

Perth Casino Royal Commission

AMENDED WITNESS STATEMENT OF DENISE ANDREE VANDERKLAU~~15~~ 24 September 2021

1. I, Denise Andree Vanderklau, care of 201 Great Eastern Highway, Burswood WA 6100, make this statement in response to a summons to give evidence dated 2 September 2021.
2. I was issued with a list of topics on 8 September 2021, and was invited to address those topics in a written witness statement by 15 September 2021. I have done my best to address those topics in the time available.
3. This witness statement contains my personal knowledge and recollection of the matters raised in the list of topics. For the purposes of preparing this statement, I have refreshed my memory from the documents in the attached list marked "DV-1". In the time available I have not been able to consider all documents that may be relevant to these topics.
4. I am not authorised to waive legal professional privilege in respect of any communication that may be subject to such a claim by any Crown group entity, and nothing in this statement is to be construed as involving a waiver of any such privilege.
5. This statement is true and correct to the best of my knowledge and belief.

MY ROLE, QUALIFICATIONS, AND EXPERTISE

(Questions 1 to 5)

6. I have been working at the Perth casino since 1996. I previously worked as a bank teller, and as an office manager for a real estate business.

Cage

7. From 1996 to around October 2007, I worked in the cage of the Perth casino. I started in the change booth. After about 8 months, I became a Cage Cashier in the Main Cage. As a Cage Cashier, I would sometimes perform the higher duties of a Cage Supervisor. I stayed in that role until around March 2005, when I was promoted to Cage Supervisor. As a Cage

Supervisor, I would sometimes perform the higher duties of a Cage Shift Manager.

8. At the time Crown took over the Perth casino in 2004, Jason Lamson was the General Manager of the cage. I reported to the Cage Shift Managers and ultimately to Mr Lamson as General Manager. Mr Lamson was replaced by David Brown in around mid-2007. At that time, and as best as I can recall, there were around five or six Cage Shift Managers, around 10 Cage Supervisors, around 30 Cage Cashiers, and around 20 to 25 Change Booth Cashiers, all working under the General Manager.

AML & Compliance Officer (2007 to 2012)

9. I stopped working at the cage in around October 2007 and joined the Legal Services team as the AML & Compliance Officer. This role was created following the introduction of the AML/CTF legislation. I was the first person to occupy the role at Crown Perth.
10. I remained in that role until late 2012, when Christo Theodoropoulos took over the role. After I left the role, I occasionally filled in when the AML & Compliance Officer was on annual leave or extended sick leave. I also returned to the role on a temporary basis from around October 2014 to March 2015 to cover for a vacancy when Mr Theodoropoulos departed.
11. Even though I left the role in late 2012, my position title was not formally changed until June 2014. But from late 2012, Mr Theodoropoulos was performing the role of AML & Compliance Officer and I was assisting Mr Paul Hulme in my new role in Gaming & Regulatory Compliance, discussed below.
12. When I was the AML & Compliance Officer, there were no other AML & Compliance Officers and no-one reported to me. On AML matters, I reported to the Executive General Manager of Legal Services, Joshua Preston. Mr Preston held the statutory AML/CTF Compliance Officer role under the AML/CTF legislation. I had a recurring AML Compliance meeting with Mr Preston about once a fortnight. On other matters unrelated to AML, such as administrative matters like annual leave, I would generally report to Claude Marais or Sasha Grist.

13. My role and duties were set out in an AML & Compliance Officer Standard Operating Procedure (**SOP**). In general terms, my job was to review reports and records to identify suspicious matters. The SOP includes an AML & Compliance Officer Monthly Checklist, which I completed and filed each month. I was also responsible for submitting Suspicious Matter Reports (**SMRs**) to AUSTRAC.
14. The reports that I received and reviewed as AML & Compliance Officer are also set out in the SOP. I reviewed some of these reports daily, for the previous day's activities, or weekly, for the preceding week's activities, and other reports were part of my monthly spot check noted in the AML & Compliance Officer Monthly Checklist. The reports that I reviewed daily or weekly included the SYCO Alert Report, DRCT Type Account Transfer report, TT Listing report, the Gaming Cheque Issued Report, and the Cash Transaction Report (which recorded Threshold Transactions). The reports that I spot checked on a monthly basis included the Foreign Currency Report, the Stop Code Activity Report, the IGT Advantage Payout Report and the Table Games Buy-in Report.
15. These reports were generated from the SYCO system based on data that had been entered by the cage or table games, in the case of cash buy-ins at the tables. My review was limited to the information contained in the reports, and those reports were printed from the SYCO system.

