

IN THE MATTER OF THE PERTH CASINO ROYAL COMMISSION

AMENDED WITNESS STATEMENT OF JOSHUA ROBERT PRESTON

Date of Document **29 July 4 August 2021**

Filed on behalf of: Joshua Robert Preston

Prepared by:
Grondal Bruining
Solicitors
Level 2, 22 Delhi Street
West Perth WA 6005

Telephone: 6500 4300
Ref: DEG 20210050

I, JOSHUA ROBERT PRESTON of **Contains sensitive information**

Contains sensitive information say as follows:

1. This statement is provided in response to the witness summons to give evidence, dated 9 July 2021 and issued pursuant to section 9 of the *Royal Commissions Act 1968* (WA), which is directed to me by the Perth Casino Royal Commission (**Royal Commission**).
2. This statement addresses the questions asked of me in numbered paragraphs 1 to 87 (inclusive) of Schedule 1 to the summons. As to the matters raised in Schedule 1 prior to numbered paragraph 1, I refer to the following correspondence which has passed between my solicitors and Solicitors Assisting the Commission (copies of which are attached), namely a letter dated 13 July 2021 from Grondal Bruining to Solicitors Assisting,¹ an email dated 20 July 2021 from Solicitors Assisting to Grondal Bruining,² and an email dated 21 July 2021 from Grondal Bruining to Solicitors Assisting.³

¹ JRP.0001.0001.0002

² JRP.0001.0001.0003

³ JRP.0001.0001.0004

3. I note that I gave evidence before the Bergin Inquiry, by way of written statements and oral evidence. I was examined extensively by Counsel Assisting over a period of 7 days, the first of which was 27 July 2020 and the last of which was 2 September 2020. For the purpose of preparing this witness statement I have not refamiliarised myself with the sundry documents that were shown to me during that period, the questions asked of me, or the answers given by me.
4. The answers which follow are based on my general recollection. I have not refreshed my memory by reference to any documents save and except that I have revisited my witness statements in the Bergin Inquiry and have seen some documents relating to the section in this statement dealing with the topic "Gaming and Wagering Commission and the Department".

YOUR ROLE

1. *The period of your employment within the Crown Group.*
5. I was employed within the Crown Group (being Crown Resorts Limited and any subsidiary of Crown Resorts Limited) between September 2006 and 31 December 2020.
2. *The roles you held within the Crown Group.*
6. In September 2006, I commenced employment with Crown Perth (formerly Burswood Entertainment Complex) in the role of General Manager – Legal and Compliance.
7. In January 2007, I moved into the role of Executive General Manager – Legal Services at Crown Perth. This role initially included responsibility for legal and compliance functions, surveillance, and Anti-Money Laundering/Counter-Terrorism Financing (AML/CTF).
8. In November 2007, I was also appointed as Crown Perth's designated AML/CTF Compliance Officer.
9. I cannot remember the exact dates, but during my time as Executive General Manager – Legal Services at Crown Perth my role expanded to include

responsibility for risk, internal audit, responsible gaming, government and public relations, security, and certain other functions. I ceased being responsible for ~~government and~~ public relations in about 2015 and security and surveillance in about 2017.

10. On 12 August 2014, I was also appointed as Co-Company Secretary of the Crown Perth related companies, namely Burswood Limited, Burswood Nominees Limited and Burswood Resort (Management) Limited. I remained in these Co-Company Secretary roles until the end of my employment with Crown.
11. On 1 March 2017, I moved into the role of Chief Legal Officer – Australian Resorts, which incorporated responsibilities in relation to Crown Melbourne. In this role, my responsibilities included legal, regulatory and compliance, risk, responsible gaming and AML/CTF for Crown Perth and Crown Melbourne, as well as responsibility for the security and surveillance functions in respect of Crown Perth. I ceased having responsibility for security and Surveillance during 2017.
12. In May 2017, I was appointed as Crown Melbourne's designated AML/CTF Compliance Officer.
13. On 30 June 2017 I was appointed as Co-Company Secretary of Crown Melbourne Limited and Crown Sydney Gaming Pty Ltd. I remained in these Co-Company Secretary roles until the end of my employment with Crown.
3. ***The company or entity within the Crown Group that was your employer from time to time.***
14. My employer was always Burswood Resort (Management) Limited.
4. ***The person(s) and (or) positions to which you reported in each role you held.***
15. In my role as General Manager – Legal and Compliance, I reported to the Executive General Manager – Legal Services for Crown Perth, namely Michael Egan.

16. When I moved to the role of Executive General Manager – Legal Services at Crown Perth, I initially reported to the Chief Executive Officer (**CEO**) of Crown Perth, namely David Courtney.
17. From March 2007 onwards, Barry Felstead took over the role of CEO of Crown Perth. I do not remember the date, but at some stage Barry Felstead's role changed to CEO of Australian Resorts at Crown Resorts Limited and I continued to report to Mr Felstead in that role.
5. *The person(s) and (or) positions which reported to you in each role you held.*
18. I cannot remember every person who reported to me over the 14 years that I was employed by Crown, particularly given the changes in staff and their roles over this time.
19. To the best of my recollection, the following people reported to me during my time as General Manager – Legal and Compliance:
 - a. Stephen Bailey (Lawyer); and
 - b. Diana Latham (Manager – Regulatory and Compliance).
20. To the best of my recollection, the following people reported to me during all or part of my time as Executive General Manager – Legal Services for some or all of that period:
 - a. Stephen Bailey as an In-house Lawyer;
 - b. Diana Latham as Manager – Regulatory and Compliance;
 - c. Bill Hughes as Head of Surveillance;
 - d. Keryn Congdon as Head of Surveillance (who took over from Bill Hughes);
 - e. Sasha Grist as General Manager – Risk and Corporate Projects;
 - f. Claude Marais as General Manager – Legal and Compliance;
 - g. Paul Hulme as Manager - Gaming Regulation;

- h. Alison Hill as Internal Audit Manager;
 - i. Rachael Murray as Internal Audit Manager (who took over from Alison Hill);
 - j. Pamela Evans as Responsible Gaming Manager;
 - k. Emma Binnie as Responsible Gaming Manager (who took over from Pamela Evans);
 - l. Melanie Strelein as General Manager Responsible Gaming (who took over from Emma Binnie);
 - m. Denise Vanderklau as AML Officer;
 - n. Chris Theodoropolos as AML Officer (who took over from Denise Vanderklau);
 - o. Julie Anderson as AML Officer (who took over from Chris Theodoropolos);
 - p. Carolyn Galati as AML Officer (who took over from Julie Anderson);
 - q. Denise Cheir as General Manager – Public Relations;
 - r. Mike McGreevy as General Manager – Security and Surveillance;
 - s. Brian Lee as General Manager – Security and Surveillance (who took over from Mike McGreevy); and
 - t. David Brown as General Manager – Cage and Count.
21. To the best of my recollection, the following people reported to me during my time as Chief Legal Officer – Australian Resorts for some or all of that period:
- a. Claude Marais as General Manager – Legal and Compliance;
 - b. Sasha Grist as General Manager – Risk and Corporate Projects;
 - c. Brian Lee as General Manager – Security and Surveillance;

- d. Drew Stuart – General Manager Risk and Assurance;
 - e. Sonja Bauer as Group General Manager - Responsible Gaming;
 - f. Michelle Fielding as Group General Manager – Compliance;
 - g. Anne Siegers as Group General Manager – Risk and Audit;
 - h. Louise Lane as Group General Manager – AML;
 - i. Nicholas Stokes as Group General Manager – AML (who replaced Louise Lane);
 - j. Jan Williamson as Senior Legal Counsel – Crown Melbourne;
 - k. Scott Cutler as Senior Legal Counsel - Crown Melbourne; and
 - l. Beau Dietrich as Legal Counsel – Crown Melbourne.
6. *Whether you sat on any committees or working groups within the Crown Group. Provide details of the committees and working groups, including its duration, purpose, composition and reporting lines.*
22. To the best of my recollection, following are the relevant details of the committees I sat on for Crown Perth:
- a. Compliance Committee:
 - i. This Committee was established in the late 2000s.
 - ii. The Committee was comprised of senior representatives from a number of departments at Crown Perth.
 - iii. The Committee would meet every second month for the purpose of overseeing the Compliance framework and to consider compliance related issues that had arisen, the controls in place, remedial action, and initiatives.
 - iv. The Committee's reporting framework was that monthly compliance certificates would be prepared and submitted to the Compliance Team to be addressed at the Committee meetings.

Key issues from the Committee meetings would then be reported to the Executive Risk and Compliance Committee (ERCC), or escalated sooner to a General Manager or an Executive Team⁴ member if required.

b. Responsible Gaming Management Committee:

- i. This Committee was established before I commenced my employment with Crown. I joined the Committee upon the commencement of my employment.
- ii. This Committee was comprised of representatives from senior management from a number of departments.
- iii. This Committee generally met ever quarter.
- iv. The purpose of this Committee was to oversee the responsible gaming framework, and consider initiatives and issues relating to responsible gaming.
- v. Key issues from the Committee meetings would then be reported to the ERCC, or escalated sooner to a General Manager or Executive Team member if required.

c. Responsible Gaming Revocation and Third Party Subcommittee:

- i. This Subcommittee was established sometime after 2010.
- ii. This Subcommittee was comprised of two executives and another member of the Responsible Gaming Management Committee and would meet as and when required.

⁴ The Executive Team comprised the Chief Executive Officer – Australian Resorts, Chief Operating Officer (COO) – Gaming, COO – Food and Beverage and Entertainment, Executive General Manager Hotels, Executive General Manager – Human Resources, Chief Marketing Officer, Chief Financial Officer (CFO) – Australian Resorts, Chief Information Officer and Chief Legal Officer – Australian Resorts.

- iii. The purpose of this Subcommittee was to consider some of the applications by self-excluded patrons who wished to have their self-exclusion revoked. Self-exclusion is where a patron can enter into an agreement with Crown Perth to be excluded from gaming at Crown Perth. The Committee also considered applications for Third Party Exclusions.
 - iv. Outcomes of the Subcommittee were reported to the Responsible Gaming Management Committee and statistics related to those applications approved or declined were also reported to the Crown Resorts Responsible Gaming Committee.
- d. Patron Care Committee:
- i. I cannot remember when this Committee was established but I think that it was around the same time as the Responsible Gaming Management Committee (being between about 2007 and 2010).
 - ii. This Committee was comprised of senior representatives from a number of departments.
 - iii. This Committee generally met ever quarter.
 - iv. The purpose of this Committee was to oversee the Responsible Service of Alcohol (RSA) framework, and consider initiatives and issues relating to the RSA and patron care.
 - v. The reporting structure was similar to the Compliance Committee and Responsible Gaming Management Committee. Key issues were reported to the ERCC, or escalated sooner to a General Manager or Executive Team member.

- e. Work Health and Safety Executive Steering Committee:
 - i. I joined this Committee in or about 2014 or 2015. I think that it had been established before I joined.
 - ii. This Committee was comprised of a number of Executive Team members and health and safety representatives.
 - iii. The Committee would meet bi-annually or as otherwise required.
 - iv. The purpose of this Committee was to receive reports from the Health and Safety Team regarding Crown's workplace health and safety performance.
 - v. The reporting structure of this Committee was similar to the committees referred to above, but it also reported to the Crown Resorts Work Health and Safety Committee.
- f. Whistle Blowers (Protected Disclosures) Committee:
 - i. I cannot recall when this Committee was established or when I joined, although I recall that it was in operation for several years.
 - ii. This Committee was comprised of a number of Executive Team members and representatives from Internal Audit, Security and Surveillance and Human Resources. The Committee would meet as and when required.
 - iii. The purpose of this Committee was to consider whistleblower disclosures.
 - iv. The reporting lines for this Committee depended on the disclosure. Usually, the Committee would report directly to the CEO – Australian Resorts but if the disclosure related to the CEO, the Committee would report directly to the General Counsel of Crown Resorts. If a disclosure related to a member

of the Committee, that member would be excused from attendance and would not be involved in dealing with the disclosure.

g. AML/CTF Committee:

- i. I participated in this Committee when it was established in about 2018.
- ii. This Committee was comprised of the AML/CTF Team and a number of senior general managers and would meet quarterly.
- iii. The purpose of this Committee was to consider AML related matters.
- iv. The reporting lines for this Committee was through to the ERCC and specific issues would also be reported to the relevant General Managers or Executive Team members.

h. Fraud Management Committee:

- i. I cannot recall when this Committee was established or when I joined, although I recall that it was in operation for several years.
- ii. This Committee was comprised of a number of senior managers, with representatives from Internal Audit, the Executive Team, Human Resources and Security and Surveillance.
- iii. The Committee would meet every quarter.
- iv. The purpose of this Committee was to consider issues relating to employee and customer fraud.
- v. This Committee at times raised material matters with relevant senior managers and reported material matters to the ERCC.

i. Executive Risk and Compliance Committee:

- i. I joined the ERCC when it was established at some time between about 2007 and 2009.
- ii. The ERCC was comprised of the Perth Executive Team (including executives with group Executive roles), the General Manager – Legal and Compliance and the General Manager – Risk and Corporate Projects. After 2017, the Group General Manager – Compliance and Group General Manager – Risk and Audit joined the ERCC.
- iii. The ERCC met quarterly.
- iv. The purpose of the ERCC was to consider reports on matters including compliance, risk, legal, health and safety, internal audit, and AML.
- v. A Legal and Compliance Report comprising key issues from the ERCC's papers went to the Burswood Limited Board for its board meeting.
- vi. The ERCC papers were also provided to members of Crown Resorts Management for information purposes and a discussion would take place with those representatives. From approximately 2017 onwards, members of Crown Resorts Management would attend the ERCC meeting.

23. To the best of my recollection, I sat on the following Committees for Crown Melbourne:

a. Compliance Committee:

- i. I joined this Committee when it was established in about 2017 or early 2018.
- ii. This Committee functioned in a similar manner and with the same purpose as the Perth Compliance Committee. It also had

a similar composition of senior managers, although I note that as a result of the creation of group roles, there was a number of representatives who from 2018 sat on both the Perth and Melbourne committees.

- iii. The Committee's reporting line was to the Melbourne ERCC.
- b. AML/CTF Committee:
 - i. This Committee was established before I joined in about 2017.
 - ii. The Committee comprised senior managers from a number of departments and would meet every quarter.
- c. Responsible Gaming Management Committee:
 - i. This Committee was established before I joined in 2017.
 - ii. This Committee comprised senior managers from a number of departments and as I recall, met every quarter.
 - iii. The purpose of this Committee was to oversee the responsible gaming framework, and consider initiatives and issues relating to responsible gaming.
 - iv. Key issues would be escalated through to the Melbourne ERCC.
- d. Self-Exclusion Committee:
 - i. This Committee was established before I joined in 2017.
 - ii. This Committee comprised representatives from the Responsible Service of Gaming Team and other senior managers from a number of departments.
 - iii. This Committee considered applications by patrons for revocation of their self-exclusion.

