

Perth Casino Royal Commission

WITNESS STATEMENT OF JARROD ROSS CAMPBELL

24 September 2021

1. I, Jarrod Ross Campbell, care of [Contains sensitive information] [Contains sensitive information] make this statement in response to a summons to give evidence dated 6 September 2021.
2. I was issued with a list of topics on 14 September 2021, and was invited to address those topics in a written witness statement by 22 September 2021. Some of the topics are written in a way that I find hard to understand. I have done my best to address the 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 "JC-1". In the time available I have not been able to consider all documents that may be relevant to these topics.
4. This statement is true and correct to the best of my knowledge and belief.

MY ROLE, QUALIFICATIONS, AND EXPERTISE

(Questions 1 to 11)

5. I have been working at the Perth casino since 1997. Before joining the Perth casino, I worked as a bank teller for a few different banks and also spent around 1.5 years as a cage cashier with the Country Club Casino in Tasmania. I do not hold any formal qualifications and have done my learning on the job.

Roles at the Perth Casino

6. I have worked exclusively in the cage since joining the Perth casino 24 years ago.

7. From 1997 until 2006, I worked as a Cage Cashier. I reported to the Cage Supervisors.
8. From 2006 until 2007, I spent about 12 months working as a Cage Supervisor. Cage Supervisors report to the Cage Shift Managers, and the Cage Cashiers report to the Cage Supervisors.
9. In 2007, I was promoted to the role of Cage Shift Manager. The numbers changed over time, but there were around 4 Cage Shift Managers at any given time. Cage Shift Managers report to the General Manager (GM), Cage & Count, who at that time was David Brown. Cage Supervisors report to the Cage Shift Managers.
10. In March 2021, I was promoted to the role of General Manager, Cage & Count, replacing David Brown. I report to John Salomone (Chief Financial Officer – Australian Resorts), who is based in Melbourne. The Cage Shift Managers and the Count Team Manager report to me, and I have general oversight of the operations of cage and count at the Perth casino.
11. At the moment, there are about 44 Cage Cashiers, 23 Cage Supervisors, and 4 Cage Shift Managers working in the cage. There is also a Count Manager, overseeing 4 Count Supervisors and 19 Count Cashiers. Recent approval from the Regulator has been granted to appoint a new position within the department (Cage Financial Integrity Manager).
12. I am employed by Burswood Resort (Management) Limited trading as Crown Perth. I do not have any KPIs for my current role. I spoke about this with Mr Salomone after I started as GM, and understand that KPIs are being developed but this has been delayed by interruptions from COVID-19 and other priorities, including Royal Commissions.

The cage's role and operations

13. The cage's role and operations are set out in various documents. The main documents are:
 - (a) the Casino Manual (Operations), also known as the **ICMs**, which has sections dealing with the cage;

- (b) numerous Cage Standard Operating Procedures (**SOPs**), which I have listed at the end of my statement and marked "**JC-2**";
 - (c) miscellaneous "cheat sheets" and checklists;
 - (d) cage-related policies, located on the Crown Perth intranet, such as the Source of Funds Policy; and
 - (e) training guides, such as the Cashier Training Guide, and Pearl Room Training Acknowledgement.
14. I understand the role of the cage in the Perth casino as being essentially a support department, providing services internally and externally.
15. Externally or patron-facing, the basic role of the cage is to conduct transactions with patrons. These transactions include:
- (a) exchanging gaming chips and gaming vouchers for cash;
 - (b) exchanging cash for Chip Purchase Vouchers (**CPVs**), but only where the patron has a deposit account;
 - (c) processing incoming and outgoing telegraphic transfers;
 - (d) foreign currency transactions;
 - (e) exchange cash for coin / coin for cash;
 - (f) Cheque Cashing Facility (**CCF**) transactions, which involves drawing a house cheque for the patron to sign in return for a CPV; and
 - (g) providing CPVs to international patrons playing on an international program who had a Funds Advance Facility (**FAF**).
16. For internal services, the General Cashier Window located in the Main Cage is used for outlets around the resort to exchange funds and drop off takings from the relevant shift.
17. There are three cage locations on the main gaming floor, one in the Pearl Room, and one in Crown Towers. There are also nine private gaming salons, each with a cage service desk location.