Gaming & Regulatory Compliance (2012 to present)

16. In late 2012, I changed roles and began assisting the Gaming & Regulatory Compliance Manager for Crown Perth. I reported to Paul Hulme, who was the Gaming & Regulatory Compliance Manager. I had no-one reporting to me.
17. On the regulatory side, my role is to assist with:
 - (a) submissions to the Department and the Gaming & Wagering Commission (**GWC**) on matters such as amendments to the Casino Manual, and software upgrades to games;
 - (b) other correspondence and updates to the Department and the GWC on compliance issues relating to the casino; and

- (c) any responses that were required to queries from the Department or the GWC.
18. On the compliance side, my role is to assist with running the compliance program. Compliance is managed with reference to a "Requirements Register," containing a list of all legislation and rules, procedures, and so on, covering the entire Perth property. The requirements listed in this register are used to formulate each department's Annual Compliance Plan, which are signed off by the applicable department.
 19. I am required to oversee monthly, quarterly, biannual, and annual surveys to be completed by each department of Crown Perth. These surveys are generated automatically by the CURA system. Any changes to, additions to, or removal of questions in the CURA system are conducted by me or by the Personal Assistant (or similar role) in the Legal Services team under my direction. The purpose of the survey is for each department to report on compliance activities and to report whether there are any compliance issues. The surveys are completed by the relevant department, which has the necessary expertise and knowledge.
 20. I also attend Legal Compliance meetings. Legal Compliance meetings are currently held monthly. Since I have been in the compliance team, Legal Compliance meetings have been held monthly or once every two months. Each department has a designated compliance officer, and those designated compliance officers attend the Legal Compliance meetings.
 21. The outcome of the Legal Compliance meeting is reported to the Executive Risk & Compliance Committee (**ERCC**). This is done through a Compliance and Regulatory Update, which I understand is a standing agenda item for the ERCC. I am responsible for drafting the compliance section of the Compliance and Regulatory Update paper for the General Manager Legal and Compliance (Mr Marais) to review. I include any material or recurring issues that come up in the Legal Compliance meetings.
 22. Mr Marais attends the ERCC meetings and presents the Compliance and Regulatory Update. I have not attended an ERCC meeting. I understand that members of the executive team sit on the ERCC, but I have not

attended these meetings and do not know who specifically attends beyond Mr Marais.

23. Paul Hulme retired from Crown in December 2019. I began performing my new role from January 2020, though my title was not formally changed to Regulatory and Compliance Manager until mid-year.
24. I was appointed to the position of Regulatory and Compliance Manager but, in practice, Paul Hulme's role was split between Ms Grist, Mr Marais, and me. My duties were expanded to include things such as attending the monthly meetings Crown held with the DLGSCI and to deal directly with the DLGSCI on submissions. The monthly meetings with the DLGSCI have been on hold since November 2020.
25. As part of the recent restructure at Crown led by Steve Blackburn in 2021, my position now sits within the Compliance & Regulatory Affairs division of the Financial Crime and Compliance team. I now report to Mark Hall, the General Manager of Regulatory & Compliance, who joined Crown Perth in July 2021.
26. Crown has recently hired a Compliance Coordinator who reports to me, and a second Compliance Coordinator has been appointed and will commence within the month. I understand that a Compliance Support Officer will also be sought to join the Perth Compliance & Regulatory Affairs division.

Training

27. During my time at the Perth casino, my training has mostly been on the job. I recall receiving some induction training when I started in the cage in 1996, but the cage training was mainly on the job training under the supervision of a senior Cage Cashier or Cage Supervisor.
28. I did not receive any specific training in AML/CTF when I was appointed as the AML & Compliance Officer. I understand that I was appointed to that role based on my experience in the cage.
29. In 2007, when I was the AML & Compliance Officer, I was involved in establishing an AML training program for staff at the Perth casino. This involved face-to-face training for teams such as the cage, table games

and dealers, surveillance management and VIP (Pearl Room). The training program involved an initial round of in-person training, and in-person training for any new staff members who subsequently joined the cage and table games teams. There would also be some ad hoc training from time to time when requested by a department.

