

Document 25

From: [REDACTED] Section 9(2)(a) of the OIA  
To: [Gambling Compliance](#)  
Subject: Re: Children Gambling in Video Games with (lots of) Real Money  
Date: Tuesday, 12 December 2017 2:54:02 PM  
Attachments: [image001.png](#)

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Hi, thank you for the reply.

With respect, and in regards to the statement that people "do not purchase loot boxes seeking to win money or something that can be converted into money" is not accurate. Loot boxes are handled differently across the industry, and while some don't translate into money's worth, many do.

I don't have a particularly wide working knowledge of the various games and their various loot box structures. But two games I know with a certainty are prima facie within your jurisdiction are "DotA 2" and "Counter-Strike: Global Offensive". They both operate very similar loot box systems. The items won in the loot boxes can then be sold directly through the client's built in marketplace. Some sell for 2c (essentially the minimum), some sell for hundreds of dollars - the game owners get a cut of the subsequent sales too. And even without the built-in marketplace, one of the games is a "free to play" model - meaning that it is common place to buy and sell the accounts as a whole; while the other game is cheap and often cheaper on sale - making it similarly possible to trade the account as a whole. This very squarely falls within the definition of "money's worth".

There are all sorts of troubling stories surrounding this business model. From kids stealing parents' credit cards, to kids spending their entire birthday money or savings and losing it all. I understand there are some parenting issues raised there too, but I would *wager* (pun!) the majority of parents either don't understand or aren't aware of the business model.

In 2016, the ACCC sued the parent company of both of these games (Valve) in ACCC v Valve (No 3). The core issue in this case was whether Valve were operating a business within Australia, and therefore caught by the provisions of the relevant legislation (to an issue of right to a refund, analogous to NZ's Consumer Guarantees Act). Citing a number of factors, the FCA concluded that Valve did indeed operate a business within Australia.

Meanwhile in NZ, Valve changed their terms and conditions affirming that they were bound by the Consumer Guarantees Act, an indirect admission that they are also "operating a business within New Zealand". Many of the same considerations that rendered Valve to be "operating a business within Australia" apply here in New Zealand. One or two either do not, or may not; there are other considerations that apply only in NZ that do not apply in Australia, for instance the fact that they use NZ currency here (in Australia they use USD).

Per the above, **there are loot boxes that are bought to win money, or money's worth, that are operated by a New Zealand business.**

Further to this, there have historically been third party websites where people could sell the won items or trade certain items the small chance to win a more expensive item. I believe the ability to do so has since been shut down by Valve. There will be an abundance of material on "CSGO Lotto" online that will probably bring you up to speed. I only mention this to emphasise how lucrative it has been for people to take advantage of children via gambling.

On the issue of *other* loot boxes that don't directly offer the chance to win money, I would

argue that the indirect ability to purchase whole accounts (commonly known as "boosting") solves this issue. I would further point out the paradox of saying that they are "not **paying** for "money's worth". If it wasn't money's worth, then it wouldn't cost money. That would be like saying you could combine the idea of scratchies and online gift vouchers:

buy a \$5 gift voucher, scratch off the panels, and maybe you win a new item in a game! Or maybe (probably) you just win the least valuable thing imaginable. And once you've scratched it off, you enter the code online to redeem.

However I concede the issue of whether they are operating a business within NZ is potentially a bit flimsy in many cases (and yet NZ kids are suckered in daily to games of chance).

Kind regards,

Section 9(2)(a) of the OIA

On Tue, Dec 12, 2017 at 2:13 PM, Gambling Compliance  
<[Gambling.Compliance@dia.govt.nz](mailto:Gambling.Compliance@dia.govt.nz)> wrote:

Hi Section 9(2)(a) of the OIA

Thank you for your email below regarding the inclusion of "loot boxes" within computer games and the potential harm they may cause to the vulnerable in society, particularly children.

The issue of loot boxes within computer games has been the source of much debate internationally and different jurisdictions have tried to determine if loot boxes qualify as gambling under their respective legislation.

There are many games which enable the user to purchase additional items to enhance the gaming experience. Loot boxes are a variation on this theme. Gamers do not purchase loot boxes seeking to win money or something that can be converted into money. They buy loot boxes so that they can use their contents within the game and thereby have a better gaming experience.

