Submission to the Joint Select Committee on Gambling Reform

Submitted by Dr John Flanagan of AMC Convergent IT
Date: 31 January 2011

<u>Pre-commitment</u>

The use of pre-commitment strategies to reduce the potential harm to EGM players has been promoted by us since 2000 when we first began working in the gambling area. Although we consider pre-commitment implementation an important first step it is not, and will not be, the complete answer to establishing responsible gambling behaviour without coupling it with the ability to unobtrusively identify "at risk" and problem gamblers and to respond appropriately to that information. The aim of this submission is to support the pre-commitment initiatives but moreover to bring to the attention of the Senate Committee that such an ability or technology exists to seamlessly and unobtrusively identify problem gambling and problem gamblers, and respond appropriately to them. Problem gambling and problem gamblers being conceptualised by problematic gambling behaviour rather than mental illness. This technology is a harm reduction not a harm minimisation strategy. It has the ability to significantly reduce the incidence of problem gambling and achieve responsible gambling, whilst at the same time maintaining gambling revenue to industry and government.

The very people pre-commitment systems seek to assist are the ones who under the Productivity Commission's recommendations will likely set arbitrarily and artificially high limits for any pre-commitment parameters and not be based upon their ability to afford that intensity of activity. On the other hand those people who are not and will not become a problem gambler will tend to set pre-commitment limits, or the system defaults, which in the main, will be very conservative. The realistic expectation expressed by both psychological and industry experts, is that such people reaching the conservative limits set will be prevented from continuing play. This group rather than go through the process to increase limits are expected to simply cease or move onto other activities.

The net effect will likely be non-problem gamblers will play less and the relative gaming turnover from problem gamblers can be expected to increase as a result of a pre-commitment strategy alone. This is not a desired outcome.

Substantial elements in favour of establishing effective pre-commitment strategies:
- (a) Preventing players from entering into periods of "out of control" behaviour.
- (b) Preventing players from spending more than "intended". The emphasis being on the word "intended". Intended does not necessarily equate to the amount, which the player can afford to lose.
- (c) Preventing players from squandering significant "wins" or entering into "chasing losses" behaviour.
- (d) Preventing players from spending more time than intended playing the EGMs.
- (e) Limiting losses by modifying the playing behaviour of the EGMs.
- (f) Providing targeted messages which using only pre-commitment can at best be informative of the approach of a self-imposed limit or the attainment thereof.
- (g) An effective *self-exclusion* process.
- (h) The pre-commitment limits and the self-exclusion being at all venues.

Implementation of pre-commitment strategies alone will fail the very category of persons it is seeking to protect or assist. The more complete system proposed by us will do the complete job.

This method enables the pre-commitment system to "alert" anonymously the player if their playing behaviour is outside the normal (or average) for a significantly large distribution of players. Thereby <u>informing</u> the player not only that they have reached a preset limit or exceeded it but their playing behaviour may well be at an "at risk" level or possibly problematic or abnormal.

The "alerts" can be triggered by:
    (1) Acceleration.
    (2) Chasing losses.
    (3) Frequency of play.
    (4) Duration of play.
    (5) Overriding of pre-commitment self-imposed limits.
    (6) Amounts won & lost
    (7) Credits won & lost
    (8) Lines & bet size variations.
    (9) And others.

The "alerts" can be a targeted message delivered to the EGM on which the person is actively playing. Or it could be an SMS or email message. Depending on the delivery method the only person who will know is the player themselves.

The information recorded simply needs to be the pre-commitment identification method (no name is required) and a *preferred "communication with"* method this could be a mobile phone for SMS or an email address or in the event the person wants no direct contact messages to the EGM they are playing on. All traceable information such as mobile phone numbers or email addresses are encrypted preserving the person's anonymity. The system knows how to use but no other party can. No other information that identifies the individual is necessary.

The transactions played by the player are recorded on a "central" database as they are playing. This does not interfere with the pre-commitment processes. The recorded information is identified only by the pre-commitment identification number. No names and no pack drill. The venue and machine identity upon which the player is playing are recorded with the transaction through the monitoring system in the venue. The player's behaviour is compared to a large distribution of players (in fact all players) using modelling techniques with or without weightings and other parameters existing or developed which indicate problematic behaviour.

If a player is "triggered" by the modelling process then a range of graded outcomes is possible as determined by a Regulatory Body:

    (a) A meaningful informative targeted message can be sent to the player in the venue and on the machine they are playing at the moment or to which they move to either in this session or the next time they play.
    (b) In addition to (a) the machine behaviour could be modified such as either prevention of play or 100% return to the player.
    (c) Other graded responses possible could be alerting and direction of counselling services to the player or restriction of play.

Pre-commitment involves the eventual mandatory requirement for every person wishing to play EGMs to have a card with pre-commitment figures on it, whether or not these are ridiculously high or default values. The Productivity Commission's stated preference is for the person to assume responsibility, at least in part, for their fate. Unfortunately, self-harm in certain individuals cannot be controlled by self-set limitations. Denial is a common feature of compulsive addictive disorders. Pre-commitment with a genuine *safety net* is possible if

player behaviour is captured, analysed and acted upon. The information is readily available from the player activity on the EGM; all of the technical requirements will be in place with the pre-commitment implementation schedule.

Anonymity can be preserved, identifying an individual with a behavioural problem or a problem or "at risk" gambler behaviour does not rely upon recording the individual's name. The pre-commitment cards will of course have an identity; all activity can be recorded against that card identity. The playing activity of frequency, duration, inter-sessional times, amounts waged, amounts won/lost, credits won/lost, lines played, and so on can all be stored against that card identity and compared with the average player values for the activities. This allows the *modelling* of the card identity determining a normal, "at risk" or "problem" player profile and not simply someone playing to a self-determined monetary limit on a card.

Modelling and identifying "at risk" and "problem" gamblers must be an integral part of any effective responsible gambling system. It can be anonymous with the identification process being restricted to the alerting on EGM message displays the card identity is inserted into.

Alternatively, should regulatory bodies wish to at future dates the identification process can be extended to include the following actions:

   a) Suggest to the card holder the reduction of the pre-commitment values;
   b) Reduce the pre-commitment values;
   c) Suggest the card holder seeks counselling assistance;
   d) Direct counselling assistance to the card holder in the venue or elsewhere.
   e) Suggest the card holder should not gamble on EGMs;
   f) Prevent the card holder from gambling on EGMs.

Models to perform such services exist for EGM and other gamblers. With pre-commitment the EGMs will have card readers, an identification method for at least the pre-commitment "card" will be in place and the EGM firmware will have been modified to enable the modification of the machine behaviour including delivery of messages. The incremental cost is minimal for the real benefits provided by identifying "at risk" and "problem" gamblers. The behaviour modelling in addition to the machine and infrastructure changes required for pre-commitment needs some centralised preferably Internet based modelling software and a referrer module to deliver the policy outcome of a triggered individual. Certainly scalable databases and perhaps some additional central computer equipment will be required. Such technologies currently exist (Gambler Subtle Assist - GSA)

What might the scale of additional costs be?
The operational costs, infrastructure costs and any royalty costs in addition to the costs of the pre-commitment strategy could be expected to be *less than* $10 per annum per "card". This is where "card" is the pre-commitment method whether it is a smart card, a swipe card, USB or other method.

Summary

Pre-commitment on its own will have less of an effect on the traditionally viewed "problem" and "at risk" gambler. Recording transactional play, facilitates the modelling and determination processes of whether a particular player, when compared to a large body of other players and other specified criteria may be either a "problem gambler" or an "at risk" player. It does not require a person to forgo their anonymity but it does identify people with gambling problems. Depending on how regulatory bodies choose to implement the system, assistance from counselling services, can either be suggested to or directed to problem or at risk gamblers. It is not big brother. Those who argue against such an implementation due to

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cost can be assured that there is only a minor incremental cost to include such a system alongside a pre-commitment system. For those who argue against such an implementation on the grounds of civil liberties or the perceived intrusive nature of a more interventionist system may choose to read any of the original GSA documents. Currently, automobile drivers are subjected to alcohol testing. The potential benefits of such intervention far outweigh the extremely obtrusive and arguably civil liberty issues to the drivers affected. Given the scenario that government had a tool available, which unobtrusively identified alcohol affected drivers as they were in the act of driving, would they use it? GSA is that tool in the gambling environment and it can be implemented in a variety of ways, with varying degrees of intrusiveness, from little to minor and with anonymity to full identification.