30. Alongside this in-person training, I was involved in developing an online training program covering AML/CTF. This was focused on the AML/CTF risks associated with transactions conducted by patrons at the casino. It was an online training module with a test at the end. We started working on this in 2007 and it was rolled out as an annual training program from 2009 until about 2012, when it switched to once every two years. Since around 2018, the AML/CTF training has gone back to being completed annually.
31. In my current role, I receive the annual online AML/CTF training that is administered across Crown. I have also completed or complete periodically a number of other Crown online training which includes Responsible Gaming, Responsible Service of Alcohol and other non-gaming related training. My training record is kept by the Learning & Development team.

AML/CTF: SYSTEMS, POLICIES, AND PROCEDURES

(Question 6)

32. Question 6 asks about my knowledge or understanding of the systems, policies, and procedures governing AML/CTF risk in connection with gaming operations at the casino for the period of my employment, including changes from time to time.
33. I am most familiar with the AML/CTF systems, policies, and procedures that were in place at the time I was the AML & Compliance Officer. Since shifting to regulatory and compliance roles, I have not had much involvement in Crown's AML/CTF systems, policies, and procedures.

34. When I was the AML & Compliance Officer, my recollection is that the AML/CTF systems, policies, and procedures were contained in the following documents.
- (a) The AML/CTF Program. This was the document required by the AML/CTF legislation. As far as I can recall, it had already been drafted when I started as AML & Compliance Officer. It contained a risk assessment, which looked at the designated services provided by Crown and the associated risks and controls in relation to those services.
 - (b) An AML/CTF Company Policy. This document contained a high-level summary of the AML/CTF Program.
 - (c) SOPs with procedures relating to AML/CTF matters. As best as I can recall, the relevant SOPs included:
 - (i) the AML & Compliance Officer SOP;
 - (ii) the Cage AUSTRAC Reporting SOP;
 - (iii) the Gaming SOP;
 - (iv) the International Operations AML/CTF SOP (previously called the Junket and Premium Player Programs SOP); and
 - (v) the Pearl Room Local Members SOP.
 - (d) There were also AML/CTF obligations in some of the other SOPs. For example, I recall that the Front Window SOP, the Variance Reporting and AML Compliance SOP and the Account Opening SOP contained some AML procedures. There may have been others that I cannot now remember.
35. These documents contained the detail of the systems, policies, and procedures that were applicable at the time. SOPs for the various departments were sent to me for review from an AML/CTF perspective.
36. In addition to the systems, policies, and procedures outlined in these documents, AML/CTF training was given to casino personnel. As I described earlier, depending on a person's role, this was a combination

of in-person training and online training. This training formed part of the system for identifying and managing AML/CTF risk. The object of the training was to give personnel a sufficient understanding of the AML/CTF obligations and risks that arose in their work.

37. Questions 6(a) and (c) ask specifically about systems, policies, and procedures for the identification and management of the risks of money laundering and terrorism financing in connection with gaming operations relating to Crown Perth's bank accounts. As far as I can recall, when I was the AML & Compliance Officer, the SOPs and other documents mentioned earlier did not deal specifically with the monitoring of Crown Perth's bank accounts in that regard. The SOPs and other documents were focused on transactions conducted by the patrons at the casino.
38. Questions 6(h) and (j) ask specifically about systems, policies, and procedures for the identification and management of the risks of money laundering and terrorism financing in connection with gaming operations relating to AUSTRAC reporting. SMRs could be generated by anyone at Crown Perth, but they were mostly received from the cage, table games, and surveillance departments. As AML & Compliance Officer, it was my job to receive and review SMRs and lodge them with AUSTRAC.
39. Question 6(k) asks specifically about systems, policies, and procedures for the identification and management of the risks of money laundering and terrorism financing in connection with gaming operations relating to recording internal Crown AML/CTF reports. I initially maintained an Excel spreadsheet listing all SMRs and all of the World Check matches for patrons, but this was eventually shifted over to the CURA system. I cannot recall when that change occurred.
40. In relation to question 6(g), my understanding is that the surveillance of gaming operations across Crown Perth is conducted by the surveillance team and the gaming and operational teams such as the cage, management and generally by employees, to monitor activities in relation to their areas, including looking for activities suggestive of money laundering or terrorism financing.

