

Perth Casino Royal Commission

Amended Witness Statement of Christo Theodoropoulos**15-20** September 2021

1. I, Christo Theodoropoulos of [REDACTED] make this **amended** statement in response to the summons to give evidence issued to me dated 2 September 2021.
2. I am a Customer Service Officer for the Australian Government Department, Services Australia (Centrelink).
3. This **amended** statement is true and correct to the best of my knowledge and belief.
4. For the purposes of preparing this **amended** statement, I have referred to the documents in the attached list marked "CT-1". I believe the list specifies the documents that I have referred to for this purpose.

MY ROLES AT CROWN PERTH

5. **Questions 1 and 2** of my list of topics to be addressed seek information concerning my roles with Crown Perth and my reporting lines in those roles.
6. I am a former employee of Crown Perth. At all times, I was employed by Burswood Resort Management Limited.
7. I worked at Crown Perth in various roles, starting as a Croupier and later progressing through management, from December 1985 to October 2014. These roles are set out below.
8. The first job that I obtained when I finished high school was at Crown Perth, which was then known as the Burswood Casino. On 20 December 1985, I began working there as a Croupier.
9. Later, I became an Inspector. As part of this role, I supervised Croupiers. I was part of a team of Croupiers and Inspectors, all of whom reported to the Table Games Pit Boss. As an Inspector, I monitored any high action and reported any significant wins and losses to the Table Games Pit Boss.
10. Between July 1997 and September 2007, I was the Table Games Pit Boss. In this role, I reported to the Gaming Shift Manager (as the role was then called). As the Table Games Pit Boss, I supervised a team of between 25 to 45 Croupiers and Inspectors. Significant wins and losses are reported to the Gaming Shift Manager. My daily responsibilities in this role included ensuring all games were conducted within the rules and regulatory frameworks in place, managing complaints from patrons, identifying and managing risk by complying with internal policies and procedures, investigating suspicious activity and escalating perceived risks to management where necessary.
11. Between September 2007 and August 2013, I was the Table Games Compliance Manager. In this role, I reported to the General Manager of Table Games. I did not work as part of a team, nor did I supervise a team. My daily responsibilities in this role included assisting the General Manager Table Games and Operations Manager in the management of all gaming compliance issues,

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assisting Gaming and other departments (e.g., Cage, Security, Surveillance) with the preparation and implementation of game rules, internal control statements, standard operating procedures, and liaising with key stakeholders to research and prepare submissions for new table game products.

12. I developed annual online questionnaire testing on various topics including responsible service of alcohol, responsible service of gambling, table game procedures, anti-money laundering and counter terrorism financing, gaming rules and procedures. The questionnaires were designed to test the knowledge of table games staff members on Crown Perth's various policies, procedures, strategies and frameworks around these topics. The questions were designed differently for different roles, according to what a person in each role needed to be aware of. For example, the questionnaire for an Inspector contained different questions to the questionnaire for a Pit Boss. The questionnaire for a Pit Boss contained different questions to the questionnaire for a Gaming Shift Manager, and so on. The spreadsheet which I used as a guide for the topics to be included as part of the questionnaire for each role is at CRW.701.005.5017.
13. In or around November 2012, as part of my Table Games Compliance Manager Role, I prepared the Table Games Threshold Transaction and Suspicious Matter Report Standard Operating Procedures Policy [CRL.533.001.0908] which applied to Crown Perth's operations.
14. In or around August 2013, I was approached by Joshua Preston to take over the role as Anti-Money Laundering (AML) **Compliance** Officer from Denise Vanderklau, who was assisting Paul Hulme in Gaming regulatory matters. I accepted the position of AML Compliance Officer in August 2013, because I felt that my experience in table games gave me a unique perspective in understanding and monitoring compliance with anti-money laundering.
15. In this role, I reported to Joshua Preston. I did not work as part of a team, nor did I supervise a team. I describe the specific roles and responsibilities I had as the AML **Compliance** Officer further below.
16. I remained in the role of Anti-Money Laundering **Compliance** Officer until October 2014, when I left Crown Perth.

ROLES AND RESPONSIBILITIES AS THE AML **COMPLIANCE OFFICER**

17. My responsibilities as the AML **Compliance** Officer broadly included ensuring that Crown Perth complied with anti-money laundering and counter terrorism financing legislation.
18. My day-to-day duties included printing out and reviewing daily transaction reports. The daily transaction reports included Threshold Transaction Reports (TTR) and Suspicious Matter Reports (SMRs). These reports were provided to me by the Cage and other business units, such as Table Games.
19. A TTR was generated if a patron made a large cash buy in of \$10,000 or greater. In those circumstances, if the patron wished to cash a winner's cheque, the patron was required to provide identification and before the transaction could occur. The patron was also required to demonstrate

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that any large amount to be cashed out was won by playing. The Cage was responsible for verifying this and they did so by liaising with table game staff, including the Pit Boss.

