basically equivalent to allowing "Card Sharps" dealing out "Seconds". All being accepted under Govt. Control.

★ I recommend that "All Computerised Animated Versions of 'Rapid Roulette' Be Banned" from both a "Casinos" and "Clubs". Plus Abolishing Inner Clubs linked Pokies.

Also those having had such in use should be a "Heavily Fine" and possibly by having License cancelled. (See Why Hoopers should Obtain a Internet License to provide 80% to Society.)

★ Why Casino Two-Up having rate of commission increased from 3.125% to 5.0% (as a plus 1.6 factor is sufficient reasoning as to Why State Governments must ensure such is impossible to ever occur in 'The Future'.

It is Time that my © As World-copyrights "Games of a Hoopers Aunt Roulette" be allowed into both 1/ Casinos and 2/ Clubs, with equal to 100.0 V/F/Ws fractions sold to players who can test their skills for a cost of \$5.00 (as Market Value of Chips which players purchase to being theirs at \$0.05 per Chip. Such calculates as for 1-0 WIN v 1-0 LOSS \$0.025 per bet.

With \$2.50 Automatically going towards District Children's Ward in Hospital,

With Hoopers Australian Roulette players purchase equal to 100-0 Chips as Red = 50 valued as 50 x 1

Blue = 25 " " 25 x 1

Yellow = 10 " " 10 x 1

White = 5 " " 5 x 1

Plus 10 Coloured Chips x 1 = 10 valued 10 x 1

100

100.0

Players at any time can Cash their high Valued Chips for lower value.

As such players are given their chips for \$5-00 for 100 V/F/U value (Such averages \$0.025 per average table stake)

Players obtain identical coloured Chips on Wins which cannot be Cashed Back For.

How-ever can be used to purchased (as In Japan) Biscuits, Chocolates, Lollies, plus other prizes valued at Whole Sale Price, even Watches, Wallets etc.

Lost Chips are re-cycled and sold in \$5-00 lots, which local a Childrens Wards, 1st Priority b Women Wards as "public" and Intermediate 2nd Priority and I anticipate the possibility of even to the full Running Costs being met, when all areas local Clubs and Pubs are allowed to play such on similiar to One or More of the Eight Ball or Billiard Tables. - receive \$2-50 with players purchasing such allowed the \$5-00 as a Tax deduction as a donation to both a Hospital and b Clubs.

Pubs desiring such would have to apply for permission.

Why such will obtain enormous donations is due to a players being aware that the commission on minimum wage in Casinos is \$10-00 on 1 placed bet, is \$0.27027 commission.

As such players will play even prepared to make donation on \$50-00 (as Red Chip on cumulative betting with 500 chips maximum and 1-0 minimum costing \$0.67 as against on 1-0 x 50 chip, where as in

Casino Gambling on a \$50-00 wages would pay \$1-35135 and if were to double up bet such would cost hypothetically as assumed, regardless of a W/m or less cost \$4-05k

Gambling is Education even though one must accept the overall cost associated with such in general would accredit such to being the highest cost of any form of education.

I do give schools as I can afford it, as each game costs in excess of \$40-00 to produce.

Over the past six years I've given out in excess of 80 Complete Games of Hoopers Aust. Roulette mainly to listeners of 2GB and Convalesce Homes.

I do expect "If" I can eventually Mine area where I'm well aware of potential gold to be recovered would be more than sufficient to provide One Hoopers Australian Roulette to One Million Homes throughout N.S.W. prior to considering The Overall Australia.

My present concerns even more so than "Gamb-ling Education and Awareness" is centred around The Warragamba Dam.

Such now is over 50 years (or about), I'm well aware of the enormous volumes of water that flows into it from The Wollondilly Area where I'd spent the latter part of my boy hood.

I enclose information as to concerns of others as well as myself.

Gambling Expenditure along with G.S.T paid in N.S.W. if such was to come to N.S.Ws, as I've long lobbied for 40-0% of expenditure from gamb-ling should go to State Governments, since I became aware as to how N.S.Ws could quite easily confront Bankruptcy. Hand When we obtain the 30 inches of rain on top of the normal accepted 28 to 34 inches within

The Warragamba Catchment Area.

I believe that Morris Gemma would provide the leadership that Labor had fell back on in the past due to as is enclosed as to 'How' M.S.Ws obtains in excess of 20.0% less of G.S.T. paid.

Subsidiary dams are essential to be built beyond The Warragamba's Back Waters.

See Warning 1996?

With \$2.0b now spent would save in the near future well in excess of \$5.0b of Fresh Water held in reserve (Grey Waters are required to flush Out Underground Pipes)

If such eventuates as things are at present with John Howard & Costello (as is also enclosed) As to How John Howard is determined to get rid of our N.S.W's State Government.

I blame the Federal Liberal Government for all of M.S.Ws 'Woes'. Even with our G.S.T. paid by people in N.S.W, plus, I believe a much higher rate of G. Machine Rate of Tax is still required.

Scope de'hoop © by N. H Hooper should be implemented to allow for equivalent to Horse & other forms of Racing especially in times of Wet Weather.

Such should be introduced with 15-16 Balls allowing for a Win Dividend

b Place Dividend

c Quinella

d Exacta

e Trifecta

See Copy enclosed separately in a Hooper's Patent

Plus f & g By Trifecta when players can nominate three Horses to their Trifecta nominated All Ways to obtain as in addition to Trifecta when successful in vicinity of \$20,000-00.

Hooper is the Apply for an Internet Casino License. Based on Own © World Copyrights specifically for Societies Benefits without Share holders.

In relation to Why \$500-00 Chips should be allowed for Poker Machines; as at 3-0% = \$15-00 per play commission. Or at 5-0% = \$25-00 per play.

On \$5-00 as 96-7 Returned = 3-3%  
One however has to be cautious relating to percentages as recorded Casino Rock Island would be within the period that a large JackPot was Paid Out.

I include my © by N.H. Hooper an overall on averaged 40 Pure Random Events based on © 2002 Revised © 2005 of How even Roulette based on similar principle to Legalised Casino Two-Up.  
Such is Confidential, however as © by N.H. Hooper is a part of 49 pages of 40 events at Pure Random which over 48 pages  $\times 40 = 1920$  Pure Random covering both a Odds  $\times$  Evens which could be any of 1/1 then 2-7% ratio of commission

By © Hoopers Sieve allows for in general over the long term for  $2^7p = 128$  to be returned on a success to matriculate within on averaged 80-0 Pure Random Outcomes.

Whilst experiences have warned me, "Those who own the implements and own/control the game will over the long term Win - other than on Casino Two-Up. as well as © Hoopers formulated Game of .....

Such is © on calculus  $20 \times 1.6 = 1.0 \times 32.0$   
 $\times$  by 2-0 for both a  $1.0 \times 5.0 \times$  consecutive Odds along with b  $1.0 \times 5.0 \times$  consecutive Evens.

As Pure Random is an assumption, when one cannot bet against such to Win whilst betting for such one most definitely loose.

As I hadn't had sufficient time to Photostat what I'm sending, could you please send me a copy of M Returned. When copying Photo Stat Machine would be required to be shrunked to around \$5.0 to ensure all is readable. Yours Sincerely  
Norman Hooper



# The Salvation Army

AUSTRALIA EASTERN TERRITORY

Office of the Territorial Commander

19 July 2006

New South Wales Casino Control Authority  
Attention: Mr David Brearley  
GPO Box 3970  
SYDNEY NSW 2001



Dear Mr Brearley,

I am writing this letter in relation to the licence of Star City Pty Ltd, the operator of the Sydney casino, which is currently the subject of renewal.

The Salvation Army is at the front line in dealing with the consequences of problem gambling. We now estimate there are over 300,000 problem gamblers in NSW, impacting on over 2 million Australians.

A major initiative to address problem gambling is currently being run and developed by The Salvation Army in south west Sydney. Together with the Fairfield RSL, we are sponsoring the recent establishment of the Problem Gambling Centre at Fairfield. The centre has been in operation for 9 months and during this time we have already identified strong trends and issues relating to the increase of problem gambling.

Of particular concern is the impact on the families of gamblers. Research shows that the consequences of problem gambling seem to impact most profoundly on those in our community who can least afford it. The Salvation Army Careline, for example, has experienced a 10% increase in calls relating to gambling over the past year.

In renewing the licence there is an opportunity for the government to place more stringent controls on poker machines. For example, no ATM machines should be placed within easy walking distance of the casino.

The Salvation Army believes that a larger percentage of gambling revenue should be directed towards programs of problem gambling rehabilitation and awareness. The Salvation Army already has such programs in place, firstly through our successful, well established Bridge program (which helps problem gamblers as well as those afflicted by drug and alcohol addiction); and now through our dedicated Problem Gambling Centre at Fairfield.

We call on the government to think carefully about the impact of problem gambling in our community, and to award any new casino licence with the issues we have raised in mind.