- iv. Statistics related to those applications were reported to the Crown Resorts Responsible Gaming Committee.
- e. RSA Steering Committee:
 - i. This Committee was established before I joined in 2017.
 - ii. This Committee comprised senior managers from a number of departments and considered Crown's RSA framework and issues and initiatives associated with RSA.
 - iii. The Committee met on a quarterly basis.
- f. Persons of Interest Committee:
 - i. This Committee was established before I joined in 2017.
 - ii. This Committee was comprised of senior managers from a number of departments and would generally meet on a quarterly basis and also on an ad hoc basis by way of circulating emails to consider applications by patrons who were barred from Crown Melbourne to have their barring removed.
 - iii. This Committee reported to the relevant senior executives when necessary.
- g. VIP Committee:
 - i. This Committee was established in about late 2016.
 - ii. The purpose of this Committee was to review existing junket operators, assess new applications for prospective junket operators and for other International Commission Business (ICB) related matters.
 - iii. This Committee was comprised of senior executives of Crown Resorts, a Crown Resorts Board member, group executives, and ICB management.

- iv. I first participated in this Committee in about April 2017, and it met periodically over 3 to 4 months after which time, it ceased to meet.
- v. This Committee was replaced by a committee comprising of me, Barry Felstead (CEO – Australian Resorts), and Michael Johnston (Non-Executive Director – Crown Resorts Limited) for the purpose of assessing new applications for prospective junket operators and assessing existing approved junket operators in the course of annual reviews carried out by the ICB team.
- h. Executive Risk and Compliance Committee:
 - i. I joined this Committee when it was established in around 2017 or early 2018.
 - ii. This Committee was run in the same manner as the Crown Perth ERCC and with the same purpose, noting however that members of Crown Resorts management attended the meetings when the Committee's first meetings took place.
 - iii. Legal and Compliance Reports comprising key issues from the Committee's papers went to the Crown Melbourne Board Compliance Committee and/or Crown Melbourne Board Audit and Risk Committee for their meetings.
- i. Crown Melbourne Board Audit and Risk Committee:
 - i. This Committee was established before I joined it in the second half of 2017.
 - ii. It was my understanding that the Committee was required under the Victorian casino regulatory framework.
 - iii. This Committee was comprised of members of the Crown Melbourne Board and invited senior managers from Crown

Melbourne and at times, Crown's external auditors. Its purpose was to oversee Crown Melbourne's risk and audit frameworks and consider issues related to risk, internal audit, and external audit. It would meet 3 times per year.

iv. This Committee reported to the Crown Melbourne Board.

j. Crown Melbourne Board Compliance Committee:

i. This Committee was established before I joined in the second half of 2017.

ii. It was my understanding that this Committee was required under the Victorian casino regulatory framework.

iii. The Committee comprised of members of the Crown Melbourne Board and invited senior managers from Crown Melbourne and would meet quarterly.

iv. The purpose of the Committee was to oversee Crown Melbourne's compliance framework and issues related to compliance.

v. This Committee reported to the Crown Melbourne Board.

24. In addition to the committees on which I sat, I was also a regular invitee to:

a. Crown Resorts Risk Management Committee:

i. I was first invited to attend this Committee at some stage between 2010 and 2013. After I attended my first meeting, I attended most subsequent meetings. I do not know when the Committee was established.

ii. This Committee would meet every six months, however from about 2018 or 2019, it started meeting quarterly.

iii. This Committee was comprised of Crown Resorts board members (executive and non-executive); and members of

Crown Resorts, Crown Perth, and Crown Melbourne management by invitation.

- iv. This Committee discussed information regarding the status of risks at the Crown Resorts corporate level, which included risk related information from the operating businesses (Crown Perth and Crown Melbourne) as it would relate to or impact on the corporate risks.
- v. This Committee reported to the Crown Resorts Board.
- b. Crown Resorts Responsible Gaming Committee:
 - i. This Committee was established in about 2010.
 - ii. The Committee was comprised of Crown Resorts executive and non-executive directors. Crown Resorts management, and Crown Perth and Crown Melbourne senior managers attended by invitation.
 - iii. The purpose of the Committee was to consider the responsible gaming framework, responsible gaming issues, and other initiatives. The Committee would consider reports from both Crown Perth and Crown Melbourne. The Committee would also consider media and other publications regarding responsible gaming.
 - iv. This Committee reported to the Crown Resorts Board and met 6 times per year.

QUALIFICATIONS AND EXPERTISE

7. *Your qualifications, expertise and experience generally.*

- 25. I hold a Bachelor of Laws from the University of Queensland and before joining Crown I served in various roles as a solicitor at Phillips Fox between 1995 and August 2006.

26. I also have a Company Directors Course Diploma from the Australian Institute of Company Directors (AICD) in 2008 and Certificate of Governance Practice from the Governance Institute of Australia in 2014.

8. *Your qualifications, expertise and experience specifically in relation to:*

- (a) *casino operations generally;*
- (b) *risk management in relation to casino operations generally;*
- (c) *in particular, and in the context of casino operations;*
 - (i) *AML/CTF risk management;*
 - (ii) *problem gambling risk management;*
 - (iii) *electronic gaming machine (EGM) risk management;*
 - (iv) *International Commission Business (as defined in the Casino (Burswood Island) Agreement) (ICB)/junket operations risk management;*
 - (v) *marketing in foreign countries, in particular China;*
 - (vi) *vulnerability of operations to criminal infiltration/association risk management.*

27. My experience in the above areas came from working on the job and from engagement with other operators in the industry, industry stakeholders and industry groups.

28. When I first started at Crown, I spent time with a number of departments to understand their activities and the casino regulatory framework. This initially gave me an understanding of the operation of relevant areas of the business and over time the risks associated with:

- a. casino operations;
- b. problem gambling;
- c. EGMs;
- d. ICB and junket operations; and
- e. vulnerability of operations to criminal infiltration/association.

29. With respect to AML/CTF risks, when the AML/CTF legislation was introduced in around 2006/2007, I reviewed the legislation, spent time considering industry commentary, liaised with Crown Melbourne and attended meetings with AUSTRAC and the Australasian Casinos Association to gain an understanding of this evolving area in casinos.
30. With respect to problem gambling, I attended forums with Gambling Help WA and participated in discussions with the Australasian Casinos Association. During these forums and discussions there would be a sharing of information and ideas related to issues and initiatives on problem gambling.
31. I did not have any responsibilities with respect to marketing in foreign countries.
9. *What training or induction, if any, you were given at the time of your employment:*
- (a) *generally; and*
- (b) *in relation to matters referred to in 8(a) to 8(c) above.*
32. I do not remember all the training or induction that I received when I started in September 2006. However, I recall receiving induction training over a number of days initially, which included training in health and safety, security and surveillance, and casino operations.
33. Although I cannot remember when, online training was introduced for the RSA, responsible gaming, and AML. This online training was to be completed every one or two years.
34. As part of a number of committees, there would be from time to time, presentations on specific subjects as a form of training. For example, during Responsible Gaming Management Committee meetings, there would be at times papers presented on new responsible gaming initiatives, processes, and industry research.

35. As another example, during the Compliance Committee meetings, there would regularly be presentations on company policies as either a new policy, an amended policy, or by way of raising awareness of a particular policy.
36. Over my time at Crown, I also participated in numerous presentations delivered by or to such groups as, AUSTRAC, law enforcement, Gambling Help WA, and gaming regulator conferences.
10. *What training, if any you were given during your employment:*
- (a) *generally; and*
- (b) *in relation to matters referred to in 8(a) to 8(c) above.*
37. I refer to my answers to questions 8 and 9.

GOVERNANCE

11. *Your knowledge or understanding of whether and to what extent Crown Resorts Limited, Crown Melbourne Limited (Crown Melbourne) or any other entity within the Crown Group, influenced or directed the manner of governance of Burswood Nominees Limited.*
38. Prior to the end of 2014, I had little exposure to the board of Burswood Limited. My exposure to the board of Burswood Limited commenced upon my appointment in 2014 as Co-Company Secretary of the Burswood Companies. I had no exposure to the board of Crown Melbourne until mid-2017 upon my appointment as Co-Company Secretary of Crown Melbourne Limited.
39. In Western Australia the Board of moment was Burswood Limited. The directors of Burswood Nominees Limited also sat on the Burswood Limited Board. It is my recollection that the Burswood Nominees Limited Board appeared to function independently, although as referenced, all of the formal board meetings were meetings of the Burswood Limited Board. However, from time to time in board meetings directors would raise and discuss issues related to Crown generally and Crown Melbourne specifically.
40. The Board of Burswood Limited included directors who were also directors of Crown Resorts, initially John Alexander and Rowen Craigie. Ken Barton, who

was the CFO for Crown Resorts, was also a director of Burswood Limited. I also note that Michael Neilson participated in the Burswood Limited Board meetings as Joint Company Secretary of Burswood Limited. Mr Neilson was also the General Counsel and Joint Company Secretary for Crown Resorts.

41. Prior to my appointment as Chief Legal Officer – Australian Resorts, John Alexander became the Executive Chairman. At that point, the directors of Burswood Nominees Limited were John Alexander, Ken Barton and Barry Felstead, all of whom were directors of Burswood Limited and Crown Melbourne Limited. Mr Alexander was also a director of Crown Resorts Limited. Mary Manos later took over from Michael Neilson as Joint Company Secretary.
42. In my role as Chief Legal Officer, I was from time-to-time invited to attend Crown Resort's Board meetings to address specific matters.
43. From about 2017, there was a focus on the development of a greater number of group functions to align governance frameworks across the operational business units. There was also influence and direction at a departmental level by the creation of group functions to align departments at an operational level.
44. The Crown Perth Responsible Gaming Committee reported to the Crown Resorts Responsible Gaming Committee, who would often consider Crown Perth Responsible Gaming Reports and sometimes provide commentary and direction on issues and initiatives raised. Crown Perth's responsible gaming strategy was historically prepared by Crown Perth Responsible Gaming Committee members and approved by Crown Perth Management. I cannot remember whether this would also go to the Crown Perth Board.
45. With the shift to the group functionality for Responsible Gaming Team, there was a greater sharing of information and a greater focus on aligning the Perth and Melbourne programs. The Crown Resorts Responsible Gaming Committee played a key role in the formation of this strategy and the Crown Perth Board was kept aware of the key responsible gaming initiatives.

46. From 2017 onwards, I established/appointed a number of other Group functions (all of whom were located in Melbourne) namely:
 - a. Group General Manager – Risk and Audit: Anne Siegers;
 - b. Group General Manager – Compliance: Michelle Fielding;
 - c. Group General Manager – Responsible Gaming: Sonja Bauer;
 - d. Group General Manager – AML: Louise Lane (and then Nick Stokes).
47. There was regular communication between Crown Perth, Crown Melbourne, and Australian Resorts employees.
48. In addition to the above, ICB reported through to a group function, namely Jason O'Connor (Executive General Manager, International Business) although I note that Mr O'Connor ceased to perform duties in that role from about August 2016. Finance also reported through to a group function, namely Alan McGregor when Mr McGregor was appointed as CFO – Australian Resorts with responsibility in approximately 2014 over both Crown Perth and Crown Melbourne.
49. The ICB Team operated as a group function for several years before I started my role as the Chief Legal Officer, and I am not aware of when it was first implemented. The management of the ICB Team were all based in Melbourne (save for Mr Chen, who was based in Hong Kong). My understanding was that none of the overseas based staff members were employees of Crown Perth. The Perth members of the ICB Team largely operated as a service team managing ICB participants when on site at Crown Perth and would report to the group functions.
50. The management of the ICB Team reported to the CEO – Australian Resorts.
51. Through the Crown Resorts committees, there was engagement between Crown Resorts and management of Crown Perth related to governance issues. For example, I recall there was discussion related to risk matters at the Crown

Resorts Risk Management Committee. This also applied to the Crown Resorts Responsible Gaming Committee.

52. Crown Perth management reported through to Crown Perth Executives (including group executives) and in turn to the CEO – Australian Resorts.
53. The Crown Resorts Limited Board would from time to time consider governance issues and, for example, recommend that the Burswood Limited Board and Burswood Nominees Limited Board adopt certain matters. For example, the new Risk Management Strategy was presented to the Crown Resorts Board (after being considered by the Crown Resorts Risk Management Committee) which in turn recommended to the Burswood Limited and Burswood Nominees Limited boards that it be adopted.
54. I do not recall observing anything unusual regarding direction or influence over Burswood Nominees Limited's manner of governance.
12. ***Your knowledge or understanding of the risk management system applicable to the activities of Burswood Nominees Limited.***
55. The risk management system for Crown Perth evolved over time.
56. Although I cannot recall what the risk framework was at the time I commenced working at Crown, I do recall that in the first few years of my employment we developed an enhanced framework, which was reflective of the developing area of risk. In this respect, I created a new role, which I think was called GM – Risk and Corporate Projects, the focus of which was to enhance the risk framework across the Crown Perth business. A key aspect of this developing area was to create (or enhance) risk profiles for each business unit.
57. The process for undertaking this was that each risk profile for the business unit would be considered and discussed at quarterly meetings between the General Manager – Risk and Corporate Projects, management, and other staff from business units. More specifically, discussions would include identifying new risks, materialisation of risks, the control measures in place to manage risks, and the status of implementation of and/or identification of new controls.

58. There would also be a risk meeting approximately every six months between the General Manager – Risk and Corporate Projects and the executives related to corporate risk profiles that they were responsible for.
 59. Further, there would be a section related to risk presented at each ERCC meeting. There would also be a full review of corporate risks conducted annually at the ERCC. As previously noted, after each ERCC meeting, a paper would be prepared to form part of the Burswood Limited Board pack.
 60. From approximately 2017 onwards, with the creation of the Group General Manager – Risk and Audit, a review of Crown's risk framework was undertaken with a number of enhancements being made including additional resources, and the development of a detailed risk management strategy.
- 13. *Your knowledge or understanding of the management structure applicable to the activities of Burswood Nominees Limited.***
61. Burswood Nominees Limited did not have any employees. All employees were employed by Burswood Resort (Management) Limited except for Barry Felstead (who at some stage became employed by Crown Resorts Limited).
 62. The management structure comprised an Executive Team with each team member responsible for a number of specific business units, a general management team with more specific responsibilities of relevant business units, then managers through to frontline management.
 63. Over time with the development of group functions, there were executives and general managers who had group responsibilities. For example, some of these group positions were: Chief Marketing Officer, CFO – Australian Resorts and Chief Legal Officer – Australian Resorts. All of these roles reported to the CEO – Australian Resorts.
- 14. *Your knowledge or understanding of the employer of each person within the management structure of Burswood Nominees Limited.***
64. I refer to paragraph 61 above.
- 15. *Your knowledge or understanding of whether and to what extent persons within the management structure of Burswood Nominees Limited were***

influenced, directed or accountable to Crown Resorts Limited, Crown Melbourne or any other entity within the Crown Group in the performance of their duties and responsibilities.

65. I refer to my answer to question 11.

16. *Your knowledge or understanding of whether and to what extent Burswood Limited influenced or directed the manner of governance of Burswood Nominees Limited.*

66. Burswood Limited was the sole unitholder of the Burswood Property Trust. Burswood Nominees Limited was the trustee of that trust and the holder of the casino licence. Burswood Nominees Limited was a wholly-owned subsidiary of Burswood Limited.

67. I am unaware of Burswood Limited directing the manner of governance of Burswood Nominees Limited. As to influence, the Board of Directors of Burswood Limited was the Board of moment. To that extent it may be said that it influenced the manner of governance of Burswood Nominees Limited, along with the fact that each of the directors of Burswood Nominees Limited sat on the Board of Burswood Limited.