While the payment of money for a loot box with the contents of which are determined by chance may appear to be gambling, the Department is of the view that loot boxes do not meet the legal definition of gambling. The Department therefore has no ability to regulate this activity under the Gambling Act 2003.

The Department will continue to follow the international discussion about loot boxes. However, it should be noted that it is not illegal for New Zealanders to gamble online with overseas gambling providers.

Kind regards.

Trish Millward | Manager Licensing Compliance | Regulatory Services  
The Department of Internal Affairs Te Tari Taiwhenua  
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**Our Vision Ta Matou Matakite**

We regulate for a **safe, transparent and trusted** gambling sector that benefits **communities**

E whakarite ture ana matau mo tetahi rangai petipeti **haumarū, marama, tika** hoki e whai hua ana **nga hapori**.

Logo-test



**From:** [REDACTED]  
**Sent:** Thursday, 23 November 2017 11:46 AM  
**To:** Gambling Compliance  
**Subject:** Children Gambling in Video Games with (lots of) Real Money

Section 9(2)(a) of the OIA

Good afternoon,

I'm writing this because it's highly topical right now and also because I've been curious for the longest time whether this kind of thing is on the radar – potential gambling in video games.

Most current video games allow for the in-game purchase of digital content (using real money). Many games take this a step further and sell things known as “loot crates” or “treasures” (many different names for the same type of thing, hereafter referred to as Crates).

**Crates Explained Generally**

Crates are digital content which can be purchased just like you might purchase an upgrade to Windows Professional, or pay on your phone to unlock premium features for an app, or even something like a ringtone.

Typically, a Crate will contain a single ‘item’ from a short list of multiple different items. These items can really be anything, from in-game perks to help you beat your human opponents, to cosmetics, that change the way the game looks or sounds to you and/or others (e.g. clothing, sound effects).

Often, but not always, items in these crates are tradeable online with other people for real money. And even when they're not, whole accounts (user name and passwords) might be (and frequently are) sold for consideration. And even when that doesn't happen, people still invest vast sums on in order to get the desired prize (which can take hundreds of attempts).

To get a crate, you pay an amount (typically around 3-10 NZD, but it really could be any amount). Once purchased, users can activate the crate and one item will be selected from the list of potential items, according to whatever algorithm the developers have assigned it.

Items have different real-world values, this will be based on how "cool" it looks, how effective it is, and how rare it is. How much it is "worth" is largely subjective, but to a large extent it is empirically observable. For example consider the difference between receiving a pair of shoes and a whole fancy outfit with special effects and other unique bells and whistles, and then consider that the fancy one is coded to be really unlikely requiring hundreds of attempts (in most cases) to obtain.

A specific example would be where a user purchases a Crate, let's say for \$5, and they receive ONE item from a fixed list of seven potential items. Two of these seven items are super-duper fancy, and special, and very appealing. These two fancy items are coded by the developers of the game to be extremely rare (we're talking fractions of a percent, and there's no oversight that I'm aware of on this algorithm). The user gets SOMETHING every time they open a Crate, sure. But what they typically get cannot be resold for more than a few cents, if anything, and if they purchase the Crate multiple times they often get the same worthless item over and over. Many users will continue to buy these Crates so that they might win the super rare items, which can be kept, traded, or sold for hundreds of dollars. Where the game environment does not allow for the item to be traded or sold, the user can just sell their account for profit – which means selling their user name and password to someone.

[https://i.ytimg.com/vi/GxK\\_BzYjveY/maxresdefault.jpg](https://i.ytimg.com/vi/GxK_BzYjveY/maxresdefault.jpg)

I found this image on Google which perfectly captures what I have described above. There are NINE potential items to win, seven normal ones and two rare ones. To clarify the description contained in that image, users will not get the same item twice until they receive all seven normal items. Thereafter they will get double-ups of the same items at random (of the seven normal items). The two "rare" items are independent of the seven normal ones; you just have fractions of a % better chance each time you buy a Crate. Starting at something ridiculously small.

Here is a wiki page on this exact type of item: <https://dota2.gamepedia.com/Treasure>

#### **Whether this is Gambling, per s4 of the GA2003**

While I would like to know whether you consider Crates as "gambling", I understand you can't provide legal advice on this issue. Notwithstanding, I think you should take this very seriously into consideration. The premise is no different to gambling with 'scratchies', yet these Crates are sold freely to children of all ages.