Yours sincerely,

Les Strong, Commissioner  
TERRITORIAL COMMANDER  
Australia Eastern Territory

Territorial Headquarters: 140 Elizabeth Street Sydney 2000 Postal Address: PO Box A435 Sydney South 1232  
Telephone: (02) 9264 1711 Fax: (02) 9266 9638

PARLIAMENT OF NEW SOUTH WALES  
LEGISLATIVE ASSEMBLY



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**THE HON. GEORGE SOURIS, M.P.**  
MEMBER FOR UPPER HUNTER  
SHADOW MINISTER FOR GAMING & RACING  
SHADOW MINISTER FOR SPORT & RECREATION



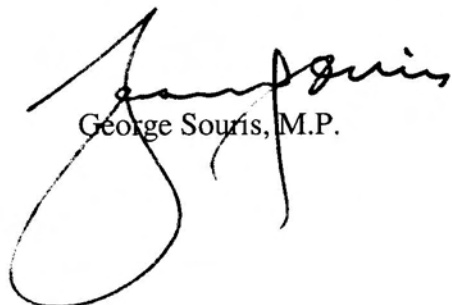
24<sup>th</sup> July, 2006

The Chairman  
Casino Control Authority  
309 Kent Street  
SYDNEY NSW 2000

Dear Chairman

I am pleased to submit herewith, the NSW Liberal/Nationals' Submission to the 2006 Investigation under Section 31 of the Casino Control Act 1992.

Yours faithfully,

  
George Souris, M.P.

**THE NATIONALS**

upperhunter@parliament.nsw.gov.au

# **SUBMISSION**

## **To THE NSW CASINO CONTROL AUTHORITY - 2006**

### **Introduction:**

It is my pleasure to submit this response on behalf of the Liberal/Nationals to the Investigation being conducted as a statutory obligation imposed under Section 31 of the Casino Control Act 1992.

This submission will focus on the suitability of Star City Pty Ltd as the operator of NSW's only Casino licence and whether the licence should continue.

### **Suitability of Star City Pty Ltd**

I refer to my submission to the 2003 Investigation which was lodged on 1<sup>st</sup> July 2003 and also to my predecessor's submission (Mr R Oakeshott MP) to the earlier Review dated 1<sup>st</sup> February 2002.

Both of those submissions referred to the continuing improvement in operations and in the culture at Star City Casino. My submission in 2003 was made after my own review and consultations with management; noting in particular the compliance with most if not all of the recommendations of the 2002 Review.

The 2003 Investigation was conducted just after the 2003 NSW General Election and I reiterate for the record that during the campaign and lead up period no MP, Government, Opposition or Cross-Bench had raised any confronting or negative issue in relation to the Casino. Likewise there had been no confronting or major negative stories raised in the media.

Virtually the same applies now as we approach the March 2007 NSW General election.

I have been the Shadow Minister for this portfolio for the entire period since the 2003 election and I can say that no MP of any political persuasion has raised any major or serious issues of probity relating to Star City Casino.



Equally, whilst there have been a number of fairly minor media stories about Star City Casino, mostly they have been derived either out of the Casino's annual reports or statistics that have been made available by the Casino. There has been no major scandal involving endemic corruption or serious criminal activities at the Casino except those that are either out of character or of a one-off nature and were attended to and resolved by the Casino, the Control Authority or the Police.

I have had regular contact with various officials at the casino from the Director of Public Affairs and General Manager to other Officials at Tabcorp Ltd headquarters including the Chief Executive of the Company and the Chairman of the Board.

I have had the opportunity to observe the operations and management of the Casino, its affiliated businesses, theatres etc sometimes as a member of the public, or by way of invited attendance at special events and launches, to more routine business visits including an escorted tour of the Endeavour Room and High Rollers rooms.

Mostly, the policy matters discussed concerned either taxation and CCB levy rates or smoking legislation. More lately I have had communications regarding the Casino's 12 year licence expiry. Otherwise matters relating to tourism and the general gaming environment.

I have also been provided with timely statistical information relating to the Casino as well as a copy of the Company's submission to this Section 31 Investigation.

In regard to the Casino's submission I note that it states that all of the Recommendations of the 2003 Review and the 2005 Interim Review have been implemented.

I am aware that total taxation paid to the State of NSW over the three year period since the last Review has been \$219.3m and the total Casino Community Benefit levy paid to the NSW Government for the same three year period was \$34.3m.

The CCB Levy is the only funding, paid on a hypothecation basis by the Casino, for the purpose of gambling counselling and rehabilitation throughout the industry including hotels and registered clubs in NSW except for some voluntary funding provided through the CDSE levy imposed on registered Clubs. No funds are applied out of general consolidated revenue for gambling and problem gambling activities.

It is my view that Star City Casino's current operator is a suitable operator for the casino licence. I believe the Casino has fulfilled its obligations under responsible gaming and the responsible service of alcohol legislation.

The complex, which includes the Casino at Darling Harbour, also includes a range of shops and restaurants, a major hotel and both a lyric theatre and showroom theatre. It is a major domestic and international tourism destination and facility and consequently I believe it is warranted that international and interstate competitive taxation rates apply as well smoking legislation.

Star City's hotel has had refurbishment and continues to enjoy its international 'Five Star' rating. The chief chef also recently won the Australian Hotels Association's Chef of the Year award and there have been a number of major stage productions hosted at one or other of the theatres.

The Casino Licence:

The views expressed in my submission to the 2003 Review are substantially unchanged.

Again, it remains Liberal/Nationals policy to maintain one-casino licence in NSW. This policy position is reiterated in the knowledge that the 12 year exclusivity period for Star City Casino expires in the latter part of 2007.

There has been some media speculation about this matter recently.

In September 1995 a 99 year licence was granted to Star City for a fee of \$376 m paid to the NSW Government and included an exclusivity (one casino) period of 12 years and a competitive gaming taxation regime of 24.5% excluding GST.

The Company is also part of the Federal taxation regime without exemption.

At the expiration of the 12 year period, the Government of the day may either allow the current regime to continue or seek to enter negotiations with the present operator for a new period of exclusivity.

It is not known whether the present Labor Government intends to follow the same path as the NSW Opposition's position or re-examine the number of Casino licences issued in NSW. I believe that the overwhelming opinion of the NSW community would be to oppose any additional casino licence.

There is a diverse and mature gaming and racing industry in NSW. There is a capped industry of some 104,000 poker machines in hotels, registered clubs and at the Casino. Keno is also available and at Broken Hill and on certain days the game of 'two-up' as well.

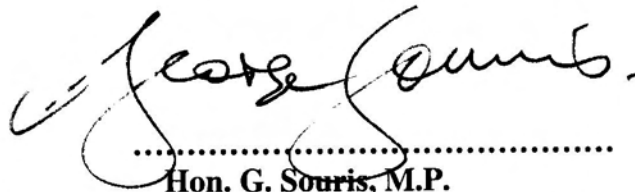
In NSW, some of the richest prize money in racing in the world is contested.

In gaming, there are diverse avenues of telephone betting, computer and internet betting, Pub, Club and Agency TAB outlets abound and of late the emergence of Betfair will provide a growing level of competition for gaming revenues.

Sydney is the nation's main international tourist gateway and Star City Casino plays its part as an important attraction in the overall tourist offerings in NSW and beyond. Inbound gamblers are sensitive to taxation rates and smoking laws and are only too aware of rival venues elsewhere in Australia and in the growing mecca of Macau and South East Asia as well as the exciting industry in the United States. Sydney will need to remain competitive and it is important for Governments to realise the elastic nature of this class of tourism. There is of course a concomitant multiplier through tourism for the rest of Sydney and NSW which must not be taken for granted.

A continuing casino licence in NSW will provide economic benefits including employment and taxation, together with the aforesaid multiplier effects, that are on balance, in the interest of the people of NSW. It is therefore my view that the licence should remain in force.

Thank you for the opportunity to make this Submission on behalf of the NSW Coalition.



.....  
Hon. G. Souris, M.P.

NSW Shadow Minister for Gaming and Racing  
22<sup>nd</sup> July 2006



**PUBLIC SUBMISSION TO  
CASINO CONTROL AUTHORITY**

**SECTION 31 LICENCE INVESTIGATION**

**JULY 2006**

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## **EXECUTIVE SUMMARY:**

Star City believes it has continued to make significant progress in developing a culture of compliance over the last three years. We believe Star City's reputation as a responsible operator of the Sydney casino licence has been enhanced since the last review in 2003.

This improvement culminated in Star City winning the first ever Australasian Compliance Institute Industry Award in 2005. An independent review in 2004 found that Star City has a competent, mature and effectively led compliance program.

These achievements reflect the considerable resources Star City puts into training and reminding employees of their workplace obligations. Since the last review, Star City has re-written the Code of Conduct to make it easier to read – and reiterated the requirement for employees to report suspicious activity. Star City has also run extensive training in Responsible Gambling, Responsible Service of Alcohol, Illegal and Undesirable Activity, Equal Employment Opportunity and Compliance (Trade Practices).

In addition, a series of themed weeks have been held to provide interactive training on issues such as Responsible Gambling (RG), Responsible Service of Alcohol (RSA), compliance and detecting Illegal and Undesirable Activity. Various committees meet regularly to revise and update any action which needs to be taken to ensure Star City meets its compliance and cultural obligations. Surveys have been taken during the last two years to measure the compliance culture and employee knowledge of their obligations. The results, included in this submission, have been very satisfactory.