17. *Your knowledge or understanding of the demarcation of roles and responsibilities as between the directors of Burswood Nominees Limited, on the one hand, and the management of Burswood Nominees Limited as delegate of the board of directors, on the other.*

68. My understanding is that the demarcation of roles and responsibilities was that which one would ordinarily expect, namely that the Board made decisions and management implemented the decisions.

69. In approximately 2019 or 2020, a Board delegations policy was prepared and considered by the Burswood Limited Board and as I recall recommended to the Burswood Nominees Limited Board that it be adopted. I cannot remember the specific details of the delegations policy, however it provided for updated delegations and authorities for management.

18. *Your knowledge or understanding of whether and to what extent the assets of Burswood Nominees Limited, including the casino licence, have been*

used as security for the debts of any other company or entity within the Crown Group.

70. I do not recall the assets of Burswood Nominees Limited, including the casino licence, being used as security for the debts of any other company or entity within the Crown Group. I note however that there were cross-guarantees as between Burswood Limited and/or Burswood Nominees Limited (I cannot recall which) on the one hand and Crown Resorts Limited on the other hand (the details of which I cannot recall).

19. *Your knowledge or understanding of the risk management system applicable to Burswood Limited.*

71. I refer to my answer to question 12.

20. *Your knowledge or understanding of the management structure applicable to Burswood Limited.*

72. Burswood Limited did not have any employees. All employees were employed by Burswood Resort (Management) Limited except for Barry Felstead (who at some stage became employed by Crown Resorts Limited). I otherwise refer to paragraphs 62 and 63 above.

21. *Your knowledge or understanding of the employer of each person within the management structure of Burswood Limited.*

73. I refer to my answer to question 20.

22. *Your knowledge or understanding of whether and to what extent persons within the management structure of Burswood Limited were influenced, directed or accountable to Crown Resorts Limited, Crown Melbourne or any other entity within the Crown Group in the performance of their duties and responsibilities.*

74. I refer to my answer to question 11, otherwise I am not aware of Burswood Limited being influenced, directed or accountable to Crown Resorts Limited, Crown Melbourne or any other entity within the Crown Group in the performance of their duties and responsibilities.

23. *Your knowledge or understanding of the demarcation of roles and responsibilities as between the directors of Burswood Limited, on the one*

hand, and the management of Burswood Limited as delegate of the board of directors, on the other.

75. My understanding is that the demarcation of roles and responsibilities was that which one would ordinarily expect. The Board made decisions and management implemented the decisions.
24. *Your knowledge or understanding of the risk management system applicable to Burswood Resort (Management) Limited.*
76. I refer to my answer to question 12.
25. *Your knowledge or understanding of the management structure applicable to Burswood Resort (Management) Limited.*
77. I refer to my answer to question 13; there was no separate management structure for Burswood Resort (Management) Limited.
26. *Your knowledge or understanding of the employer of each person within the management structure of Burswood Resort (Management) Limited.*
78. I refer to my answer to question 13.
27. *Your knowledge or understanding of whether and to what extent persons within the management structure of Burswood Resort (Management) Limited were influenced, directed or accountable to Crown Resorts Limited, Crown Melbourne or any other entity within the Crown Group in the performance of their duties and responsibilities.*
79. I refer to my answer to question 11.
28. *Your knowledge or understanding of the demarcation of roles and responsibilities as between the board of Burswood Resort (Management) Limited, on the one hand, and the management of Burswood Resort (Management) Limited as delegate of the board, on the other.*
80. My understanding is that the demarcation of roles and responsibilities was that which one would ordinarily expect, namely that the Board made decisions and management implemented the decisions.

29. *Whether you were aware of cl 22.1 (r) and cl 22.1 (ra) of the Casino Agreement between Crown Melbourne and Victorian Commission for Gambling and Liquor Regulation (VCGLR) and, if so:*
- (a) *whether those clauses were ever discussed by or with the board of Burswood Limited or Burswood Nominees Limited during your tenure as a director; and*
 - (b) *how those clauses were interpreted by, and applied to, the operations of Burswood Limited and Burswood Nominees Limited.*
81. I became aware of clause 22.1(r) and 22.1(r)(a) in approximately 2017. I do not remember either of those clauses being discussed by or with the Board of Burswood Limited or Burswood Nominees Limited.⁵
82. I cannot recall whether I ever knew how those clauses were interpreted by, and applied to, the operation of Burswood Limited and Burswood Nominees Limited. If I did, I cannot now remember.
30. *The phrases ‘risk appetite’ and ‘risk tolerance’ are commonly used in risk management aspects of corporate governance. Acknowledging that the reach and understanding of those phrases is of relatively recent origin, what is your knowledge or understanding of the approach and attitude of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and Burswood Resort (Management) Limited to risk appetite and risk tolerance:*
- (a) *at the commencement of your employment and (or) directorship(s);*
 - (b) *whether it changed from time to time during your employment and (or) directorship(s); and*
 - (c) *the frequency and nature of any instructions given to you by the directors of one or more of those companies or others to whom you reported on those subjects.*
83. I cannot recall the phrases “risk appetite” and “risk tolerance” being used when I began with Crown.
84. I cannot recall when the phrases “risk appetite” and “risk tolerance” began being used at Crown.

⁵ The question includes “during your tenure as a director”. For the sake of completeness, I note that I am answering the question without reference to those words as I was never a director of any of the companies.

85. The concepts of “risk appetite” and “risk tolerance” were concepts that became to be considered as part of risk framework generally, but I cannot recall when.
86. I cannot recall what risk framework was in place when I first started, however I do recall that from about 2007 or 2008, we started to review and enhance the risk framework.
87. The framework used risk profiles, risk matrixes and risk maps detailing (for example) the business risks (including the controls to manage those risks) and what appetite the Board had for accepting risks, which was articulated in the form of likelihood of occurring and consequence of occurring.
88. In 2017, Crown commenced a review of its risk framework. An initial key enhancement was the appointment of a Group General Manager – Risk and Audit, who was then tasked with reviewing in detail the risk framework and making any necessary enhancements and improvements.
89. A key enhancement that followed was the development of a specific risk appetite position (which included risk tolerance) together with a detailed Risk Management Strategy. These changes were being driven across the group and the boards (Crown Perth, Crown Melbourne, and Crown Resorts) were positively engaged and supported the process of review and enhancement.
90. In line with the risk enhancements from 2017 onwards, there was an increase in risk information being reported to the Board in its board papers.
91. There were ongoing discussions regarding risk with Mr Felstead and members of the Executive Team, but I cannot remember any specific instructions. The discussions usually occurred during the periodic reviews of corporate risk profiles at the ERCC meeting. I also received commentary from Crown Resorts Risk Management Committee during the periodic reviews.
92. Discussions also took place regarding risk at the usual Burswood Limited Board meetings. As the reports to the Burswood Limited Board relating to risk to the Board evolved with more detail, so too did the discussions regarding risk.

31. *Your knowledge or understanding of the entities concerned in or associated with the organisation and conduct of gaming operations at the Perth Casino and the manner in which gaming operations at the Perth Casino are organised and conducted, including as to:*
- (a) *the identity of the employer of individuals engaged in gaming operations at the Perth Casino;*
 - (b) *the identity of the operator and (or) manager of gaming operations at the Perth Casino;*
 - (c) *any agreement, arrangement or understanding between Burswood Nominees Limited and any employer and operator and (or) manager referred to in paragraphs 31(a) and 31(b); and*
 - (d) *the extent to which Burswood Nominees Limited has the ability to supervise and control the organisation and conduct of gaming operations by any employer or operator and (or) manager referred to in paragraphs 31(a) and 31(b).*
93. The employer of individuals engaged in gaming operations at the Perth Casino was Burswood Resort (Management) Limited. Burswood Nominees Limited was the operator of gaming operations, in that it holds the licence in its capacity as trustee of the Burswood Property Trust. It did so using individuals employed by Burswood Resort (Management) Limited.
94. I understood that there was an historical agreement between Burswood Nominees Limited and Burswood Resort (Management) Limited. All I can recall is that under the agreement, Burswood Resort (Management) Limited was required to employ staff and provide those staff to Burswood Nominees Limited for it to carry out its functions.
95. As the licence holder Burswood Nominees Limited was always able to exercise control of the organisation and the conduct of gaming.
32. *Your knowledge and understanding of the historical structure and operation of the ICB of the Crown Group generally and separately in regard to the Perth Casino, including as to:*
- (a) *its financial model;*
 - (b) *management responsibility;*
 - (c) *agreements, arrangements or understandings with junket operators, junket representatives and (or) premium/privileged players;*

- (d) *memberships, loyalty programs or other agreements, arrangements or understandings with premium/privileged players or casino patrons;*
- (e) *the provision of credit to junket operators, junket representatives, premium/privileged players and (or) other patrons;*
- (f) *the receipt of payments from junket operators, junket representatives, premium/privileged players and (or) other patrons using a credit or debit card with the funds then made available for gaming activities;*
- (g) *the provision of gratuities to junket operators, junket representatives, premium/privileged players and (or) other patrons;*
- (h) *the provision of funds for gaming at the Perth Casino by junket operators, junket representatives, premium/privileged players and (or) other patrons;*
- (i) *target markets and marketing for ICB; and*
- (j) *the identification and management of risk associated with ICB, including the risks to employees, agents or patrons in target markets.*

96. I had no direct involvement or responsibility for ICB of the Crown Group generally, or separately regarding Perth Casino. My knowledge and understanding of such matters is therefore limited.
97. Crown Perth and Crown Melbourne initially had their own ICB teams. At some point in time (which I cannot now recall) that shifted to a more centralised model with Perth and Melbourne reporting into a single group function (the title of which changed over time). This group function reported to Mr Felstead.
98. Turning then to each of the specific items mentioned (using the same lettering), and by reference to the Crown Group generally (and Perth specifically where appropriate):
- a. I did not have an in-depth knowledge or understanding of the financial model, other than I knew it was a low-margin business with a high cost of operation.
 - b. I refer to what I have said above.

- c. I had a high-level understanding of the nature of the key agreements with junket operators. Those agreements were a Non-Exclusive Gaming Agreement, a dedicated Junket Program Agreement (which detailed the relevant information for each individual junket program, including terms in relation to complimentary allowances and other ancillary aspects of the program) and, if credit was provided to the junket operator, a detailed application for deposit/cheque cashing facility form.

There was also a Premium Player Agreement that provided for the terms of an international players gaming activity, complimentary allowances and, if credit was provided to the Premium Player, a detailed application for deposit/cheque cashing facility form.

Separate from the above, I became aware that there was an agreement in place between the Sun City Group and Crown Resorts, which provided for Sun City to have a dedicated private gaming salon at Crown Melbourne for its exclusive use.

The only arrangements or understandings (as opposed to agreements) relating to ICB with junket operators, junket representatives, or premium players arrangements made from time to time were between Crown Melbourne and a small number of junket operators for use of particular gaming salons.

- d. I had a general knowledge of the existence of membership/loyalty programs. Initially Perth and Melbourne had their own programs, which became a centralised program in or about 2014 or 2015. These programs were akin to frequent flyer programs, where points were earned through financial activity, including gaming, accommodation, food and beverage, etc. I cannot recall the specifics regarding the redemption of points, although my recollection is that only points earned through gaming activities could be redeemed for gaming credits. Moreover, there were different levels of membership ranging from the base level to a premium level. My recollection is that it was

based on the level of patronage as well as money spent. Different levels of membership unlocked different entitlements, including access to premium gaming areas.

As to “other agreements, arrangements or understandings”, I refer to my answer in (c) above.

- e. Credit was provided to junket operators and international premium players: not junket representatives or local patrons. The provision of credit was the responsibility of a separate Credit Control Team which considered the applications and made recommendations to management. The process undertaken included obtaining information through third-party service providers about lines of credit held in the applicant’s name at other casinos, locally and globally, and whether there were any adverse credit-related issues associated with the applicant.
- f. I cannot recall any approved program at Crown Perth by which the receipt of payments from using a credit or debit card were then made available for gaming activities, nor am I aware of that ever happening. I was aware that Crown Melbourne had a process in place whereby international patrons could use credit cards to obtain funds for gaming activities. My understanding was (and is) that the process had ceased by the time I took up my position as Chief Legal Officer.
- g. Gratuities (i.e. matters outside contractual entitlements) were provided to junket operators and premium players, primarily in the form of complementary accommodation, food and beverage, and entertainment. The one exception to that which I can recall was the provision of cash in red envelopes to recognise appropriate occasions, particularly Chinese New Year. This was explained to me as being the tradition of Ang Pao whereby gifts of money in a red packet are provided as tokens of good wishes.

- h. There are only two ways that funds were provided at the Perth Casino, namely the use of the patrons' own funds and the provision of credit by Perth Casino (as to which see (e) above).
- i. My knowledge and understanding in this regard is very general. I am aware that initially Perth concentrated on the Southeast Asian market. In time, that extended to the Northeast Asian market. I am aware that Crown had employees located overseas who were responsible for promoting Crown Perth and Crown Melbourne.
- j. I was not involved in and had no knowledge or understanding of the historical operation of the ICB as to how it identified and managed risks associated with ICB.

I note however, that after my commencement as Chief Legal Officer – Australian Resorts I gained knowledge of the risks associated with the operation of the ICB as a result of assisting Crown in responding to the Victorian gaming regulator's investigation into the China arrests and the class action that had either been threatened or commenced.

- 33. ***Your knowledge or understanding of the oversight exercised historically by the directors or managers of one or more of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and Burswood Resort (Management) Limited as to the structure and operation of the ICB of the Perth Casino.***
- 99. I understand that this question is asking for my knowledge or understanding of the positions and reporting lines in relation to the ICB from my commencement with Crown in 2006.
- 100. When I commenced employment at Crown Perth, as best I recall, the ICB business reported directly to Crown Perth management (I think but I am not sure that it was the COO – Gaming).
- 101. At some later point, a group function was created that was responsible for the ICB business across Crown Melbourne and Crown Perth with the Crown Perth ICB Team reporting to the group function. Management of the group function

was based in Melbourne and, as I understand it, group function employees were employed by Crown Melbourne Limited.

102. When the position of CEO – Australian Resorts was created, the ICB business reported to that position.

34. *Your knowledge or understanding of the systems, policies and procedures historically applicable for the Crown Group and (or) Perth Casino for:*

- (a) *due diligence upon, and probity investigations of, prospective junket operators, junket representatives, premium/privileged players and other patrons before approving or entering into an agreement, arrangement or understanding with junket operators, junket representatives, premium/privileged players and patrons in connection with gaming activities at a Crown casino; and*
- (b) *review, affirmation, cancellation or termination of approvals, agreements, arrangements or understandings with junket operators, junket representatives, premium/privileged players and patrons in connection with gaming activities at a Crown casino.*

35. *Please include, for example, your knowledge or understanding historically of the Crown Group generally and separately in regard to the Perth Casino, including as to:*

- (a) *the person(s) and (or) positions responsible for performing due diligence and probity investigations about a junket operator, junket representative or patron;*
- (b) *the person(s) and (or) positions responsible for decisions to approve/disapprove or enter into/terminate an agreement or arrangement with a junket operator, junket representative or patron;*
- (c) *the policy for reporting to directors and (or) senior managers the due diligence outcomes and decisions to approve/disapprove or enter into/terminate agreements or arrangements with a junket operator, junket representative or patron;*
- (d) *the policy for extending credit to junket operators, junket representatives, premium/privileged players and (or) other patrons; and*
- (e) *the policy for reporting decisions to extend credit to junket operators, junket representatives, premium/privileged players and (or) other patrons to directors and (or) senior managers.*

103. I will answer questions 34 and 35 together. Historically, all junket operators were approved by the Gaming and Wagering Commission. That process

changed in or about 2010 following a submission from Crown for that process to be removed from the casino regulatory framework. After that change, Crown took responsibility for carrying out due diligence on junket operators. That process evolved over time. Following in this regard I note that I provided the following evidence to the Bergin Inquiry reflecting the process as was in place when I commenced giving evidence at that Inquiry.