41. In relation to question 6(m), when I was AML & Compliance Officer I would prepare a draft AML/CTF Update for Mr Preston to review. I understand that the AML/CTF Update is a standing agenda item for the ERCC. The update would include information on topics including amendments to the AML/CTF Program, AUSTRAC reporting, the AML/CTF Risk Register, compliance breaches and any new designated services.
42. I have not stayed across the detail of AML/CTF systems, policies, and procedures (including reporting) as part of my current role, but I understand that the AML team now receives Unusual Activity Reports (**UARs**) and that they undertake more comprehensive investigations into suspicious matters before lodging an SMR.

CAGE OPERATIONS

Overseas bank accounts (Question 10)

43. When I worked in the cage, I recall that the International Room Cage had cheque books linked to overseas bank accounts in Singapore, Hong Kong, and possibly Malaysia.
44. My understanding of the purpose of those cheque books and bank accounts was that they were to enable international patrons from those countries to be paid winnings in their home currency, without having to convert the winnings from Australian Dollars. I think patrons may have been able to deposit funds into the account in Singapore as well, and possibly into the accounts in Hong Kong and Malaysia, though I cannot now recall.
45. I did not have access to the overseas bank accounts. Cage Supervisors were required to co-sign the cheques to patrons in respect of those accounts. I can recall co-signing cheques from time to time. That was the extent of my involvement with those accounts.
46. I understand that the overseas bank accounts were later closed, but I do not know when this occurred.

The functions of and transactions at the cage (Questions 11-13)

47. Questions 11 to 13 concern my knowledge and understanding of the role of the cage, the kind of transactions that occurred there, and the processes for dealing with those transactions, over the period of my employment at the Perth casino, including any changes that may have taken place from time to time.
48. As I said, I worked in the cage from 1996 to 2007. My knowledge of the cage's role and operations comes predominantly from that time. Since leaving the cage, I have kept up with aspects of the cage's operations as they relate to AML/CTF and compliance matters, such as the updates to the Casino Manual.
49. The role of the cage and the transactions that occurred at the cage are recorded in documents such as the Casino Manual and SOPs. As far as I am aware, the cage's operations and processes have always been recorded in these documents. The relevant sections of the Casino Manual and the cage SOPs would therefore contain the details sought by questions 11, 12, and 13.
50. With that said, my recollection of the transactions listed in question 12 is as follows.
 - (a) *Gaming Machine Tickets for Cash.* Before TITO tickets were introduced, patrons would receive hand-pay slips when the amount of winnings exceeded the maximum payout limit for coins, set up on the machine. The hand-pay slip had to be signed by the patron at the machine, and could then be redeemed at the cage for cash. The Cage cashier would verify the patron's signature against a copy of the slip received from the Gaming Machine Department and, once satisfied, would make payment to the patron. The introduction of TITO tickets came after my tenure in the cage, in April 2013.
 - (b) *Gaming Chips for Cash.* Gaming chips were presented to the cage and exchanged for cash. There were several different types of gaming chip. Amounts of \$1,000 or more required a second Cage Cashier to verify the amount, and amounts of \$10,000 or more required a Cage Supervisor to verify the amount and required

submission of a Threshold Transaction Report (or a Significant Transaction Report, under the previous legislation).

