



Victorian Commission for
Gambling and Liquor Regulation

REASONS FOR DECISION

In the matter of an application by Whittlesea Bowls Club Inc under section 3.4.17(1)(b) of the *Gambling Regulation Act 2003* for amendment of its gaming venue operator licence to vary the number of Electronic Gaming Machines permitted at the approved premises, the Whittlesea Bowls Club, located at 101 Church Street, Whittlesea from 40 to 50.

Commission:

Mr Mark Brennan, Chair
Mr Bruce Thompson, Deputy Chair
Mr Robert Kerr, Commissioner

Decision:

That the application be granted

Date of Reasons:

30 May 2012

Signed:

Mark Brennan
Chairperson



REASONS FOR DECISION

BACKGROUND

1. On 16 December 2011, Whittlesea Club Inc (**Applicant**) lodged an application pursuant to section 3.4.17(1)(b) of the *Gambling Regulation Act 2003 (Act)* for amendment of its venue operator's licence to vary the number of Electronic Gaming Machines (**EGMs**) permitted at the approved premises, the Whittlesea Bowls Club, situated at 101 Church Street, Whittlesea (**Club**) from 40 to 50.
2. On 21 March 2011, the Victorian Commission for Gambling and Liquor Regulation (**Commission**) held a public inquiry to consider the application pursuant to section 28(2)(g)(iii) of the *Victorian Commission for Gambling and Liquor Regulation Act 2011 (VCGLR Act)*.

COMMISSIONERS

3. The Commissioners who determined the application are Mark Brennan (Chairperson), Bruce Thompson and Robert Kerr.

DECISION

4. The Commission grants the application.

RELEVANT MUNICIPAL AUTHORITY – THE WHITTLESEA CITY COUNCIL

5. Section 3.4.19(1) of the Act gives the relevant municipal authority in which the approved venue is located the right to make a submission addressing the economic and social impact of the proposed amendment on the well-being of the community of the municipal district and surrounding municipal districts.
6. The relevant municipal council in respect of this application is the Whittlesea City Council (**Relevant Authority**).
7. The Relevant Authority elected to make a submission on the proposed amendment.

DETERMINATION OF THE APPLICATION

8. The determination of this application is governed by section 3.4.20(1)(c) of the Act, which states that the Commission must not amend a venue operator's licence to increase the number of EGMs permitted in an approved venue unless the Commission is satisfied that:
 - 8.1. amendment of the licence does not conflict with a Ministerial Direction given under section 3.2.3 of the Act;
 - 8.2. the regional limit or municipal limit for EGMs in the region or municipal district in



- which the venue is located will not be exceeded by the making of the amendment; and
- 8.3. the net economic and social impact of the amendment will not be detrimental to the well being of the community of the municipal district in which the approved venue is located.

DOCUMENTARY EVIDENCE

Documents filed prior to the hearing

Applicant

9. Application Form, dated 16 December 2011, including an application for modification of the existing gaming machine area;
10. Economic Impact Statement prepared by Rhys Quick of Urbis Pty Ltd, dated December 2012;
11. Social and Economic Addendum Report prepared by Rhys Quick of Urbis Pty Ltd, dated March 2012;
12. Patron Profile, undated;
13. Budgeted Income & Expenditure for the period 2010/11-2015/16;
14. Expenditure Report prepared by David Baldi, Mercury Group Victoria Inc (**Mercury**), dated February 2012;
15. Revised Social Impact Statement prepared by Harvestdata, dated 10 March 2012;
16. Patron Numbers prepared by the Applicant, undated;
17. Responsible Gambling Code of Conduct, dated October 2011;
18. Witness Statement of Bernard James Walker, General Manager, the Applicant, undated, including Budgeted Income & Expenditure table for 2011 to 2016 and suburbs and postcodes map of the Relevant Authority;
19. Witness Statement of Geoffrey Aldous, Chairman, the Applicant, undated, including Short History from 1955 to 2005; Constitution; letter in support of the application from Doug Quine, Member, the Club, dated 13 March 2012; and Home page from Website;
20. Witness Statement of Anne Hutchison, Compliance Officer, Mercury, dated 16 December 2011; and
21. Further witness Statement of Bernard James Walker, General Manager, the Applicant, undated, as to why commercially sensitive information should not be published on the VCGR website.