- a. Prospective junket operators applied for Crown's approval to become a junket operator via a number of avenues:
 - i. the prospective applicant may contact Crown and express interest in becoming a junket operator;
 - ii. Crown may contact the prospective applicant about becoming a junket operator following a referral from an industry contact or an existing junket player; or
 - iii. Crown may contact the prospective applicant about becoming a junket operator based on Crown's industry knowledge.
- b. Typically, these initial interactions occurred between the prospective applicant and staff in the sales/operations arm of Crown's International VIP Team.

A prospective applicant completed a New Junket Operator Application. Staff in the sales/operations arm of the International VIP Team typically assisted the prospective applicant to complete the details on this document.

- c. The New Junket Operator Application requested that the applicant provide a range of information and documentation, including:
 - i. Know Your Customer (**KYC**) details including full name, full residential address and date of birth;
 - ii. business name and address if applicable;
 - iii. copy of passport;

- iv. copy of national identity card or drivers licence;
 - v. copy of utility bill, bank statement or other document which provided evidence of residential address;
 - vi. copy of business card;
 - vii. copy of personal cheque;
 - viii. copy of a DICJ licence, a police check from the applicant's country of residence or, if an applicant is unable to obtain a police clearance because they are based in Hong Kong or Singapore (where police clearances are not available), Crown obtains a police check via an external organisation called Fit2Work;
 - ix. copy of completed ABN and TFN Application forms (unless an ABN had been provided as part of the due diligence process);
 - x. copy of completed Non-Exclusive Gaming Agreement;
 - xi. copy of application for an Australian bank deposit account, cheque cashing, credit facility or funds advance facility;
 - xii. evidence of any junket operations elsewhere; and
 - xiii. copies of any land title or wealth evidence that may be available.
- d. Once this material was provided, staff of the Credit Control Team within the broader International VIP Team would undertake a due diligence process to assess an applicant's integrity, creditworthiness, and history in the industry. The due diligence process involved the collation of internal information held by the International VIP Team as well as a range of externally sourced information from third-party providers.

- e. In summary, the searches and processes undertaken by the Credit Control Team were as follows:
- i. searching a third party due diligence system (Dow Jones Risk & Compliance);
 - ii. obtaining any Crown gaming history (if the applicant had previously played at Crown);
 - iii. obtaining any available information through a third-party service, Central Credit, about lines of credit held in the applicant's name at other casinos locally and globally, and whether there are any adverse credit related entries associated with the applicant;
 - iv. obtaining Global Data (formerly Wealth Insight) Report;
 - v. obtaining Wealth X Report;
 - vi. obtaining Acuris Risk Intelligence Report (formerly C6);
 - vii. obtaining company searches (across various local and international databases);
 - viii. obtaining property searches (domestic and international);
 - ix. obtaining bankruptcy information (where available); and
 - x. performing general internet searches for any publicly available information of relevance.
- f. Through the due diligence process, the Credit Control Team built a profile of the applicant. The Credit Control Team used this information to decide whether to progress the application to the approval stage. This depended on the team's view about the potential suitability of the applicant for approval as a junket operator connected with Crown. The team might take one of three courses:

- i. advise the sales/operations staff in the International VIP Team that the application will not be progressed to the approval stage. This would be the case if there was a failure to provide important information (such as a police check or equivalent) or if the Credit Control Team identified adverse information (for instance adverse entries on Central Credit);
 - ii. decide to recommend that the applicant be approved to enter into a junket arrangement with Crown; or
 - iii. decide to recommend that the applicant be approved to enter into a junket arrangement with Crown on certain conditions. This might be the case if no important information was missing, and no adverse information had been identified, but a less critical document, such as a utility bill, had not been provided. In that case, the recommendation may be that the applicant is approved to enter into a junket arrangement, on condition that the missing document is provided.
- g. If the Credit Control Team decided to make a recommendation of the kind identified in subparagraphs (ii) or (iii) above, it prepared a due diligence profile for the applicant. The due diligence profile provided an overview of the results of all of the due diligence searches and identity documentation.
- h. Responsibility for assessing whether to approve a new relationship with a prospective junket operator rested with three senior representatives of Crown. I was one of those representatives. The other two representatives were Barry Felstead, (CEO – Australian Resorts, Crown Resorts Limited) and Michael Johnston (Non-Executive Director, Crown Resorts Limited). Due diligence profiles were circulated to each of us via email for our review and approval. The prospective junket operator would not be approved unless each of us granted approval.

- i. The process that I generally followed when reviewing a due diligence profile and deciding whether I would approve the applicant was as follows:
 - i. I initially read through the due diligence profile and assessed whether any key information was missing or whether there was any material adverse information. For instance, I would not approve a junket operator application if the applicant had not provided a DICJ licence, police check or Fit2Work check; or in instances where I was advised that the DICJ licence or check would be received imminently, I would make my approval subject to receipt of those documents. That said, it was unlikely that such an application would have been progressed by the Credit Control Team for approval;
 - ii. if no key information was missing and there was no material adverse information, I next checked whether the applicant had had any history of gaming activity at Crown. If the applicant had such a history, that provided me with some assurance that the person had been approved by Crown as a junket operator in the past, or otherwise had player history at Crown, as opposed to a person who is unknown to Crown. If their history with Crown revealed adverse information, particularly with respect to gaming integrity matters (for instance that they were caught cheating), I would not approve them as a junket operator;
 - iii. I next reviewed any information from Central Credit (a third-party provider, as noted above) for evidence of gaming activity at other casinos. Again, this provided me with assurance that the person had been considered by other casino operators or other regulators and had been found to be suitable by them to conduct business as a junket operator, or at least to gamble at those other casinos;

- iv. I then reviewed the findings from the reports obtained from other third-party providers (Dow Jones, Acuris, Wealth Insight and Wealth X Reports). Key factors for me in reviewing this information were as follows:
1. whether the person had had any charges laid or convictions recorded against them in relation to offences that are relevant to a person's integrity. In general, the more serious and more recent the charge or conviction, and the greater the number of charges or convictions, the more significant I considered it as a reason not to approve the applicant. In contrast, a relatively minor and isolated offence a long time ago may not have caused me to think the applicant is unsuitable to approve as a junket operator;
 2. whether any adverse information comprised only media reporting of alleged charges or convictions. While I took media reporting seriously, it was of less weight for me if, as was sometimes the case, it is from a long time ago and provides only vague details of allegations which may not have been proven;
 3. whether any adverse information appeared from more than one source. This was a more general point, which was related to the previous one. For instance, I placed more weight on media reporting if the detail in the reporting could be corroborated with other substantive information or cross-referenced with another third-party provider's information;
- v. when considering any adverse information that appeared in the third-party due diligence reports, I also had regard to the fact that Crown's process required that an applicant come into Australia before commencing any activity as a junket operator.

This meant that, in general, the junket operator needed to apply for a travel visa through the Department of Home Affairs, an application process which required the applicant to pass a character test in order to be granted a visa;

- vi. if, following my initial review, I was not satisfied that I had all of the information that I need to make a decision on the application (or if I had queries about the information provided), I would revert to the Credit Control Team within the broader International VIP Team and request further information.
- j. As I have stated above, a new junket operator would not be approved unless each of Mr Felstead and Mr Johnston and I approved the application. We each conducted our review of an application independently, although occasionally we consulted each other before reaching our decision.
- k. If I was satisfied, based on the due diligence information, with the integrity of the prospective junket operator, I would email my approval to the Credit Control Team. If I considered that approval should be subject to conditions, whether they had been recommended by the Credit Control Team or not, I stated this in my email. Mr Felstead and Mr Johnston likewise emailed their decision.
- l. Generally, junket operator applications which were progressed to Mr Felstead, Mr Johnston, and me were approved. That is because such applications should only have progressed to us if there were no material deficiencies in the information provided (including the DICJ licence or equivalent police/integrity check) and if the due diligence process did not return material adverse information.
- m. If Mr Felstead, Mr Johnston, and I provided approval, the VIP International Team executed a Non-Exclusive Gaming Agreement with the new junket operator. That agreement was an ongoing agreement, rather than an agreement for a fixed term. Accordingly, it was not

necessary for a junket operator to “renew” their agreement after a given period. However, as explained below, junket operators were subject to ongoing review, including detailed annual reviews.

- n. If a new junket operator application was approved, the new junket operator's profile was sent to Crown's Regulatory and Compliance Department, which undertook the following steps to formalise the arrangement with the junket operator and comply with Crown's regulatory obligations:
 - i. ensure the Non-Exclusive Gaming Agreement had been duly completed;
 - ii. submit any ABN/TFN application to the ATO, or check ABN/TFN details where the junket operator already had an ABN or TFN;
 - iii. in the case of Crown Melbourne, notify the VCGLR of the details of the new junket operator in accordance with Crown's regulatory obligations;
 - iv. update Melbourne and Perth gaming management systems to ensure the details of the junket operator are captured in advance of any gaming activity occurring; and
 - v. update Crown's Salesforce junket operator section, which allows the International VIP Team to commence engaging with the junket operator.
- o. Crown undertook a range of ongoing due diligence on junket operators with whom it had agreements, comprising:
 - i. daily screenings of junket operators through the Dow Jones Risk and Compliance database;
 - ii. annual reviews of existing relationships with junket operators from a probity perspective; and

- iii. ongoing surveillance, due diligence and monitoring via Crown's AML/CTF Program.

I expand on each of these processes below.

- p. Further, and importantly, Crown's usual practices regarding unacceptable behaviours applied on an ongoing basis to junket operators, junket representatives and junket players, which included being subject to the usual security and surveillance measures in place at Crown.
- q. The Dow Jones Risk and Compliance Database automatically conducted a daily screening of all active junket operators against global watch lists (i.e. for sanctions, Special Interest Persons and Politically Exposed Persons) and alerted Crown where a potential match is generated. Generally speaking:
 - i. Special Interest Persons were persons formally accused of, arrested for or convicted of serious crimes within six categories comprising corruption, financial crime, trafficking, organising crime, terror or tax crime (with the designation "Special Interest Persons" typically being applied by third-party due diligence providers); and
 - ii. Politically Exposed Persons were persons who hold prominent public positions or functions in a government body or an international organisation. Politically Exposed Persons are frequently referred to in the AML/CTF context as PEPs.

Crown used both definitions in its own AML/CTF Programs.

- r. Crown could, and at times did, also conduct ad hoc searches of junket operators through this database. For example, if Crown identified commentary in media reports or otherwise through staff members or received a request from a law enforcement agency or regulator about a junket operator, we may have undertaken a search of the database. If

a match was generated, we assessed the detail of the information and took further steps, including reviewing the AML risk rating for the junket operator or escalating the matter to senior management or to Crown's "Persons of Interest" Committee. Crown's Persons of Interest Committee considered persons of interest (both at periodic meetings and on an ad hoc basis) and considers whether Crown should allow them to continue to frequent Crown. For the sake of completeness, I note that, at Crown Perth, such matters were escalated to senior management (rather than the Persons of Interest Committee).

- s. The annual review process was undertaken by the Credit Control Team. It comprised a comprehensive information gathering process of much the same nature as that undertaken at the application stage. The Credit Control Team collated new copies of the kinds of documentation brought in at the application stage and conducted new searches. If the information obtained as part of the annual review was of an adverse nature, the Credit Control Team prepared a new profile that is sent to Mr Felstead, Mr Johnston and me, to consider whether Crown should continue to engage with the junket operator.

36. To the extent of your knowledge explain:

- (a) the general operation and purpose of the 'SYCO' system;**
- (b) the information recorded in SYCO;**
- (c) the origin of that information; and**
- (d) your involvement in managing, operating, auditing, overseeing or interrogating the SYCO system.**

104. SYCO is an IT-based casino management system, which was developed (as I understand) by Crown Melbourne and subsequently implemented at Crown Perth when Publishing and Broadcasting Limited purchased Burswood, which was before I started working for Crown.

105. SYCO's purpose is to record details pertaining to

- a. patron data such as:

- i. date of birth;
 - ii. address;
 - iii. buy-in amounts;
 - iv. turnover;
 - v. payouts;
 - vi. patron deposits; and
 - vii. type of games played;
 - b. the gaming activity generally such as games played, turnover, amounts deposited, and amounts paid out.
106. SYCO was also used to generate reports for the business use, for example reports for marketing, reports for finance and reports for AML.
107. As I recall, Crown's threshold transaction reports and international funds transfer instruction reports were also generated from information recorded in SYCO.
108. It is my understanding that patron personal information would be inputted into SYCO when a patron would provide such details to join the Crown Club, by the Cage when patrons opened an account or undertook a transaction that required a patron to be identified and by table games managers when players performed transactions that required identification to be provided.
109. It is also my understanding that gaming data would be inputted through other systems. For example, there was a system call "Advantage" that would input gaming machine performance data into SYCO.
110. Cage staff would also input financial data into SYCO related to patron deposits and transactions.
111. I was not responsible for the management, operation, audit, or oversight of SYCO; this responsibility was as I understand it, with IT and Gaming. My

main involvement with the SYCO system was through my teams accessing it to obtain patron related information and running reports generated by the system.

AML/CTF

37. *Your knowledge and understanding of the nature and content of the AML/CTF systems, policies and procedures as to the identification and management of the risks of money laundering and terrorism financing in connection with gaming operations at the Perth Casino, including as to:*
- (a) the identity of Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited bank accounts or Crown Group bank accounts operated in connection with gaming operations at the Perth Casino that are the subject of AML/CTF systems, policies and procedures (Crown Perth Bank Accounts);*
 - (b) receiving funds from, and allocating funds to, patrons for gaming at the Perth Casino;*
 - (c) operating any bank account in connection with gaming at the Perth Casino;*
 - (d) internal accounting and allocation of funds to patrons at the Perth Casino;*
 - (e) receiving funds from, or transferring funds to, third parties (e.g., transfer of funds between patrons or to non-patron third parties);*
 - (f) cage operations at the Perth Casino;*
 - (g) person(s) and (or) positions within Burswood Nominees Limited and the Crown Group with responsibility for internal reporting of matters that may result in a report to AUSTRAC (e.g., suspicious matter reports, threshold transaction reports, international funds transfer reports and AML/CTF compliance reports) (internal Crown AML/CTF reports);*
 - (h) person(s) and (or) positions within Burswood Nominees Limited and the Crown Group with responsibility for receiving and reviewing internal Crown AML/CTF reports;*
 - (i) person(s) and (or) positions with responsibility for decision-making and authority to make the reports to AUSTRAC required under the AML/CTF legislation;*
 - (j) recording internal Crown AML/CTF reports;*
 - (k) recording decisions to make reports to AUSTRAC; and*

- (l) *reporting internal Crown AML/CTF reports, reports to AUSTRAC and compliance with AML/CTF legislation to directors and (or) senior managers of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited.*

112. In this regard I provided the following evidence to the Bergin Inquiry reflecting the process as was in place when I commenced giving evidence at that Inquiry.