I've tried to be as descriptive as possible without rambling, but if you'd like me to provide further information I'd be happy to. I could dig up specific examples to make it easier for evidence

Kind regards,

Section 9(2)(a) of the OIA

**From:** [Jason Hewett \(Parliament\)](#)  
**To:** [Lloyd Bezett](#)  
**Subject:** RE: IA Ministerials - Loot boxes in computer games  
**Date:** Thursday, 30 November 2017 2:20:22 PM  
**Attachments:** [image001.png](#)

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Hi Lloyd

I will get back to you as soon as I can on this.

**Jason Hewett**

Private Secretary for the Minister of Internal Affairs

Hon Tracey Martin

5.3L Executive Wing | Parliament Buildings

DDI: 04 817 8340 | M: 021 420 602 | E: [Jason.hewett@parliament.govt.nz](mailto:Jason.hewett@parliament.govt.nz)

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**From:** Lloyd Bezett [mailto:[Lloyd.Bezett@dia.govt.nz](mailto:Lloyd.Bezett@dia.govt.nz)]  
**Sent:** Thursday, 30 November 2017 9:19 AM  
**To:** Jason Hewett <[Jason.Hewett@parliament.govt.nz](mailto:Jason.Hewett@parliament.govt.nz)>  
**Subject:** IA Ministerials - Loot boxes in computer games

Morning Jason

You will be aware that the Minister has received a dozen letters on the subject of loot boxes in computer games. The letters have the following themes: a) that loot boxes are gambling and seek to exploit children and the vulnerable and should be regulated as such, and b) that games containing loot boxes should be given age-restricted classifications under the Classification Act.

We have been labouring over this for some time and have got to a position we're confident of. Namely, that loot boxes do not appear to be gambling under the law and that the Classification Act does not permit a restricted classification on the basis that a publication contains gambling. This last point is also made on the OFLC website.

Section 9(2)(g)(i) of the OIA



As an interesting aside the following stories recently appeared, suggesting that consumer pressure works.

[https://www.pcauthority.com.au/news/ea-loses-billion-in-stock-value-after-loot-box-debacles-478723?utm\\_source=mobile&utm\\_medium=email&utm\\_campaign=share](https://www.pcauthority.com.au/news/ea-loses-billion-in-stock-value-after-loot-box-debacles-478723?utm_source=mobile&utm_medium=email&utm_campaign=share)

<https://www.cnbc.com/2017/11/28/eas-day-of-reckoning-is-here-after-star-wars-game-uproar.html>

**Lloyd Bezett** | Senior Policy Advisor | Operational Policy | Regulatory Services

**The Department of Internal Affairs Te Tari Taiwhenua**

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Document 27

**From:** [Lloyd Bezett](#)  
**To:** [Jason Hewett \(Parliament\)](#)  
**Cc:** [Heather McShane](#); [Mark Thornton](#)  
**Subject:** RE: IA Ministerials - Loot boxes in computer games  
**Date:** Friday, 1 December 2017 8:28:55 AM  
**Attachments:** [image001.png](#)

---

Thanks Jason

Section 9(2)(g)(i) of the OIA

Regards

**Lloyd Bezett** | Senior Policy Advisor | Operational Policy | Regulatory Services  
**The Department of Internal Affairs Te Tari Taiwhenua**  
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**From:** Jason Hewett (Parliament)  
**Sent:** Friday, 1 December 2017 8:05 AM  
**To:** Lloyd Bezett  
**Subject:** RE: IA Ministerials - Loot boxes in computer games

Morning Lloyd

Section 9(2)(g)(i) of the OIA

Section 9(2)(g)(i) of the OIA

In particular the first sentence.

<https://www.stuff.co.nz/business/opinion-analysis/99080950/a-beginners-guide-to-loot-boxes--harmless-fun-or-gambling>

Interested in your thoughts

Jason Hewett

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5.3L Executive Wing | Parliament Buildings  
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**From:** Lloyd Bezett [<mailto:Lloyd.Bezett@dia.govt.nz>]  
**Sent:** Thursday, 30 November 2017 9:19 AM  
**To:** Jason Hewett <[Jason.Hewett@parliament.govt.nz](mailto:Jason.Hewett@parliament.govt.nz)>  
**Subject:** IA Ministerials - Loot boxes in computer games

Morning Jason

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We have been labouring over this for some time and have got to a position we're confident of. Namely, that loot boxes do not appear to be gambling under the law and that the Classification Act does not permit a restricted classification on the basis that a publication contains gambling. This last point is also made on the OFLC website.