- (c) *Cash deposits at the cage.* Patrons could attend the cage with cash to deposit into a DAB account. A DAB account is a casino account maintained for a patron and transactions on this account are conducted at the cage. Patrons could present to the cage with a commodity such as cash, chips, or foreign currency for deposit into the patron's DAB account. The patron would usually draw from the account by way of a Chip Purchase Voucher (**CPV**), though it was possible to withdraw cash, for example to use on the gaming machines.
- (d) *Funds Advance Facility (FAF).* FAF was only available in Perth for international players playing on an international program. It was essentially a way for junket players or individual international patrons playing on international programs to receive funds for gaming on credit. It required pre-approval from the credit team, and there was an approval matrix in the Casino Manual along with other relevant procedures. My understanding is that this is no longer in use.
- (e) *Cheque Cashing Facility (CCF).* CCF enabled a patron with prior approval to write out a personal cheque in return for a CPV. The patron could then use the CPV to obtain gaming chips. The cheque would be banked in five business days, and the patron had the option of buying back the cheque before it was banked. The CCF was more popular in the early days before people could withdraw money more easily through EFTPOS and ATMs. It was used mostly by patrons in the Pearl Room.
- (f) *Foreign currency.* The cage would accept foreign currency, and in my time working in the cage a lot of foreign currency came through the cage. Approval from a Cage Supervisor was needed to process foreign currency, except for transactions below \$1,000 and for particular currencies. My experience was that international patrons bringing large amounts of foreign currency became less common

as telegraphic transfers became easier and more popular as a means for international patrons to bring money to the casino.

- (g) *Telegraphic transfers received.* The cage would accept telegraphic transfers if a patron had a DAB account. The cage would prepare a form titled 'Requisition To: Release Deposited Funds at Cage', known as a **TT Release Form**. The TT Release Form would be signed by the cage personnel as well as the patron and the funds would then be deposited to the patron's DAB account and generally withdrawn as a CPV to be used at the tables. A copy was sent to the Finance team.
- (h) *Telegraphic transfers sent.* A patron would present at the cage and present (generally) chips and request funds to be transferred to a bank account. The transaction would be processed through the patron's DAB account and a TT Request form would be generated from the SYCO system. The form would be signed by the patron, a member of cage management and a member of gaming management. The TT Request form would be sent to the finance department for processing. Until around 2004 or 2005, these transfers had to be made to an account in the patron's name. This was then changed to allow third-party transfers. These third-party transfers were relatively uncommon in my time in the cage, and I do not recall processing any.
- (i) *Bank cheque/draft.* Domestic patrons could attend the cage with a cheque to be exchanged for gaming chips. Approval would be sought from gaming management to accept the bank cheque which would then be deposited to the patron's DAB account and a CPV issued. There was an approval matrix in the Main Bank section of the Casino Manual, along with other relevant procedures.
- (j) *Transfers between casinos in respect of patrons.* In my experience there were occasional transfers between casinos for patrons. For example, a patron may have asked Crown Perth to send money to Crown Melbourne or another casino in Australia.

51. In addition to these transactions, it was possible for patrons to make cash deposits into Crown's bank account. This was not common when I was in the cage. I do not recall many, if any, cash deposits into a Crown bank account for a patron when I was in the cage.
52. Question 13 asks about the process for receiving funds at the cage for release into a patron's SYCO/DAB account.
- (a) For funds that were received from a patron into a Crown bank account, the cage completed a TT Release Form with supporting documentation. No other forms were required. Crown was not required to complete a Threshold Transaction Report as we did not receive the physical cash, and this report would have been completed by the bank. When the patron presented at the cage, the patron signed the TT Release Form to accept the funds, and the funds were credited to the patron's DAB account.
 - (b) The SYCO system had pre-set fields for the cage to complete when processing the TT Form. These fields included, for example, currency type, amount, exchange rate (if required), what the funds were to be used for, the patron's member number (which then populated the patron's name and address) and any other comments.
 - (c) A TT Release Form had to be completed by a Cage Shift Manager, or sometimes by a Cage Supervisor performing higher duties as Cage Shift Manager. No additional approval was required from other cage management in order for funds to be credited to the patron's DAB account. Approval was required from senior management, generally the CFO or CEO, for the early release of funds – meaning the release of funds to the patron before those funds had cleared in Crown's bank account.
 - (d) TT reports were produced from SYCO each day. When I was the AML & Compliance Officer, I initially reviewed TT reports on a weekly basis, for the preceding week's TTs. As telegraphic transfers became more common, I understand the AML & Compliance Officer reviewed the TT reports more regularly and sometimes daily.