- a. The structures and practices which Crown had in place to address money laundering risks at Crown's casinos were set out in the AML/CTF Programs which have been developed for Crown Perth and Crown Melbourne.
- b. In addition to the AML/CTF Programs, in 2019, Crown approved an enhanced tiered AML/CTF Governance Framework.
- c. An important part of the new AML/CTF Governance Framework was the development and implementation of the new Joint AML/CTF Program.
- d. In explaining the structures and practices that were in place, I refer predominantly to Crown Melbourne's AML/CTF Program, which was very similar to the AML/CTF Program for Crown Perth.
- e. The AML/CTF Program was designed to address the identification, mitigation and management of money laundering and other risks Crown faced in the provision of designated services. The AML/CTF Program set out how Crown:
 - i. trained its employees to identify, mitigate and manage money laundering risks;
 - ii. conducted appropriate due diligence on its employees and the different due diligence conducted depending on the role of the employee within the business;
 - iii. knew its customers. Know Your Customer was a concept under the AML/CTF Act which required certain information to be

obtained from a customer. The AML/CTF Program identified the information that is to be obtained and how Crown was to obtain this information.

- iv. identified customers that may be Politically Exposed Persons, subject to adverse media, or Special Interest Persons, and allocated them an AML risk rating. Customers were initially allocated with a risk rating of "Low" until Crown obtained further information, and may have been escalated to "Moderate", "Significant" or "High" in appropriate circumstances, as set out in the AML/CTF Program;
 - v. monitored customer transactions, monitored delivery methods of designated services and monitored the use of chips and gaming machine tickets which were used to make or place bets within the casino;
 - vi. reported threshold transactions, international funds transfer instructions and suspicious matters to AUSTRAC; and
 - vii. reviewed, both internally and externally, its AML/CTF Program(s) on a regular basis.
- f. Crown's ability to effectively manage the risk of money laundering depended not only on its processes, but also on its employees and staff, particularly in connection with risk management and general security and behaviour awareness.
- g. All new Crown employees participated in a corporate company-wide induction program, which incorporated (amongst other matters) information about Crown's AML/CTF obligations.
- h. In addition, Crown employees who worked in areas involved in the delivery or support of designated services completed Crown's Online Anti-Money Laundering training module as well as further departmental procedural training specific to their areas. These

employees were also required to complete refresher training every second year.

- i. As a further initiative, as required, face to face targeted training was also provided by the AML Team. For example, employees of particular operational departments including the Casino Cage, Table Games, Gaming Machines, Security, Surveillance, Credit Control, Responsible Gaming, VIP Services and Crown's interstate and international representatives, completed more extensive training in relation to money laundering. The AML Team also provided targeted training when a new product or service was released, or a new money laundering risk was identified.
- j. If there was a breach or non-compliance with Crown's AML/CTF Program by a particular employee, remedial training was provided by the Business Unit to the relevant employee (and potentially to the broader Business Unit if there was a concern about broader non-compliance), with the nature of the training included on the relevant employee's file. Any instances of remedial training (and the reasons for that training) were formally reported by the AML Team and the Business Unit to the property-specific Crown Melbourne or Crown Perth Compliance Committees.
- k. Crown conducted due diligence on individuals before they commenced employment within the Crown business, which always included a police check.
- l. In addition to the human resource and interview procedures relevant to the role, a person seeking employment in gaming related and management areas (e.g. Table Games, Gaming Machines, Security, Surveillance, Casino Cage and senior management) had to apply for and be granted a licence issued by the relevant government regulator. As part of this process potential employees were subject to a police check. Licences were required to be renewed on a periodic basis and a fresh police check was required in order for the licence to be renewed.

This licensing regime helped Crown to ensure that regular probity checks were carried out on employees who worked within gaming related and management areas. Specifically, this reduced the risk of Crown employing a person in an integrity-based role that had criminal links, which reduced the chance of compromise to the business through collusion with patrons.

- m. A person seeking employment who would not be working in gaming related or management areas had to provide a police check as part of their employment with Crown.
- n. All contractors had to provide a police clearance check, and if a contractor role was to be a casino regulatory licensed position, the appropriate licence had to be obtained.
- o. Crown interacted with a range of different individuals. Crown's customers ranged from casual walk-in patrons to premium players and junket players. The due diligence checks that Crown carried out on its customers depended on the customer's classification and the customer's interaction with Crown.
- p. At a minimum, for walk-in patrons, Crown had processes in place for security to identify banned patrons, underage patrons, intoxicated patrons, or patrons acting in an inappropriate manner prior to entering the gaming floor. Once on the gaming floor, customer behaviour was subject to surveillance and Crown's unacceptable behaviour and related policies. Security and surveillance teams, in the course of their normal duties, were constantly monitoring the behaviour of patrons, which may have enlivened a reporting obligation to AUSTRAC in connection with suspicious behaviour. Gaming floor staff were trained to report suspicious behaviour on the gaming floor to either their direct manager or to the AML Team, who assessed the transaction or behaviour reported by the employee and lodged a report with AUSTRAC if required. Walk-in patrons who engaged in a threshold transaction were

required to provide identification and other relevant information as described below.

- q. KYC information was the base level customer identification information obtained by Crown. The requirement to collect such information and the circumstances in which this information was to be obtained were set out in the AML/CTF Act and AML/CTF Program.
- r. This information was important in guarding against money laundering as it allowed Crown to report suspicious activity (where the person could be identified) or threshold transactions, should this arise, with appropriate identification information. I understood from my interactions with law enforcement and other regulatory agencies that this then enabled them to consider the nature and risk of particular transactions or information with greater accuracy, that is, with the identity of the person involved.
- s. Crown was required to collect KYC information when a customer:
 - i. opened an account with Crown;
 - ii. conducted a cash transaction of A\$10,000 or more using a designated service;
 - iii. conducted a foreign exchange transaction of the equivalent of A\$1,000 or more;
 - iv. was the transferor of an overseas outbound instruction under a Designated Remittance Arrangement; or
 - v. was the transferee of an overseas inbound instruction under a Designated Remittance Arrangement.
- t. The information collected included full name, date of birth and residential address details, which was verified against appropriate identification documents (such as a driver's licence or passport) and recorded in Crown's gaming management system.

- u. All active customers recorded in Crown's gaming management system were screened against the Dow Jones Risk and Compliance third party due diligence system in order to identify any relevant sanctions, whether they were a Politically Exposed Person and whether they are a Special Interest Person. This involved screening up to 400,000 individuals daily. Any matches identified by the Dow Jones Risk and Compliance system were alerted to the AML Team, who then, depending on the nature of the alert, carried out additional due diligence in the manner described in Crown's AML/CTF Program.
- v. Crown's AML/CTF Program also set out the circumstances in which Crown collected further KYC information, carried out enhanced customer due diligence and allocated customer risk ratings.
- w. Crown's reporting obligations to AUSTRAC included an obligation to submit suspicious matter reports. A key component of the AML/CTF Program, and of particular relevance to suspicious matter reports, was Crown's Transaction Monitoring Program.
- x. The Transaction Monitoring Program was used by the AML Team to seek to identify materially large or unusual transaction values, patterns of transactions, suspicious matters or other activity which suggested higher than usual money laundering risks.
- y. The reports generated by the Transaction Monitoring Program were considered regularly by the AML Team, who determined following any investigations whether there were reasonable grounds to lodge a suspicious matter report with AUSTRAC.
- z. Crown had strict confidentiality obligations under the AML/CTF Act in relation to suspicious matter reports.
- aa. In accordance with the AML/CTF Program, Crown also conducted risk assessments in relation to its products and services to identify, mitigate and manage any money laundering risk in relation to that product or service. These risk assessments were carried out:

- i. prior to the introduction of new products or services;
 - ii. on customers, based on factors such as transactions, behaviour and jurisdiction; and
 - iii. on designated services provided by Crown.
- bb. Under the AML/CTF Program, an annual review was carried out in respect of Crown's 'existing casino designated services'.

113. Turning then to each of the specific items mentioned:

- a. The AML/CTF systems and processes applied equally to all of Crown Perth's Bank Accounts in that transactions on each of those accounts were subject to the AML/CTF processes.
- b. The AML/CTF Program applied to receiving funds from and allocating funds to patrons for gaming at the Crown Perth Casino. The receipt of funds from and allocation of funds to patrons was managed by the Cage Team. In this respect, Cage staff were subject to the AML/CTF Program, including the Transaction Monitoring Program which provided for Cage staff to monitor transacting on an account for suspicious transactions. Further, as part of the Transaction Monitoring Program, Crown's AML Team ran a telegraphic transfer report on a regular basis and reviewed it for suspicious transactions.
- c. Internal accounting and allocation of funds to patrons was undertaken by Cage and Finance. The AML processes in place as described above would apply equally in these circumstances.
- d. This was undertaken by Cage and Credit Control.
- e. Until about 2020, the process of transferring funds to third parties required Crown staff to satisfy themselves as to the relationship between a patron and the third party before approving such a transaction. In these circumstances, Cage staff would liaise with gaming staff and/or International VIP staff to obtain further

information. If no legitimate relationship could be established, Crown's policy was to not accept the transaction. Crown staff also were to consider such transactions as to whether they were suspicious and if they were lodge a suspicious matter report. The process of third-party transfers ceased in 2020.

- f. As mentioned above, Cage operations were subject to the AML Program, and policies and procedures in place. They also had their own departmental policies and procedures in place.
- g. The AML Team was responsible or for lodging suspicious matter reports. All staff members could raise a suspicion and when they did, it would be brought to the attention of the AML Team, who would ultimately lodge the Suspicious Matter Report.

The obligation for completing a Threshold Transaction Report was with Cage and Gaming Operations. These reports were entered into SYCO, with those reports then being automatically uploaded to AUSTRAC.

The Cage Team was responsible for the completion of IFTI reports which would then be lodged by the AML Team with AUSTRAC.

The AML Team was responsible for preparing the Annual AML/CTF Compliance Report for lodgement with AUSTRAC, which would be approved by me before lodgement.

- h. As referred to above, the AML Team would receive and review all Suspicious Matter Reports and all IFTI reports.
- i. The AML, Cage, and Gaming Teams had the authority for making reports to AUSTRAC.
- j. Records of all reports to AUSTRAC were kept on Crown's databases, namely SYCO and in CURA (which held Crown's AML patron risk register).

- k. I am unaware of any separate recording of decisions to make reports to AUSTRAC. Decisions to make reports to AUSTRAC manifested themselves in actual reports.
- l. Initially, reporting to the Burswood Limited Board was by way of exception reporting.

Reports to senior managers comprised as follows:

- i. AML reported to the Compliance Committee, which included completion of monthly compliance certificates.
- ii. The Group General Manager – AML would prepare an AML paper that would be provided to the ERCC for consideration at its quarterly meeting. That paper included such information as statistical information on numbers of reports made to AUSTRAC, any material issues, interactions with AUSTRAC, AUSTRAC Compliance Assessment information, changes to the AML Program and other AML related initiatives.

From approximately 2017, more detailed information was provided to the Burswood Boards related to AML through AML reports and risk updates.

- 38. ***Your knowledge or understanding of the management responsibility within Burswood Nominees Limited and the Crown Group for identifying and managing money-laundering and terrorism financing risks.***
- 114. The “management responsibility” was primarily with the AML Team (who reported to me as the AML/CTF Compliance Officer, and I, in turn, reported to the CEO – Australian Resorts) and also included those departments where AML risks were relevant, namely Cage, Security and Surveillance, Gaming Operations and Finance.
- 39. ***Your knowledge and understanding of the oversight exercised by the directors of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited as to the development and implementation of, and compliance with, its systems,***

policies and procedures to identify and manage the risks of the Perth Casino operations being used as a vehicle to facilitate money-laundering.

115. The oversight exercised by the directors of Burswood Limited was as follows:
 - a. the Board approved the original AML/CTF Program in 2007;
 - b. at that time, it also gave to the CEO Crown Perth, delegated authority to:
 - i. approve amendments of a non-material nature to the Program;
 - ii. oversee the implementation of and compliance with the Program;
 - c. at Board meetings, the directors would receive reports relating to AML in the Legal, Risk and Compliance Update. The information reported on included material changes to the Program (which would require the Board's approval), AUSTRAC Compliance Assessments (including any findings made by AUSTRAC), changes in legislation, material compliance failures, and risk related issues. The nature of those reports developed over time with an increase in information being reported, recognising the enhancement of those areas and reporting processes.
116. I was not involved in the preparation of papers for the Crown Resorts Board prior to mid-2017 and therefore cannot comment on what information was provided to that Board. From mid-2017, I became involved in providing Legal, Risk, Compliance and AML related information to Crown Resorts' General Counsel who prepared a dedicated paper that was presented to the Crown Resorts Limited Board.
117. In 2019, a detailed paper on Crown's enhanced AML Framework, including the new joint AML/CTF Program was prepared and provided to the boards of Crown Resorts Limited, Burswood Limited and Burswood Nominees Limited.
40. *Your knowledge or understanding of what, if any, investigations or enquiries have been undertaken by the board of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited, and when, to ascertain whether any bank accounts*

of Riverbank Investments Pty Ltd (Riverbank) or any other bank accounts maintained with respect to the Perth Casino operations may have been used as a vehicle to facilitate money-laundering or terrorism financing.

118. I understand that Crown Resorts Limited engaged external experts to carry out a review of all of Crown's bank accounts in 2020. This was done towards the very end of my tenure with Crown and I had little to do with it.

41. *Whether you know or suspect that any bank accounts maintained with respect to the Perth Casino operations, other than a bank account of Riverbank, may have been used as a vehicle to facilitate money-laundering or terrorism financing.*

119. I had no knowledge that any such bank accounts were being used to facilitate money laundering or terrorism financing. Nor did I have any specific suspicions that any such bank accounts maintained with respect to the Perth Casino operations were being used as a vehicle to facilitate money-laundering or terrorism financing, other than where specific Suspicious Matter Reports were lodged with AUSTRAC. The fact that accounts may be used as a vehicle to facilitate money-laundering or terrorism financing was recognised as an established risk in casinos and were amongst the reasons that the AML/CTF Program and supporting policies and procedures were created and implemented.

42. *Whether you know if any of Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited received or assisted in receiving payments at any hotel forming part of the Perth Casino complex from international customers using a credit or debit card (ordinarily a China Union Pay (CUP) card), with the funds received then being made available for gaming.*

120. I have no knowledge of any such activity.

RIVERBANK

43. *Your knowledge or understanding of the activities, assets and business of Riverbank.*

121. My understanding was:

- a. the only purpose of Riverbank was to hold a bank account;
- b. it held no other assets, had no other activities and had no employees.