Section 9(2)(g)(i) of the OIA



As an interesting aside the following stories recently appeared, suggesting that consumer pressure works.

[https://www.pcauthority.com.au/news/ea-loses-billion-in-stock-value-after-loot-box-debacles-478723?utm\\_source=mobile&utm\\_medium=email&utm\\_campaign=share](https://www.pcauthority.com.au/news/ea-loses-billion-in-stock-value-after-loot-box-debacles-478723?utm_source=mobile&utm_medium=email&utm_campaign=share)

<https://www.cnn.com/2017/11/28/eas-day-of-reckoning-is-here-after-star-wars-game-uproar.html>

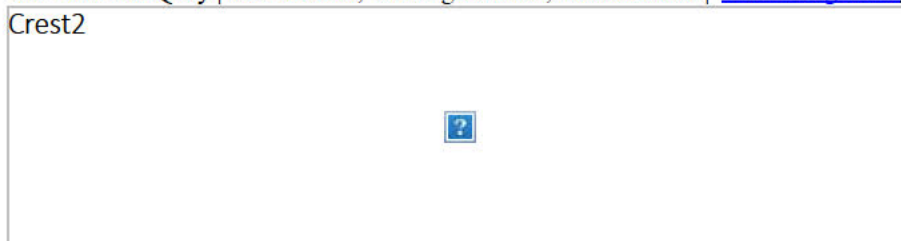
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Document 28

**From:** [Lloyd Bezett](#)  
**To:** [Mark Thornton](#)  
**Subject:** Lootbox ministerials  
**Date:** Friday, 1 December 2017 8:57:14 AM  
**Attachments:** [Lootbox ministerials.docx](#)

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Mark

I've added the end para. What do you think?

Lloyd

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Document 30

**From:** Heather McShane  
**To:** [Lloyd Bezett](#)  
**Subject:** RE: Lootbox ministerials  
**Date:** Monday, 4 December 2017 2:14:32 PM

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Great, thanks. Please circulate to Gareth and Louise in the meantime.

Regards, Heather

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**From:** Lloyd Bezett  
**Sent:** Friday, 1 December 2017 10:37 AM  
**To:** Heather McShane  
**Subject:** Lootbox ministerials

Heather

Attached is the draft text for the 12 ministerials the Minister IA has received. Some don't refer to the Classification Act, so those para will be left out. Jason Hewitt asked for something like the last para be added.

Policy is meeting with the Minister on Tuesday and the Loot box ministerials are on the agenda. The letters will be finalised after that.

Regards

**Lloyd Bezett** | Senior Policy Advisor | Operational Policy | Regulatory Services  
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Document 31

**From:** [Trish Millward](#)  
**To:** [Aimee Ballinger](#)  
**Subject:** RE: [REDACTED]  
**Date:** Monday, 4 December 2017 1:27:16 PM  
**Attachments:** [image001.png](#)

Out of scope

Large volume of enquiries about Loot boxes questioning whether they are gambling interest from both media and Minister

[REDACTED]

Out of scope

[REDACTED]

Out of scope

[REDACTED]

Out of scope

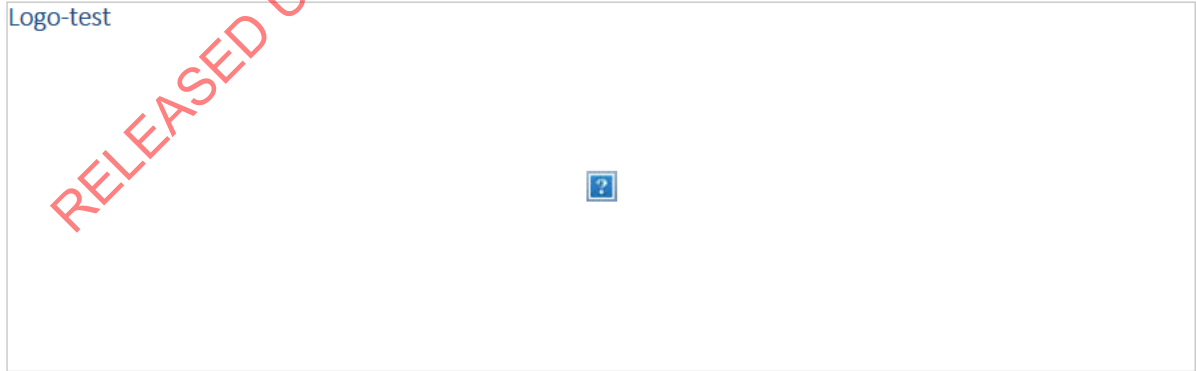
[REDACTED]