<u>Does the technology exist to unobtrusively identify "at risk" and "problem" gamblers?</u>

The answer to this is an emphatic yes. There are a number of different providers globally of such modelling techniques. iCare in the United States is one and Gambler Subtle Assist (GSA) in Australia is another.

The GSA model has been developed and patented in Australia and other countries (Australian Patent No. 2004269430). As a patented process, GSA covers any situation wherein a person plays with an identification means of any nature whatsoever, anonymous or otherwise. The information is stored and analysed (or modelled) against a distribution of other players and other criteria. For the purposes of making the gaming activity safe for every player, the gambler is identified as either responsible, "at risk", "problem" or other classes. Modelling products such as GSA are based upon *algorithms* (equations) that are readily adaptable to changing societal norms and rules and which learn with the accrual of data and continually develop and refine the modelling, thus improving accuracy. GSA also provides pre-commitment services with centralised monitoring and control in addition to its modelling and identification of "at risk" and "problem" gambler capabilities. It requires no more infrastructure than the proposed pre-commitment recommendations and yet delivers actual *harm reduction* strategies with objective measurable benefits to all players, including "at risk" and problem gamblers, venues, the industry and the general public as a whole.

The abstract of the issued Australian patent for Gambler Subtle Assist states:

"A system for facilitating responsible behaviour by an entity comprising an identification means for identifying the entity, a facility for verifying the identification means and facilitating pursuit of the behaviour, a storage means coupled to be in communication with the facility for storing information related to the pursuit of the behaviour by the entity, a modeller module for comparing the information related to the pursuit of the behaviour by the entity with a behaviour model to determine a category of behaviour of the entity and a resolver module for determining one or more actions to be initiated in relation to the entity and their pursuit of the behaviour such as initiating a change to one or more operating parameters of the facility in response to the activation of one or more limits, blocks or triggers related to the entity."

Temporary cards can be catered for. These would be allocated to international players and very infrequent players dependent as determined by regulatory body's policies.

Card registration for modelling under GSA is no different to the registration processes for the pre-commitment card.

GSA can work on a voluntary basis pending the mandating of the pre-commitment card usage.

GSA provides the community with the ultimate ability to significantly reduce the harm caused by gambling enabling, as Professor Dickerson has stated on previous occasions, for the

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industry to become de-regulated in terms of advertising and indeed can become a normal commercial enterprise *because* pre-commitment with the ability to identify the "at risk" and "problem" gamblers through objective modelling means provides the player *safety net*.

Pre-commitment can be expected to decrease the prevalence of the playing of EGM but not through the reduction of problem gamblers playing them, rather through the decreased activity of those who are not and never would be problem gamblers. The relative contribution to industry revenue from the "at risk" and "problem" gambler group will increase with pre-commitment where the individual specifies without intervention their own limits in terms of money, time and other parameters. Pre-commitment in the absence of modelling all players' behaviour compared to the population distribution and problem gambling criteria should not be expected to have significant impact on those people with problems.

Not to implement a system, which identifies "at risk" and "problem" gamblers, is a wasted opportunity and it would be a huge oversight not to make such a tool an ancillary part of the *pre-commitment recommendations* currently before the Honourable Senate Committee Members.

The attached slides and screen layouts show, implementation of pre-commitment and modelling are based in the same infrastructure with direct player behaviour being the data source for both the pre-commitment and modelling modules.

Gambler Subtle Assist is a complete pre-commitment, EGM monitoring, global loyalty (centralised loyalty gateway) and harm reduction system. It both exits and is an Australian patented process specific to the identification of "at risk" and "problem" gamblers through objective means based upon actual player behaviour.

AMC Convergent IT has a wealth of experience in the development of scalable Internet based database applications exactly of the type required for the pre-commitment and harm reduction from gambling to be effectively and quickly implemented. Gambler Subtle Assist has been a self-funded application development of AMC Convergent IT to address an issue of immense socioeconomic importance to the Australian public.

We would welcome answering queries and further expanding on this topic directly to the Honourable Members.

On behalf of AMC Convergent IT I commend this material for the consideration of the Honourable Members of the Joint Select Committee on Gambling Reform.

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APPENDIX A

Capabilities outline of Gambler Subtle Assist (GSA)

GAMBLER SUBTLE ASSIST

Capabilities

For the Gambler
- Pre-commitment put into practice
- Player pauses (circuit breakers) – direct (active), indirect (passive).
- Gambling duration and cumulative spend status screen messages
- Exclusion
- Eliminate underage gambling
- Identification of "at risk" and problem gamblers
- Direct support to those who need it
- Rehabilitation tool
- Activity statements

Technological Architecture
- Extensible to multiple gambling modes
- Central intelligence
- Population database
- Changes to system immediate
- Actively protect players pre-commitments without requiring EGM firmware change (patent pending).

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GAMBLER SUBTLE ASSIST

Precommitment (voluntary, universal, or mandated; with or without voluntary overrides)

- Time Limits (session, daily, weekly, monthly)
- Player nominated inter-sessional time interval
- Spend Limits (session, daily, weekly, monthly, yearly)
- Maximum bet
- Machine denominations
- Specific day exclusions
- Gambling mode exclusions
- Total exclusions
- Player pauses. Player nominates timing and duration of pause. (Acts as circuit breaker to loss of control episodes)
- Messages on duration of play, cumulative spend (via direct to EGM, SMS, Email & Screen – one or more)

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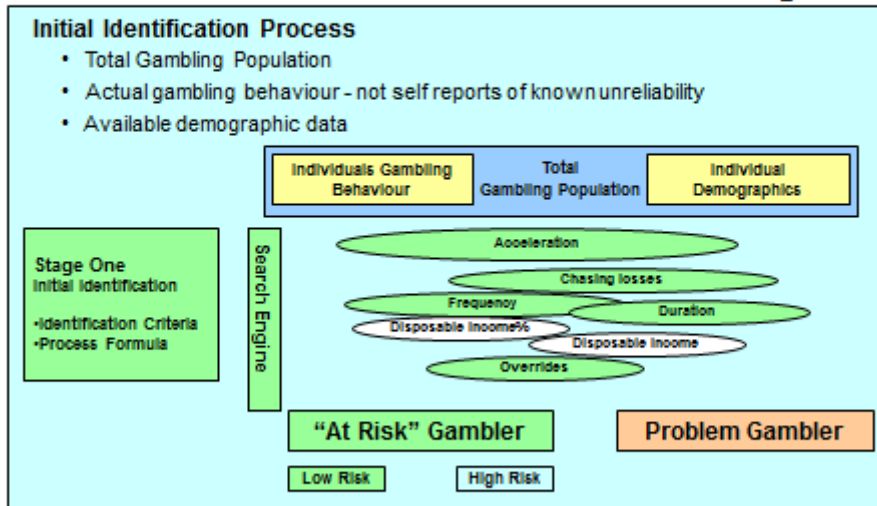
Other Critical Capabilities

- Identification of "at risk" and problem gamblers.

- Support services directed to identified patrons, even under anonymous card options.

- Pre-commitment decisions in hand players.

- Activity statements, on request via Internet or regular (post, email) over any period.

- Database as research tool.

GAMBLER SUBTLE ASSIST

Stage 1
Initial Identification
Modelling

Initial Identification Process
- Total Gambling Population
- Actual gambling behaviour - not self reports of known unreliability
- Available demographic data

| Individuals Gambling Behaviour | Total Gambling Population | Individual Demographics |

Search Engine

Stage One
Initial Identification

•Identification Criteria
•Process Formula

Acceleration
Chasing losses
Frequency
Duration
Disposable Income%
Disposable Income
Overrides

"At Risk" Gambler   Problem Gambler

Low Risk   High Risk

White: Used, if provided

APPENDIX B

Impacts on Players, Industry & the Community

Impact on recreational gamblers acceptance and enjoyment

- Universal acceptance of cards, therefore GSA card is seen as the preferred system "key", rather than facial recognition, etc.
- Gambler Cards will undoubtedly add enjoyment to the ritualistic and superstitious aspects of gaming.
- Set & modify own pre-commitment with safety mechanism.
- Catch-all (Identification & "at risk" players).
- Activity statements "on demand" on the web, kiosks.
- Passive & Active modes *(graded levels of intervention)*.

Impact on licensees, employees and non-gamblers

- Take pressure off the venue staff from onerous and impossible responsibilities *(active)*
  (Passive mode needs venue staff to enforce exclusion & pre-commitments compared to automatic (EGM) enforcement in Active mode. This may add to work in venue & potentially involvement in possible confrontational events.)
- Increase staff morale when industry seen as more responsible and not contributing to destruction of individuals and families.
- Reduces legislative burden.
- Long term security as Industry becomes sustainable.

