

## IN THE PERTH CASINO ROYAL COMMISSION

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**AMENDED WITNESS STATEMENT OF SANDRINO "SANDY" DEL PRETE**

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Sport and Cultural Industries

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## STATEMENT OF SANDRINO "SANDY" DEL PRETE

I, SANDRINO "SANDY" DEL PRETE, c/- level 17, Gordon Stephenson House, 140 William Street, Perth WA 6000, Deputy Director Strategic Regulation, Department of Local Government, Sport and Cultural Industries ~~Racing, Gaming and Liquor~~, say as follows:

1. This statement is provided in response to the witness summons to give evidence, dated 16 August 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**). This statement has been prepared according to the list of topics provided by the Royal Commission on 20 October 2021. The topics are set out below.

### Qualifications and experience

**Topic 1: My qualifications and experience, generally, and in relation to the regulation and oversight of casinos and casino gambling, specifically.**

2. My qualifications and experience are set out in my curriculum vitae.<sup>1</sup> In short, I am a career public servant with over 40 years of experience in various government agencies.
3. I have worked in the Department since 1990, in various licensing and compliance roles, and since 2005, in various management roles.
4. On commencement, I received formal training in regard to casino regulation. At that time, all new inspectors received a formal training course which was generally of 3 months duration, which focused on:
  - a. how the various games were conducted;
  - b. the flow of money and chips;
  - c. the accounting side of the casino business;
  - d. casino revenue, and
  - e. security and surveillance activities.

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<sup>1</sup> See DLG.0001.0013.0003.

5. I cannot remember receiving any further formal training as an inspector although we did meet on a monthly basis and on occasions, refresher training was provided. I did also attend some seminars/conferences as a senior inspector.

## **Employment history**

### **Topic 2: My employment history with the Department.<sup>2</sup>**

6. My employment history with the Department is as follows:
  - a. March 1990 to August 2005 Casino Inspector (with the position retitled to Inspector during the course of my appointment to reflect the addition of other responsibilities such as gaming and liquor);
  - b. August 2005 to July 2007, Senior Inspector Compliance;
  - c. July 2007 to July 2012, Deputy Director Licensing;
  - d. November 2010 to March 2011, acting periods as Director Licensing and Director Compliance
  - e. July 2012 to November 2012, Assistant Director Administrative Law (liquor), in which I determined liquor licensing applications;
  - f. November 2012 to March 2015, Policy Manager;
  - g. January 2013 to February 2013, acting as Director Strategic Regulation
  - h. March 2015 to February 2019, Assistant Director Liquor and Gambling, which was re-titled at some point to Assistant Director Licensing and Industry Services and was also re-titled Deputy Director;
  - i. November 2018 to December 2018, acting as Director Licensing and Industry Services;
  - j. February 2019 to February 2021, seconded to the role of Regulatory Specialist (to assist with the TAB sale); and
  - k. March 2021 to present, Deputy Director Licensing (although the position sits within the Strategic Regulation Section), which is focused on wagering-related activities.

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<sup>2</sup> The List of Topics defines 'Department' as meaning the Department of Local Government, Sport and Cultural Industries and its predecessors including the Department of Racing, Gaming and Liquor, and the Office of Racing, Gaming and Liquor. This statement uses the same definition of 'Department'.

7. From approximately July 2012, my involvement with casino related work in the Department decreased as the roles I was appointed to did not include "hands on" casino regulation. As the Policy Manager I was more involved in regulation and policy development and significant wagering-related activities including the racing bets levy function. However, in my capacity as the Assistant Director Licensing (and then Deputy Director Licensing following the title change), I dealt with the licensing of casino employees and casino key employees.
8. Since 30 July 2021, I have been on a combination of annual leave and long service leave from the Department, with an expected return date of 10 January 2022.

**Topic 3: The circumstances of my appointment as Acting Chief Casino Officer.**

9. From documents prepared by the Department, I understand that I was appointed as the Acting Chief Casino Officer (**A/CCO**) for a 2-week period from 19 October 2015 to 6 November 2015.
10. I cannot specifically remember performing the A/CCO role at that time, nor can I remember the circumstances of how I came to be appointed as the A/CCO particularly as the position of CCO was historically linked to a specific position in the Department and it appears from my examination of my service records that I was in my substantive position at the time and not acting in a different position.