Relevant Authority

22. Draft Economic and Social Impact Submission Form, dated August 2010;
23. Witness Statement of Peter Spratt, Senior Research Officer, Relevant Authority, dated 5



- March 2012, including map of venue site, catchment area, municipal and SLA boundaries and photograph of Whittlesea Township;
24. Development Bulletin, Second Edition, dated September 2006;
 25. Social and Economic Impact Assessment, prepared by the Relevant Authority, dated February 2012;
 26. Community Support Services, including a list of Service Providers in Whittlesea and six letters of opposition to the application from Whittlesea Community Support Service Providers dated 1 February, 7 February, 20 February, 27 February, 1 March 2012.
 27. Relevant Authority Responsible Gaming Strategy, dated October 2002;
 28. Local Charter for Responsible Gaming, dated April 2000; and
 29. Expert's report in respect of the application by Colin Gill, Executive Manager, Ferrier Hodgson, dated 15 March 2012.

Commission

30. Two statistical reports prepared by Commission officers, the Economic and Social Impact Report and Addendum Economic and Social Impact Report, dated March 2012 also were available to the Commission.

Documents tendered at the inquiry

Applicant

31. Exhibit A1- Patron Survey, dated 20 March 2012;
32. Exhibit A2 - Gaming Tax and Surplus Calculations for 50 EGMs with additional revenue prepared by David Baldi, Mercury, dated 20 March 2012;
33. Exhibit A3 - Gaming Tax and Surplus Calculations for the current 40 EGMs prepared by David Baldi, Mercury, dated 20 March 2012;
34. Exhibit A4 - Gaming Tax and Surplus Calculations for 50 EGMs without additional revenue prepared by David Baldi, Mercury, dated 20 March 2012.

Relevant Authority

35. Exhibit C1 - Minutes for Ordinary Council Meeting, dated 28 February 2012; and
36. Exhibit C2 - Council Meeting Agenda, dated 20 March 2012.

EVIDENCE HEARD BY THE COMMISSION

Applicant's submissions

Economic and Social Evidence - Background

37. The Applicant submitted the Economic Impact Statement and Social and Economic Addendum Report prepared by Rhys Quick of Urbis Pty Ltd, which outline background evidence on the economic and social impact of the application.
38. The Club is located in the Statistical Local Area (**SLA**) of Whittlesea North, in the rural



- north of the Local Government Area of Whittlesea (**Whittlesea LGA**). The Club is one of nine gaming venues in Whittlesea LGA and one of three gaming venues in Whittlesea North SLA. The remaining gaming venues in Whittlesea LGA are located within the SLAs of Whittlesea South-East and Whittlesea South-West.
39. The Club is a sporting and entertainment venue incorporating two professional bowls greens, couch greens for social groups, function room, members room, bistro, dining room, central bar and gaming room with 40 EGMs.
 40. The closest gaming venue to the Club is the Epping RSL, which is located about 20 kilometres to the south-west of the Club. The Bridge Inn Hotel is located 10 km from the Club in Whittlesea North SLA and received approval for 40 EGMs from the Commission in 2009, which are expected to commence operating in 2013.
 41. Whittlesea LGA has an adult population of 121,472 and an annual forecasted rate of population growth for Whittlesea around 3.9% p.a. over the next four years.
 42. Whittlesea LGA is characterised by a high proportion of young families and a predominately 'blue collar' workforce, including technicians, tradespersons, labourers and clerical and administrative workers.
 43. The Applicant gave evidence that Whittlesea North SLA is less disadvantaged relative to the SLAs of Whittlesea South-East and Whittlesea South-West cited the 2006 Social and Economic Indexes for Areas (**SEIFA**) in support of this contention.
 44. The net EGM expenditure per adult in Whittlesea LGA is \$822, which is significantly higher than the Melbourne net EGM expenditure per adult of \$651.
 45. The southern region of Whittlesea LGA is subject to a municipal limit on EGMs of 212. The Club is the only gaming venue in Whittlesea LGA that is located outside the area subject to the municipal limit.
 46. At the time of the hearing of this application, 621 EGMs were operating within Whittlesea LGA. The EGM density in Whittlesea LGA will increase from 5.11 EGMs per 1000 adults to 5.19 EGMs per 1000 adults as a result of this application, which remains below the EGM density in Victoria of 6.08 EGMs per 1000 adults.