A highlight of the period under review was the training and appointment of 20 Responsible Gambling Liaison Managers. These senior managers were given specialist training to ensure Star City can provide superior assistance to anyone who may have a gambling problem 24 hours a day. This is just one example of Star City going above and beyond its legal requirements to be a responsible casino operator.

At the same time, Star City continues to enhance its position as the State's premier gaming and entertainment venue. The complex now attracts around 8 million patrons a year – up to 35,000 a day. Star City was one of the State's most successful live sites during the recent World Cup soccer with capacity crowds right through the night.

During the period under review, more than \$84 million has been spent maintaining and improving the complex. Major projects include construction of a private dining area in Astral Restaurant, a new VIP slots Lounge, refurbishment of all hotel rooms and apartments, construction of the Oasis Lounge, hotel lobby lounge and 36 Degrees Bar as well as quality smoking balconies.

This investment has been recognised by patrons and industry bodies.

The Lyric Theatre hosted productions like *We Will Rock You*, *The Producers*, *Dusty* and *Saturday Night Fever*. The world premiere of *Priscilla Queen of the Desert* will be held in the theatre in October. The Lyric has been named Best Entertainment Venue (AHA Awards for Excellence) and Best Variety Venue in the Mo Awards.

Star City's hotel has again been awarded a 5-star rating and Astral is being recognised as one of the finest restaurants in NSW. In fact, Astral's head chef, Sean Connolly was named Chef of the Year in the 2006 AHA Awards for Excellence.

Clearly, one of Star City's key tasks is to provide the type of facilities and services expected by visitors to Sydney's premier entertainment venue. To this end, Star City commissioned monthly surveys, known as 20/20, to monitor customer satisfaction. In July 2005, the survey indicated that 19 per cent of visitors to Star City were "advocates" who would urge their friends and family to visit the complex. By May 2006, this figure had more than doubled to 42 per cent.

Star City has also continued to make an enormous contribution to the NSW economy. The company currently employs more than 3000 people in jobs with genuine career paths. These employees earn about \$160 million a year in salaries, wages and other payments.

Star City paid \$226 million in gaming taxes to the State Government over the last three years. A further \$34 million was paid in community benefit levies. Since inception, the company has generated more than \$1 billion in taxes and licence fees.

On top of these economic benefits, Star City is one of the State's top tourist and leisure attractions for both domestic and international visitors. The recent Soccer World Cup was a prime example with capacity crowds being drawn to the complex during the tournament. Television and radio stations crossed live to Star City to capture the atmosphere among fans. This is a good example of how Star City has become a genuine "part of Sydney" in the last three years.

The attached submission outlines a range of Star City's other benefits and achievements over the last three years. It is by no means exhaustive but it gives an indication of the progress made since the last review.

Although Star City is pleased with its progress, the company accepts there is no room for complacency, especially in relation to maintaining an appropriate culture and meeting compliance with its legal and social responsibilities. Star City remains committed to maintaining and improving the culture it has built up over the last six years.

Star City contends that it is in the public interest for the casino licence to continue and that Star City is suitable to hold that licence.

## 1. INTRODUCTION

The NSW Casino Control Authority (“Authority”) is required under section 31 of the Casino Control Act 1992 (“Act”) to investigate whether:

- Star City Pty Ltd (“Star City”) is suitable to continue to give effect to the casino licence and the Act; and
- It is in the public interest that the casino licence continue in force.

This submission gives an overview of why Star City holds the view that it is in the public interest for the casino licence to remain in force and for Star City to hold that licence.

It provides a summary of the further improvements that Star City has made to its culture, business and facilities since the last review in 2003.

This submission also outlines the way Star City has implemented all the recommendations from the last review in 2003.

Star City believes its performance – both culturally and as a business – has continued to improve over the last three years.

However, it is also recognised that, in a company the size of Star City, further improvements can always be made.

It is therefore Star City’s intention to work with the investigation to review the last three years and to identify areas how it can become a better place to work and a better place to visit.



## 2. MAJOR ACHIEVEMENTS

Star City has sought to achieve excellence in every aspect of its operations – from business to culture - over the last three years. This has led to the company winning numerous awards and being recognised as a leader in its field.

The major awards and achievements since 2003 include:

- Star City won the first ever Australasian Compliance Institute Industry Award in 2005. It was presented to Star City's General Manager Compliance for her role in developing a "strong culture of compliance" at the casino;
- Lyric Theatre recognised as Best Entertainment Venue in 2003 and 2004 in the Australian Hotels Association Awards;
- Lyric Theatre – Best Variety Venue in the Australian Entertainment "Mo Awards" for 2006;
- Star City obtained HACCP (Hazard Awareness Critical Control Points) accreditation for every one of its restaurants in 2004 and for its bars and beverage operations in early 2006;
- Sean Connolly, the Astral Restaurant head chef, was named "*Chef of the Year*" in the Australian Hotels Association Awards (NSW) for 2006;
- Star City won the gold category of the "Green Globe Awards" presented by the Sustainable Energy Development Authority of NSW (SEDA) in 2005 for achieving reductions in greenhouse gas emissions through energy saving initiatives;
- Star City's Security Department won the Outstanding Customer Service Award in the 2004 Security Industry Awards for Excellence;
- Several international awards, including Best Social Event, for event management operations over the last three years;
- The Star City Hotel won Best Apartment style Hotel in the 2005 Australian Hotels Association Awards. It was also voted one of the top three hotels in NSW at the Hotel Club Awards for 2006.

### 3. CULTURE / COMPLIANCE

Star City has aimed to develop - and continuously improve - a culture of compliance over the last six years. It is recognised that this is an on-going process and that no business can ever afford to become complacent that it has completed its obligations in this critical area.

Nevertheless, Star City believes it has continued to make substantial progress and achievements in improving its culture since 2000.

**In fact, Star City won the first ever Industry Award from the Australasian Compliance Institute during 2005. It was awarded to the Star City General Manager Compliance for her work in developing “a more sustainable organisation with a strong culture of compliance.”**

An independent review of Star City’s compliance program by Neill Buck and Associates in 2004 also found that the casino had a “competent, mature and effectively led compliance program”.

“Star City has amongst the best compliance systems we have seen,” the review said.

The action taken by Star City to improve its compliance culture over the last 3 years includes:

- A new, easy to understand Code of Conduct which was distributed to every employee in the company. The Code emphasises the requirement for all employees to report actual or suspected illegal or undesirable activity;
- A “Be Alert” campaign in the staff canteen which focussed on illegal and undesirable activity and promoted the compliance hotline and the Investigations hotline. Employees were encouraged to be vigilant against suspicious activity;
- The Lawlex compliance management system was introduced in 2004. It details all key legal obligations for the company and makes managers accountable for meeting these obligations;
- A unified complaints handling system, overseen by the General Manager Compliance, was introduced in 2005;
- All senior management, including the Managing Director, have key performance indicators (KPIs) related to Compliance included in their annual performance reviews;
- Compliance training and refresher training has been provided in all the key areas including Responsible Gambling, Responsible Service of Alcohol, Illegal and Undesirable Activity, Code of Conduct and Equal Employment Opportunity;
- On-line training modules have been developed for trade practices and general compliance. These are being progressively rolled out to management groups;
- The training and appointment of 20 Responsible Gambling Liaison Managers. About 17 of these officers are still employed at Star City and this ensures there are employees available to assist patrons and colleagues 24 hours a day with a higher level of training in responsible gambling;
- Star City has given external presentations on compliance and culture to various business and compliance forums. These have been delivered by the Managing Director, Compliance General Manager, Human Resources General Manager and Table Games General Manager;

- Tabcorp and Star City have been involved in an industry working group established by the Australian Casino Association to work on the new anti-money laundering and counter terrorism financing legislation;
- Regulator presentations at Star City's senior managers forums (including two presentations by the Chief Executive of the NSW Casino Control Authority).

### **3.1 Compliance Surveys**

As outlined above, Star City has put in place an extensive program aimed at developing a culture of compliance throughout the business.

However, the company recognises that it is imperative to benchmark and measure the success of these measures.

Consequently, the company's first compliance culture survey was conducted in May 2005 and benchmarks were established.

A follow-up survey was conducted in May 2006.

The results of these surveys have been supplied to the Authority.

The key findings of the 2006 survey are:

- 99 per cent of Star City employees know their compliance obligations and are confident they carry them out;
- 96 per cent of employees feel comfortable about reporting a customer who is not doing the right thing;
- 89 per cent of employees are confident their manager/supervisor will take action if they report an issue;
- 92 percent of employees believe their managers show leadership and follow the rules at Star City;
- 78 per cent of employees would use the Compliance Hotline if a serious issue could not be resolved;
- 74 per cent of employees believe customer complaints are taken seriously by Star City.

The 2006 survey results are based on responses from 445 employees – 15 per cent of the workforce.

Overall, there has been a 9 per cent positive increase in the compliance culture at Star City in the last 12 months.

There has been an 8 per cent improvement in managerial behaviour since the benchmark survey in 2005. This means employees believe their supervisors are more likely to follow the company's values, walk the talk by doing the right thing, take action when issues are brought to their attention and provide feedback.

Importantly, there has been a 17 per cent positive increase in the willingness of employees to use the Compliance Hotline. This follows a campaign to give the Hotline and the Compliance General Manager a higher profile.

A survey was also taken as part of the "Be Alert" education campaign in the staff canteen.