Impact on lost cards, tourist visitors, card fraud

- No value on card, No trade in cards
- Temporary visitor cards (international, interstate, pensioners)
- Lost cards. Data resides centrally not on card. Replacement cards preserve the history, exclusions and limits as were applied to the original.
- Cards renewed annually *(configurable)*.

Industry and community benefit

- More profitable use of venue as more patrons comfortable to frequent venues when industry seen as more ethical or less socially damaging.
- Identify & actively direct assistance to "at risk" & problem gamblers.
- Shifts revenue base from problem gamblers to non-problem gamblers, making the industry ethically and economically sustainable.
- Large reduction in social cost of problem gambling.
- Gambling ethically, legally and economically sustainable.
- Flexible to change with changing needs quickly and cheaply – no card recall to bring effect to change.

Gambling is a legal recreational activity & business, the issues with "problem gambling" revolve around its early identification & the availability of assistance coupled with mechanisms enabling individual responsibility & accountability – "user pays" & a consumer protection approach.

Gambler Subtle Assist is the "catch-all" solution to the consumer protection issues & the emerging gambling community crisis irrespective of the access method to be used.

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APPENDIX C

WHAT MIGHT PRE-COMMITMENT & MODELLING LOOK LIKE

This is GSA.

Card Maintenance
Operator: John Thomas Flanagan

Card Code: 0000000000000016
Venue: Site 2
Location inside venue: 10
Date of Last Change: 08-Feb-2005

Basic | Limits Overall | EGM/Casino | Racing | Lotto | Card money | Exclusions | Personal | Loyalty | Card Password | Sessions

Discretionary income: 57000.00
Proof of Age: Yes
Limits: Yes
Blocked: No
Created: 17-Feb-2003

State (Residence): VICTORIA
Country (Residence): AUSTRALIA

Proof Age Method (photo ID): Drivers licence
Proof Age Reference #: 2084 396 2
Status: Active
Replacement card:

Help | | Find Card | New Card | Save Card | Reset

1. Discretionary income is optional.
2. State and Country of residence is compulsory.
3. Proof of Age and the 100 point ID method is compulsory, the 100 point method is held in non-human readable form in the database.
4. Limits (pre-commitments) can be set to *compulsory*.

Card Maintenance
Operator: John Thomas Flanagan

Card Code: 0000000000000016
Venue: Site 2
Location inside venue: 10
Date of Last Change: 08-Feb-2005

Basic | Limits Overall | EGM/Casino | Racing | Lotto | Card money | Exclusions | Personal | Loyalty | Card Password | Sessions

Total Daily limit($): 600.00
Total Weekly limit($): 900.00
Total Monthly limit($): 1200.00
Total Yearly limit($): 15000.00

Limits is MAXIMUM all forms gambling: No

Apply Limits to:
EGM/Casino: Yes
Racing: Yes
Lotto: Yes

Help | | Find Card | New Card | Save Card | Reset

Players may specify over all spend pre-commitment limits and indicate if limits apply to all forms gambling. GSA is written to apply to EGM/Casino, racing and lotto gambling monitoring.

GSA is configurable to support monitoring of all or each of or a combination of gambling on EGM/casino, racing or lotto.

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Card Maintenance
Operator: John Thomas Flanagan

Card Code: 0000000000000016

Venue: Site 2

Location inside venue: 10
Date of Last Change: 08-Feb-2005

Basic | Limits Overall | **EGM/Casino** | Racing | Lotto | Card money | Exclusions | Personal | Loyalty | Card Password | Sessions

Session limits	Amount limits	Time limits	Exclude EGM of value
Session ($): 2.00	Daily ($): 600.00	Daily (hrs): 9.00	Machine value ($): 0.50
Session (hrs): 4.00	Weekly ($): 900.00	Weekly (hrs): 12.00	Machine value ($): 2.00
Maximum Bet limit($): 600.00	Monthly ($): 1200.00	Monthly (hrs): 24.00	
Minimum Session Break: 5	Yearly ($): 15000.00		Override limits: No

Help | | Find Card | New Card | Save Card | Reset

Card Maintenance
Operator: John Thomas Flanagan

Card Code: 0000000000000016

Venue: Site 2

Location inside venue: 10
Date of Last Change: 08-Feb-2005

Basic | Limits Overall | EGM/Casino | Racing | Lotto | **Card money** | Exclusions | Personal | Loyalty | Card Password | Sessions

Play money on card only: Yes

Last deposited $ 500.00

Maximum card balance $ 2500.00

Date of deposit: 2005-02-08 01:31:07

Balance remaining $ 620.00

Help | | Find Card | New Card | Save Card | Reset

Card Maintenance
Operator: John Thomas Flanagan

Card Code: 0000000000000016

Venue: Site 2

Location inside venue: 10
Date of Last Change: 08-Feb-2005

Basic | Limits Overall | EGM/Casino | Racing | Lotto | Card money | **Exclusions** | Personal | Loyalty | Card Password | Sessions

Exclude on pension/pay day: No

Last Pay Day date: 0000-00-00

Pension/Pay day cycle(weeks): 0

Date limits modified: 2005-02-08 22:18:00

Help | | Find Card | New Card | Save Card | Reset

Players can elect to exclude themselves from playing or gambling on EGM/casino and other forms of gambling, if configured, on days selected by themselves such as paydays or pension days and the like.

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Optional

Depending on the statutory body's rules this information is optional for players to provide. The email address or phone numbers are used, where provided to advise & contact the player in relation to profile changes or their identification of "at risk" or "problem gambler".

Loyalty

GSA provides the ability for a player to specify loyalty schemes of which they are members and to whom they wish to have their playing activity updated to. Currently, a player may specify 4 clubs to be a member of, this can be readily increased. Players accrue loyalty a transaction to the Club the venue is associated with if they are a member of that Club.

Password

This tab is where the player sets up their password. At the issuance of a GSA card a default – *random* password is allocated and advised to the player (in person in a sealed envelope or by automatic email). The player can then change the password using the *Internet Self Maintenance* application over the web.

Sessions

Session Start	Session End	Venue	Terminal	Denomination	Session Number	Time (Minutes)	Betting	Winnings	Movement Net Winnings are in Red
2005-02-13 19:46:47	19:47:33	Site 1	1	$0.01	3	0	$1.60	$0.00	$1.60
2005-02-13 19:44:59	19:46:40	Site 1	1	$0.01	2	1	$4.15	$0.00	$4.15
2005-02-13 19:43:11	19:43:11	Site 1	1	$0.01	1	0	$0.00	$0.00	$0.00
2005-02-12 15:53:26	15:54:35	Site 1	1	$0.10	1	1	$5.00	$0.00	$5.00
2005-02-10 23:55:27	23:59:26	Site 1	1	$0.01	4	3	$0.80	$0.00	$0.80
2005-02-10 04:34:22	04:35:35	Site 1	1	$0.01	3	1	$0.00	$0.00	$0.00
2005-02-10 04:32:04	04:33:12	Site 1	1	$0.01	2	1	$0.00	$0.00	$0.00
2005-02-10 04:31:23	04:32:00	Site 1	1	$0.01	1	0	$0.00	$0.00	$0.00
2005-02-09 00:35:03	00:35:18	Site 1	1	$0.20	1	0	$0.00	$0.00	$0.00
Total							$11.55	$0.00	$11.55

The *player's sessions* over the current month are shown. Not the underline of the session date and time indicates the session details are available to be drilled down to.

Longer periods of the player's gambling history can be viewed in other GSA options.