122. The bank account held in the name of Riverbank was closed in December 2019.
44. *Your knowledge or understanding of the circumstances in which Riverbank opened and operated any bank accounts that were used in connection with gaming at a casino (Riverbank Accounts), including as to:*
- (a) *how it was decided that Riverbank was to hold, and continue to hold, bank accounts which were to be used by the Perth Casino's patrons to deposit funds; and*
 - (b) *otherwise, the purpose of accounts with financial institutions held by Riverbank.*
123. Riverbank Accounts were opened before I commenced at Crown. I am unaware of the details or circumstances regarding the opening of the accounts.
124. I understood that Crown's Treasury Department dealt with the opening and closing of all bank accounts and liaising with the relevant banks.
125. I understood the Riverbank Accounts were operated by staff at Crown Perth within the Cage and Finance Departments.
126. I understood the Riverbank Accounts was for patron deposits related to gaming activity.
127. I am not aware of the Riverbank Accounts being used for any other purpose.
45. *Your knowledge and understanding of the risk management system which applied to Riverbank, both in and of itself and more broadly within the context of the Crown Group.*
128. The relevant risk management system was that which applied to Crown Perth generally for all of its operations. In other words, there was no separate risk management system which applied to Riverbank or the Riverbank Accounts.
129. In this regard I provided the following evidence to the Bergin Inquiry setting out my understanding in this regard, namely as follows:
- a. To the best of my knowledge, from 2007 onwards following the enactment of the AML/CTF legislation:

- i. Crown Perth had in place frameworks for the monitoring of all its bank accounts, including the Riverbank Accounts;
 - ii. Crown Perth provided anti-money laundering training to staff with responsibilities for monitoring Crown-operated bank accounts, including Riverbank Accounts; and
 - iii. the monitoring of the Riverbank Accounts was conducted no differently from the monitoring of other Crown-operated bank accounts.
- b. Crown Perth has a transaction monitoring program as part of its AML/CTF Program (and had such a program in place before the closure of the Riverbank Accounts).
- c. The AML Program set out the framework for the transaction monitoring Program, which monitored transactions to seek to detect materially abnormal transaction values or other behaviour which suggests higher than usual money-laundering/terrorism-financing risks. The specific transactional activities and other behaviours and the method for dealing with each were as follows:

| Activity/attribute monitored (monitored by) | Method |
|--|---|
| Monitoring of patron behaviours for suspicious matters (all operational staff) | Staff observation, with suspicious activity reported to the Legal Officer -AML via an SMR |
| Cash transactions equal to or greater than \$10,000 (Cage Supervisors) | Report from SYCO system |
| Cheques issued to patrons (Cage Supervisors) | Report from SYCO system |
| Buy-ins - carded, uncarded, voided | Report from SYCO system |

| | |
|---|---|
| (Table Games Management) | |
| Account opening and transacting (Cage Supervisors) | Report from SYCO system Report from EzPay system |
| Foreign currency transactions equal to or greater than AU\$1000 (Cage Supervisors) | Report from SYCO system |
| Trends in play (Legal Officer - AML) | Report from SYCO system |
| Names of known patrons in World Check or equivalent reputable service provider (Cage Supervisors and Legal Officer - AML) | Data matching |

- d. Cage was to monitor account opening and transacting, which covered deposits on any of Crown's bank accounts that are inputted into Crown's casino monitoring system, SYCO. The transaction monitoring program also provided for monitoring of patron behaviour for suspicious matters.
- e. The AML Program extended to all of Crown Perth's bank accounts including the Riverbank Accounts.
- f. Transactional activity on the Riverbank Accounts was subject to monitoring under the AML Program in the same way as was transactional activity on the Crown Perth bank account. The AML Program did not differentiate between that account and the Riverbank Accounts.
- g. Crown Perth maintained standard operating procedures to implement the framework. These standard operating procedures outlined the process around deposits into bank accounts operated by Crown Perth and included procedures for accessing the online bank accounts, checking for new deposits and crediting those deposits against the identified patron's account in SYCO.

- h. Crown Perth's standard operating procedures also outlined reporting processes for Cage staff who are tasked with reviewing online bank account statements, which includes reviewing any transactions in and out of the account, which are not supported by an appropriate level of gaming play, or transactions that otherwise appear unusual in all the circumstances. Where such behaviour was identified and Cage staff identified it to be suspicious, they were required to complete an internal suspicious matter report and email a copy to the Crown Perth AML Team.
- i. From SYCO, a report was generated which contained the details of all deposits into Crown-operated bank accounts (including historically the Riverbank Accounts) that have been recorded by Cage staff against individual patron accounts. This consolidated report is known as a Telegraphic Transfer Listing Report. The AML Team was to review this report in accordance with the AML Program for any transactional activity that may raise concerns (including behaviours that I referenced above).
- j. In support of Crown Perth's transaction monitoring program, all staff involved in the monitoring of bank accounts controlled by Crown Perth (including historically the Riverbank Accounts) and all staff involved in related areas such as gaming, security and surveillance, undertook mandatory online AML/CTF training. The training relevantly included:
 - i. details on the concept of structuring;
 - ii. an explanation of what constitutes a suspicious matter; and
 - iii. the general principle that a suspicious matter is any observation which causes a staff member to have a feeling of apprehension or mistrust regarding patron activities.
- k. Crown Perth monitored transactions on the Riverbank Accounts as follows:

- i. Crown Perth Cage staff reviewed online bank statements containing the transactions processed on the Riverbank Accounts daily and completed a form entitled "*Requisition To: Release Deposited Funds at Cage*" (**Requisition Form**), which listed the dollar amount to be credited to the identified patron's SYCO account;
 - ii. Crown Perth Cage Staff then used the Requisition Form to record all Riverbank Accounts transactions in SYCO and credited deposits made into the Riverbank Accounts against the relevant patron's SYCO account as a Transfer Acknowledgement amount;
 - iii. Crown Perth Cage staff reviewing transactional activity were required to do so in accordance with the AUSTRAC standard operating procedures and their AML/CTF training;
 - iv. Crown Perth's AML Team extracted the Telegraphic Transfer Listing Report from SYCO and reviewed the deposits credited to patron accounts from the Riverbank Accounts against other transactional information, to assess whether the funds were used for gaming or for the redemption of a debt and to otherwise assess the AML/CTF risk posed by the patron pursuant to the transaction monitoring program.
46. *Your knowledge and understanding of the management structure which applied to Riverbank.*
130. Riverbank was a subsidiary of Burswood Limited and had no employees.
47. *Your knowledge and understanding of the persons who performed services in relation to the activities of Riverbank and which entity employed those persons.*
131. The persons who performed services in relation to the activities of Riverbank were:
- a. Crown Perth Finance Department;

- b. Crown Perth Cage Team;
 - c. Crown Perth AML Team; and
 - d. as mentioned above, Crown Resorts Treasury Department managed the Riverbank Accounts, as it did with all of Crown's bank accounts.
132. All Crown Perth employees were employed by Burswood Resort (Management) Ltd. As I understand, the Crown Resorts Treasury Department were employed by Crown Resorts Limited.
48. ***Your knowledge and understanding of the persons who were responsible for transferring funds from the accounts with financial institutions held by Riverbank for use by patrons of the Perth Casino and under whose direction they did so.***
133. My understanding was that Cage management was responsible for transferring funds from accounts with financial institutions held by Riverbank for use by patrons. It was also my understanding that Cage management would also communicate with the ICB Management Team and gaming management regarding transfers.
49. ***Your knowledge and understanding of whether and to what extent persons who performed services for Riverbank were influenced, directed or accountable to Crown Resorts Limited, Crown Melbourne or any other entity within the Crown Group in the performance of their duties and responsibilities.***
134. As set out in my answer to question 11, the management of the ICB Team was a group function, and as those performing group roles were based in Melbourne, they were employed by Crown Melbourne Limited. The Perth Casino members of the ICB Team (who reported to the ICB Group function) were employed by Burswood Resort (Management) Limited.
135. The management of the ICB Team reported to the CEO – Australian Resorts.
136. Other than that, I had no knowledge or belief that persons who performed services for Riverbank were influenced or directed by Crown Resorts Limited, Crown Melbourne or any other entity within the Crown Group.

50. *Your knowledge and understanding of the person(s) and (or) positions responsible for monitoring the operation of the bank accounts of Riverbank for compliance with systems, policies and procedures to identify and manage the risks of the Perth Casino operations being used to facilitate money-laundering and terrorism financing.*
137. As bank accounts, the Riverbank Accounts were the subject of the AML/CTF systems, policies, and procedures.
51. *Your awareness of the extent to which the operation of the bank accounts of Riverbank was accounted for in the AML/CTF program of the Crown Group or entities within that group, including as to:*
- (a) *the extent to which the Riverbank Accounts were the subject of AML/CTF systems, policies and procedures;*
 - (b) *whether any internal Crown AML/CTF reports were prepared in connection with one or more of the Riverbank Accounts; and*
 - (c) *whether any internal Crown AML/CTF reports prepared in connection with one or more of the Riverbank Accounts were reported to or provided to directors of Burswood Nominees Limited and (or) other members of the Crown Group.*
138. As noted previously, the Riverbank Accounts (as with all bank accounts) were the subject of the AML framework.
139. I am not aware of there being any internal Crown AML/CTF reports prepared in connection with the Riverbank Accounts. However, there was an internal Crown report prepared during Bergin Inquiry when Crown became aware of cash deposits under \$10,000.00 being made into the Riverbank Accounts.
140. I am unaware of who was provided with any internal report. However, I am aware that a draft report was provided to Mr Barton around September 2020.
52. *Your awareness of legal advice in respect of the operation of the bank accounts of Riverbank insofar as it concerns the AML/CTF compliance program of the Crown Group, or entities within that group, and otherwise the compliance of those entities with the Australian AML/CTF legislation requirements.*
141. I am aware that legal advice was sought and obtained in respect of the Riverbank Accounts. That information is the subject of legal professional privilege. I am unaware whether such privilege has been waived by the party

in whom the privilege resides. Accordingly, at this point I say nothing further about this.

53. *Your involvement in, or awareness of, concerns expressed by financial institutions, with which bank accounts in the name of Riverbank were held, that such accounts may have been used by third parties for the purpose of money-laundering, as well as what response was given and ought to be given to those financial institutions in relation to such concerns.*
142. As a result of my involvement in the Bergin Inquiry, I was reminded that a bank that held a Riverbank Account had expressed concerns to the CFO – Crown Resorts and the Treasury Department regarding a number of sub-\$10,000.00 deposits made in different bank branches.
143. I also recall being questioned about attending a meeting with the bank together with other senior Crown representatives to discuss the matter. From documents shown to me, I accept that I attended the meeting, but I have no independent recollection of doing so.
144. I have no independent recollection of what Crown's response was. The response which ought to have been given in relation to such concerns was that Crown would investigate the transactions, that transactions of that nature should not have been accepted until satisfactory investigations had been carried out and refused if not satisfactory, Suspicious Matter Reports should have been lodged, and that controls would be reviewed and enhanced where necessary to reduce the risk of this practice being repeated in the future.
54. *Your knowledge or understanding of the circumstances in which one or more of the Riverbank Accounts was closed, including as to:*
 - (a) *whether the directors of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited were provided with reports or other information about the closure of one or more of the Riverbank Accounts; and*
 - (b) *the response of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited to the closure of one or more of the Riverbank Accounts.*

145. I have no independent recollection when or why the overseas Riverbank accounts were closed, but I may have been shown some documentation during the Bergin Inquiry.
146. The Australian Riverbank Account was closed in late 2019. I may have been aware of the circumstances of the closure and may have been shown documentation during the Bergin Inquiry in relation to money laundering, but I do not recall.
147. I am unaware of any reports being provided to any of the Crown Boards.
148. I cannot recall any response in relation to closure of the overseas Riverbank accounts. I cannot recall any response was in relation to the closure of the Riverbank accounts in 2019.
55. *Your knowledge or understanding of differences (if any) in the way the bank accounts of Riverbank and bank accounts of Southbank Investments Pty Ltd were opened and operated in connection with gaming at the Perth Casino and Melbourne Casino respectively.*
149. I am unaware of any such differences, except that Crown Melbourne required regulatory approval to open the Southbank Investments bank account.

RESPONSE TO PUBLIC ALLEGATIONS AND REGULATORY INVESTIGATION

56. *Your knowledge and understanding of any response of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited to public allegations of money laundering through the Perth Casino and the Melbourne Casino, infiltration of the Perth Casino and the Melbourne Casino by organised crime and associations between Crown and organised crime made at or around the following times:*
- (a) *September 2014: Four Corners “High Rollers – High Risk? Australian casinos and the threat posed by organised crime”;*
 - (b) *October 2017: Allegations tabled in Federal Parliament by Mr Andrew Wilkie MP;*
 - (c) *April – July 2018: Guardian (allegations of EGM tampering);*
 - (d) *July 2019: 60 Minutes and Fairfax Media (money laundering and criminal infiltration); and*

(e) *September 2020: ACLEI release of the Operation Angove Report.*

150. Dealing with each of the specific items mentioned.

- a. The responses to the September 2014 Four Corners program were managed by Crown Resorts Limited through Michael Neilson (General Counsel and Company Secretary Crown Resorts) and Rowen Craigie (Chief Executive of Crown Resorts). One or both of them communicated with the Gaming and Wagering Commission of Western Australia (GWC). Soon after the Four Corners program, I called someone at the GWC or Department (I cannot remember which/who it was) and informed them that Crown Resorts was managing the response to the program and that someone from Crown Resorts would contact them shortly. Crown Resorts issued a response to Four Corners.
- b. The allegations made by Mr Andrew Wilkie MP all related to Crown Melbourne. I do not remember all of the allegations tabled but I remember that one of them related to Crown Melbourne being in breach of the gaming framework for the unauthorised activity in relation to installing blanking buttons on a gaming machine. Another that I recall was related to the use of "picks" in gaming machines to assist in the game being played in a continuous pattern. Crown Melbourne cooperated with the Victorian Commission for Gambling and Liquor Regulation's (VCGLR) investigations into these matters. In regard to blanking buttons, Crown Melbourne paid a fine after being found to be in breach of the gaming legislation. Crown Resorts issued a public statement regarding the EGM tampering and other allegations. My understanding is that the response was prepared and issued after various departments/teams (including my departments/teams) had provided information to Crown Resorts Management. I cannot now recall what information I/my departments/teams provided, other than I recall it was largely information relating to the machine "tampering" allegation. I recall that the Crown Resorts public statement was to the effect that it denied that what had occurred was machine "tampering"

but that it would fully cooperate with the relevant authorities in any investigations relating to the allegations. With respect to the picks, Crown Melbourne ceased the practice of issuing picks or allowing picks to be used and also put in place a policy for staff to look for any items being used to hold down a button and to advise patrons that the practice was not permitted. I also recall contacting AUSTRAC in response to the allegations. AUSTRAC subsequently carried out a compliance assessment in regard to Crown Melbourne's AML/CTF Program with a specific focus on EGMs. Crown accepted the recommendations made by AUSTRAC on the completion of its assessment. Crown Perth carried out an audit of its EGMs to see if there were any "blinking button" and "continuous spin" issues. There were no blinking button issues identified, however there were some EGM legacy issues in relation to continuous play functionality that were addressed with the GWC.

- c. I do not recall the effect of the Guardian articles. My recollection is that they largely covered allegations made by Mr Wilkie MP. I do not recall any response of Crown Resorts Limited specifically to matters raised in the Guardian articles beyond what I have referred to above with respect to Mr Wilkie's allegations.
- d. For the July 2019 60 Minutes and Fairfax Media report, Crown Resorts made a public statement. I was involved in Crown Resorts' responses insofar as I (and others) provided information to the Crown Resorts Management Team and Crown Resorts Board members who were coordinating the responses. I recall Mr Felstead and I presented two papers to the Board. I also recall being provided with drafts of the public statements and being involved in discussions about them to the extent that they dealt with information which I had provided. The responses were to the effect that Crown denied the allegations, clarified certain details, provided commentary on systems in place relevant to the allegations and stated that it would cooperate with any investigations in regard to the allegations.