The results included:

- 97 per cent of participants identified Sylvia Aloizos as the Compliance General Manager
- 94 per cent identified the Compliance Hotline number as 8080

### **3.2 Responsible Gambling**

Star City has continued to develop and improve its Responsible Gambling program over the last three years. It is the company's aim to have the best program of any gaming operator in NSW. Star City also ensures that it complies with the Tabcorp Responsible Gambling Code of Practice.

A major initiative last year was the training and appointment of a team of 20 Responsible Gambling Liaison Managers. Senior employees from throughout the business were invited to volunteer to undergo additional training in responsible gambling matters. The course covered suicide intervention, problem gambling awareness, advanced communication skills and assertive communication skills. The course, provided by Wesley Gambling Counselling Service, means Star City now provide more highly trained employees at any time of the day or night to assist patrons with gambling problems.

The Star City Responsible Gambling program also includes:

- A dedicated Responsible Gambling Manager;
- Extensive signage and brochures throughout the complex;
- A self exclusion program ;
- On-line Responsible Gambling training and refresher training;
- An agreement with Wesley Gambling Counselling Services to provide counselling and crisis intervention for patrons and employees.

A Responsible Gambling Week was held in 2004 and 2005 to raise awareness of problem gambling issues and to measure the knowledge of employees

#### **Responsible Gambling Employee Surveys**

As noted above, Star City conducted Responsible Gambling Awareness Weeks in July 2004 and July 2005. The aim was to raise awareness among employees of Responsible Gambling (RG) issues.

As part of the project, employees were asked to complete a confidential questionnaire to assess their knowledge and views on the current RG training program.

KPMG were commissioned to oversee and evaluate the employee surveys.

The 2005 results include:

- 92.5 per cent of employees believe Star City's Responsible Gambling training was effective in assisting their understanding of RG issues (up 7.3 per cent on the 2004 survey);
- 92.5 per cent of employees believe their RG training would help them identify a patron with a gambling problem (up 12 per cent);
- 90 per cent of employees believe Star City is committed to Responsible Gambling (up 7.9 per cent);

- 82 per cent of employees are comfortable talking to their supervisors about RG issues (down 3 per cent);
- 77 per cent of respondents said they believed their supervisors would follow up on important RG issues (up 13 per cent).

KPMG found that employees “appear to have a good awareness of RG issues, particularly with the procedures for self exclusion, checking ID and the problem gambling services available”.

KPMG made a series of recommendations to further improve Star City’s RG performance and these are being introduced.

### **3.3 Responsible Service of Alcohol**

Responsible Service of Alcohol (RSA) is another key component in Star City’s overall program to develop a culture of compliance.

Star City’s Responsible Service of Alcohol Committee is charged with the responsibility to oversee the company’s performance in meeting its obligations as a responsible supplier of liquor. It also monitors the implementation of training and guidelines to deal with RSA situations.

A major initiative in 2006 was the first RSA Awareness campaign. Again, it was held in the staff canteen based on a similar format to the RG Awareness Week. Employees were invited to complete an RSA survey, view a video on the effects of alcohol and test a set of “beer goggles” which simulate the effects of someone with a blood alcohol reading between .08 and 0.15.

More than 510 employees participated in the RSA survey with 96 per cent saying they believe Star City’s RSA training is effective in assisting them to identify an intoxicated patron. All respondents indicated they would take action if they believed a minor was in the casino with an alcoholic drink.

Other highlights of Star City’s RSA program over the last three years include:

- A full review of Star City’s liquor signage was conducted with the assistance of the NSW Casino Control Authority;
- Star City has gone above and beyond the requirements of the law by providing training for all front of house employees who may have to deal with RSA issues;
- Star City worked with the NSW Casino Control Authority (the Authority) to update the on-line and classroom components of the RSA course;
- Star City has given an undertaking to the Authority that it will implement refresher training every 2 years. An on-line refresher training course was developed and launched in December 2005.

All current employees who are required to complete RSA training have done so. All new employees recruited to roles requiring RSA training must complete the on-line component of their course before they can take up their jobs at Star City.

### **3.4 Training And Expertise**

Star City has implemented an extensive training program to develop and reinforce its culture of compliance.

Training is currently provided in a range of issues relating to culture including:

- Responsible Service of Alcohol (RSA)

- Responsible Gambling (RG)
- Code of Conduct
- Equal Employment Opportunity (EEO)
- Illegal and Undesirable Activity
- Compliance (Trade Practices)

Before starting work at Star City all new employees are required to review the Code of Conduct and score a 100 per cent pass mark in an online quiz. The Code of Conduct is also included in the induction course for new employees along with a section on detecting and reporting Illegal and Undesirable Activity.

Refresher training is also provided for employees with 2 or more years service. At the end of June 2006, 97 per cent of employees in this group had completed on-line refresher courses in EEO and the Code of Conduct.

Employees are also required to undergo refresher training every two years in Illegal and Undesirable Activity. At the end of June 2006, 98.5 per cent of employees had completed their refresher course.

Star City has recently introduced a new Learning Management System (LMS) to ensure training and education needs are met.

This is a significant commitment from Star City. However, this training regime is considered necessary to maintain the culture of compliance within the company.

## 4. EXPERIENCE AND EXPERTISE

Star City has an experienced and highly qualified management team, backed up by the resources of Tabcorp, which is Australia's largest gaming and entertainment company.

The Star City management and executive committee includes:

### **Walter Bugno** (Chief Executive Officer, Casinos Division)

Walter has held various senior executive positions with companies recognised for their achievements in delivering great products and service for their customers. Most recently he was President (Asia Pacific) of Campbell Arnotts Limited. He is a former Managing Director Australia of Lion Nathan Limited and is Chairman of the Sydney Football Club. Walter has a Bachelor of Commerce and Master of Commerce from the University of NSW.

### **Jim L'Estrange** (Managing Director, Star City)

Responsible for the day to day running of Star City since February 2004. Previously General Manager of Retail Customer and Sales at Westpac with responsibility for relationship management. Strong focus on customer service.

### **Paul Arbuckle** (General Manager, Table Games)

Has 30 years experience in the casino industry after starting at Wrest Point Casino in Hobart in 1976. Has worked in casinos in Darwin and Perth (Burswood) where he was Vice President of Table Games. Paul has been General Manager of Table Games at Star City since 1997.

### **Stephen Spence** (Chief Financial Officer)

Has 16 years experience in Finance and Accounting, including 8 years with leading accounting firm, Arthur Andersen where he became Audit Manager. Since 1997, Stephen has worked for a number of organisations including News Limited before joining Star City in 2001. He has been General Manager, Finance at both Conrad Jupiters in Queensland and Star City.

### **Sylvia Aloizos** (General Manager, Compliance)

Sylvia is accredited as an Associate of the Australasian Compliance Institute (ACI). She is also the convenor of the Compliance Taskforce of the Australian Casinos Association. Sylvia previously worked at Crown Casino in Melbourne for more than six years, initially as Insurance Manager and then as Senior Corporate Solicitor before moving to Star City.

### **Michael Ahearne** (General Manager, Electronic Gaming)

Member of the Chartered Institute of Management Accountants and holds an Executive Masters of Business Administration from the Graduate School of Business University of Technology, Sydney. Michael joined Star City in 2000 and has held senior management positions in finance and marketing at Star City as well as leading the Jupiters integration with Tabcorp Casinos in 2004.

### **Michael Anderson** (General Manager, Legal)

Michael is admitted as a Legal Practitioner of the Supreme Court of NSW, is a practising solicitor and holds both a Bachelor of Economics (Finance Major) and a Bachelor of Laws from Macquarie University. Michael previously worked in private legal practice, and as an in-house lawyer for The BOC Group and as Senior Legal Counsel for David Jones Limited.

**Tony Pieris** (General Manager, Property Services and Asset Protection)

Graduate Civil Engineer with 18 years experience in the construction and development industry in Australia and South East Asia. Tony oversaw the construction of the Star City complex and the temporary casino. He has managed property services, public areas, capital works, retail and new development planning at Star City.

**Bruce Mulligan** (General Manager, Human Resources)

Holds an Economics degree from Newcastle University. Bruce has worked in Human Resources and Industrial Relations roles at BHP, Alcan and Newcastle City Council. He was previously Human Resources Manager at Carlton United Breweries. Bruce was appointed Human Resources General Manager of Star City in 2001 and for the Casinos Division in 2003.

**Ross Cunningham** (General Manager, Entertainment)

35 years in the Entertainment industry, including 10 years as General Manager, Entertainment at Star City. Former Vice President of Hoyts USA and National Operations Manager of Hoyts Australia. Former Executive Manager of Entertainment & Hotel for Panthers at Penrith. Ross is currently Vice President of Live Performance Australia and Chair of The Helpmann Awards Administration Committee

**Steven East** (General Manager, Food and Beverage)

Steven worked for more than 20 years for Sodexo Food and Management Services in England and Australia before being appointed General Manager, Food and Beverage at the Sydney Opera House. He has been at Star City for more than three years, overseeing 600 employees in Star City's restaurants, bars and gaming floor food services

**Richard Munro** (General Manager, Hotel)

More than 20 years experience in the hospitality industry. Richard has worked in hotels throughout Australia including the Gold Coast, Brisbane, Christmas Island, and Ayers Rock. He is Vice President of the Darling Harbour Business Association and a Board member of the Australian Hotels Association's Accommodation division.