18. The cage operations are conducted by the following roles within the cage department:
 - (a) *Cage Cashiers*, who can occupy a front window location, chip bank, or main bank. Some Cage Cashiers work in the Pearl Room cage VIP location.
 - (b) *Cage Supervisors*, who are responsible for supervising the day-to-day operations of the cage. Cage Supervisors are required to authorise particular transactions, and to oversee the balancing of the Main Bank area (which happens twice per day, at 6am and 6pm).
 - (c) *Cage Shift Managers*, who oversee the daily operations of all cage locations and private gaming salons across the resort. They monitor the bank accounts, release funds to patrons and attend to administration duties.
 - (d) *Cage Financial Integrity Manager*, will be responsible for Cage administration duties relating specifically to AML. Including reporting threshold transactions through to AUSTRAC, AML/CTF compliance with all Cage transactions, training, audits and reporting regulatory changes.
19. The Count Team is responsible for collecting, counting, and reporting revenue from electronic gaming and the table gaming departments. The Team also counts the General Cashier deposits from the different outlets across the resort.

Qualifications and Training

20. My training in the cage has been mostly on the job. I recall receiving induction training when I started, and being partnered with an experienced Cage Cashier to learn the different skills and areas of operation. I cannot remember the specific details of my induction training because it was so long ago. I have continued to learn on the job since then.
21. I have had regular AML/CTF training through the Crown Learn module.

22. The AML/CTF training has changed in recent times. In late 2020 Cage management had targeted face-to-face AML/CTF training with John Yates (Group Senior Manager AML Customer Investigations). In early 2021 I had AML/CTF business operations team training by WebEx, which was given by Adam Sutherland (Group General Manager - Financial Crime Governance).
23. On Responsible Service of Gaming (**RSG**), I have also had regular training through the RSG module on Crown Learn. Recently I completed a face-to-face RSG training course for managers, conducted by the RSG team.
24. I am also involved in a new training program that is being piloted next month. It is called the "Responsible Practices and Decision Making Workshop" – Cage/Count and Table Games. With the change of leadership in the cage it gave us an opportunity to review operational effectiveness and culture. This led to the pilot project where we wanted to ensure the team has the necessary skills, systems and culture to maintain the highest standards of compliance.

GOVERNANCE AND MANAGEMENT

(Questions 12 and 13)

25. In terms of reporting, I prepare a monthly report on cage transaction statistics. I have been preparing this since I started as GM in March 2021.
26. The report covers various cage statistics such as the number of source of funds forms completed, the number of threshold transaction reports and the number of telegraphic transfers (**TTs**) processed. The report is generated manually as an Excel spreadsheet, with the assistance of Cage Shift Managers. I send it to Mr Salomone, Lonnie Bossi, and the Executive General Managers of Table Games (Cori Cairns) and EGMs (Shannon Blake).
27. In terms of meetings, I have a weekly business operations team meeting with the Executives, GMs and senior managers from Perth, and certain management members from Melbourne and Sydney. It is focused on

business operations around the properties. I also participate in weekly meetings on remediation planning.

POLICIES AND PROCEDURES: JUNKETS, VIPS, CREDIT

Due diligence and arrangements (Questions 14.a and 14.b)

28. As far as I know, the International Operations department was responsible for junkets. The cage was not involved in junket due diligence or the approvals for junket operations.
29. Question 14.a.iv asks about access to the Pearl Room. Domestic VIP patrons have access to the Pearl Room. My understanding is that this is the responsibility of Tony Godfrey (Premium Compliance Manager). The cage is not involved in due diligence for patron membership of the Pearl Room.

Credit (Questions 14.c and 14.d)

30. Junket Operators and International premium players who participated in Premium Gaming Programs could apply for a Funds Advance Facility. FAF approvals were the responsibility of the credit department.
31. The cage only became involved in FAF applications if an approval was requested out of hours or on weekends, when the credit department was unavailable. A Cage Shift Manager or a Cage Supervisor on higher duties would process the application and forward the paperwork to the Credit Department. There is a section of the Casino Manual governing FAFs, and a CCF/FAF checklist for guidance regarding the process.

AML/CTF

Suspected money laundering (Question 15)

32. As far as I am aware, a decision regarding the continued gaming activities of a patron suspected of money laundering would be made at a senior management / executive level.
33. The SYCO system allows stop codes to be placed on the accounts of particular patrons to reflect things like a Notice to Revoke Licence or **NRLs**. These act as alerts for the cage personnel when the patron presents to the cage. There are several stop codes, including things like

B for Beware, P for Prohibit Patron Play, and X for Patron Excluded From Property, and there is a comment field explaining the basis for the stop code.