- e. I do not recall whether Crown responded to the ACLEI release of the Operation Angove Report. This occurred towards the end of my employment with Crown when I was heavily involved with the Bergin Inquiry.

57. *Your knowledge or understanding of any response of Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited to the arrest, detention and conviction of Crown employees in China in 2016.*

151. I cannot recall any response of Crown Perth to the arrest, detention, and conviction of Crown employees in China in 2016. This issue was managed by Crown Resorts and Crown Melbourne.

152. Internally, a presentation was prepared (with assistance from Crown's external lawyers who were advising on the China matter) for me to give to the GWC providing an update on the China matter (which I did).

58. *Your knowledge or understanding of any response of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited, Burswood Resort (Management) Limited and (or) Crown Melbourne to the recommendations of the VCGLR Report "Sixth Review of the Casino Operator and Licence June 2018" (VCGLR Sixth Review Report).*

153. I was involved in Crown's response to this review.

154. Crown's response was that it accepted the VCGLR's recommendations. Crown's response was published with the VCGLR Sixth Review Report and during my time at Crown, it had implemented a number of the recommendations and was working to implement the remainder of the outstanding recommendations.

155. I gave a presentation to the GWC which included details on the recommendations to VCGLR Sixth Review Report. That presentation was prepared by my Crown Perth team in consultation with my Crown Melbourne team. To the best that I can recall, the presentation included the relationship and the relevance of those recommendations to Crown Perth. By that I mean that some of the recommendations were specific to Crown Melbourne, some

of the recommendations had already been implemented at Crown Perth and other recommendations were to be implemented at Crown Perth in due course.

59. *Your knowledge or understanding of any response of Burswood Limited, Burswood Nominees Limited, Burswood Resort (Management) Limited and (or) Crown Melbourne to the disciplinary actions of the VCGLR referred to on pages 66, 135 (non-compliance with junket related internal controls) and pages 66, 75 (unauthorised variations to the configuration of 17 gaming machines) of the VCGLR Sixth Review Report.*
156. For the findings of non-compliance with junket related internal controls, Crown Melbourne's response was to accept the findings together with strengthening controls to prevent similar failures in the future. Crown Melbourne introduced a dedicated person in the compliance department to undertake ongoing reviews of junket obligations. Crown Melbourne carried out several audits and strengthened its process controls.
157. Crown Perth did not have the same standard operating procedures as those which Crown Melbourne was found to have breached. I cannot recall if there was any response by Crown Perth to the disciplinary actions relating to non-compliance with junket related internal controls.
158. For the disciplinary action regarding gaming machines, Crown Melbourne accepted the finding. To address that failure, Crown Melbourne noted that it had or was in the process of implementing an enhanced compliance framework which would strengthen its processes to reduce the risk of such issues occurring into the future. Further, a form called a "gaming initiatives form" became mandatory for any change to the control environment. This form needed to be circulated to departments for approval of the initiative before implementation.
159. I think there was a public statement issued by Crown Melbourne with respect to the disciplinary actions, but I cannot recall what it said. There was no public response by Crown Perth.
60. *Your knowledge or understanding of any response of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or)*

Burswood Resort (Management) Limited during the course of the Bergin Inquiry to matters raised during that inquiry relating to:

- (a) criminal infiltration of the Perth Casino;***
- (b) commercial relationships with junket operators, junket representatives, premium/privileged players and (or) other patrons at the Perth Casino who have known or alleged associations to organised crime; and***
- (c) money-laundering through bank accounts operated in connection with the Perth Casino.***

160. I had limited involvement with Crown's response on such matters during the Bergin Inquiry, as I was heavily involved in preparing to give and giving evidence to the Inquiry.

161. Having said that, it is my recollection that to address the issues listed above, Crown:

- a. ceased to do business with international junkets;
- b. stopped all approvals of third-party money transfers;
- c. made changes to cash deposit procedures;
- d. engaged a third party to undertake due diligence on a number of junket operators;
- e. engaged a third party to review Crown's existing due diligence and related processes;
- f. engaged external experts to review its bank accounts; and
- g. employed further resources in the AML and financial crimes areas.

PROBLEM GAMBLING

61. ***Your knowledge or understanding of what, if any, investigations or enquiries have been undertaken by the board of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited or Burswood Resort (Management) Limited, and when, to ascertain the nature and extent of problem gambling at the Perth Casino***

162. I cannot recall any such investigations or enquiries.

62. *Your knowledge or understanding of the nature and content of Crown Resorts Limited's, Burswood Limited's, Burswood Nominees Limited's and (or) Burswood Resort (Management) Limited's systems, policies and procedures to identify and manage the risks of problem gambling at the Perth Casino.*
163. Crown Perth had a framework in place before I commenced employment with Burswood. That framework evolved during the course of my employment to enhance responsible service of gambling.
164. A number of systems and processes were in place under the responsible service of gambling framework, including:
- a. a Responsible Gambling Code of Practice;
 - b. The Responsible Service of Gambling Strategic Plan;
 - c. Self Exclusion and Involuntary Exclusion processes;
 - d. Revocation of Self Exclusion process;
 - e. Third Party Exclusion Application process;
 - f. Observable Signs Training;
 - g. Concerning Behaviour Reports process;
 - h. an ATM policy;
 - i. Player Activity Statements and Play Safe Limits;
 - j. Facial recognition technology;
 - k. Crown's relationship with Gambling Help WA; and
 - l. the reporting structure in place comprising the Responsible Gaming Management Committee, the Compliance Committee, the ERCC, the Crown Resorts Responsible Gaming Committee and the Burswood Limited Board.
165. Further to paragraph 164.l, under the responsible gaming framework in place:

- a. Crown Perth staff prepared reports that were presented to the Responsible Gaming Committee. Key issues from these reports would then be reported to the ERCC and in turn the Burswood Limited Board.
 - b. A detailed report was also prepared by the Crown Perth Responsible Gaming Team which was provided to the Crown Resorts Limited Responsible Gaming Committee. The report included responsible gaming statistical data, such as numbers of self-exclusions, numbers of revocations of self-exclusion and numbers of concerning behaviour reports.
 - c. As a result of that reporting framework, there would be enquiries from the Burswood Limited Board and the Crown Resorts Limited Responsible Gaming Committee on Responsible Gaming matters.
 - d. During my time on the Crown Resorts Responsible Gaming Committee, the statistical analysis in the reports evolved, with detailed data being provided to the Committee.
166. Before my appointment as Chief Legal Officer, Crown Melbourne had been developing a data analytics tool to assist with proactive identification of potential problem gaming issues. In about 2018, that tool was implemented in Crown Melbourne. It was planned to be implemented in Crown Perth around the time that I left.
167. In 2019, Crown engaged a panel of independent experts to undertake a full review of Crown's Responsible Gaming framework. A report was prepared which identified strengths, weaknesses, and recommendations for enhancement. The recommendations were accepted and were being developed for implementation when I left.
63. *Your knowledge or understanding of the management responsibility within Crown Resorts Limited's, Burswood Limited's, Burswood Nominees*

Limited's and (or) Burswood Resort (Management) Limited's systems for identifying and managing the risks of problem gambling at the Perth Casino.

168. The "management responsibility" was primarily with the Gaming Team, Responsible Gaming Team and the Risk Team. The Executive Team also provided oversight of this framework.
64. ***Your knowledge or understanding of the oversight exercised by the directors of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited as to the development and implementation of, and compliance with, its systems, policies and procedures to identify and manage the risks of problem gambling at the Perth Casino.***
169. I have no knowledge or understanding of the oversight exercised by the directors of Crown Resorts Limited, other than I know that the directors received regular reports from Crown Resorts Limited's Responsible Gaming Committee.
170. The directors of Burswood Limited received information relating to responsible gaming as part of the Legal, Risk and Compliance Reports at their board meetings.
65. ***Your knowledge or understanding of what, if any, requests have been made of any of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and Burswood Resort (Management) Limited by third parties to conduct research into any aspect of problem gambling by reference to the Perth Casino or by utilising information about the Perth Casino operations, and any responses to such requests.***
171. My recollection is that there were requests made for information about the Perth Casino operations of this nature and that Crown provided certain information, but I cannot recall any specifics.

ELECTRONIC GAMING MACHINES

66. *Your knowledge or understanding of, from 2004, the structure and operation of Burswood Nominees Limited's EGM business at the Perth Casino, including as to:*

- (a) its financial model;***
- (b) management responsibility; and***
- (c) marketing.***

172. I have no knowledge of any of these matters prior to my commencement in 2006.

173. I was not responsible for the electronic gaming business and as such my knowledge and understanding was of a general nature.

174. I do not recall any details regarding the EGM financial model save that it was an important part of Crown Perth's business, and it is my recollection that it was the largest component of Crown Perth's profits.

175. The EGM business was managed by the COO – Gaming, who had a General Manager of Gaming Machines and a Manager of Gaming Product, together with other line managers. The COO – Gaming reported to the CEO - Australian Resorts.

176. Historically the Marketing Department reported to the COO – Gaming. However, from about 2015, as best I can recall, the marketing function became a group function, which reported to Crown's Chief Marketing Officer. The Chief Marketing Officer reported to CEO - Australian Resorts.

67. *Your knowledge or understanding of the oversight exercised by the directors of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and Burswood Resort (Management) Limited as to the structure and operation of its EGM business.*

177. The CEO – Australian Resorts provided reports on the EGM business at each formal board meeting of the Burswood Limited Board. As I understand it, CEO - Australian Resorts also provided a report which included details of the EGM business to Crown Resorts Board meetings.

68. *Your knowledge or understanding of the nature and content of Crown Resorts Limited's Burswood Limited's, Burswood Nominees Limited's and (or) Burswood Resort (Management) Limited's systems, policies and/or procedures for seeking authorisation from the GWC for games to be played on EGMs.*
178. Crown's Gaming Product Team, together with the Compliance and Regulatory Team, discussed potential new EGMs (or variations of existing approved EGMs) (**New Product**) with gaming manufactures. If Crown wished to proceed with a New Product, it would prepare a submission to the GWC, including the following information:
- a. details of the proposed New Product;
 - b. details of the manufacturer;
 - c. functionality of the game; and
 - d. measures in place to comply with the legislative restrictions and the WA Appendix the Gaming Machines National Standards.
179. The Gaming Product Manager and the COO – Gaming would then attend a GWC meeting to present on the proposed New Product, including a video demonstration of the proposed New Product.
180. GWC would then decide whether to accept, ask for further information, or decline.
69. *Your knowledge or understanding of what, if any, investigations or enquiries have been undertaken by the directors of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited or Burswood Resort (Management) Limited, and when, to ascertain the nature and extent of problem gambling at the Perth Casino associated specifically with EGMs.*
181. I cannot recall any such investigations or enquiries.
70. *Your knowledge or understanding of the nature and content of Crown Resorts Limited's, Burswood Limited's, Burswood Nominees Limited's and (or) Burswood Resort (Management) Limited's systems, policies and procedures to identify and manage the risks of problem gambling at the Perth Casino associated specifically with EGMs.*
182. I refer to my answer to question 62.

71. ***Your knowledge or understanding of the management responsibility within Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited for identifying and managing the risks of problem gambling at the Perth Casino associated specifically with EGMs.***
183. I refer to my answer to question 63.
72. ***Your knowledge or understanding of the oversight exercised by the directors of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited as to the development and implementation of, and compliance with, its systems, policies and procedures to identify and manage the risks of problem gambling at the Perth Casino associated specifically with EGMs.***
184. I refer to my answer to question 64.
73. ***Your knowledge or understanding of the usual process by which Burswood Nominees Limited and (or) the Crown Group introduced new EGMs to the Perth Casino including the usual process by which Burswood Nominees Limited sought and obtained the approval of the GWC for new EGMs.***
185. I refer to my answer to question 68.
74. ***Your knowledge and understanding of the nature of EGMs approved and (or) authorised EGMs operated at the Perth Casino and Melbourne Casino and the extent to which the EGMs operated at Perth Casino differ in any material respects to the EGMs operated at Melbourne Casino.***
186. As stated in my answer to question 68 above, there was a document called "National Standards" which had an appendix setting out the requirements of gaming machines in Western Australia for purposes of operating in Western Australia.
187. There was, as I recall, a specific Victorian Appendix to the National Standards.
188. From what I can recall, key differences between Crown Perth and Crown Melbourne included:
- a. Crown Melbourne's EGM spin rate was between 2 and 3 seconds, but the spin-rate for Crown Perth was not less than 5 seconds, which was reduced to not less than 3 seconds for the base game and not less than 5 seconds with features taken into account in about 2019;

- b. Crown Perth's return to player was 90% whereas Crown Melbourne's return to player was 87%
- c. Crown Perth could not have spinning reels (known as pokie machines);
- d. Crown Perth also had different limits on its EGM note acceptors (from memory it was \$100) to Crown Melbourne (which had a higher limit);
- e. Crown Melbourne had approval for a continuous spin option on a large complement of EGMs and Crown Perth did not save for my reference to paragraph 150.b to a small number of legacy machines.

GAMING AND WAGERING COMMISSION AND THE DEPARTMENT

75. *Your knowledge or understanding of whether, how and/or to what extent management of the Perth Casino operations was given direction or guidance from the board of either Burswood Limited, Burswood Nominees Limited or any other entity within the Crown Group about when and how generally to communicate with the GWC or the Department about matters to do with the Perth Casino, either generally or in relation to specific subjects.*
189. Communications with the GWC and/or the Department were generally a matter for Crown Perth management. I do not recall any of the boards giving direction or guidance as to when and how generally to communicate with the GWC or Department about Crown Perth.
76. *Your knowledge or understanding of whether, how and/or to what extent management of the Perth Casino operations, as a matter of general practice, informed the board of either Burswood Limited, Burswood Nominees Limited or any other entity within the Crown Group of the content of information that management:*
- (a) *proposed to communicate to the GWC; and /or*
 - (b) *had communicated to the GWC.*
190. Where appropriate, Perth Casino management informed the Board of Burswood Limited of key matters which management intended to communicate to the GWC. This included such matters as the Responsible Gaming Framework presentation, the response to media allegations presentation, the 3 second spin rate for EGMs proposal, the ICB tax rate changes proposal, and the table games supervision levels proposal.

191. Management would then keep the Board updated as and when required with respect to the information that management had communicated to the GWC on such matters.
192. Perth management did not ordinarily inform the Burswood Limited Board of more general communications with the GWC, such as staff issues and new game approvals.
77. *Your knowledge or understanding of whether, how and/or to what extent management of the Perth Casino operations was given direction or guidance from the board of either Burswood Limited, Burswood Nominees Limited or any other entity within the Crown Group about when and how to communicate with the GWC or the Department about the subject matter of any of the allegations identified in paragraph 86 below.*
- (a) *approval of 'video bingo' as an authorised game in or about 2004;*
193. I have no knowledge of this matter as it was prior to my commencement of employment at Crown.
- (b) *changes to the regulation of junkets in 2010;*
194. I cannot recall any such direction or guidance from the boards on this matter.
- (c) *the allegations made in the Four Corners program "High Rollers – High Risk? Australian casinos and the threat posed by organised crime" in September 2014;*
195. This is a matter in respect of which Crown Resorts managed the communications with the GWC and/or the Department, with the management of Perth Casino assisting as required.
- (d) *changes to the manner in which Taxes and (or) Licence Fees are calculated between 2013 and 2015;*
196. Whilst Crown Perth had the conduct of this matter, it was one in which some direction and guidance was provided by Crown Resorts.
- (e) *changes to the nature and level of on-site supervision in 2015;*
197. I cannot recall any such direction or guidance from the boards on this matter.