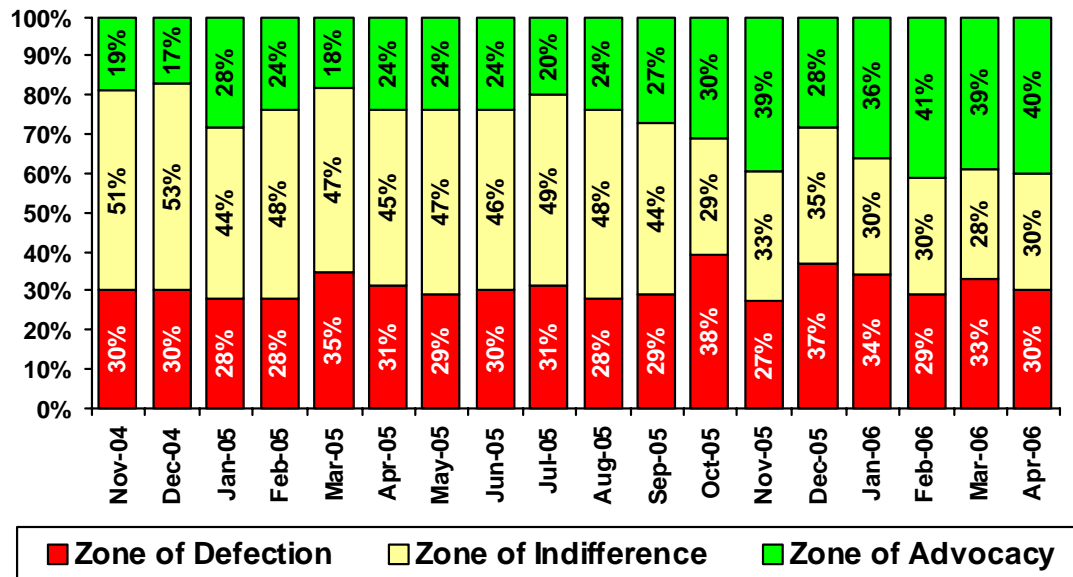
## 5. CUSTOMER SERVICE

Star City has put significant resources into improving customer service over the last three years. The aim has been to make Star City a better place to visit by providing better facilities and giving customers a better experience – right across the complex. This includes restaurants, bars, hotel, gaming floors, theatres, retail and other facilities.

To measure its success, Star City commissioned a new customer service monitoring program, known as **20/20 Vision**, in October 2004. Under the program, each department is given a score out of 20 for customer satisfaction – based on interviews with 360 customers. A second score out of 20 is provided from mystery shopping.

Star City set a target to encourage more customers to be “advocates” – people who would rate the theatres, restaurants, hotel and other facilities so highly that they would urge their friends and family to visit the complex. In simple terms, patrons who give Star City a rating of 18 or more are deemed to be advocates. Those who rate Star City from 14 to 18 are in the “zone of indifference” where they are unlikely to speak highly or negatively of Star City. Those who rate Star City below 14 are in the “zone of defection” and are unlikely to be loyal.

The following chart shows how Star City’s advocacy has more than doubled in the last 18 months.



Every Star City department has improved its customer service score since the 20 /20 program began. It has reached the stage where the best performing departments, such as hotel, have an advocacy level as high as 65 per cent.

Areas which have shown the biggest improvements over the last financial year are Trophies Bar, Astral Bar, the Endeavour Room cage and tables, Trophies food court and the host desk on the main gaming floor.

## 6. STANDARD AND NATURE OF FACILITIES

Star City has set a goal to be the premier gaming and entertainment complex in New South Wales. This can only be achieved if the casino complex is constantly upgraded and refurbished to ensure it meets international standards.

In the last three years, Star City invested in a record capital works program to encourage more people to visit the complex and to give customers and employees an even better experience. In fact, over the last three years, Star City has spent more than \$53 million on capital works.

The major capital works projects undertaken during this period include:

<b>Project</b>	<b>Works</b>
Hotel Refurbishment	Upgrading of all standard hotel rooms to retain 5 star status
Astral Refurbishment	Upgrading of the Astral bar and restaurant including construction of a new private dining area
VIP Slots Lounge	Construction and fit out of new slot lounge for VIP players
Oasis Lounge	Construction of a new VIP tables and slot lounge for premium players
Smoking Balconies	Construction of smoking balconies off the VIP Slot Lounge and the Poker Pit area
Carpeting	Re-carpeting of the main gaming floor and mezzanine level
Apartment upgrade	Refurbishment of apartments – carpet and furniture replacement
Bluff Bar	Total upgrade of the former Harbour View Lounge into a new food and beverage facility for poker players
Toilets	Construction of additional toilets on the main gaming floor
Lobby Lounge	Construction of a coffee and cocktail lounge in the hotel lobby

The Capital Works and Repair & Maintenance budgets for the years 2004, 2005 and 2006 are set out in the following table.

	<b>2004</b>	<b>2005</b>	<b>2006</b>
Capital Works	15.8 m	11.2 m	26.6 m
Repairs & Maintenance	9.8 m	10 m	10.7 m
<b>Total</b>	<b>25.6 m</b>	<b>21.2 m</b>	<b>37.3 m</b>

This means Star City has spent a total of \$53.6 million on new capital works during the last three years and a further \$30.5 million on repairs and maintenance. The total outlay on capital works and maintenance during the period under review is \$84.1 million.

## **6.1 Table Games**

Star City is licensed to operate 210 table games including Blackjack, Roulette, Baccarat, Craps and Pontoon. The quality of the table game facilities is of the highest standard. All equipment is tested and evaluated prior to purchase and is audited by Star City's Occupational Health and Safety Committee.

Highlights for the period under review include:

- Poker has surged in popularity around Australia following the introduction of television coverage of world poker tournaments. Star City has responded to this demand by developing an extensive new Poker Pit. The nearby Bluff Bar has also been renovated to cater for the increased patronage in this area;
- Star City's Endeavour Room became the first private gaming area in the world to introduce Rapid Roulette for its premium players;
- Star City continues to offer new and improved table games to keep the product "fresh" for regular players. New games include Three Card Poker, Four Card Poker, Perfect Pairs on Pontoon, Perfect Pairs on Baccarat, Triplestar on Roulette, Rapid Big Wheel and Double Chance;
- Digital Pitcam technology has been introduced to further improve game security and dispute resolution;
- The One2Six and Deckmate shufflers have improved the customer experience by reducing the waiting time between hands.

These initiatives have resulted in a significant increase in customer satisfaction levels. In fact, the Table Games division recorded its highest ever score in the 20/20 Customer Service survey in April 2006. More than 30 per cent of table games patrons are now "advocates" of Star City.

## **6.2 Electronic Gaming**

Star City operates 1,500 electronic gaming machines. This is the maximum number permitted under the casino license so Star City must implement the newest and most exciting games to maintain its position as the premier gaming venue in NSW.

Star City's TAB, which remains the number one outlet in NSW, is undergoing a major refurbishment to be completed in August 2006.

Star City makes about 300 - 400 slot game conversions every year and also purchases between 100 – 160 new machines each year. The aim is to provide patrons with the newest and best facilities in a very competitive environment.

In the last three years Star City has improved its electronic gaming operations by:

- Introducing new linked jackpots including the Zorro and Pick a Box hyperlinks. The Major Jackpots, Great Escapes, Ozzys Challenge and Prosperity linked jackpot products have also been introduced;
- Fitting ticket printer technology to more than 250 gaming machines;
- Replacing traditional LED jackpot signage with plasma screens and new designs;
- Building and opening the new Oasis gaming area and a new bar area, 36 Degrees;
- A successful trial of a coin to note converter to improve convenience for customers.

## **6.3 Food and Beverage**

Star City has put extensive resources into upgrading its food and beverage outlets over the last three years. The aim is to provide customers with quality dining and bar facilities backed up by exceptional service.

A key element in the program was to achieve HACCP (Hazard Awareness Critical Control Points) accreditation, which recognises that the highest standards of food safety practices are in place.

Star City achieved HACCP accreditation for every one of its food operations in March 2004. Those operations have successfully passed six monthly audits to maintain this accreditation. Star City believes it is the largest food service provider in the State to obtain and maintain this accreditation. In March 2006, the HACCP accreditation was extended to include all Star City's bars and beverage operations – believed to be a first in Australia.

Star City's Food and Beverage Department has won numerous awards and accolades over the past three years. This includes the selection of the Astral Head Chef, Sean Connolly as "Chef of the Year" in the Australian Hotels Association (NSW) 2006 Awards.

Other major achievements include:

- The \$2 million refurbishment of the Astral Bar and Restaurant aimed at making it competitive with the finest bar and dining outlets in the State. A private dining room has been included as well as a new terrace bar;

- A new “lobby lounge” was opened in the Hotel. It has proved extremely popular for coffee, light snacks and cocktails throughout the day and evening;
- The Harbour View Lounge was given a \$1.3 million refit and re-opened as the Bluff Bar;
- The Lightning Ridge Bar has re-opened as the “36 Degrees Bar” following a \$1.4 million refurbishment;
- The Astral Restaurant, Astral Bar, Pyrmonts, Al Porto and Garden Buffet have all been finalists in hotel, restaurant and other industry awards over the last three years;
- Star City employees won gold and silver medals in the National Worldskills championships for hospitality in 2006. This followed the success of an employee who won bronze at the world championships in Helsinki in 2005.