Economic and Social Evidence - Rhys Quick, Urbis Pty Ltd

47. The Applicant called Mr Rhys Quick, Urbis Pty Ltd, to give evidence regarding the anticipated economic and social impact on Whittlesea North SLA and the area immediately surrounding the Club should the application be granted.
48. Mr Quick acknowledged that net EGM expenditure is higher in Whittlesea LGA than Metropolitan Melbourne and Whittlesea LGA has a comparatively high level of disadvantage however he gave evidence that:
 - 48.1. the net EGM expenditure figure reflects the expenditure in the southern region



- of Whittlesea LGA, rather than the northern region of Whittlesea North SLA where the Club is located (**North Region**);
- 48.2. Whittlesea North SLA is significantly less disadvantaged on the SEIFA than the SLAs of Whittlesea South-East and Whittlesea South-West; and
- 48.3. the Club patrons are predominately from Whittlesea North SLA, rather than the southern, more disadvantaged areas of Whittlesea LGA.
49. In coming to this conclusion, Mr Quick cited the following factors:
- 49.1. the net EGM expenditure per adult and EGM density in Whittlesea North SLA (\$281 and 3.6 EGMs per 1000 adults) are significantly lower than in Whittlesea LGA;
- 49.2. a significant proportion of the net EGM expenditure in Whittlesea LGA can be attributed to the four largest venues in Whittlesea LGA, the Excelsior, Bundoora Tavern, Epping Plaza Hotel and the Plough Hotel, due to the size and location of the venues;
- 49.3. a patron survey taken between 6 June 2011 and 20 June 2011 indicates that Club patrons predominately reside in Whittlesea North SLA (84%); and
- 49.4. people are more likely to travel south from Whittlesea North SLA, rather than travel north from Whittlesea South-West or Whittlesea South-East SLAs because the southern SLAs have a larger range of services than Whittlesea North SLA.
50. It was Mr Quick's evidence that the impact of an additional 10 EGMs at the Club on problem gambling was likely to be minimal on the basis of the following evidence:
- 50.1. should the application be successful, 50 per cent of the anticipated increase in EGM expenditure at the Club is attributable to the transfer of EGM expenditure from other venues in Whittlesea LGA, and the remaining 50 per cent is attributable to new EGM expenditure;
- 50.2. the Club is not located in a retail precinct or a busy activity centre and there is limited public transport to the Club therefore the Club is unlikely to attract gaming patrons who did not otherwise intend to visit the Club;
- 50.3. gaming is not the predominant activity of the Club;
- 50.4. there is limited temporal accessibility to EGMs - the Club has moderate hours of trade (closing 1am at the latest); and
- 50.5. it is difficult for patrons to hide problem gambling as patrons of the Club must sign in or be a member and staff know most of the patrons.
51. Mr Quick acknowledged that the composition and value of the proposed Club redevelopment is uncertain because it is only at a concept stage however he gave



evidence that the Applicant intends to redevelop the Club at a cost of \$2.5 to \$3 million should the application be successful.

Economic and Social Evidence - Dr Rohan Miller, Harvestdata

52. The Applicant called Dr Rohan Miller, Harvestdata, to give evidence on the anticipated social impact on Whittlesea North SLA and the area surrounding the Club should the application be granted.
53. In his evidence, Dr Miller stated inter alia that the area surrounding the Club is not a vulnerable community because the EGM density in Whittlesea LGA is low, the EGM density has remained static until the recent approval of the Bridge Inn Hotel application, and the population of Whittlesea LGA is experiencing significant growth, which will be expected to dilute the EGM expenditure per adult in Whittlesea LGA.
54. In his written evidence, Dr Miller relied upon studies that found no direct relationship between EGM expenditure, density of gaming EGMs and the prevalence of problem gambling.
55. Dr Miller acknowledged that the Victorian Commission for Gambling Regulation had not accepted this conclusion in previous applications: however he referred to new research (not yet published); and noted that the issue of problem gambling is complex and not limited to EGM use.