RIVERBANK

Riverbank Investments Pty Ltd and the Riverbank accounts (Questions 14-15)

53. I did not have any responsibilities in relation to the operation of Riverbank Investments Pty Ltd (**Riverbank**).
54. When I was in the cage, Riverbank had an account with HSBC. When I was a Cage Supervisor performing higher duties as a Shift Manager, I reviewed bank statements from the HSBC account from time to time in connection with TT Release Forms. This was in relation to telegraphic transfers into the HSBC account. As I noted earlier, I do not recall seeing any cash deposits when I was in the cage.
55. I was not involved in opening the bank account with HSBC, and I do not have any knowledge of the circumstances in which the account was opened. I understood at the time that the purpose of the account was to enable patrons to send funds to gamble at the Perth casino.
56. When I left the cage in October 2007, the Riverbank account was still with HSBC. The HSBC account remained in place during my time as AML & Compliance Officer from October 2007 to late 2012. I understand that the HSBC account was later closed, but I was not involved in the closure and have no knowledge of the circumstances surrounding the closure of the account.

Transfers from the Riverbank account (Question 16)

57. My understanding from my time at the cage is that funds were not "transferred" from the HSBC account to individual patrons. The funds would remain in the HSBC account but were notionally allocated to patrons' DAB accounts. My understanding is that the finance team would transfer the funds from the HSBC account to another Crown bank account from time to time, but I was not aware of the details of this.
58. The allocation of funds from the HSBC account to a patron's DAB account was done by the TT Release Form procedure that I described earlier. The Cage Shift Manager (or sometimes the Cage Supervisor performing the role of Cage Shift Manager) would complete the TT Release Form. There also used to be a role called Manager – Cage & Count who could

complete TT Release Forms, but that role ended in around 2013. That role sat below the General Manager and above the Shift Manager.

59. During my time at the cage, I do not recall any directions from cage management about the allocation of funds from the HSBC account. The TT Release Form procedure was governed by an SOP called the Telegraphic Transfers SOP. Beyond that, cage operations were under the general supervision of the General Manager, Cage & Count.

Monitoring of the Riverbank account (Question 17)

60. As best as I can recall, during my time at the cage I did not know who was responsible for monitoring the HSBC account for compliance with systems, policies, and procedures to identify and manage the risk of money laundering and terrorism financing.
61. The cage personnel responsible for preparing the TT Release Forms would routinely look at the HSBC bank account for the purposes of preparing those TT Release Forms. As I said, when I was at the cage I looked at the HSBC bank account from time to time.
62. Prior to 2007 we were subject to the *Financial Transactions Act 1988*. Under this Act we were obligated to provide Suspicious Transaction Reports to AUSTRAC. It is my understanding that the reports were sent to the surveillance department who lodged them with AUSTRAC.

AML/CTF (Question 18)

63. As far as I can recall, when I was the AML & Compliance Officer the HSBC account was not specifically addressed in the AML/CTF Program.
64. I am not aware of any AML/CTF reports prepared in connection with the HSBC account. I am aware of the following reports in connection with the subsequent ANZ account operated by Riverbank.
65. On 25 March 2014, Mr Preston sent me an email attaching an agenda for a meeting between Crown and ANZ, and asked me to address the agenda items in a note. At this stage, I occupied my role as the Gaming & Regulatory Compliance Officer and Mr Theodoropoulos was the AML &

Compliance Officer, although, as noted above, my title had not yet been updated.

66. I have a general recollection of receiving this email from Mr Preston, but cannot now recall the circumstances leading to it. As best as I can remember, Mr Preston wanted me to gather the information identified in the agenda for Mr Preston to use for an upcoming meeting with ANZ on 27 March 2014.
67. On 26 March 2014, I emailed Mr Preston and attached a note that I had prepared addressing the points raised in the agenda paper. My note included an overview of the bank accounts held by Burswood Nominees Ltd and Riverbank Investments Pty Ltd. I also attached a copy of the Telegraphic Transfers SOP, which recorded the process for dealing with transferred funds at the cage.
68. In my covering email to Mr Preston, I wrote that I had spoken with David Brown, Vasula Kessel (a member of the Finance team), and Evelyn Siow (also in the Finance team) to obtain some of the information contained in my note. I also summarised a conversation that I had with Mr Brown about numerous deposits in one of the ANZ accounts under the \$10,000 threshold. I cannot now recall the substance of these conversations beyond what is contained in my email.
69. In my email, I asked Mr Preston to call me to discuss some things regarding the matter. I cannot now remember what I wanted to discuss.
70. I received a calendar invitation to the 27 March 2014 meeting, but I cannot recall attending and I do not think that I did attend. As best as I can recollect, my role was to assist Mr Preston by gathering information for the meeting. I had no further involvement after that. I expected that Mr Preston and Mr Brown would take the matter forward with ANZ and within Crown.
71. I do not recall following up or remaining involved in the matter after sending my email to Mr Preston.
72. The next occasion on which I looked at the Riverbank account was in around August 2020. I was asked to do this by Mr Marais. Mr Marais came