#### **6.4 Hotel**

Star City’s Hotel maintained its 5-star rating from AAA Tourism in August 2005. This follows an on-going program to ensure all hotel rooms and apartments are constantly upgraded and fitted with modern facilities.

All hotel rooms were upgraded in 2005 and all apartments were renovated in 2005. The 35 executive suites in the hotel are currently being re-fitted.

This upgrading program resulted in Star City winning the Best Apartment Style Hotel in the 2005 Australian Hotels Association Awards for Excellence. In 2006, Star City was also voted one of the top three hotels in NSW in the Hotel Club Awards and was voted Best Sydney Hotel by Australian Traveler Magazine 2006.

During the period under review Star City also invested \$850,000 on a new car park system. A further \$350,000 was used to install an automated wardrobe dispensing system. The banqueting area, which is part of the Hotel Department, won an international award for Best Themed Event for less than \$US50,000.

Star City’s conference and banqueting facilities play a significant role in the NSW tourism market. They mean Sydney can attract major conferences from interstate and overseas. The table below shows the number of conferences and delegates attracted to Star City during the period under review:

	<b>2003/04</b>	<b>2004/05</b>	<b>2005/06</b>
Number of events	672	709	740
Number of guests	124,778	116,265	109,622

## 6.5 Entertainment

Entertainment remains a key component of Star City's mission – to be the premier gaming and entertainment facility in NSW.

Before Star City opened, there was a lack of quality theatres in Sydney and many major productions had to be taken interstate instead. This led to an exodus of local theatergoers to other States, particularly Victoria, to see quality shows.

However, Star City's theatres have hosted more than 1.5 million patrons over the last three years alone.

### ***Lyric Theatre***

The Lyric Theatre has consistently been recognised as the best in NSW. It won Best Entertainment Venue in the Australian Hotels Association Awards in 2002, 2003 and 2004. It also won Best Variety Venue in the Australian Entertainment *Mo Awards* in 2006.

During the last three years, Star City has sought to attract the best productions from Australia and around the world.

The major productions staged at the Lyric Theatre during the last three years include:

<b>Production</b>	<b>Attendance</b>
The Producers	226,000
We Will Rock You	175,000
Dusty The Original Pop Diva	118,000
Saturday Night Fever	114,000
The Lion, the Witch and the Wardrobe	60,000

Other shows staged at the Lyric Theatre include Cirque Dreams, Sleeping Beauty on Ice, An Inspector Calls and Human Nature.

### ***Showroom Theatre***

The Showroom Theatre remains the best cabaret venue in New South Wales. It's versatility means it can be used for anything from stage shows to conferences, product launches and closed circuit television features. For instance, the Showroom attracted capacity audiences for the recent World Cup Soccer matches featuring Australia.

During the last three years the Showroom has hosted a range of successful productions including Menopause the Musical which attracted 89,000 people to 198 performances.

Other shows to feature in the Showroom over the last three years include *Oh What A Night*, *Shoosh*, *Drumstruck*, *Bravo* and *Frank*, *More From A Life In Song*. Individual acts to perform in the Showroom include Todd McKenney, Rhonda Burchmore, Guy Sebastian, Anthony Callea and Jimmy Barnes.

## 6.6 Property Services

### ***Environmental***

Star City has been part of the NSW Government's *Greenhouse Reduction Program* since December 1998. This is a voluntary program which establishes targets to be achieved by industry to reduce harmful greenhouse emissions through improvements in energy efficiency, management of waste and other measures. Independent experts measure the progress and results.

Star City has previously won Bronze and Silver Awards for its achievements in saving energy. **In 2005 Star City won a Gold "Green Globe" Award for achieving reductions in greenhouse gas emissions.**

Other environmental achievements include:

- Joining the Commonwealth Government's Greenhouse Challenge program aimed at saving electricity, gas and water;
- Star City conducted a "Green Week" in the staff cafeteria to increase awareness of the environment and energy issues;
- A joint program with Sydney Water to investigate recycling programs aimed at saving up to 200,000 litres of water a day;
- Publishing a Star City "Green paper" setting out key achievements and plans to make further energy savings.

### ***Safety - Engineering and Maintenance***

There is no more important issue for Star City than the safety of patrons and employees. Consequently, the casino has been shut down twice in the last two years so that essential electrical tests can be carried out.

The tests were aimed at checking the backup generator systems, the load shedding systems and to conduct maintenance of the main switchboards and emergency operations.

The tests were conducted during 6 to 8 hour shutdowns in December 2004 and 2005. It is envisaged that a third shutdown will be conducted in December 2006.

Other major maintenance and engineering projects carried out during the last three years include:

- New technology to clean the Star City seawater line which is used to cool the complex's air conditioning system;
- Upgrading the diesel generator system;
- Installation of new emergency lighting systems;
- An independent review of all Star City engineering equipment to determine their condition and a 10 year plan for future replacement;
- Developing a roulette wheel lifting device to reduce injuries in gaming equipment maintenance.

## **6.7 Asset Protection**

### ***Security***

Star City has stepped up its training of security officers during the period under review to ensure the entire department is aware of the latest initiatives to protect employees, patrons and assets.

Security Managers completed a range of courses including the Diploma of Security and Risk Management, the Certificate 4 Security and Risk Management Course and the Diploma in Customer Service. In October 2005, Star City adopted a new and improved Security Officer training regime, which has improved the level of knowledge and expertise among security officers.

Star City has worked hard to ensure the Security team is at the forefront of the company's push for excellence in customer service. Security has constantly been among the top departments in the 20 / 20 customer service ratings. The improvement culminated in Star City's security team winning an award for "Outstanding Customer Service" from ASIAL, the peak industry body in 2004.

### ***Surveillance***

The Surveillance Department continues to implement measures to improve its effectiveness in monitoring the integrity of all gaming operations at Star City.

Initiatives put in place during the period under review include:

- Implementation of a quarterly Gaming Integrity Report. This report outlines an analysis of gaming table operations;
- C.I.D database. This is an electronic reporting system on resource allocation, guest passes and the exclusions database. It is the first of its kind in Australia;
- Twelve hour recording capabilities. Efficiencies have been achieved by introducing 12 hour recording on VCRs, reducing the time required for tape changes and enabling surveillance employees to conduct more proactive monitoring;
- Business Continuity Plan. Star City has led the way in the Tabcorp casino division by implementing a new emergency management plan;
- OH & S – Safety Work Basic elements. Surveillance has taken a lead in implementing work safety initiatives. In fact, the Surveillance Department has achieved 100 per cent compliance in three consecutive reviews.

### ***Investigations***

A fully staffed and resourced Investigations Department exists with a state of the art intelligence system.

The Investigations Department makes regular presentations to departments, senior managers and other employees on issues related to illegal and undesirable activity, including training in how to identify such activity.

Regular meetings are held with all major law enforcement and regulatory agencies. Assistance and information is provided to these agencies as required.



## **6.8 Cage**

While the prime responsibility of the Cage is to provide cash-out facilities for patrons, it also plays an important role in the campaign against illegal and undesirable activity. Specifically, Cage employees have a duty to help detect possible money laundering suspects and suspicious transactions. Some of the measures used to do this include:

- Star City cashiers receive instruction on detecting money laundering as part of their induction training. Every new member of the Cage team also completes a checklist in their first week of training to ensure they are competent in all aspects of AUSTRAC reporting and compliance
- Since January 2004, every Cage employee has completed annual AUSTRAC refresher training

Star City believes that it leads the way among casinos in reporting significant and suspicious cash transactions.

## 7. SOCIAL IMPACT

### 7.1 Financial contribution to NSW

Star City is one of the State's major employers and makes a significant tax contribution to the NSW Government and the local economy each year. As at June 30 2006, Star City employed a total of 3134 people. This makes Star City one of the biggest single-site employers in the State.

In the last three years Star City paid:

<b>Payment</b>	<b>Amount Paid</b>
Gaming Taxes to the State Government	\$219.3 million
Casino Community Benefit Levy	\$34.3 million
Salaries and wages	\$470.3 million
Total taxes	\$296.3 million

### 7.2 Other benefits

In addition, Star City has filled a void in the entertainment industry by providing two major theatres which can cater for large scale productions. This, in turn, creates employment for hundreds of people in the entertainment industry.

The casino has helped to revive the Pyrmont peninsula, which is now a thriving area. Major companies including Channel 10 and Channel 7 have moved into the area since the casino was established. While there was initial resistance to the casino in Pyrmont, it is now accepted by the local community. Indeed, Star City is represented on most business and community groups in the area.

### 7.3 Employees / Human Resources

As indicated in the last recent licence review in 2003, Star City has consistently been recognised for its work practices and benefits. Employee benefits include paid maternity leave, free uniforms, free meals, free light rail travel, subsidised parking, a subsidised child care centre and an active social club.

Star City has also been approved as a Registered Training Organisation.