AML/CTF systems, policies, and procedures (Question 16)

34. I am aware that Crown has an AML/CTF Program and various policies on AML/CTF risk identification and management. Part A and Part B of the AML/CTF Program are available on the Crown Perth intranet.
35. As I have explained, the cage's role and the detail of its operations are set out in documents such as the Casino Manual, SOPs, and Policies. My understanding is that Crown's AML/CTF systems, policies, and procedures are reflected in the documents governing the operation of the cage.
36. For example:
 - (a) The Telegraphic Transfers SOP governs inward and outward telegraphic transfers to Crown's bank accounts. It includes controls around the processing of inward and outward funds.
 - (b) The Significant Cash Transactions / Source of Funds Form SOP governs the receipt of large cash amounts from patrons. It requires a Source of Funds form for all cash presented over a defined threshold per day, and requirement of an Unusual Activity Report (UAR).
 - (c) The AUSTRAC Reporting / AML and CTF SOP contains information on Threshold Transaction Reporting, UARs, ID requirements, and International Funds Transfer Instructions.
37. Crown has an AML department which receives daily reports from the cage and is responsible for reporting to AUSTRAC. The cage is not involved in that process, but sometimes we assist the AML department with any follow-up questions or details that are required.

AML/CTF failures (Questions 17 and 18)

38. With the benefit of hindsight and the investigations conducted alongside the various inquiries, I can see that Crown failed to identify or manage

activities suggestive of money laundering with Crown's bank accounts. I did not appreciate the risk at the time, cage focus was on cash transactions, monitoring patron gaming activity and reporting TTR's. This has been addressed by revised processes and procedures, like no longer accepting third party deposits, not aggregating deposits, the Return of Funds Policy, documented proof of personal bank account, and face to face AML training.

CAGE OPERATIONS

Overseas bank accounts (Question 19)

39. To my knowledge, Crown Perth does not have any overseas bank accounts for the purpose of receiving funds from and paying funds to patrons. I cannot recall Crown having overseas bank accounts in the past. My understanding is Crowns foreign currency bank accounts were held in Australia and not overseas.

Role and functions of the cage (Questions 20 and 21)

40. I have set out my understanding of the cage's role and function in paragraphs 13 to 19 above.
41. As I said there, the cage's role and the detail of its operations are set out in documents such as the Casino Manual, SOPs, and Policies. Versions of the SOPs and Casino Manual have been in place since I joined the cage. They are updated from time to time when processes change.

RIVERBANK

(Questions 23 to 29)

42. I had access to Riverbank bank statements as a Cage Shift Manager. Cage Shift Managers were responsible for reviewing the bank statements to prepare the paperwork for releasing funds for front money or redemptions for patrons at Crown Perth. This was done by a **TT Form**, with the supporting documents attached. We also initiated the paperwork for transfers out to patrons, but this was processed by the Finance team.

43. The job of preparing TT Forms for the Riverbank account used to be performed by the Cage Manager. When that role ended in around 2013 / 2014, it became the responsibility of the Cage Shift Managers, or Cage Supervisors performing higher duties.
44. I did not have any broader responsibility with Riverbank or the bank accounts. My understanding of the purpose of the accounts was that they were for the privacy of patrons.
45. I knew that the AML team was reviewing reports from the cage and performing various checks, but I was not aware of the specifics of what the AML team was doing and monitoring at the time. From my perspective in the cage, we were filing the TT Forms and attaching supporting documents.
46. I know that ANZ expressed concerns about the Riverbank account, but I do not have a specific recollection of this from the time. In the course of preparing this statement, I was shown an email that I sent on 2 April 2014, when I was still one of the four Cage Shift Managers in the cage (CRW.529.011.1745). I have no specific memory around the matters in the email.
47. In the email, I noted that Crown were negotiating with ANZ due to their concerns about the Riverbank account. So I guess I would have been aware of ANZ's concerns at the time. This would have been a general awareness because I was not involved in any discussions with ANZ or any other bank.
48. My email was copied to many people, including:
 - (a) Cage Operations (all of the Cage Shift Managers, Supervisors on higher duties, and the GM, David Brown);
 - (b) Cage Management (all of the Cage Shift Managers and Cage Supervisors, as well as Mr Brown);
 - (c) various members of the International Operations department, including the duty managers and the Senior VP; and
 - (d) various members of the Overseas team.