The results of a drill-down on a session are shown below:

Session Header	
Reference	Information
Venue	Site 1
Terminal	1
Session	1
Card #	0000000000000016
Date	2005-02-12
Start Time	00:35:03
End Time	00:35:18
Duration	0 Minutes
Machine Denomination	$0.20
Funds Advanced	$0.00
Total Loss	$5.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	5
Number Of Wins	0
Number Of Fund Updates	1
Average Bet	$1.00
Average Win per Bet	$0.00
Average Win	$0.00
Average Time to Bet	0.00 Seconds

Terminal 1, Session 1:	Site 1				
Time	Journal	Bet	Win	Net Movement	Funds Added
15:53:49	324	$1.00		$1.00	
15:53:50	325	$1.00		$1.00	
15:53:41	320				$5.00
15:53:49	323	$1.00		$1.00	
15:53:46	322	$1.00		$1.00	
15:53:43	321	$1.00		$1.00	
		$5.00		$5.00	$5.00

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Blocked Card

In this example a player whose GSA card is blocked attempted to use their card

Session Header	
Reference	Information
Venue	Site 1
Terminal	1
Session	9
Card #	0000000000000101
Date	2005-02-12
Start Time	16:01:37
End Time	16:01:37
Duration	0 Minutes
Machine Denomination	$1.00
Funds Advanced	$0.00
Total Winnings	$0.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	Yes
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	0
Number Of Wins	0
Number Of Fund Updates	0
Average Bet	$0.00
Average Win per Bet	$0.00
Average Win	$0.00
Average Time to Bet	0.00 Seconds

Terminal 1, Session 9: Site 1					
Time	Journal	Bet	Win	Net Movement	Funds Added

Session Header	
Reference	Information
Venue	Site 1
Terminal	1
Session	7
Card #	0000000000000101
Date	2005-02-12
Start Time	15:59:58
End Time	15:59:58
Duration	0 Minutes
Machine Denomination	$0.50
Funds Advanced	$0.00
Total Winnings	$0.00
Denomination Warning	No
Denomination Block	Yes
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	0
Number Of Wins	0
Number Of Fund Updates	0
Average Bet	$0.00
Average Win per Bet	$0.00
Average Win	$0.00
Average Time to Bet	0.00 Seconds

Terminal 1, Session 7: Site 1					
Time	Journal	Bet	Win	Net Movement	Funds Added

History of Play

Session Header	
Reference	Information
Venue	Site 1
Terminal	1
Session	2
Card #	0000000000000101
Date	2005-02-12
Start Time	00:19:45
End Time	00:34:52
Duration	15 Minutes
Machine Denomination	$0.20
Funds Advanced	$0.00
Total Loss	$2.10
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	27
Number Of Wins	3
Number Of Fund Updates	3
Average Bet	$1.08
Average Win per Bet	$1.00
Average Win	$9.00
Average Time to Bet	33.33 Seconds

Terminal 1, Session 2:   Site 1

Time	Journal	Bet	Win	Net Movement	Funds Added
15:10:58	299	$0.50		$0.50	
15:11:04	300	$2.00		$2.00	
15:10:56	298	$0.50	$4.50	-$4.00	
15:10:50	0				$0.50
15:10:16	296	$1.00		$1.00	
15:10:28	297	$0.50		$0.50	
15:11:12	301	$2.00	$18.00	-$16.00	
15:11:18	302	$2.00		$2.00	
15:11:24	307	$2.00		$2.00	
15:11:25	308	$2.00		$2.00	
15:11:22	306	$2.00		$2.00	
15:11:21	305	$2.00		$2.00	
15:11:19	303	$2.00		$2.00	
15:11:20	304	$2.00		$2.00	
15:08:57	0				$4.00
15:10:14	295	$1.00		$1.00	
15:09:26	286	$0.50		$0.50	
15:09:28	287	$0.50		$0.50	
15:09:24	285	$0.50		$0.50	
15:09:23	284	$0.50		$0.50	
15:09:15	282	$0.10		$0.10	
15:09:22	283	$0.50		$0.50	
15:10:09	0				$2.00
15:09:31	288	$0.50		$0.50	
15:09:55	293	$1.00		$1.00	
15:09:57	294	$1.00		$1.00	
15:09:37	289	$0.50	$4.50	-$4.00	
15:09:48	292	$1.00		$1.00	
15:09:42	291	$0.50		$0.50	
15:09:40	290	$0.50		$0.50	
		$29.10	$27.00	$2.10	$6.50

This is the session history of a player who spent 15 minutes on a machine, made 27 bets, had 3 wins, had an average bet of $1.00 and inserted $6.50 eventually losing $2.10 over the session. The session started at 00:19 on the 12th February 2005 and ended at 00:34 on the same day.

The information block on the right hand side shows each spin of the EGM machine in this session. This information indicates the audit number, bet amount, amount won, net movement and the points at which funds were added to the EGM machine by the player (coin or cashless).

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Reached Pre-commitment Limit – Targeted Message

Session Header			Terminal 1, Session 1:	Site 1			
Reference	Information	Time	Journal	Bet	Win	Net Movement	Funds Added
Venue	Site 1	00:20:40	148	$0.10		$0.10	
Terminal	1	00:20:39	147	$0.10		$0.10	
Session	1	00:20:40	149	$0.10		$0.10	
Card #	0000000000000101	00:20:41	150	$0.10		$0.10	
Date	2005-02-11	00:20:42	151	$0.10		$0.10	
Start Time	00:19:15	00:20:37	146	$0.10	$1.50	-$1.40	
End Time	00:19:35	00:20:36	145	$0.10	$1.50	-$1.40	
Duration	0 Minutes	00:20:28	141	$0.50		$0.50	
Machine Denomination	$0.01	00:20:29	142	$0.10		$0.10	
Funds Advanced	$0.00	00:20:34	143	$0.10	$1.50	-$1.40	
Total Loss	$30.00	00:20:35	144	$0.10	$1.50	-$1.40	
		00:20:46	152	$1.00		$1.00	
Denomination Warning	No	00:20:51	153	$2.00		$2.00	
Denomination Block	No	00:21:48	160	$2.00		$2.00	
Excluded Warning	Yes	00:21:48	161	$2.00		$2.00	
Excluded Block	No	00:21:49	162	$2.00		$2.00	
Amount Limit Warning	Yes	00:21:57	163	$0.10		$0.10	
Amount Limit Block	No	00:21:47	159	$2.00		$2.00	
Time Limit Warning	No	00:21:47	158	$2.00		$2.00	
Time Block	No	00:20:51	154	$2.00		$2.00	
		00:20:52	155	$2.00		$2.00	
Number Of Bets	49	00:21:01	156	$0.50		$0.50	
Number Of Wins	4	00:21:10	157	$0.10		$0.10	
Number Of Fund Updates	0	00:20:27	140	$1.00		$1.00	
Average Bet	$0.73	00:20:26	139	$1.00		$1.00	
Average Win per Bet	$0.12	00:19:39	123	$0.20		$0.20	
Average Win	$1.50	00:19:38	122	$0.20		$0.20	
Average Time to Bet	0.00 Seconds	00:19:40	124	$0.10		$0.10	

Card Blocking

Card Block Request
Operator: Flanagan, John Admin

Card Code: 0000000000000016   Venue: Site 2
                                     Location in venue: 10
                                     Date of Last Change: 13-Feb-2005

Details

Blocked: No

[Find Card] [Block Card] [Reset]

When a card is blocked, an email or SMS or letter is forwarded to the player where the contact details have been provided. Once a card is blocked it is immediately rendered invalid.

Re-Activating a Pre-commitment Card

Card is ACTIVE.

Card Re-Activation Request
Operator: Flanagan, John Admin

Card Code: 0000000000000016   Venue: Site 2
                                     Location in venue: 10
                                     Date of Last Change: 13-Feb-2005

Details

Blocked: No

[Find Card] [Re-activate Card] [Reset]

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Reporting

<table>
<tr><td colspan="8" align="center">Report Options</td></tr>
</table>

By	Week	Date	14-Feb-2005	Display As	Table	Filter	None
						Type	Bettings

Venue by Betting

Venue	Week End 09-Jan-2005	Week End 16-Jan-2005	Week End 23-Jan-2005	Week End 30-Jan-2005	Week End 06-Feb-2005	Week End 13-Feb-2005	Week End 20-Feb-2005	Total
Site 1						$201.86	$55.70	$257.56
Total:						$201.86	$55.70	$257.56

Reporting is by card, venue or consolidated. A venue login allows the venue to see only their data. A Statutory Body login allows the user to see the consolidated view.

Reports may be shown for the last 7 days, 7 weeks, 7 months, 7 years or compare the last 7 of each Monday or Tuesday or Wednesday, etc.

Report Options

By	Week	Date	14-Feb-2005	Display As	Table	Filter	None
						Type	Bettings

Betting per Hour by Week: Site 1

Time	Week End 09-Jan-2005	Week End 16-Jan-2005	Week End 23-Jan-2005	Week End 30-Jan-2005	Week End 06-Feb-2005	Week End 13-Feb-2005	Week End 20-Feb-2005	Total:
00:00 - 00:59						$82.00		$82.00
04:00 - 04:59						$0.10		$0.10
23:00 - 23:59						$0.80		$0.80
01:00 - 01:59						$6.11		$6.11
15:00 - 15:59						$47.10		$47.10
16:00 - 16:59						$60.00		$60.00
19:00 - 19:59						$5.75		$5.75
21:00 - 21:59							$55.70	$55.70
Total:						$201.86	$55.70	$257.56

Here one sees the totals for Site 1 for the Week ending 13 Feb 2005 and 20 Feb 2005.