Out of scope

Thanks, Aimee

Aimee Ballinger | Senior Advisor, Sector Initiatives  
Regulatory Services | DDI: 04 495 9459 ext 5459

Logo-test



Document 32

**From:** [REDACTED] **Section 9(2)(a) of the OIA**  
**To:** [Lance Daly](#); [Lloyd Bezett](#)  
**Cc:** [Pete Collins](#); [Greg Clark](#)  
**Subject:** Kiwi's join bid to restrict gambling in video games: "It's the endless wanting more" | 1 NEWS NOW | TVNZ  
**Date:** Monday, 4 December 2017 9:07:43 AM

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Good morning guys

An interesting article and also the comment that "the regulators" say that there is nothing they can do and that it's possibly not gambling probably as there isn't a monetary value. However my understanding is that if you spend to participate (this is a consideration) and there is a chance and a prize then it is gambling?

<https://www.tvnz.co.nz/one-news/entertainment/kiwis-join-bid-restrict-gambling-in-video-games-its-endless-wanting-more>

It is certainly a growing trend and it is coming here. The DIA will need to move quickly to decide how this form of "entertainment" is to be controlled. Lance this is another reason why I strongly believe NZ should be allowing NZ operators to offer online gambling so it can be regulated under our laws. Overseas operators don't have to meet any of our harm min requirements.

Interesting times!

Cheers

[REDACTED] **Section 9(2)(a) of the OIA**

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Document 33

**From:** [Trish Millward](#)  
**To:** [Poni Lealofi](#)  
**Subject:** FW: Loot boxes RNZ  
**Date:** Tuesday, 5 December 2017 12:41:01 PM  
**Attachments:** [image001.png](#)  
[image004.png](#)

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fyi

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**From:** Gareth Bostock  
**Sent:** Tuesday, 5 December 2017 12:32 PM  
**To:** Cath Anyan; Lance Daly; Lizanne Geyer; Michelle White; Trish Millward  
**Subject:** FW: Loot boxes RNZ

Of interest.

Nga mihi

Gareth

**Gareth Bostock** | Director  
Gambling Compliance Group  
**Department of Internal Affairs Te Tari Taiwhenua**  
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**From:** Heather McShane  
**Sent:** Tuesday, 5 December 2017 11:38 AM  
**To:** Lloyd Bezett; Mark Thornton; Mike Osmond; Gareth Bostock  
**Subject:** FW: Loot boxes RNZ

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**From:** Trevor Henry  
**Sent:** Tuesday, 5 December 2017 11:34 AM  
**To:** Heather McShane  
**Subject:** Loot boxes RNZ

More on loot boxes. Max Abbott points finger at DIA about 21 minutes in:

<http://www.radionz.co.nz/national/programmes/ninetonoon/audio/2018624195/game-developers-face-backlash-over-loot-boxes>

Trevor Henry  
Senior Communications Adviser  
The Department of Internal Affairs  
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*I work Tuesday, Wednesday and Thursday. If your inquiry is urgent please contact Emma Blackmore ([xxxx.xxxxxxxx@xxx.xxxx.xx](mailto:xxxx.xxxxxxxx@xxx.xxxx.xx)). Otherwise I will deal with it when I'm next in the office.*

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Document 34

**From:** [Trish Millward](#)  
**To:** [UM\\_PRC\\_RS Licensing Compliance](#)  
**Subject:** FW: Loot boxes RNZ  
**Date:** Tuesday, 5 December 2017 12:45:15 PM  
**Attachments:** [image001.png](#)  
[image004.png](#)

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An interesting issue, lots of enquiries to the inbox in the past few weeks. Have a listen to the audio. Policy are meeting with the Minister re our position (which is that this is not gambling under our jurisdiction) then we will confirm and update everyone.