**Topic 4: The circumstances of the establishment of the Regulatory Services Team and my role in it.**

11. It is not entirely clear to me what is meant by the "Regulatory Service Team". If it is the post-machinery of government (**MOG**) changes "Regulatory Services Division", then that directory was established after MOG saw the then Department of Racing Gaming and Liquor combined with a number of other government agencies to become the Department.
12. However, the reference to the Regulatory Services team may be a reference to a small group of officers that worked within the Policy/Strategic Regulation Division where I was the Policy Manager for a period.
13. By way of background, I can recall there had been a Regulatory Unit or Team established within the Department in the 1990s. That team was

responsible for the management of submissions/applications lodged by stakeholders (apart from employee licensing applications). They would receive submissions from the Perth Casino (and other stakeholders), register the request and arrange for the relevant areas to provide a report and where necessary, a briefing to the GWC. If the GWC made a decision based on the submission which required a formal instrument, the Regulatory Team would be responsible for drafting that instrument or instructing Parliamentary Counsel's Office to draft the instrument. This team was also responsible for the development of audit and inspection programs which were used by inspectors to perform their functions. The Regulatory Team was disbanded sometime in the 2000s.

14. My recollection is that sometime in around 2013, the Deputy Director General, Mr Michael Connolly, sought to re-establish a similar team to the historic regulatory unit or regulatory team. Officers within the policy area of the Department were tasked with undertaking some work with that in mind. At the time I was the Policy Manager and was involved in the initial stages of the work undertaken.
15. This work involved documenting how the Department regulated the Perth Casino and the other industries within its remit (being the liquor industry, community gaming and wagering). It also involved looking at what internal controls were in place, and what could go wrong if internal or external controls failed in the relevant industry. This work does not appear to have been finalised.
16. I understood the work was to be done so consideration could be given to how best to utilise the Department's inspectors across the various business areas of the Department. I also understand that the work would involve an update of the existing audit and inspection programs, but I was not involved in that aspect of the work.
17. My role was to provide background knowledge, based on my experience as an Inspector and Senior Inspector Compliance across the Department's regulated industries. After the initial work in 2013, my recollection is that I had little, if any, further involvement with this project.
18. As the Assistant/Deputy Director Licensing and Industry Services within the Regulatory Services Division of the Department between 2015 and early 2019, my casino-related roles were generally limited to licensing of

casino employees and casino key employees and since that time I have had no involvement.

## **Delegations**

### **Topic 5: Powers delegated to me by the Gaming and Wagering Commission (GWC) during my employment by the Department.**

19. No powers have been delegated to me personally by the GWC. However, the GWC has delegated various powers to the positions that I have occupied (or acted in) within the Department. Those delegations include the following:
  - a. Delegation to the position of Director Compliance with effect from 26 June 2007;<sup>3</sup>
  - b. Delegation to the position of Deputy Director Licensing with effect from 24 June 2008;<sup>4</sup>
  - c. Delegation to the position of Deputy Director Licensing and Coordinate Licensing with effect from 24 March 2009;<sup>5</sup>
  - d. Delegation to the position of Deputy Director Licensing with effect from 23 March 2010;<sup>6</sup>
  - e. Delegation to the position of Director Licensing with effect from 22 June 2010;<sup>7</sup>
  - f. Delegation to the position of Deputy Director Licensing with effect from 29 July 2011;<sup>8</sup>
  - g. Delegation to the position of Assistant Director Liquor and Gambling with effect from 27 May 2015;<sup>9</sup> and
  - h. Delegation to the position of Deputy Director Licensing and Industry Services with effect from 27 June 2017.<sup>10</sup>

### **Topic 6: Powers you have discharged pursuant to a delegation from the GWC during your employment by the Department.**

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<sup>3</sup> GWC.0007.0001.0025.

<sup>4</sup> GWC.0007.0001.0023

<sup>5</sup> GWC.0007.0001.0021.

<sup>6</sup> GWC.0004.0003.0014.

<sup>7</sup> GWC.0004.0003.0021.

<sup>8</sup> GWC.0004.0003.0015.

<sup>9</sup> GWC.0004.0003.0002

<sup>10</sup> GWC.0004.0003.0025.

20. Pursuant to those delegations I have exercised various powers, including:
- a. Approving amendments to the annexures to the Principal Directions given pursuant to section 24 of the *Casino Control Act 1984*;<sup>11</sup>
  - b. Approving amendments to the Casino Manual (Operations);<sup>12</sup> and
  - c. Determining licenses and renewals of casino employees and casino key employees.
21. Since July 2007 when I was appointed as Deputy Director Licensing, the main delegated power that I have exercised related to the licensing of casino employees and casino key employees in my capacity as Deputy Director Licensing.