The sessions for Site 1 between nominated hours is shown below:

Sessions between 21:00:00 and 21:59:59   Site 1

Terminal ▼	Monday 14-Feb-2005	Tuesday 15-Feb-2005	Wednesday 16-Feb-2005	Thursday 17-Feb-2005	Friday 18-Feb-2005	Saturday 19-Feb-2005	Sunday 20-Feb-2005	Total:
1	$0.00 1 $0.00 2 $0.00 1 $0.70 2 $10.00 3 $35.00 4 $0.00 3 $0.00 4 $10.00 1							$55.70
Total:	$55.70							$55.70

Each underline is a journal for the EGM transaction in this Site 1 that can be drilled down on.

Session Header

Reference	Information
Venue	Site 1
Terminal	1
Session	3
Card #	6016902010067516
Date	14-Feb-2005
Start Time	21:51:50
End Time	21:52:41
Duration	0 Minutes
Machine Denomination	$0.50
Funds Advanced	$50.00
Total Loss	$10.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	1
Number Of Wins	0
Number Of Fund Updates	2
Average Bet	$10.00
Average Win per Bet	$0.00
Average Win	$0.00
Average Time to Bet	0.00 Seconds

Terminal 1, Session 3:   Site 1

Time	Journal	Bet	Win	Net Movement	Funds Added
21:52:36	400	$10.00		$10.00	
21:52:15	399				$40.00
21:51:59	398				$10.00
		$10.00		$10.00	$50.00

Here one of the transactions has been drilled down to and note <u>all</u> the information including player card number is available for examination, reporting and monitoring.
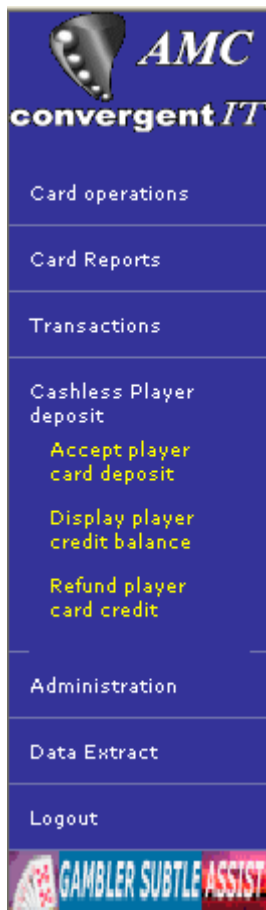
CASHLESS PLAY

GSA supports cashless playing. The funds are not stored on the physical card, although smartcards can be used. The funds are deposited to the GSA card account and are held on the GSA Portal.

The funds are transferred to the "cashless" acceptor in the EGM and play according to any pre-commitment rules the player has put in place occurs.

The balance on the GSA card account is decremented by a transfer of the funds to the cashless acceptor or EGM.

Under GSA pre-commitment strategies the player can:

Set a maximum credit balance for the cashless GSA card account.

Elect to <u>only</u> play with the cashless card account. If a player elects to play cashless only, then they cannot play with cash (coin/notes) in EGM machines – the GSA authorisation process stops them and continues to inhibit the coin & note acceptors.

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Deposit funds using the Internet and credit card authorisation; or use cash or debit or credit cards by visiting a GSA point in a venue or mailing a deposit to the GSA operators. Any other secure payment means can also be used.

Players can have credit balances on their GSA card account re-paid to them in the form of a transfer to their bank account or a cheque. Fees are associated with this service.

All deposits and withdrawals, in fact any movement, in the balance of the account is written to the databases and a DEPOSIT report is available through the *GSA Internet Self Maintenance* facility at any time the player wishes to obtain a report. Reports may also be obtained via the mail; however, fees are associated with this method.

The GSA *cashless facility* places no money on the GSA card, the money is held centrally on the GSA Portal with access to balance and transactions protected by the need to have both the GSA card number and the correct PIN or PINs. Consequently, this cashless playing technique does not generate theft or fraud opportunities or place the player at risk of assault.
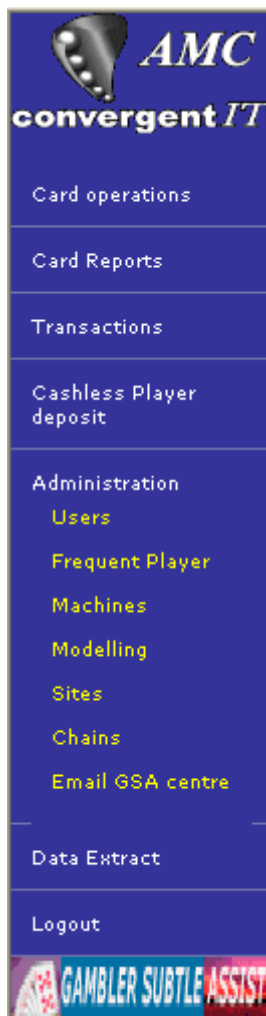
Administration

Users:
Functionality to deal with setting up authorised users in venues, the Statutory Body, the GSA system operators and others are provided. User setup defines the access level of each authorised user and exactly what they can and cannot access and do.

Machines:
Information relating to the venue, location within the venue, the denomination of the EGM, the maximum number of lines, registration information and nature of game and further information is held by GSA for reporting and compliance purposes.

Modelling:
The applications that identifies an individual as an "at risk" or "problem gambler" are encapsulated in a highly secure area of the Administration section of the secure GSA Portal. The modelling consists of a complex series of psychological and psychiatric based algorithms. These applications continually run and triggered individuals are contacted by either email, mail or visit to address details provided or alternatively the individual is <u>found</u> whilst playing in a venue and contacted at the venue where contact details have not been provided.
Due to the commercial sensitivity of this area and algorithms no further details on this section are provided at this time.

Site Maintenance:
Details relating to licenced venues is set up and held here, including who to contact and how to contact them in the event of a triggered individual.

Email GSA:
An ability to email the GSA support area is provided.
PLAYER REPORTING AND ACCESS TO THEIR INFORMATION TO CHANGE PRE-COMMITMENTS

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Players may obtain access to the information GSA holds in relation to themselves from a range of sources:

Kiosks within a venue, if installed;
Telephonically requesting information;
Request mailing of information, fees may apply to cover postage and pettys;
Over the Internet.

The following example demonstrates the Internet Self Maintenance application available for GSA players to:

Amend or change personal details;
Change allowed pre-commitments;
Obtain activity statements online;
Deposit funds by credit or debit card to a GSA cashless account;
Obtain deposit history report;
Obtain a history of changes to their GSA card;
View session information of their playing activity;
View significant pre-commitment limit events.

The initial LOGIN screen is:

The login process requires both the GSA card number or email <u>and</u> the player password.
This is a secure login with encryption of passwords and nothing appears as clear text.

Basic tab

Fields with a white background can be changed by the player using the Internet Self Maintenance. Fields on a solid background can only be changed by authorised GSA operators either at a venue or a GSA point. In this example the player is <u>unable</u> to change the *Proof of Age, Limits (pre-commitment), Blocked, Status, Replacement card, Proof Age Method or Proof Age Reference* fields.

Limits Overall tab

A player can elect to set pre-commitments on <u>any</u> supported gambling form which by *default* is EGM/Casino machines and may include racing and lotto in the future.

EGM/Casino tab

A player can set the pre-commitments in terms of spend & time on a session, daily, weekly, monthly and yearly basis as well as time breaks between sessions and what value machines to <u>not</u> allow them to play.

Additionally a player may elect to be asked a question at the time they reach a pre-commitment if they wish to override that limit. If they actively override this becomes a factor in the "at risk" and "problem gambler" identification modelling. Whether a player is given the choice about enabling overrides or not is configurable at a global system level.