(f) *the arrest, detention and conviction of Crown employees in China in or about 2016;*

198. This is a matter in respect of which Crown Resorts managed the communications with the GWC and/or the Department, with the management of Perth Casino assisting as required.

199. I note however that I was requested by Crown Resorts to provide a presentation to the GWC in regard to this matter. I cannot recall whether that request was from the Board of Crown Resorts (as opposed to management).

(g) *changes to the Casino Manual (Operations) relating to junkets in 2017;*

200. I cannot recall any such direction or guidance from the boards on this matter.

(h) *the allegations tabled in Federal Parliament by Mr Andrew Wilkie MP in October 2017;*

201. Whilst Crown Perth had the conduct of this matter, it was one in which some direction and guidance was provided by Crown Resorts.

(i) *the allegations of EGM tampering raised in Guardian articles in April – July 2018;*

202. I cannot recall any such direction or guidance from the boards on this matter.

(j) *disciplinary action taken by the VCGLR for failure to adhere to internal controls relating to junkets in or about 2018;*

203. I cannot recall any such direction or guidance from the boards on this matter.

(k) *disciplinary action taken by the VCGLR for varying the operation of 17 gaming machines without approval in or about 2018;*

204. I cannot recall any such direction or guidance from the boards on this matter.

(l) *the recommendations of the VCGLR Sixth Review Report;*

205. I cannot recall any such direction or guidance from the boards on this matter.

(m) *approval to extend credit to ICB players, junket operators, premium players, privileged players and (or) patrons;*

206. I cannot recall this approval.

(n) the allegations of money laundering and criminal infiltration raised in 60 Minutes and Fairfax Media articles in July 2019;

207. This is a matter in respect of which Crown Resorts managed the communications with the GWC and/or the Department, with the management of Perth Casino assisting as required.

(o) the allegations raised during the Bergin Inquiry and conclusions in the Bergin Report concerning the RISKS;

208. I cannot recall any such direction or guidance from the boards on this matter.

(p) EGM revenue

209. I am unsure what the reference to "EGM revenue" is specially referring to. However, I cannot recall any such direction or guidance from the boards in regard to "EGM revenue" as such.

(q) problem gambling.

210. I cannot recall any such direction or guidance from the boards on this matter.

78. In respect of the subject matter of each of the allegations identified in paragraph 86 below, your knowledge or understanding of how and (or) to what extent management of the Perth Casino operations informed the directors of either Burswood Limited, Burswood Nominees Limited or any other entity within the Crown Group of the content of information that management:

(a) proposed to communicate to the GWC; and / or

(b) had communicated to the GWC.

(a) approval of 'video bingo' as an authorised game in or about 2004;

211. This matter was before I commenced employment with Crown therefore, I cannot comment.

(b) changes to the regulation of junkets in 2010;

212. I cannot recall how management informed the Burswood Limited Board as to this issue. I expect it would have been included in one of the usual written reports included in the directors' meeting board packs. I also note that a matter of this nature would have formed part of the ERCC papers which were reviewed and considered by a number of Burswood Limited Board and

Burswood Nominees Limited Board members in their participation with the ERCC process.

(c) the allegations made in the Four Corners program "High Rollers – High Risk? Australian casinos and the threat posed by organised crime" in September 2014;

213. I cannot recall anything with respect to Burswood Limited. It may have been the subject of communication with the Board of Crown Resorts (as it had the conduct of the matter), but I cannot now recall.

214. I did not report anything to any other Crown Group entity.

(d) changes to the manner in which Taxes and (or) Licence Fees are calculated between 2013 and 2015;

215. I recall first attending Burswood Limited Board meetings from the end of 2014, and that the Board was generally kept informed including through written reports included in the directors' meeting board packs. I also note that this matter was included in the ERCC papers which were reviewed and considered by a number of Burswood Limited Board and Burswood Nominees Limited Board members in their participation with the ERCC process.

(e) changes to the nature and level of on-site supervision in 2015;

216. I cannot recall how management informed the Burswood Limited Board as to this issue. I expect it would have been included in one of the usual written reports included in the directors' meeting Board Packs or discussed as part of "Other Business". I also note that a matter of this nature would have formed part of the ERCC papers which were reviewed and considered by a number of Burswood Limited Board and Burswood Nominees Limited Board members in their participation with the ERCC process.

(f) the arrest, detention and conviction of Crown employees in China in or about 2016;

217. I recall that the Board of Burswood Limited was advised (I think by myself and Mr Felstead) of the nature of the presentation on this topic to the GWC. I cannot recall whether this was before and/or after I gave the presentation.

(g) *changes to the Casino Manual (Operations) relating to junkets in 2017;*

218. I cannot recall specifically, although expect that a matter of this nature would have been included in the legal, risk and compliance reports for the Burswood Limited Board meetings. I also expect that a matter of this nature would have formed part of the ERCC papers which were reviewed and considered by a number of Burswood Limited Board and Burswood Nominees Limited Board members in their participation with the ERCC process.

(h) *the allegations tabled in Federal Parliament by Mr Andrew Wilkie MP in October 2017;*

219. I cannot recall specifically, although I expect that a matter of this nature would have been included in the legal, risk and compliance reports and/or CEO's Report for the Burswood Limited Board meetings or discussed as part of "Other Business". I also expect that a matter of this nature would have formed part of the ERCC papers which were reviewed and considered by a number of Burswood Limited Board and Burswood Nominees Limited Board members in their participation with the ERCC process.

(i) *the allegations of EGM tampering raised in Guardian articles in April – July 2018;*

220. I cannot recall specifically, although I expect that a matter of this nature would have been included in the legal, risk and compliance reports and/or CEO's Report for the Burswood Limited Board meetings or discussed as part of "Other Business". I also expect that a matter of this nature would have formed part of the ERCC papers which were reviewed and considered by a number of Burswood Limited Board and Burswood Nominees Limited Board members in their participation with the ERCC process.

(j) *disciplinary action taken by the VCGLR for failure to adhere to internal controls relating to junkets in or about 2018;*

221. I cannot recall specifically, although I expect that a matter of this nature would have been included in the legal, risk and compliance reports and/or CEO's Report for the Burswood Limited Board meetings or discussed as part of "Other Business". I also expect that a matter of this nature would have formed

part of the ERCC papers which were reviewed and considered by a number of Burswood Limited Board and Burswood Nominees Limited Board members in their participation with the ERCC process.

(k) disciplinary action taken by the VCGLR for varying the operation of 17 gaming machines without approval in or about 2018;

222. I cannot recall specifically, although I expect that a matter of this nature would have been included in the legal, risk and compliance reports and/or CEO's Report for the Burswood Limited Board meetings or discussed as part of "Other Business". I also expect that a matter of this nature would have formed part of the ERCC papers which were reviewed and considered by a number of Burswood Limited Board and Burswood Nominees Limited Board members in their participation with the ERCC process.

(l) the recommendations of the VCGLR Sixth Review Report;

223. I recall that I informed the Burswood Limited Board after the event that I had made a presentation to the GWC, which included details on the VCGLR Sixth Review Report recommendation, but cannot now recall the detail of what I said.

(m) approval to extend credit to ICB players, junket operators, premium players, privileged players and (or) patrons;

224. I cannot recall this approval.

(n) the allegations of money laundering and criminal infiltration raised in 60 Minutes and Fairfax Media articles in July 2019;

225. I recall that the Burswood Limited Board was advised of the nature of the presentation that I provided to the GWC after the event. I also recall that either the Crown Resorts Board or a Crown Resorts Board Committee was advised that I had presented to the GWC.

(o) the allegations raised during the Bergin Inquiry and conclusions in the Bergin Report concerning the RISKS;

226. I have no knowledge of what information management of Perth Casino communicated to the GWC during or after the hearing of the Bergin Inquiry (other than being informed that Mr Barton was going to present to the GWC)

and have no knowledge of what the directors were informed as to such communications, either beforehand or afterwards.

(p) EGM revenue

227. I am unsure what the reference to “EGM revenue” is specifically referring to. However, I cannot recall whether the Burswood Limited Board was advised in regard to communications or proposed communications with GWC regarding “EGM revenue”.

(q) problem gambling.

228. I do not recall whether I informed the Burswood Limited Board before I presented to the GWC on the Crown Perth Responsible Gaming Framework. I do recall that I informed the Board of the presentation after the event, as well as informing Crown Resorts Responsible Gaming Committee after the event.

79. Your knowledge or understanding of any contact, formal or informal, which occurs between the GWC and (or) Department, on the one hand, and Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited, on the other.

229. There were multiple forms on contact between the GWC and/or Department and Burswood Resort (Management) Limited and Crown Resorts Limited employees. Those contacts included:
- a. Formal presentations to the GWC delivered by Burswood employees and at times Crown Resorts Limited employees (in the form of Burswood and/or Crown Resorts employees being invited to attend a GWC meeting).
 - b. Formal meetings between the Department and Burswood employees (usually in the form of a monthly “DRGL Operations Meetings”).
 - c. Informal meetings between the Department and Burswood employees that occurred from time to time.
 - d. Formal and informal discussions between the Department and Burswood employees occurred from time to time.

80. *Your knowledge or understanding of any relationship, formal or informal, between the GWC and (or) Department, on the one hand, and Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited on the other.*
230. A number of friendships formed.
231. I knew that Mr Marais, Mr Hulme and Mr Connolly were friends.
232. I knew that Mr Jon Nichols was also a friend of Mr Connolly.
233. I too was friendly with Mr Connolly. However, save for two occasions that I recall, we did not see each other socially. Those occasions were as follows:
- a. we learnt that we were both in Melbourne at the same time and had dinner together (each of us paying for our own meals);
 - b. at Mr Connolly's invitation many years ago I went out on his boat for a couple of hours or so along with Mr Marais and Mr Hulme.
81. *Your knowledge of any gifts or benefits, including hospitality, provided by the Crown Group, including by its officers or employees, to officers and employees of the Department, and members of the GWC.*
234. I do not recall any such matters other than Mr Sargeant travelling to Macau with myself and Mr Felstead to look at other casinos, the gaming environment and other gaming product. I understand that Mr Sargeant's travel and accommodation costs were paid for by Crown. I was informed by Mr Felstead that Mr Sargeant had disclosed this fact to the Gaming Minister.
82. *Your knowledge of any personal relationships and friendships between employees and officers of the Crown Group on the one hand and employees and officers of the Department, or members of the GWC, on the other. Please specify when, to your knowledge, those personal relationships and friendships began and when you first became aware of them.*
235. I refer to my answer to question 80.
83. *Your knowledge or understanding of any policies and procedures of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited regarding integrity issues relevant to interactions with the GWC, including with individual GWC members and (or) the Department, including with individual officers and employees. For*

example, addressing conflicts of interest and detecting and reporting misconduct (serious and minor).

236. As to the relevant policies and procedures, Crown Perth had various integrity-related policies and procedures including a Code of Conduct, Gifts and Gratuities Policy, and a Conflicts of Interest Policy. Crown Perth also had a Protected Disclosures (Whistleblowers) Policy. There was also a Crown Resorts Anti-Bribery and Corruption Policy.

84. *Your knowledge or understanding of any involvement of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited in changes that have been made historically to the GWC's regulatory objectives and philosophy in respect of:*

- (a) the regulation and oversight of Perth Casino, generally; and*
- (b) the risks associated with junket operations, money laundering, cash and electronic transactions and the Perth Casino and criminals infiltrating casino operations (RISKS), specifically.*

237. The involvement that I can recall is in respect of changes referred to in paragraph 190 above, the 2010 change to the approval of junket operators, and the changes the GWC was making to its onsite Government Inspectors' presence and processes.

85. *Please include your knowledge or understanding, for example, of any involvement of Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited concerning:*

- (a) approval of 'video bingo' as an authorised game in or about 2004;*

238. This matter was before I commenced employment with Crown therefore, I cannot comment.

- (b) changes to the regulation of junkets in 2010;*

239. This was the subject of a submission by Crown Perth.

- (c) changes to the manner in which Taxes and (or) Licence Fees are calculated between 2013 and 2015;*

240. This was the subject of a submission by Crown Perth with input from Crown Resorts.

- (d) *changes to the nature and level of on-site supervision in 2015;*
241. This was the subject of a submission by Crown Perth.
- (e) *changes to the Casino Manual (Operations) relating to junkets in 2017; and*
242. This was the subject of a submission by Crown Perth.
- (f) *approval to extend credit to ICB players, junket operators, premium players, privileged players and (or) patrons.*
243. I cannot recall the detail of this matter.
86. *Your knowledge or understanding, including your understanding of the accuracy, of any communications with, representations made to or disclosure of information to the GWC and (or) Department by Crown Resorts Limited, Burswood Limited, Burswood Nominees Limited and (or) Burswood Resort (Management) Limited with respect to the following matters relating to regulation and oversight of the Perth Casino:*
- (a) *approval of 'video bingo' as an authorised game in or about 2004;*
- (b) *changes to the regulation of junkets in 2010;*
- (c) *the allegations made in the Four Corners program "High Rollers – High Risk? Australian casinos and the threat posed by organised crime" in September 2014;*
- (d) *changes to the manner in which Taxes and (or) Licence Fees are calculated between 2013 and 2015;*
- (e) *changes to the nature and level of on-site supervision in 2015;*
- (f) *the arrest, detention and conviction of Crown employees in China in or about 2016;*
- (g) *changes to the Casino Manual (Operations) relating to junkets in 2017;*
- (h) *the allegations tabled in Federal Parliament by Mr Andrew Wilkie MP in October 2017;*
- (i) *the allegations of EGM tampering raised in Guardian articles in April – July 2018;*
- (j) *disciplinary action taken by the VCGLR for failure to adhere to internal controls relating to junkets in or about 2018;*
- (k) *disciplinary action taken by the VCGLR for varying the operation of 17 gaming machines without approval in or about 2018;*

- (l) *the recommendations of the VCGLR Sixth Review Report;*
- (m) *approval to extend credit to ICB players, junket operators, premium players, privileged players and (or) patrons;*
- (n) *the allegations of money laundering and criminal infiltration raised in 60 Minutes and Fairfax Media articles in July 2019;*
- (o) *the allegations raised during the Bergin Inquiry and conclusions in the Bergin Report concerning the RISKS;*
- (p) *EGM revenue; and*
- (q) *problem gambling.*

87. *Your knowledge or understanding of any steps taken by the Crown Group and (or) Burswood Nominees Limited prior to any communications with, representations made to or disclosure of information to the GWC and (or) Department to ensure or verify the accuracy of the communications, representations and information.*

244. I answer questions 86 and 87 together. As for the accuracy of such communications and the steps taken to verify the accuracy, I can only speak to matters in which I had some involvement, namely (b), (d), (e), (f), (g), (h), (i), (j), (k), (l), (n) and (q).

245. I cannot recall any communication, representation or information provided to the GWC or the Department which I considered to be inaccurate when made.

246. I accepted at face value information provided to me by other Departments within the Crown Group of Companies for which I was not responsible.

247. In the case of (f), whilst I gave that presentation, and whilst it bears my name, I did not prepare that presentation. Having said that, at the time I delivered the presentation, I did not believe it to be in any way deficient or inaccurate.

Contains sensitive information

Signed:

Date:

29 July - 4 August 2021