20. A SMR was generated if a person was suspected to be engaging in any unusual behaviour or an unusual transaction. For example, if it were suspected that a patron was trying to cash out large sums of money (\$10,000 and above) without being able to demonstrate that the money was won by playing.
21. All SMRs and TTRs were reported to AUSTRAC. I facilitated that reporting through AUSTRAC's online portal. I also informed Mr Preston about any SMRs, which is a matter which I return to below.
22. I was responsible for training Crown Perth staff in relation to its anti-money laundering and counter terrorism financing policies, including how to spot unusual or suspicious activity. As part of the training, I informed Croupiers and Inspectors about the circumstances in which they were required to advise their immediate supervisors of any suspicious activity and when to complete a SMR. I also informed the Pit Boss of the circumstances in which they ought to call surveillance and track any suspicious activity. Refresher training on anti-money launder and counter terrorism financing, which I facilitated, occurred annually.
23. I met with, and reported to, Mr Preston on a monthly basis. These meetings were recorded in minutes. No one else attended these meetings other than Mr Preston and me.
24. At these meetings, I discussed various matters including any SMRs and TTRs. My briefing to Mr Preston informed him of the type of patron that was coming to the casino and the sort of play that was taking place. As part of this briefing, I maintained an excel spreadsheet which referred to all of the players for which an SMR had been generated. The spreadsheet graded those players according to the level of risk they posed. A player could be graded as low, medium or high risk.
25. I attended monthly compliance meetings. The compliance officers from all departments also attended these meetings. I participated in these meetings to report any concerns from an anti-money laundering perspective. For example, if something went wrong in the Cage or at the table games that triggered a breach, then I raised such matters at the monthly meetings. An example of such a breach included if a Cage staff member made a transfer to a patron of \$10,000 or more without obtaining identification from the patron. In those circumstances, the group discussed the breach, the causes of the breach, any steps required to be taken to manage the breach, and how Crown Perth could improve to prevent further breaches. These meetings were recorded in minutes.
26. I participated in some Persons of Interest Committee meetings. I cannot remember how many of these meetings I attended. The committee discussed information relating to patron which had been brought to our attention from an external source such as the Australian Federal Police or the local Police. An example agenda for a Persons of Interest Committee meeting is at CRW.700.064.3910.

RIVERBANK


27. **Questions 3 to 10** of my list of topics to be addressed seek information concerning the transactions received in the bank accounts of Riverbank Investments Pty Ltd (**Riverbank**).

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28. I have very limited knowledge and understanding of the Riverbank bank accounts.
29. I first heard of the Riverbank bank account in 2021 when it was referred to in the news. Any information that I have obtained about the Riverbank account has been through the media.
30. At the time of my employment with Crown Perth, I was not aware of the existence of the Riverbank account (and therefore do not know the purpose for which Riverbank held funds). Nor was I aware of the closure of the Riverbank account and the circumstances surrounding the closure of the account.
31. I do not know whether information about the Riverbank account was ever reported to the directors of Crown Perth, including about the closure of the account.
32. I do not know whether any reports were prepared in relation to the Riverbank account or the extent to which the anti-money laundering and counter terrorism financing policies and procedures were applied to that account.
33. During the course of my employment with Crown Perth, I was not aware that any financial institutions raised concerns about the Riverbank account.
34. More generally, I was aware during the course of my employment that the Cage facilitated transfers of money to and from a patron's bank account electronically. I cannot remember who specifically had responsibility within the Cage team for that purpose. To the best of my knowledge, funds to be deposited in a patron's account were required to come from a legitimate bank source, such as an external bank.
35. I am unaware of the process and procedure that Cage staff were required to follow to facilitate electronic transfers, including whether approvals were required from Cage management or other management teams. Although, I was aware that there did exist a process and procedure for that purpose. I am also unaware of whether there were any forms, information, or supporting information prepared by the Cage for a transfer of money received from a patron.
36. I am familiar with the SYCO platform, which is a patron management software associated with electronic fund transfers managed by the Cage. A patron's name, address and contact number was input into SYCO. SYCO recorded each transaction in which sums of money were deposited into a patron's account.
37. I am familiar with SYCO because in my role as the AML **Compliance** Officer, I reviewed reports generated from SYCO. If a patron played under a loyalty card, then that patron's play was logged and appeared in the SYCO reports. The SYCO reports formed part of the daily transaction reports that I reviewed daily, as referred to above.

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38. In my role as the AML ~~Compliance~~ Officer, I did not review or audit any bank accounts. Rather, the monitoring of any suspicious activity was undertaken by me through review of the daily transaction reports, which I referred to above. The Cage and the Finance department had oversight of bank accounts.



CHRISTO THEODOROPOULOS

Dated: ~~16~~ 20 September 2021