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GAMBLER SUBTLE ASSIST

Cardholder: Internet Self Maintenance

Card Code: 0000000000000016   **Date of Last Change:** 13-Feb-2005

Basics | Limits Overall | EGM/Casino | Racing | Lotto | Cashless | Exclusions | Personal | Loyalty | Password | Sessions

Racing Daily limit($): 90.00
Racing Weekly limit($): 200.00
Racing Monthly limit($): 300.00
Racing Yearly limit($): 2000.00

Help   Log Out   Email   Deposit History   Activity Statement
Block card   Card Changes   Update   Reset

GAMBLER SUBTLE ASSIST

Cardholder: Internet Self Maintenance

Card Code: 0000000000000016   **Date of Last Change:** 13-Feb-2005

Basics | Limits Overall | EGM/Casino | Racing | Lotto | Cashless | Exclusions | Personal | Loyalty | Password | Sessions

Lotto Daily limit($): 110.00
Lotto Weekly limit($): 115.00
Lotto Monthly limit($): 300.00
Lotto Yearly limit($): 2000.00

Help   Log Out   Email   Deposit History   Activity Statement
Block card   Card Changes   Update   Reset

If multiple gambling forms are enabled and supported by the Statutory body additional tabs in the form covering them become visible to the player for which they can set pre-commitment limits. The two tabs above show the forms for player pre-commitments in terms of racing and lotto.

GAMBLER SUBTLE ASSIST

Cardholder: Internet Self Maintenance

Card Code: 0000000000000016   **Date of Last Change:** 14-Feb-2005

Basics | Limits Overall | EGM/Casino | Racing | Lotto | Cashless | Exclusions | Personal | Loyalty | Password | Sessions

Play money on card only: Y   Balance remaining $ -50.00
Last deposited $ -50.00
Maximum card balance $ 200.00
Date of deposit: 2005-02-14 19:00:54

Help   Log Out   Email   Deposit History   Activity Statement
Block card   Card Changes   Update   Reset

Cashless tab

The player who has elected to play on a cashless basis cannot change that status currently via the web; they can either deposit funds to the card account which is held on the GSA Portal host using a credit or debit card or change the maximum card balance.

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The *exclusions* tab contains days or dates upon which the player does not wish to be allowed to play. To activate this request the player provides a written request to a GSA point and the information is processed. Having been set up a written response is needed from the player to remove the specific exclusion.

In the example above the player has elected to not be allowed to play on *Pension/Pay days* starting from the 2nd April 2004 and with a cycle every 2 weeks.

Other specific exclusion days or events can be configured.

The player may amend their *Personal* details tab including address, email address and telephone numbers for contact by the GSA operators.

The *Loyalty* tab is where the player is able to maintain the loyalty scheme numbers for the various loyalty programs operated by licenced venues that they are a member of and wish to have updated with the session information of their activities as appropriate. This enables the player to reduce the

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number of cards they need to carry and avoids the need for them to remember to use the loyalty card. The GSA card <u>must</u> be inserted, depending on the mode implemented, and hence with this information GSA can ensure the player receives credit for their activity within the venue affiliated with the loyalty scheme(s) of which they are a member.

The *Password* tab is provided for the player to change their password (PIN) associated with their GSA card and Internet access to GSA. The passwords are encrypted.

The *Sessions* tab shows the player activity over the current month. The session information can be drilled-down to the session detail that includes the venue, the machine identity, the length of time, any pre-commitment limits reached, any exclusions attempted to breach, wins, losses, amount of funds played, and so on.

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Session Header	
Reference	Information
Venue	Site 1
Terminal	1
Session	1
Card #	0000000000000016
Date	2005-02-12
Start Time	00:35:03
End Time	00:35:18
Duration	0 Minutes
Machine Denomination	$0.20
Funds Advanced	$0.00
Total Loss	$5.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	5
Number Of Wins	0
Number Of Fund Updates	1
Average Bet	$1.00
Average Win per Bet	$0.00
Average Win	$0.00
Average Time to Bet	0.00 Seconds

GAMBLER SUBTLE ASSIST

Terminal 1, Session 1 Card # 0000000000000016 : Site 1

Time	Journal	Bet	Win	Net Movement	Funds Added
15:53:49	324	$1.00		$1.00	
15:53:50	325	$1.00		$1.00	
15:53:41	320				$5.00
15:53:49	323	$1.00		$1.00	
15:53:46	322	$1.00		$1.00	
15:53:43	321	$1.00		$1.00	
		$5.00		$5.00	$5.00

Each session shows the information above providing the player letting the player determine exactly what occurred.

SELECTABLE INTERNET PLAYER REPORTS

GAMBLER SUBTLE ASSIST

Cardholder: Internet Self Maintenance

Card Code: 0000000000000016
Date of Last Change: 14-Feb-2005

Basics | Limits Overall | EGM/Casino | Racing | Lotto | Cashless | Exclusions | Personal | Loyalty | Password | Sessions

Discretionary income: 15000.00
Proof of Age: Y
Limits: Y
Blocked: N
Created: 31-Jan-2004

State (Residence): VICTORIA
Country (Residence): AUSTRALIA
Proof Age Method (photo ID): Drivers licence
Proof Age Reference #: 2084 396 3
Status: Active
Replacement card:

Help   Log Out   Email   Deposit History   Activity Statement
Block card   Card Changes   Update   Reset

The *buttons* at the bottom section of the screen are controls and reports the player may select.

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PLAYER GSA CARD CHANGES REPORT

				Change Details for Card: 0000000000000016 current Site: Internet Self Maintenance	Operator:			
Rec # ▼	Notified Date	Reference	Blocked	Changes		Email	Venue	Operator
		No. changes:	164			No. blocks:	38	
579	2005-2-14 11:09 PM	542f25c3	No	Player maximum card balance changed from 0.00 to $200.00.		acs_john@yahoo.com	11	Flanagan, John Admin
565	2005-2-13 7:44 PM	f7fbec68	Yes	Blocking changed from Yes to No.		acs_john@yahoo.com	10	Flanagan, John Admin
564	2005-2-13 1:17 AM	58cbe34c	No	Player maximum card balance changed from 150.00 to $200.00.		acs_john@yahoo.com	-1	Cardholder 0000000000000016 via Internet
561	2005-2-12 3:56 PM	6e380817	Yes	Blocking changed from No to Yes.		acs_john@yahoo.com	999999	Cardholder 0000000000000016 via Internet
560	2005-2-10 10:29 PM	dbf15973	No	Maximum Bet limit changed from $ 35.0 to $40.0. Session Break changed from : 120 minutes to 150 minutes.		acs_john@yahoo.com	999999	Flanagan, John Admin
559	2005-2-10 10:27 PM	6b50b9be	No	Maximum Bet limit changed from $ 30.0 to $35.0. Session Break changed from : 90 minutes to 120 minutes.		acs_john@yahoo.com	10	Flanagan, John Admin
558	2005-2-10 10:25 PM	c931c82d	No	Maximum bet amount limit changed from $ 20.0 to $30.0.		acs_john@yahoo.com	-1	Cardholder 0000000000000016 via Internet
557	2005-2-10 10:22 PM	07ed6d20	No	Sessions amount limit changed from $ 180.00 to $120.00. Daily time limit changed from: 20.00 hours to 12.00 hours. Maximum bet amount limit changed from $ 30.0 to $20.0. Break on reaching Maximum Spend or Time in a Session changed from: 80 minutes to 90 minutes.		acs_john@yahoo.com	-1	Cardholder 0000000000000016 via Internet
556	2005-2-10 10:19 PM	0f69fde6	No	Sessions amount limit changed from $ 200.00 to $180.00. Week limit changed from $ 350.00 to $450.00. Maximum bet amount limit changed from $ 25.0 to $30.0. Break on reaching Maximum Spend or Time in a Session changed from: 90 minutes to 80 minutes.		acs_john@yahoo.com	-1	Cardholder 0000000000000016 via Internet
555	2005-2-10 10:14 PM	f5304c4e	No	Maximum bet amount limit changed from $ 30.0 to $25.00. Time Break after reaching Maximum Spend or Time in a Session and starting a new Session changed from: 120 minutes to 90 minutes.		acs_john@yahoo.com	-1	Cardholder 0000000000000016 via Internet
554	2005-2-10 10:14 PM	77365a99	No	Limits apply to racing changed from: No to Yes. Limits apply to lotto changed from: No to Yes.		acs_john@yahoo.com	-1	Cardholder 0000000000000016 via Internet
553	2005-2-10 9:58 PM	2ef04f01	No	Time Break after reaching Maximum Spend or Time in a Session and starting a new Session changed from: 30 minutes to 120 minutes.		acs_john@yahoo.com	-1	Cardholder 0000000000000016 via Internet
552	2005-2-10 9:55 PM	ca30e28c	No	Sessions amount limit changed from $ 160.00 to $200.00.		acs_john@yahoo.com	-1	Cardholder 0000000000000016 via Internet

This report is obtainable on demand by the player and reflects all changes made to their GSA card from any source whatsoever and who made the change. This ensures the player that requested changes have been made in accordance with their wishes and secondly lets them follow other changes including *blocks*.