During the period under review Star City has also:

- Introduced the Shine Community Service Achievement Awards to recognise employees going above and beyond their normal duties in the workplace by performing volunteer work in the community;
- Maintained a successful Employee of the Month and Employee of the Year reward scheme;
- Introduced the Star City Shine Achievement Awards – a process to instantly recognise outstanding performance by employees;
- Enabled employees to use their leave accruals more flexibly through the Enterprise Agreement;

- Improved the company's Occupational Health and Safety performance. This includes an improved performance by Star City in the WorkCover and Workers Compensation management audits;
- Provided opportunities for employees to complete Management Diplomas;
- Invested significantly in a Learning Management System to support the company's training and education initiatives.

## 8. RECOMMENDATIONS FROM THE 2003 s.31 REPORT

Star City has sought to implement the recommendations of all previous Section 31 licence reviews and interim reviews. As indicated earlier, Star City recognises that in a company this size there will always be opportunities to improve culture and operational procedures.

The chart below indicates the status of Star City's progress in implementing the recommendations from the 2003 Section 31 licence review and the interim assessment conducted by the Authority in 2005.

A full description of the action taken to address these issues has already been provided to the Authority.

It is Star City's intention to co-operate fully with the current review and to work with the Authority in implementing any initiatives to further improve the company's operations.

<b>RECOMMENDATIONS ARISING FROM THE 2003 S.31 REVIEW</b>		
<b>Recommendation Number</b>	<b>Description of Recommendation</b>	<b>Response</b>
2003/01	Adequate resources of Investigations Department	<b>Implemented.</b> Additional Investigator appointed and technology upgraded.
2003/02	Investigation Department feedback to persons reporting illegal/undesirable activity	<b>Implemented.</b> Feedback is provided to employees who give information to the investigators.
2003/003	Metal Detectors	<b>Implemented.</b> Star City operates metal detectors at all entrances to the main gaming floor and retail arcade.
2003/04	Security Supervisor training	<b>Implemented.</b> All Acting Supervisors have undergone additional training.
2003/05	Executive Exclusion Committee guidelines	<b>Implemented.</b> Policy updated to include guidelines for the executive exclusion committee.
2003/06	Endeavour Room Access policy	<b>Implemented.</b> Regular audits conducted to monitor access to the Endeavour Room.
2003/07	Admission to the ER after exclusion	<b>Addressed.</b> Policy changed and updated. The Authority advised.
2003/08	Evaluate Responsible Gaming training	<b>Implemented.</b> KPMG evaluate RG training as part of their review of RG Week surveys.
2003/09	RG training for Security officers	<b>Implemented.</b> Specialist RG training provided to security officers.

**RECOMMENDATIONS ARISING FROM THE 2003 S.31 REVIEW**

<b>Recommendation Number</b>	<b>Description of Recommendation</b>	<b>Response</b>
2003/10	Pymont Safety Audit and Alcohol summit	<b>Addressed.</b> Star City working with law enforcement and community groups on safety and liquor issues.
2003/11	Smoking	<b>Addressed.</b> Star City complies fully with the State Government's new smoking restrictions.
2003/12	Compliance program	<b>Addressed.</b> Star City keeps the Authority fully apprised of its compliance program.

**Mario G Tosatto**  
**'Paternoster House'**  
**Paternoster Row**  
**Pymont NSW**  
**GPO Box 419,**  
**Sydney 2001**



**July 24, 2006**

**Casino Control Authority**  
**GPO Box 3970,**  
**Sydney 2001**

### **SUBMISSION - SECTION 31 of the Casino Control Act 1992**

I make this individual submission as a concerned resident, business operator and stake holder in the Pymont precinct since 1988.

My submission is in accordance with the published Terms of Reference Items:

- 5 The effect of the casino in relation to the public interest...etc
- 9 Such other matters as the Authority considers relevant

#### **Definition**

Star City Casino is a 24 hour entertainment facility set on a 3.34 hectare site. Additionally, Star City Casino contains a number of bars (6 bars and 7 restaurants), however these are not 'hotels' as defined by the Liquor Act 1982. (BBC Consulting Planners Job No 04-243, June 2005)

The contribution of Star City to the State, the City, Tourism and Employment has been well documented and advertised. I embraced and supported the concept of the facility from its announcement and have enjoyed the infrastructure that accompanied the development and continue to do so, but with some reservations.

I wish to draw the attention of the authority and the operator to the Pymont Village Business and Residential Community. Star City Casino is an integral player in Pymont and the co operation of its neighbours cannot be purchased financially by contributions but must be earned thru visible social responsible practice on the street

#### **Perimeter Security Management**

The current management security strategy which places security personnel only at the entrance to the gaming floor and other licensed outlets within the complex has total disregard for the activities on the adjacent public domain and internal public promenade. Electronic Security surveillance on the perimeter of the venue does not deter aggressive and anti social behaviour and furthermore this methodology is retro active and not pro active. The practice of the operator to eject unwelcome, aggressive and inebriated patrons to the public domain of Pymont St, Pymont is inappropriate. These guests of Star City Casino need to be professionally monitored at the entry perimeter to facility and not further fuelled by and thence ejected by Star City Casino to the public domain. These Star City rejects thence proceed to perform revengeful anti social acts within the Pymont Village Business and Residential Community. These acts include assault, loud abuse, damage to vehicles and property, theft, breaking glass and urination in the public domain. Usually these ejected patrons then

proceed to another local licensed facility which falls under the Liquor Act in an attempt to obtain further service, at which time they may be also refused entry or service.

#### **Strategic Facility Planning - Pymont Village**

The forecast annual growth estimates from the Tourism Council indicate that from tourism alone Star City Casino patronage in 2005 of 720,000 will increase in 2010 to an estimated 1,200,000 patrons, not including metropolitan patronage. (Sect 31 submission Oct 2001)

In light of this projected growth, The Casino Control Authority, in conjunction with Star City Casino and with reference to the Liquor Act 1982 must Strategically Plan to address issues affecting the local public domain of Pymont. This Pymont Village Strategic Plan should include the input from all related authorities and be fluid in nature to address specific events at Star City Casino and the surrounding environs; within reason this plan should be a document available to the public so that all participants can be held accountable. Furthermore at each and every review Under Section 31 of The Casino Control Act 1992, the Casino Control Authority stipulate that Star City Casino prepare a Social Impact Assessment for public information prior to the review date

#### **Special Event Planning – Pymont Village**


Star City Casino in co operation with Regulatory Authorities must manage and control the adjacent Pymont Public Domain. The recent FIFA World Cup produced capacity crowds on the gaming floors/liquor outlets, with patrons refused entry at those points, these patrons were within the confines of Star City Casino (parked & required to pay) Unable to view the event, yet able to circulate within the perimeter and thence to the Pymont Public Domain disillusioned and dissatisfied with the venue and searching locally for another.

Special Event Ticketing, Media Promotion and Perimeter Advice/Monitoring would have better managed this chaos and subsequent anti social behaviour in the Pymont Public Domain.

Recent promotions from Sydney Football Club in conjunction with the Sydney Morning Herald imply that Star City Casino will be the defacto home and function venue of Sydney FC for all home and away games, and thence by default all Soccerroo International matches both at home and abroad.

The intent of this submission is to promote transparency and inclusion of all relevant participants to the operation of Star City Casino in conjunction with Regulatory Bodies and the affected Pymont Village Business/Residential Community

Yours sincerely

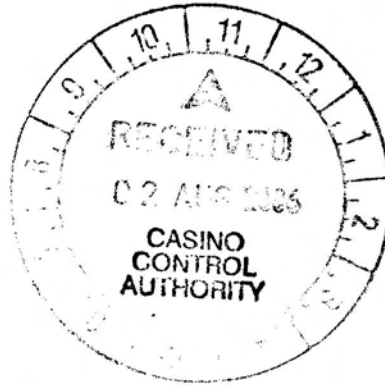
  
M G Tosatto

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27 July 2006

The Chief Executive  
NSW Casino Control Authority  
GPO Box 3970  
SYDNEY NSW 2001



Dear Sir

### **Section 31 Investigation**

TTF Australia appreciates the opportunity to provide a response to the terms of reference for the Section 31 investigation of the Sydney Casino operator, which is to determine the continued suitability of Star City Pty Ltd to continue to operate its casino licence and that the casino licence continue in force.

TTF Australia is a national member-funded CEO forum, advocating the public policy interests of the 200 most prestigious corporations in the Australian transport, property, tourism and infrastructure sectors.

TTF Australia's Membership comprises the most significant owners and operators in the Australian tourism market. TTF Australia, through its industry position, market intelligence and expertise in the tourism, hospitality and entertainment sectors, is well qualified to comment upon elements of public interest with respect to the operation and continuing operation of the casino licence and upon the suitability of Star City to continue to administer that licence.

#### ***(1) Continued operation of the casino licence***

The operation of a casino in Sydney plays a very strong part of the vibrancy of the city and a core attraction for visitors from all locations, be it the suburbs of Sydney, interstate or international. A casino forms part of the infrastructure of an international city such as Sydney.

International Visitors Survey Data collated by Tourism Research Australia (2005) indicates that about 20% of all overseas visitors visit casinos when in Australia (over 1 million visitors) and about 50% of overseas visitors come to Sydney. The total annual visitation to Star City is about 8 million visitors. Not only does this tell us of the role which a casino plays in product offerings for tourists, but it also shows the significance of the casino to the local population, which comprises almost 85% of Star City's clientele.