Cheers Trish

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**From:** Gareth Bostock  
**Sent:** Tuesday, 5 December 2017 12:32 PM  
**To:** Cath Anyan; Lance Daly; Lizanne Geyer; Michelle White; Trish Millward  
**Subject:** FW: Loot boxes RNZ

Of interest.

Nga mihi

Gareth

**Gareth Bostock** | Director  
Gambling Compliance Group  
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**From:** Heather McShane  
**Sent:** Tuesday, 5 December 2017 11:38 AM  
**To:** Lloyd Bezett; Mark Thornton; Mike Osmond; Gareth Bostock  
**Subject:** FW: Loot boxes RNZ

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**Sent:** Tuesday, 5 December 2017 11:34 AM  
**To:** Heather McShane  
**Subject:** Loot boxes RNZ



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<http://www.radionz.co.nz/national/programmes/ninetoonoon/audio/2018624195/game-developers-face-backlash-over-loot-boxes>

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*I work Tuesday, Wednesday and Thursday. If your inquiry is urgent please contact Emma Blackmore ([xxxx.xxxxxxxx@xxx.xxxx.xx](mailto:xxxx.xxxxxxxx@xxx.xxxx.xx)). Otherwise I will deal with it when I'm next in the office.*

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Document 35

**From:** [Lloyd Bezett](#)  
**To:** [Gareth Bostock](#); [Stephen Waugh](#)  
**Cc:** [Heather McShane](#)  
**Subject:** FW: Computer game "loot boxes" and gambling  
**Date:** Thursday, 14 December 2017 8:37:52 AM  
**Attachments:** [image001.jpg](#)  
[image002.png](#)

[Redacted] Section 9(2)(h) of the OIA

Gareth/Stephen

[Redacted]

Section 9(2)(h) of the OIA

Like the UK, we would take the view that a game that allowed a player to cash out their "winnings" through the game (i.e. not through a secondary market) would probably be gambling. However, we would then have to consider where the gambling takes place and, if it is overseas, it is beyond the jurisdiction of the Gambling Act.

The ministerials prepared will confirm the OFLC view that gambling does not meet the gateway test in section 3(1) of the FVPC Act and therefore a computer game cannot be restricted because it contains gambling.

Regards

**Lloyd Bezett** | Senior Policy Advisor | Operational Policy | Regulatory Services  
Direct Dial: +64 4 495 9367 | Extn: 5367

[Redacted]

Section 9(2)(h) of the OIA

[Redacted]

[Redacted]

[Redacted]

Section 9(2)(h) of the OIA

[Redacted]

[Redacted]

Section 9(2)(h) of the OIA

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**From:** Lloyd Bezett  
**Sent:** Tuesday, 5 December 2017 2:16 PM  
**To:** Lara Caris  
**Subject:** RE: Computer game "loot boxes" and gambling

Hi Lara

No particular deadline. Although the ministerials should go out shortly.

Regards

Lloyd Bezett | Senior Policy Advisor | Operational Policy | Regulatory Services  
Direct Dial: +64 4 495 9367 | Extn: 5367

---

**From:** Lara Caris  
**Sent:** Tuesday, 5 December 2017 2:00 PM  
**To:** Lloyd Bezett  
**Subject:** RE: Computer game "loot boxes" and gambling

Hi Lloyd.

It's just with colleagues for peer review.

Did you have any particular deadline other than ASAP that we should be working towards?

Nga mihi

**Lara Caris**  
Senior Solicitor

Legal Services, Strategy and Governance Branch  
**Department of Internal Affairs Te Tari Taiwhenua**

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147 Lambton Quay | PO Box 805, Wellington 6140 | [www.dia.govt.nz](http://www.dia.govt.nz)

cid:image002.jpg@01D3525A.A53B5660



*This email may include legal advice and be legally privileged. It should not be disclosed on an information request without further legal advice.*

---

**From:** Lloyd Bezett  
**Sent:** Tuesday, 5 December 2017 11:50 a.m.  
**To:** Lara Caris  
**Subject:** Computer game "loot boxes" and gambling

Morning Lara

I was wondering how you were coming along with finalising the opinion?

Regards

**Lloyd Bezett** | Senior Policy Advisor | Operational Policy | Regulatory Services  
**The Department of Internal Affairs Te Tari Taiwhenua**  
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