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PLAYER GSA CARD CASHLESS DEPOSIT REPORT

GAMBLER SUBTLE ASSIST

Deposit Date ▼	Reference	Cash	Method	Non-cash	Operator	PREMISES
ALL deposits:		**$4,700.00**			**Number of deposits:**	**74**
Sub-total deposits:		$4,004.73		$695.27		
2005-2-6 1:45 AM	6385bfd3	-$20.00	CASH	$0.00	Flanagan, John Admin	Site 1
2005-2-6 1:43 AM	ebeecf72	$50.00	CASH	$0.00	Flanagan, John Admin	Site 1
2005-2-14 7:00 PM	db1d174a	$0.00	MASTERCARD	-$50.00	Flanagan, John Admin	Internet Self
2005-2-14 6:54 PM	2e901e42	$0.00	MASTERCARD	$20.00	Flanagan, John Admin	Site 2
2005-2-13 7:45 PM	None	-$10.00	Withdrawal Via EGM Machine	$0.00	Self	Site 1
2005-2-13 1:37 AM	33563b24	$20.00	CASH	$0.00	Flanagan, John Admin	Site 1
2005-2-13 1:24 AM	1e4d38e1	$10.00	CASH	$0.00	Flanagan, John Admin	Site 1
2005-2-13 1:19 AM	44b5b0b4	$25.00	CASH	$0.00	Flanagan, John Admin	Site 1
2005-2-1 2:43 PM	0e3c451a	$0.00	MASTERCARD	$110.00	Flanagan, John Admin	Site 1
2005-2-1 2:41 PM	4ba5bbb5	-$90.00	CASH	$0.00	Flanagan, John Admin	Site 1
2004-8-12 3:28 PM	fead3f61	$100.00	CASH	$0.00	Flanagan, John Admin	Site 2
2004-4-3 12:18 AM	8c52a66d	$10.00	CASH	$0.00	John Thomas Flanagan	Site 1
2004-4-2 1:41 AM	10a4c729	$0.00	MASTERCARD	$30.00	John Flanagan Administrator	Site 3
2004-4-2 1:30 AM	82c10356	$50.00	CASH	$0.00	John Flanagan Administrator	Internet Self
2004-4-2 1:01 AM	231d741d	$0.00	DINERS	-$25.00	John Flanagan Administrator	Site 2
2004-4-2 1:00 AM	a5b0348f	-$10.00	CASH	$0.00	John Flanagan Administrator	Internet Self

This report shows <u>all</u> deposit and payout receipts affecting the cashless GSA card account, including refunds to the player. The information can be tracked over any date period the player desires.

PLAYER GSA CARD ACTIVITY STATEMENT REPORTS

GAMBLER SUBTLE ASSIST

Report Options

By [Day]   Date [10-Feb-2005]   Display As [Table]   Filter [None]
Type [Bettings]

Venue by Betting - Card # 0000000000000016

Venue	Monday 07-Feb-2005	Tuesday 08-Feb-2005	Wednesday 09-Feb-2005	Thursday 10-Feb-2005	Friday 11-Feb-2005	Saturday 12-Feb-2005	Sunday 13-Feb-2005	Total ▼
Site 1			$0.00	$0.80		$5.00	$5.75	$11.55
Total:			$0.00	$0.80		$5.00	$5.75	$11.55

This reporting structure provides the player with an easy to use powerful tool to understand a large number of things about their playing over any period of time. The calendar can be set to any date today or in the past. The report can be generated on a daily, weekly, monthly or yearly basis and then a range of different filters applied.

The filters may be a specific warning or block activity or any warning or block activity.

The type may be betting, winnings, net movement or sessions.

In the above example you can see card 16 played at Site 1 on 9-Feb, 10-Feb and 12-Feb.

Report Options

By	Day	Date	10-Feb-2005	Display As	Table	Filter	None
						Type	Bettings

Betting per Hour by Day: Site 1 - Card # 0000000000000016

Time	Monday 07-Feb-2005	Tuesday 08-Feb-2005	Wednesday 09-Feb-2005	Thursday 10-Feb-2005	Friday 11-Feb-2005	Saturday 12-Feb-2005	Sunday 13-Feb-2005	Total:
00:00 - 00:59			$0.00					$0.00
04:00 - 04:59				$0.00				$0.00
23:00 - 23:59				$0.80				$0.80
15:00 - 15:59						$5.00		$5.00
19:00 - 19:59							$5.75	$5.75
Total:			$0.00	$0.80		$5.00	$5.75	$11.55

Clicking on the Site 1 the player is shown the times of each of their activities in the Site.

Clicking on the time reveals:

Betting per Hour by Day: Site 1 - Card # 0000000000000016

Time	Monday 07-Feb-2005	Tuesday 08-Feb-2005	Wednesday 09-Feb-2005	Thursday 10-Feb-2005	Friday 11-Feb-2005	Saturday 12-Feb-2005	Sunday 13-Feb-2005	Total:
00:00 - 00:59			$0.00					$0.00
04:00 - 04:59				$0.00				$0.00
23:00 - 23:59				$0.80				$0.80
15:00 - 15:59 View Sessions for this Hour						$5.00		$5.00
19:00 - 19:59							$5.75	$5.75
Total:			$0.00	$0.80		$5.00	$5.75	$11.55

This enables the player to view the sessions they played in this time interval.
Clicking on the link shows:

Card # 0000000000000016   Sessions between 15:00:00 and 15:59:59   Site 1

Terminal ▼	Monday 07-Feb-2005	Tuesday 08-Feb-2005	Wednesday 09-Feb-2005	Thursday 10-Feb-2005	Friday 11-Feb-2005	Saturday 12-Feb-2005	Sunday 13-Feb-2005	Total:
1						$5.00 1		$5.00
Total:						$5.00		$5.00

This indicates the player played terminal 1 on the 12-Feb and *bet* $5.00; note the underlined 1 beside the $5.00 by clicking on it the player sees the full session details.

Session Header

Reference	Information
Venue	Site 1
Terminal	1
Session	1
Card #	0000000000000016
Date	12-Feb-2005
Start Time	00:35:03
End Time	00:35:18
Duration	0 Minutes
Machine Denomination	$0.20
Funds Advanced	$0.00
Total Loss	$5.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	5
Number Of Wins	0
Number Of Fund Updates	1
Average Bet	$1.00
Average Win per Bet	$0.00
Average Win	$0.00
Average Time to Bet	0.00 Seconds

GAMBLER SUBTLE ASSIST

Terminal 1, Session 1 Card # 0000000000000016 : Site 1

Time	Journal	Bet	Win	Net Movement	Funds Added
15:53:49	324	$1.00		$1.00	
15:53:50	325	$1.00		$1.00	
15:53:41	320				
15:53:49	323	$1.00		$1.00	
15:53:46	322	$1.00		$1.00	
15:53:43	321	$1.00		$1.00	
		$5.00		$5.00	

The player has been able to view the entire details of the session they were interested in. This gives to the player the ultimate power to always be able to know exactly what they did, no guessing.

PLAYER SELF EXCLUSION (BLOCK) USING THE INTERNET SELF MAINTENANCE

GAMBLER SUBTLE ASSIST

Cardholder: Internet Self Maintenance
Card Block Request

Card Code: 0000000000000016

Venue: Internet Self
Location in venue: 11
Date of Last Change: 14-Feb-2005

Details

Blocked: No

Block Card   Return Self Maintenance   Reset

The Player can *self-block* or *exclude* themselves from being allowed to play EGM machines within a venue or all venues. The player is sent an email confirming their blocking of their card.

PLAYER EMAIL TO GSA SUPPORT

GAMBLER SUBTLE ASSIST

**Email to
Player_support@systraq.com**

From (Name):	JOHN T FLANAGAN
From (Email):	acs_john@yahoo.com
Subject:	
Message:	

Send Email   Reset

A player may direct any questions to the GSA operations and support area directly from the Internet Self Maintenance application. The email can cover any relevant matter or question the player has in relation to GSA and its operation.