49. My email noted that the money changer may distribute the \$75k into amounts under \$10k. I now appreciate that this was a flag for AML/CTF, and this is no longer possible in the cage. At the time, it did not set off any alarm bells with me because this happened in the cage with certain money changers. My understanding was that these money changers would split up transfers into smaller amounts due to international transfer limits from some countries. This information had been previously relayed to the cage from the International Operations department . I can't remember who that was. Looking back, these split transactions should not have occurred.
50. I copied my GM, and others at a higher level in my email. I don't recall receiving any follow up one way or the other, after my email. As far as I can recall, I did not receive any emails or have any discussions about it after the TT was processed.
51. On the same day, I sent an email to Craig Spence (the CFO of Crown Perth) seeking approval for Early Release of Funds in relation to the same patron (CRW.529.011.2973). I do not recall receiving any follow-up from Mr Spence about it after completing the Early Release.

INTERNATIONAL COMMISSION BUSINESS AND JUNKETS

(Questions 30 to 32)

52. My knowledge and understanding of the structure and operation of International Commission Business regarding its financial model or senior management responsibility at the Perth casino is limited. This was the responsibility of the International Operations department.
53. The cage's involvement in junket programs was limited to the transactions around junket buy in, deposit account transactions, access to their FAF facility, cashing out, and settling their accounts. The cage was not involved in things like the agreements, and gratuities. That was all handled by the International Operations team.
54. Question 32(b) asks about suspicious behaviour. If a member of the cage team sees something unusual or suspicious, they are supposed to submit a UAR. That applies to all parts of the casino, including activity in the Pearl Room and the private gaming salons.

RESPONSIBLE SERVICE OF GAMING

(Questions 33 to 34)

55. Question 33 asks about my knowledge of the systems, policies, procedures, person(s), and position(s) responsible for or applicable to providing or ensuring RSG at the Perth Casino.
56. Crown has a dedicated RSG team in Perth. The GM of RSG is Melanie Strelein Faulks. I believe Ms Strelein-Faulks has a team of about 14 advisors and administration staff.
57. From the perspective of the cage, all cage staff are trained to be on the lookout for RSG issues, and to alert the RSG team when patrons present with signs of RSG issues. Cage management also receive emails from the RSG team when they seek information regarding gaming behaviour of particular patrons. RSG enter stop codes on patron accounts in the casino management system for patrons that self-exclude. If a patron is identified at the Cage the RSG team is notified immediately.

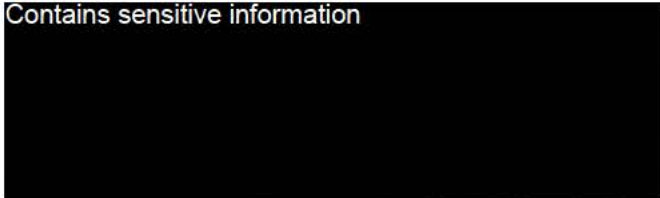
CORPORATE CULTURE

(Questions 35 to 37)

58. Question 35 asks about the corporate culture at the Perth Casino. From a cage perspective, staff turnover in the cage is very low, which indicates to me that the cage staff are content with their jobs and working conditions.
59. As for corporate culture in Perth more broadly, I have noticed a shift in recent times away from a focus on revenue and profits, and a better balance in terms of focusing on people and processes. Having Lonnie Bossi at the helm of Crown Perth has been positive, and in my view Mr Bossi is leading the change in culture.
60. The program that I mentioned above, the Responsible Practices and Decision Making – Cage & Count and Table Games Project, is also part of the change in culture. This is something that Mr Bossi has sponsored.

61. Question 36 asks about how staff concerns or complaints regarding activities or incidents at the Perth Casino are handled. They should be raised with the staff members supervisor or manager or directly with a HR representative. If the matter remains unresolved, they can escalate to the next level of management.
62. Question 37 asks about the process for receiving misconduct complaints and the persons responsible for investigating them. I have no experience with misconduct complaints, but I would expect that this would go to the HR team in the first instance.

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Jarrold Campbell

Dated: 24 September 2021