Expenditure Evidence

56. The Applicant called Mr David Baldi, General Manager of Mercury to give evidence on the likely EGM expenditure and net venue gaming revenue (**NGR**) expected to result from the application.
57. The Commission understands the term NGR to mean the net machine revenue multiplied by the number of EGMs at a particular venue.
58. Mr Baldi estimated that the Club's NGR in the first 12 months following the introduction of an additional 10 EGMs would increase by between 9% to 14% (\$163,284 and \$284,879), which represents an increase of between 0.16% and 0.28% NGR in Whittlesea LGA.
59. In evidence on the positive financial consequences for the club, Mr Baldi relied upon a daily cost of \$16.82 per machine, including a Mercury monitoring fee of \$7 per day and a gaming cost of \$9.82 per day.
60. In his written evidence, Mr Baldi noted that the estimated increase in NGR could be lower due to the competition from the Bridge Inn Hotel and removal of the ATM from the Club in July 2012.



Premises and Club Evidence - Background

61. The Applicant called two witnesses to provide evidence regarding the Club and its role in the community:
 - 61.1. Mr Geoffrey Aldous, Chairman of the Applicant, to give evidence about the intended Club redevelopment and increase in community contributions should the application be successful; and
 - 61.2. Mr Bernard James Walker, General Manager of the Applicant, who gave evidence regarding the forecasted increased in NGR should the application be successful, the Club's patron profile and the responsible service of gaming.
62. The Applicant operates the Club from 101 Church Street, Whittlesea.
63. According to the Constitution, the purpose of the Applicant is to provide all things incidental to the playing and observing of lawn bowls.
64. The Applicant is a non-profit sporting organisation established in 1955. The majority of the income generated by the Club is used to manage and improve facilities and programs at the Club. The Applicant also makes both financial and in-kind contributions to the community, including providing free bowls facilities for events, free coaching to school students and young lawn bowlers, and free meeting facilities for community groups, such as Whittlesea Rotary.
65. The Club has over 2,000 members, of whom about 180 are full members and 1,800 are social members.
66. EGMs were first installed in the Club in December 2006.

Premises and Club Evidence – Geoffrey Aldous

67. Mr Aldous acknowledged the Applicant could not commit to the redevelopment plans as a condition of an increase from 40 to 50 EGMs because the Applicant is financially conservative, the Applicant is servicing a debt of \$800,000 and the last increase of EGMs at the Club was subject to a redevelopment, which took the Club years to fund.
68. However, Mr Aldous gave evidence that the Applicant intends to use the increased revenue from the additional 10 EGMs for the benefit of club members and visitors and if possible to redevelop the Club, including the addition of a 200 seat function room, extension and upgrade of the members' area, upgrade of the clubhouse area, and acquisition of adjacent land on which to build a synthetic bowling green.
69. Mr Aldous contended that increasing the capacity of the function areas at the Club will benefit the community by enabling the Applicant to honour its commitment to the Relevant Authority to host the local Country Music Festival, and the additional bowling green will assist to provide facilities to the Applicant's increasing number of bowling members.



70. Further, Mr Aldous acknowledged that the community contributions proposed by the Applicant should the application be successful will vary according to the surplus revenue generated by the Applicant however he gave evidence that the Applicant is committed to making a community contribution of 15 per cent of the profit from the Applicant's operations should the application be successful and that this commitment was approved by the Applicant's Board.

Premises and Club Evidence – Bernard Walker

71. Mr Walker has been the General Manager of the Applicant since 2010 and has extensive experience in the hospitality industry, including hotel management and management of a club gaming venue.
72. Mr Walker noted that, as a community based Club, staff generally have good relationships with club members, but not equally strong in every case. However, he gave evidence that, in respect of the Applicant's ability to reduce the risk of problem gambling, staff seek to form relationships with regular gaming patrons and the Applicant monitors EGM usage through staff interactions with gaming patrons and by requiring patrons to be members or signed in by members.
73. Further, Mr Walker drew attention to the Applicant's compliance with responsible gaming requirements, namely - the Mercury Code of Conduct and conducting regular reviews of the Self-Exclusion Program with Mercury. Mr Walker gave evidence that the Whittlesea Council had not raised any concerns about problem gambling with the Club.
74. In respect to further anticipated benefits of the application, Mr Walker gave evidence that the Club is seeking an increase of 10 EGMs to improve its competitiveness, to cater for peak periods of EGM utilisation and to enable the Club to upgrade facilities.
75. Mr Walker elaborated on those points by stating the:
- 75.1. Bridge Inn Hotel is located 10 kilometres from the Club, has been approved for 40 EGMs and is expected to commence operations in the near future;
- 75.2. utilisation of the EGMs at the Club is in excess of 70 per cent on Thursday, Friday and Saturday evenings; and
- 75.3. Club is at capacity in respect to patron attendance and function facilities.