LOGOUT SCREEN

GAMBLER SUBTLE ASSIST

Logged Out

Thank you for your Patronage

Any changes that have been made will be activated, subject to the relevant guidelines and any 'cool off' periods applicable.
If you have supplied an email address, an email confirming the changes made by you will be forwarded.

You can only view **your** own card and details. Email messages are automatically sent to the cardholder confirming <u>all</u> changes made.
For auditing purposes a record of <u>all changes</u> and who is making them are retained. This information is held subject to Privacy provisions.

Re-login

PLAYER ACTIVITY STATEMENT & STATUTORY BODY REPORTING OPTIONS

FILTERS

The report filter option of *any warnings* has been selected.
The report shows that at *Site 1* there were 2 warnings issued to players.

Drilling down on the *Site 1* reveals:

The warnings happened in the hours shown and further drilling down shows:

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The *audit journal* for the terminal session is shown and drilling down shows

Session Header	
Reference	Information
Venue	Site 1
Terminal	1
Session	1
Card #	0000000000000101
Date	09-Feb-2005
Start Time	00:19:15
End Time	00:19:35
Duration	0 Minutes
Machine Denomination	$0.01
Funds Advanced	$0.00
Total Winnings	$0.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	Yes
Excluded Block	No
Amount Limit Warning	Yes
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	0
Number Of Wins	0
Number Of Fund Updates	0
Average Bet	$0.00
Average Win per Bet	$0.00
Average Win	$0.00
Average Time to Bet	0.00 Seconds

The venue

The player's session number
The player GSA card number
Date
Session start time
Session end time
Session duration in this case zero.
Machine denomination.
Funds inserted – none as card rejected due limit reached.

Player was *excluded* from playing.

Reason player excluded was *pre-commitment amount limit* had been reached.

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Session Header	
Reference	Information
Venue	Site 1
Terminal	1
Session	8
Card #	0000000000000101
Date	12-Feb-2005
Start Time	16:00:06
End Time	16:00:34
Duration	0 Minutes
Machine Denomination	$1.00
Funds Advanced	$450.00
Total Loss	$40.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	No
Amount Limit Warning	Yes
Amount Limit Block	Yes
Time Limit Warning	No
Time Block	No
Number Of Bets	2
Number Of Wins	0
Number Of Fund Updates	1
Average Bet	$20.00
Average Win per Bet	$0.00
Average Win	$0.00
Average Time to Bet	0.00 Seconds

Warning message about *amount limit* given

Play *block* due to amount limit having been reached.

Terminal 1, Session 8 Card # 0000000000000101 Showing: Any Warning : Site 1					
Time	Journal	Bet	Win	Net Movement	Funds Added
16:00:30	328	$20.00		$20.00	
16:00:24	327	$20.00		$20.00	
16:00:14	326				$450.00
		$40.00		$40.00	$450.00

The player's activities that lead to the warning and block in the example above.

An *excluded player block* is shown below:

Session Header	
Reference	Information
Venue	Site 1
Terminal	1
Session	9
Card #	000000000000101
Date	12-Feb-2005
Start Time	16:01:37
End Time	16:01:37
Duration	0 Minutes
Machine Denomination	$1.00
Funds Advanced	$0.00
Total Winnings	$0.00
Denomination Warning	No
Denomination Block	No
Excluded Warning	No
Excluded Block	Yes
Amount Limit Warning	No
Amount Limit Block	No
Time Limit Warning	No
Time Block	No
Number Of Bets	0
Number Of Wins	0
Number Of Fund Updates	0
Average Bet	$0.00
Average Win per Bet	$0.00
Average Win	$0.00
Average Time to Bet	0.00 Seconds

CHANGES MADE TO A PLAYER PROFILE GENERATES EMAILS TO PLAYER

Email successfully sent to acs_john@yahoo.com

Precommit card details were successfully saved

Card Maintenance
Operator: John Thomas Flanagan

Card Code: 0000000000000016

Venue: Site 2
Location inside venue: 11
Date of Last Change: 15-Mar-2005

Basic | Limits Overall | EGM/Casino | Racing | Lotto | Card money | Exclusions | Personal | Loyalty | Card Password | Sessions

Discretionary income: 57000.00
Proof of Age: Yes
Limits: Yes
Blocked: No
Created: 17-Feb-2003

State (Residence): SOUTH AUSTRALIA
Country (Residence): AUSTRALIA

Proof Age Method (photo ID): Drivers licence
Proof Age Reference #: 2084 396 2
Status: Active
Replacement card:

Help   Find Card   New Card   Save Card   Reset

The email response to the player indicates each field that has been changed.

It shows what the field was and what it has been changed to.

A reference number is allocated by the system and the player is directed to the GSA point where the change was made if appropriate and informed how to contact the person who activated the player's request.

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SAMPLE EMAIL FORWARDED TO PLAYER FOLLOWING CARD CHANGES

GAMBLER SUBTLE ASSIST CARD PROFILE UPDATE: CONFIDENTIAL

Date: 15/03/2005

Dear Cardholder 0000000000000016 ,

On 15/03/2005 the following changes were made to your Gambler Subtle Assist card profile either directly by you via the Internet

or as recently requested in correspondence with us.

The changes are effective from 15/03/2005 time: 00:29 .

The changes requested were:

State changed from: VIC to SA.
Sessions amount limit changed from $ 2.00 to $200.00.
Day limit changed from $ 600.00 to $550.00.
Week limit changed from $ 900.00 to $850.00.
Month limit changed from $ 1200.00 to $1150.00.
Year limit changed from $ 15000.00 to $13000.00.
Excluded machine type changed from $ 0.50 to $1.00.
Daily time limit changed from: 9.00 hours to 6.00 hours.
Weekly time limit changed from: 12.00 hours to 18.00 hours.
Monthly time limit changed from: 24.00 hours to 28.00 hours.
Maximum Bet limit changed from $ 600.00 to $20.00.
Session Break changed from : 5 minutes to 15 minutes.

The changes were processed by John Thomas Flanagan at:

Site 2
Unit 237/416 St Kilda Road,
Melbourne,
VIC   3004

Your reference number for these changes is: 58e42532.

Should you have any queries or wish to make further changes please do not hesitate to contact us at our email address in this

email (webmaster@systraq.com) or at the venue (jflanagan@amcretail.com).

Alternatively, you may contact the venue by telephone where the changes were made on 03-9820-8877 for assistance.

Thank you for your request and we are pleased to be of service.

Yours faithfully,

John T. Flanagan
Director Gambler Subtle Assist Card Services

CARD BLOCK REQUEST PROCESSING WITH EMAIL RESPONSE TO PLAYER

Email successfully sent to acs_john@yahoo.com

Card block request was successfully saved

Card Block Request
Operator: John Thomas Flanagan

Card Code:	0000000000000016	**Venue:** Site 2
		Location in venue: 11
		Date of Last Change: 15-Mar-2005

Details

Blocked: Yes

[   ]   Find Card   Block Card   Reset

SAMPLE EMAIL ALERTING PLAYER THE GSA CARD IS BLOCKED

GAMBLER SUBTLE ASSIST CARD PROFILE UPDATE: CONFIDENTIAL - CARD BLOCK

Date: 15/03/2005

Dear Cardholder 0000000000000016 ,

On 15/03/2005 acting in accordance with your expressed wishes we have BLOCKED your Gambler Subtle Assist card.

From the effective date and time your card will no longer activate gaming or gambling activities at any venue within the State of Victoria.

The insertion of a card into the poker machine or its swiping at a gaming machine or, depending on your profile at betting at a racing meeting or Lotto purchase point and verification the card is both valid and active is an essential step in the gambling and gaming process in Victoria.

The BLOCK on card 0000000000000016 is effective from 15/03/2005 time: 00:00 .

The changes were processed by John Thomas Flanagan at:

Site 2
Unit 237/416 St Kilda Road,
Melbourne,
VIC

Your reference number for the blocking of the card is: a8e87b34.

Should you have any queries or wish to make further changes please do not hesitate to contact us at our email address in this email (webmaster@systraq.com) or at the venue (jflanagan@amcretail.com).

Alternatively, you may contact the venue by telephone where the changes were made on 03-9820-8877 for assistance.

Thank you for your request and we are pleased to be of service.

Yours faithfully,

John T. Flanagan
Director Gambler Subtle Assist Card Services

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RE-ACTIVATING A PLAYER GSA CARD

Emails are generated or SMS or mail letters are generated for those players who have provided appropriate contact details for the following circumstances:

Changes to GSA card details.
Blocking requests.
Re-activation requests.
Triggering by GSA modelling.