

The
CAMPBELL
Group of Companies



25 February 2009

Ms Karen Gosling
General Manager- Airports Branch
Department of Transport & Regional Services
GPO Box 594
CANBERRA ACT 2601

Dear Ms Gosling,

Thank you for your letter of 25 September 2008. I would like to express my dismay to the recently released Green paper. It has not taken up our issue of granting approval for gambling specifically at the shopping centre of Harbour Town, Adelaide. Our submission was ignored.

My views, and indeed those of the Lottery Commission have been submitted last year. Please refer to my previous correspondence of 22/10/08 and 3/9/08 and 18/7/07.

Yours Sincerely,

Sarah Campbell
Director



The **CAMPBELL** Group of Companies



22nd October 2008

Ms Karen Gosling
General Manager - Airports Branch
Department of Transport & Regional Services
GPO Box 594
CANBERRA ACT 2601

Dear Ms Gosling

Thank you for your letter dated 25th September 2008 regarding approval for Lotteries for our store at Harbour Town, West Beach.

I have enclosed a copy of the Australian Newsagent Federation (ANF) latest update, date 9/10/08, which states:-

"Advocacy on lotteries in airports

The ANF recently contacted the Federal Office of the Minister for Transport and Infrastructure in relation to amendments of the regulation of lotteries and soft gambling products within Airports.

The ANF in conjunction with Brisbane Airports Corporation is presenting a case to the Minister to ease the current restrictions surrounding the sale of scratchies and other lottery products on Federal Airport property.

If successful, these amendments will allow the sale of lottery products in those Federal Airports that do not currently permit the sale lottery products and will also reduce and simplify the level of regulatory oversight of the current limited lottery operations."

The email address for this site is news@anf.net.au.

Please could you advise if you require any more information to assist in the preparation of the Green paper.

Yours sincerely



SARAH CAMPBELL
DIRECTOR

Encl.

AUSTRAC itself).

We ask for your continued patience while ANF and Western Union staff telephone newsagents to obtain the final details as we are completing your registration with AUSTRAC and so as to submit the 2007 Compliance Report.

The registration and compliance reporting for the majority of the newsagent network is nearly completed. There are only few newsagents remaining who need to be registered and the ANF will be following up with those agents shortly.

The ANF and Western Union would like to thank all of those newsagents who assisted our staff in the collection and updating of contact details for the completion of agent registrations and compliance reports.

If you receive a call or letter from AUSTRAC that you are unsure of or do not understand fully, or have any further questions regarding your AUSTRAC 2007 Compliance Reports, please call the Western Union team at ANF on (02) 8425 9600 and we will advise you of the best course of action.

For further information please see the [update](#) on the home page of the ANF website.

Advocacy on lotteries in airports



ANF NEWS.

9/10/08.

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Agents in Action

Three Connections members are floating in a pool of Connections Points following their impressive wins in the recent Triple Display Competition. Benalla Newsagency, Coolum Village News, and NewsXpress Parap were the shining stars in the Top Gear Australia, Grazia and Australian Good Food display competitions.

According to Connections with ACP, these three stores showed a consistent level of enthusiasm and excelled in all areas from the teaser campaigns to the in-store displays and activities plus outstanding press coverage.

The winner by a whisker was NewsXpress Parap. Click here to see the [slideshow](#) (2 MB Powerpoint file).

Update newsagency details on ANF website

The Find A Newsagency search engine allows internet users to look for a newsagent in their

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25th August, 2008

Ms. Karen Gosling
General Manager - Airports Branch
Department of Transport & Regional Services
GPO Box 594
CANBERRA
ACT 2601

Dear Ms Gosling,

I am writing to you seeking approval to operate a SA Lotteries lottery agency within my business, Campbells Clearance Centre, situated at the Harbour Town shopping centre in West Beach, Adelaide, South Australia.

My family have run newsagencies and lottery outlets in major shopping centres in SA for over 30 years. The Harbour Town shopping complex lies on airport land. However, our customers assume they can purchase lottery tickets from our premises which is not possible. The customers do not understand why they cannot purchase a lottery ticket in this centre, but can do so in every other shopping complex that we are in. Nor can we. This centre is no different to a Westfield shopping complex, but we cannot sell lottery products! Approximately 94,000 customers visited our store last year, many of whom expected to buy a lottery ticket, but could not.

Our application to become an agent of SA Lotteries in Harbour Town was approved long ago. The shopping centre itself is very supportive of our application, as they believe the sale of lotteries products would enhance their general business.

Please could you consider our request seriously. I am aware that changes to the current regulations are being prepared, and would ask that our case be considered as an exception or included as a case study for progression in submissions.

Yours Sincerely,

Sarah Campbell

All correspondence: 297 Diagonal Road, Oaklands Park, South Australia 5046. Ph: 61 8 296 6222. Fax: 61 8 296 3522.