Responsible Gaming Evidence

76. The Applicant subscribes to the Clubs Victoria Responsible Gambling Initiative and is a member of Mercury.
77. The Applicant called Ms Jacqueline Hutchison, Compliance Officer of Mercury, to give evidence on the approach of the Applicant to responsible gaming practices.
78. Ms Hutchison acknowledged that the Applicant does what a responsible provider of EGMs is



reasonably expected to do however gave evidence that the Applicant's actions were still beyond the norm for gaming venues. Ms Hutchison raised the following examples in support of her conclusion:

- 78.1. the Applicant subscribes to the Self-Exclusion Program and there are currently 39 people excluded from the Club; and
- 78.2. of the 500 venues managed by Mercury, 40 venue managers were willing to conduct self-exclusion interviews of which Mr Walker was one.

Relevant Authority's submissions

Expenditure Evidence

79. The Relevant Authority called Mr Colin Gill, Director, Ferrier Hodgson, to give evidence regarding the written submission on expenditure by the Applicant's expert, Mr Baldi.
80. Mr Gill questioned the financial projections and modelling by the Applicant in respect of the anticipated increase in EGM expenditure and EGM costs, and the likely financial capacity of the Applicant to increase community contributions and redevelop the Club should the application be granted.
81. In particular, Mr Gill noted the absence in the analysis of Mr Baldi of the:
 - 81.1. proposed community contributions (\$70,000);
 - 81.2. expense of an additional 2.6 full-time equivalent staff;
 - 81.3. absence of interest the Applicant incurs, or forgoes, on money expended to purchase additional EGMs; and
 - 81.4. increased operating costs for 10 additional EGMs (\$28 per EGM per day, including a Mercury service fee of \$7 per EGM per day).
82. Mr Gill concluded that, for reasons including the additional costs likely to be incurred by the Applicant should the application be granted, the financial benefit to the Club was overstated by the Applicant, and that the Applicant would suffer a financial detriment or nil financial benefit should there be an increase of 10 EGMs at the Club.
83. The Commission notes that the analysis of Mr Baldi and Mr Gill considered different factors in determining whether 10 additional EGMs would result in a financial benefit to the Applicant. The Commission is satisfied on balance that the additional 10 EGMs will result in some increase to revenue for the Applicant and an increase in the economic and social benefits to the community through continued community contributions proposed by the Applicant, particularly - complimentary facilities for the gathering of community groups.

Economic and Social Evidence

84. The Relevant Authority called Mr Peter Spratt, Senior Research Officer at the Relevant



- Authority, to give evidence regarding the economic and social impact on Whittlesea North SLA and the area surrounding the Club should the application be granted.
85. Mr Spratt's opinion was that there would be a social deficit should the application be successful because the high EGM expenditure per adult in Whittlesea LGA could not simply be attributed to the population growth and any increase in EGM expenditure is likely to have a detrimental social impact in the Whittlesea LGA because of the vulnerabilities in the LGA.
86. In support of his conclusion, Mr Spratt gave evidence that:
- 86.1. Whittlesea LGA has among the highest level of EGM expenditure per adult in Victoria (\$822 compared to \$622 for Victoria);
 - 86.2. the EGM expenditure is concentrated in a small proportion of the community (9% of adults);
 - 86.3. Whittlesea LGA is relatively low on the socio-economic scale with SEIFA scores below the average of metropolitan Melbourne;
 - 86.4. the Applicant understated the increase in EGM expenditure and the Applicant's expenditure for the addition 10 EGMs should the application be successful; and
 - 86.5. any social benefit to be derived from community contributions is uncertain as the Applicant had not confirmed the community contributions and the redevelopment, specifically – the Applicant's report states that the Applicant's proposal to increase financial contribution is subject to the Applicant being in a financial position to do so.
87. The social and economic impact assessment prepared by Mr Spratt concludes that the EGM expenditure in Whittlesea LGA is increasing and is limited to 'fewer than 10% of residents who are frequent users of EGMs and disproportionately [to] problem gamblers'.
88. The Commission notes the conclusion that a disproportionate percentage of frequent EGM users are problem gamblers is not supported by the 2010 Productivity Commission Inquiry Report on Gambling, which states that, among the group of regular EGM users, 15 per cent are regarded to be problem gamblers.
89. The assessment notes the Relevant Authority Annual Household Survey for 2008/2009, which states that the proportion of adults in Whittlesea LGA using EGMs declined from 13.2% in 2005 to 8.5% in 2009 and the estimated average expenditure per EGM user increased by 67% between 2005 and 2009.
90. Mr Spratt acknowledged that the opposition by the Relevant Authority to the application is required under the Responsible Gaming Strategy, which states that any increase in the number of EGMs within the LGA will be opposed by the Relevant Authority however he gave evidence that this Strategy did not influence the content of his economic and social