It is not difficult to conclude that Star City plays an important role in Sydney life and that the role of a casino meets a need. TTF Australia considers that the absence of a casino in Sydney would have a detrimental impact to both national and international perceptions of Sydney (that of a sophisticated global city) and that this would flow through to Sydney's ability to attract international visitors and would impact on domestic tourism as well. That other locations in Australia might have casinos but Sydney might not, would only provide a competitive advantage to those other locations at the expense of Sydney.

TTF Australia sees the nature of operations under the casino licence as offering a vastly different product to that of competitors in the gaming arena. Registered clubs do not in practice offer the outward looking and quality experience provided by the casino. The peculiarities of the registered club environment are potentially intimidating to the uninitiated visitor, whereas the casino provides an environment designed to welcome the visitor.

TTF Australia cannot see any reason why the casino licence should not be continued. There appears to be no large scale community concern about the operation of a casino licence, there is no obvious rationale as to why the forms of gaming, gambling and other activities authorised by the licence should not continue at this time.

## ***(2) Suitability of Star City to operate the casino licence***

The operating environment of and community attitudes toward the casino in Sydney has markedly changed since the early opening years. Controversy and novelty have given way to a broad acceptance of the casino's activities which have become part of the Sydney scene. The 'mainstreaming' and calming of the operations of the casino have been due to the operational efforts of Star City. Star City's vision for the casino and its associated activities, its response to issues which have developed and its attitude to regulatory and compliance issues present a model of corporate responsibility and good citizenship.

Star City has become an accepted part of the Sydney entertainment scene. The early stigma attaching to the casino as potentially a place of low standing, has been replaced through a fastidious effort to maintain and improve standards and to provide offerings for a spectrum of society and visitors. The maintenance of standards is an obvious business incentive for Star City, as it maintains a broader appeal in doing so, particularly through the perception of it being a secure and honest environment. Star City attracts customers at an average of about 22,000 per day. As it stands Star City is the single biggest entertainment facility and night attraction in Sydney, this constitutes a significant asset for the city; its scale and citizenship has catalysed the increasingly successful redevelopment of Pymont (adding greater value to Sydney).

Star City employs over 3000 people, being in itself one of the largest employers in the city. An enormous effort goes into training of staff, both to satisfy regulatory conditions but also to exceed customer expectations.

TTF Australia is aware of the considerable efforts to which Star City has gone to create a business virtue of compliance. Star City has placed an emphasis of fulfilling the obligations of its licence, of overtly promoting responsible gambling, of offering counselling services and exclusion policies and adhering to responsible service of alcohol requirements. These efforts have created a reputation for security at Star City,

which in turn makes the venue more attractive to a broader range of customers and visitors.

Star City has invested heavily in maintaining and freshening its product offerings. It is understood that over \$50 million in capital works has been expended over the past three years. The casino and its associated hotel and serviced apartment operations have recently been substantially renovated. The hotel and serviced apartments are of the highest standard, achieving a 5-star rating by AAA Tourism. The Australian Hotels Association awarded Star City the Best Apartment Style Hotel award in 2005.

The restaurants and hospitality at Star City, which have also been refurbished, are of a high quality with a range of product appealing to a range of public tastes. Star City has not adopted an elitist stance, but manages to pitch its product at a number of levels whilst maintaining quality. This provides that Star City connects with Sydney at a number of levels and in a multitude of ways.

It is understood that further capital works for Star City are planned. Additional public precincts and hospitality as well as increased accommodation are in the planning stage. Investment in a stand alone hotel would be the first such investment in Sydney for almost ten years. Star City is to be applauded for being forward looking in its management approach.

Responsibility in development and management of the property is evidenced by Star City's participation in a range of government programs for energy and water conservation. Star City has also received "Green Globe" awards for its successes in achieving greenhouse gas emission reductions in its operations.

The major entertainment venues provided by Star City are major assets for Sydney. The Lyric Theatre and Showroom have filled voids in the entertainment capabilities of Sydney and have enabled the staging of shows which could not otherwise be accommodated. The fact that Star City properly maintains these venues and backs productions is an expression of the use of the venue as an holistic entertainment precinct, with no undue concentration on the gaming business. TTF Australia regards this management emphasis as most appropriate and serves to endorse the approach of Star City Pty Ltd as a responsible operator under its licence and a significant contributor to the overall attractiveness of Sydney.

The operations of Star City provide a gaming tax stream of about \$75 million per year to the State Government. Additionally, about \$10 million is paid every year in community benefit levies. These taxes and levies, linked to the commercial performance of Star City, provide an important contribution to the overall welfare of Sydney and NSW.

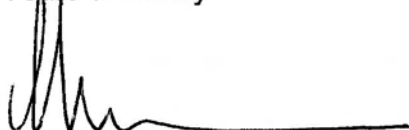
Star City has acquired a corporate management team of high quality and broad experience. The increasing professionalism and breadth of vision in the operations of Star City might be attributed to the competence of its management team and its ability to draw upon lessons and experience in the operation of the casino licence. Such experience would be difficult for anyone else to replicate; and as performance of Star City has continually improved under the licence, TTF Australia would submit there is no case to consider that the casino would operate better under any other management.

## **Conclusion**

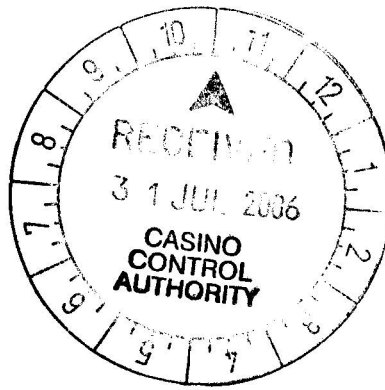
The purpose of the Section 31 investigation is in effect to determine whether there remains a legitimate place in NSW for a casino licence, and if so, whether Star City Pty Ltd remains the appropriate operator of the licence. TTF Australia believes the answer to both propositions is an unambiguous yes. There is clearly a demand for a casino, and the public interest is served in a number of ways through the existence and operations of the casino, in particular the entertainment and attraction it provides for the local community and to tourists. The management of the casino has continually improved in performance over time, the product offerings of Star City are outstanding and its plans for future development are both exciting and far-sighted. The management and operations of Star City add to the overall package of Sydney as a global city and Sydney as an attractive destination, through this Star City also adds to the economic benefit of NSW.

TTF Australia strongly supports the continuation of current licence arrangements in NSW. Should you wish to discuss this submission or any matters arising from it please do not hesitate to contact either me or Peter Staveley, National Manager, Infrastructure, Investment & Planning (02 9240 2000).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Christopher Brown', followed by a long horizontal line extending to the right.

**CHRISTOPHER BROWN**  
Managing Director & CEO



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Casino Control Authority  
GPO Box 3970  
SYDNEY 2001

25 July 2006

Call for Submissions under Section 31 of the Casino Control Act 1992  
Terms of Reference – Paragraph 5; The effect of the casino in relation to the public interest.

1. I am a resident and business operator at the above address and very close neighbour of the casino. I have lived and worked here since 1995 and make use of the casino's facilities and services.
2. Guests of the apartment block throw glass bottles, invariably alcohol bottles, from the balconies into Pyrmont St. In the past they have hit resident's cars and houses. Usually they hit the pavement or the wall of the Electricity Sub Station. If one were to hit a moving car or a pedestrian a serious injury or possibly death could occur.
3. Guests of the apartment block yell and scream from the balconies disturbing the general amenity but in particular disturbing the residents in Union St which have their backs and bedrooms to the Casino and Pyrmont St who front the casino. Sleeping can be very difficult on occasions.

4. What is the policy regarding the removal of unwanted guests from the Casino? It would appear that they are always pushed out via the rear entrance – Pymont St. Generally these people are inebriated or very angry or both and after being thrown out they often cause damage to property around the area. Throw bottles and other missiles, use fists or feet to smash at property [as can be seen on the columns at the Pymont St exit], pull out plants of local restaurants and the public square, generally smash things, urinate and sometimes defecate and make a huge amount of noise yelling abuse. Quite often this spills over into a domestic or other fight in Union St/ Square or other parts of the area.
5. There seems to be some unusual acoustic dynamics at work here so that any noise from the casino is greatly amplified to the surrounding area. So the balcony noise, the angry customers and even the music from the garden level sound like they are actually in our own gardens.
6. The whole issue of rubbish particularly alcohol bottles, broken glass and take away food wrappers is a big problem. While not all of this can be directed at the casino it is true that much can. Customers and or staff arrive, park in the surrounding streets and deposit their rubbish in the gutter, baby nappies, food and drink containers. The amenity of the whole area is lowered by this problem; stakeholders, who contribute to this problem, like the casino should have a bigger role to play in solving the problem.
7. Parking has been a big issue in the surrounding streets but the problem is getting intolerable. One of the many issues is the illegal use of Disability Stickers and Resident / Visitors Stickers [as issued to Pymont residents]. The casino cannot be held accountable for the actions of it's customers but many of these vehicles belong to employees. What action does the casino take to minimise its impact in this regard?

Yours sincerely

  
Kim White