C.K. Investments Pty. Ltd. (A.C.N. 007 639 474); Longhorn Investments Pty. Ltd. (A.C.N. 007 614 459); Yackatoo Nominees Pty. Ltd. (A.C.N. 007 898 731); Highland Consolidated Pty. Ltd. (A.C.N. 007 683 801); Inveraray Investments Pty. Ltd. (A.C.N. 007 602 271); Just Books Pty. Ltd. (A.C.N. 008 010 044).

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1st July, 2008

Michael J. Taylor
Secretary
Department of Transport and Regional Services
GPO Box 594
CANBERRA ACT 2601

Dear Michael,

Thank you for your letter dated 16th July 2007, in reply to Reference Number # P2006/1363. Could you please advise me as to why the Airport Club (James Schofield Drive, Adelaide Airport ph: 08 82344158), are operating a Lottery License on Airport land and yet we are unable to be granted authorization?

Yours sincerely,

Sarah Campbell
Director
Campbells Group of Companies

Ms Sara Campbell
Director
Campbells Clearance Centre
West Beach Harbour Town
Tapleys Hill Road
WEST BEACH SA 5024

~~26 March 2007~~ 18 July.

Mr Michael Taylor
Secretary
Department of Transport and Regional Services
GPO Box 594
CANBERRA ACT 2601

Dear Mr Taylor

I am writing to you seeking approval to operate an SA Lotteries lottery agency within my business, Campbell's Clearance Centre, situated at the Harbour Town shopping centre in West Beach, Adelaide, South Australia.

It has been brought to my attention that the South Australian government, who administer gambling in South Australia, do not have the authority to approve gambling within this shopping centre because it is situated on Federal Airport land.

I have been advised that section 137 of Airports (Control of On-Airport Activities) Regulations 1999 (No 3) states "Except in accordance with a continued gambling authority or a gambling permission, a person must not engage in a gambling activity on a regulated airport".

I am further advised that the Secretary may give certain permissions under Section 139A (1) (DOTARS) under section 139A of Airports (Control of On-Airport Activities) Regulations 1999 (No 3) to 'engage in a gambling activity at a regulated airport that is not in New South Wales'. Among other requirements, that 'the person must hold a gambling permission to engage in a gambling activity at the airport.'

In seeking your approval, I would like to present my reasons for making this application:

- The shopping centre is situated on the fringe of the Adelaide Airport adjoining a major road where access to and from the complex is made. The site is not only a major tourist attraction but is also frequented by many South Australian consumers as it is a 'destination' location for great 'value you for money' fashion and home wares purchases.
- Lottery outlets in shopping centres in South Australia are the norm rather than the exception. Purchases of lottery products locally are part of the weekly shopping experience for consumers. A SA Lotteries agency within our store at Harbour town would provide convenience for consumers as the nearest SA Lotteries agent is approximately 3.5km from this shopping centre.

- 94,000 customers visited our Clearance Centre between July 2005 and June 2006.
- The local economy benefits from overseas and interstate visitors frequenting the Harbour Town shopping centre facility.

Why a SA Lotteries lottery agency should be considered favourably

- SA Lotteries is a statutory government body. The proceeds from the sale of Lottery products is returned to the South Australian community via The Hospitals and The Sport & Recreation Fund. In fact, in 2005-06 SA Lotteries contributed \$85M to the Hospitals Fund increasing the total returned since SA Lotteries established in 1967 to \$1.7 billion.
- SA Lotteries is committed to and prides itself on their approach to Responsible Gambling.
- A SA Lotteries lottery agency generates employment opportunities within small business in South Australia.

Our track record

Campbell's Newsagencies have successfully operated up to eight lottery agencies over the last 31 years. Currently with four outlets located in two of Adelaide's largest shopping centres, Westfield Shoppingtown's Marion and Modbury, in 2005-06 we achieved lottery sales of \$8M generating more than half a million dollars in commission and providing employment opportunities within our four stores.

We were also a category winner of the SA Lotteries Agency Excellence award in 2006 – Best Metropolitan Newsagency, and we pride ourselves on our professional operations and commitment to responsible gambling.

We have been consistently amongst the top 20 Newsagencies for sales of SA Lotteries products over the last 20 years.

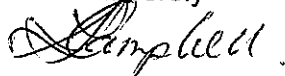
SA Lotteries, as the state government operating authority in South Australia, is supportive of my application to you. Please refer to the attached reference for more information.

If you require any further information regarding this application, I can be contacted on (08) 8296 6222. Equally for more information on the reference from SA Lotteries, please contact Callum Mulvihill, Group Manager-Marketing & Sales on (08) 8208 4100.

I have been advised that approval from you to operate a state run lottery agency will be endorsed by SA Lotteries subject to my business meeting state regulations for being a lottery agent.

Your favourable consideration is sought.

Yours sincerely



Sara Campbell
Director