assessment.

FINDING

91. The Applicant's General Manager has lengthy experience in the hospitality, including club management. The Applicant complies with the Mercury Responsible Gambling Code. On balance, the Commission is satisfied that the Applicant has a satisfactory approach to problem gambling.
92. The Commission recognises that problem gambling is a complex issue and while the Commission does not accept the contention that there is simply no causal link between the EGM density and problem gambling, problem gambling risks need to be assessed in the light of the circumstances of the municipality and preventative measures taken by a particular EGM venue.
93. In relation to the impact of the application on EGM density and expenditure, the Commission notes that the EGM density in Whittlesea LGA will remain below the average EGM density in Victoria on the granting of this application. Further, the net EGM expenditure and EGM density in Whittlesea North SLA will continue to be lower than the EGM expenditure and density in Whittlesea LGA and Melbourne. Moreover, the Commission takes note that real (inflation adjusted) EGM expenditure per head in the area has been falling and is projected to continue to fall.
94. The Commission also is satisfied that on balance the patrons attending the Club are principally from the North Region in Whittlesea North SLA, which is socially and economically more advantaged relative to the capped southern region of Whittlesea LGA.
95. The Commission accepts Mr Quick's proposition that residents in Whittlesea LGA are more likely to travel to the southern regions of Whittlesea LGA, than travel north to the North Region, because there are more services available in the southern region.
96. A further consideration for the Commission is that the granting of this application will increase choices available to gaming consumers by increasing the number of EGMs available during the peak periods of utilisation at the Club (Thursday to Saturday evenings) and enhancing the ability of the Applicant to compete with other venues, such as the Bridge Inn Hotel when it commences EGM operations in 2013.
The Commission concludes that the increase in consumer choice resulting from the granting of this application will provide a economic and social benefit to the residents of Whittlesea LGA
97. The Commission is satisfied that, although there is some uncertainty about the precise extent or timing of the Applicant's commitment to further investment plans and increasing financial contributions to the community, the increase of 10 EGMs at the Club will result in some increase to revenue for the Applicant, which will enhance the Applicants ability to



service debt and, by virtue of the Applicant being a community club, result in an increase in benefit to the community arising from Club services in a township where there are limited alternatives.

98. On balance, the Commission is of the view that the granting of this application will assist the Applicant to redevelop the Club's facilities and, as a result, contribute to the community in-kind by providing improved and subsidised function facilities to community groups, such as the Country Women's Association, and for community functions, such as the local Country Music Festival.
99. Pursuant to section 3.3.4(1)(c), the Commission must weigh the likely positive economic and social impacts of an application against the likely negative economic and social impacts.
100. In balancing the detrimental and positive aspects of this application, the Commission is satisfied that a variation of the venue operator's licence to permit an additional 10 EGMs to be operated at the Club will not result in a net economic and social detriment to the community of the municipal district.
101. Accordingly, the Commission is satisfied that it should exercise its discretion to approve the application.
102. The administrative process of amending the licence will take place at a time subsequent to this decision, as provided by section 3.4.20 of the Act.

The preceding document is a true copy of the Reasons for Decision of Mr Mark Brennan (Chairperson), Mr Bruce Thompson (Deputy Chair) and Mr Robert Kerr.

Date of Hearing:	21 March 2012
Date of Decision:	2 May 2012
Date of Reasons for Decision:	30 May 2012
Appearing for the Applicant:	Mr Peter Caillard of Counsel
Appearing for the Relevant Authority:	Mr John Rantino
Counsel Assisting the Commission:	Ms Shahaan Murray