to see me and told me that an issue had arisen in Mr Preston's testimony before the Bergin Inquiry about multiple cash deposits in the Riverbank accounts. Mr Marais asked me to look at the bank statements to identify the instances where this had occurred.

73. Mr Marais requested copies of the Riverbank statements from the finance department via Vasula Kessell. Once I received the statements, I went through them and identified cash deposits under \$10,000. I then matched those deposits to the TT Release Forms that had been created by the cage. I then prepared a table which included the details of the aggregated transactions, what the funds were used for (such as front money for a new program, or the redemption of a FAF) and a brief description of other information that we held within the AML Risk Register. My initial review was from 2014 onwards, and I subsequently extended the review back to July 2013 (when the Riverbank account was opened at the ANZ).
74. I reported the results of my work to Mr Marais in August 2020, and I later sent the report to Nick Stokes, copying Mr Marais, by email on 22 September 2020. Initially I understood that my work was to assist Crown Perth's understanding of the extent of the aggregation and to obtain legal advice. I was later informed that it would form part of a report from Mr Marais to the Crown Resorts or Crown Perth board, but I do not recall being involved in the matter after submitting my report to Mr Marais and Nick Stokes, apart from clarifying some aspects of the table for Mr Marais. I was not involved in any reports to directors of Burswood Nominees Limited or other members of the Crown Group.

75. Contains sensitive information

Concerns of financial institutions (Question 19)

76. The only awareness I had of any concerns expressed by financial institutions relating to the bank accounts were those told to me by David Brown and noted in my email to Mr Preston of 26 March 2014. At the time, I do not recall whether I was specifically aware that these concerns were

about Riverbank accounts, as opposed to other Crown bank accounts with ANZ.

77. I was not aware of any concerns being expressed by HSBC during my time in the cage or as the AML & Compliance Officer.

Closure of the Riverbank accounts (Question 20)

78. I did not communicate with HSBC, ANZ, or CBA in any of my roles at the Perth casino. I am not aware of the circumstances surrounding the closure of the HSBC account. I was not aware of the fact that any accounts with ANZ or CBA were closed subsequently. I have seen an email from Mr Marais dated 14 October 2019, to which I was copied, noting the closure of the Riverbank accounts. I do not have a specific recollection of receiving the email. I cannot say anything about the circumstances of the closure of these accounts.

AML/CTF FAILURES

(Questions 7 to 9)

79. Based on the review that I undertook in 2020, it appears to me that Crown failed to identify or manage activities indicating or suggesting money laundering or terrorism financing. This is because the presence of numerous deposits under the \$10,000 threshold is indicative of potential structuring activity in the account. In my review I only found one incident of aggregation where an SMR was sent by the cage at the time.
80. I have not undertaken any analysis of whether Crown's processes and procedures governing the operation of the cage enabled, facilitated, or allowed this activity to occur. The review I conducted of the Riverbank account statements in 2020 was for the specific purpose of identifying the extent of the aggregation incidents. However, given what I found in that review, the processes and procedures in operation at the cage enabled the aggregation activities to occur. There was also no procedure requiring the AML & Compliance Officer to review information beyond what was entered into the SYCO system to pick up the transactions separately from the cage.

81. Contains sensitive information
Contains sensitive information I understand that the Riverbank accounts are now closed, and there are procedures in place to prevent cash deposits and third-party transfers. The Cage, Finance and AML CURA surveys have also been updated to include questions relating to Crown's bank accounts held for gaming purposes, cash deposits into those accounts and third party transfers.


DENISE VANDERKLAU

Dated: ~~24~~ 15 September 2021