**Topic 7: My understanding prior to 2021 of how a Departmental officer was to exercise delegated powers of the GWC. Specifically:**

**(a) whether I understood that an officer was to exercise the powers delegated by the GWC unfettered by any control or oversight by the GWC; or**

**(b) whether I understood the delegation to reserve a power to the GWC to ratify or reject any exercise of delegated power.**

22. It was not my understanding that an officer with delegated powers was to exercise those powers unfettered by any control or oversight by the GWC.
23. It was my understanding that if the GWC disagreed with a decision that a delegate made, then it could be changed or altered to reflect the GWC's position. I do not know how this would have been achieved or whether it would involve a formal decision of the GWC. I cannot recall a situation where a delegate made a decision that the GWC disapproved of or disagreed with.

**Topic 8: Whether my current understanding of how a Department officer is to exercise a delegated power is different from my understanding prior to 2021 and if so, how and why my understanding has changed.**

24. My current understanding remains the same as set out in Topic 7. I cannot recall exercising any delegated powers in respect to casino

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<sup>11</sup> GWC.0007.0007.0073; GWC.0007.0007.0091; GWC.0007.0007.0099.

<sup>12</sup> GWC.0007.0007.0085,

matters since early ~~2019~~ 2021 and have not had occasion to consider how a Departmental officer is to exercise delegated powers.

## **Regulation and oversight of Perth Casino**

**Topic 9: My understanding in 2015 of relevant GWC policies and procedures to ensure the proper exercise of powers and discharge of responsibilities and obligations in respect of the regulation and oversight of the:**

**(a) Perth Casino; and**

**(b) risks associated with junket operations, money laundering, cash and electronic transactions and the Perth Casino and criminals infiltrating casino operations,**

**(c) risk of harm from casino gaming; and**

**the regulatory objectives and philosophy underpinning those policies and procedures.**

25. Other than being an A/CCO for a 2-week period of 19 October 2015 to 6 November 2015 (which I cannot recall performing - See Topic 3), my involvement in casino-related work in 2015 was limited. Since 2015, my involvement in casino-related work has largely been limited to determining licensing applications for casino employees and casino key employees.

**Topic 10: Whether my current understanding of the matters referred to in topic 9 is now different from your understanding in 2015 and, if so, how and why your understanding has changed.**

26. See my answer for Topic 9.

**Topic 11: The process for the development of the Department's audit and inspection program for the Perth Casino that was implemented in 2015 following the cessation of dedicated casino shifts for Departmental inspectors, including:**

**(a) what risks were to be addressed by the audit and inspection program;**

**(b) how those risks were identified; and**

**(c) how the audit and inspection program was designed to address those risks, including whether this involved the development of risk treatment plans.**



27. I cannot recall any involvement in the development of the Department's audit and inspection program for the Perth Casino that was implemented in 2015. As indicated at Topic 4 my recollection is that audit and inspection programs had been developed in the 1990s by the Regulatory team and were updated in 2013.

**Topic 12: My understanding of the difference, if any, between audit programs and inspection programs in the context of the regulation of the Perth Casino.**

28. When I was an Inspector and Senior Inspector, I conducted both inspections and audits at Perth Casino. Based on my experience, I understand that an inspection program consists of a series of specific point in time checks. For example, an inspection might involve checking if a dealer is dealing correctly and announcing "no more bets"
29. In contrast, audit programs are a more detailed examination of an activity that follows an activity from start to finish. For example, in relation to a table game audit, the audit would involve checking that the games rules have been correctly applied, that the dealer has complied with dealing practices including the way chips are stacked, payments made, cards are collected, supervision has been correctly undertaken, cameras are in place, chip credits and fills are correctly processed, monies/chips are properly dispensed into drop boxes and revenue is properly calculated.

**Topic 13: My knowledge and understanding of how the audit and inspection program at Perth Casino has been implemented since 2015, including how records are kept and the use and purpose of the Compliance Activity Frequency Chart and Risk Category Compliance Activity Sheet.**

30. I cannot recall being involved in the implementation of the audit and inspection program at Perth Casino in 2015 nor since 2015, can I recall being involved in any process or processes for review of such programs.

**Topic 14: Any process or processes for the review since 2015 of that audit and inspection program.**

31. Please see my answer to Topic 13.

**Topic 15: My knowledge of what, if any, audits or inspections within the audit and inspection program in place since 2015 have been addressed to:**

- (a) risks associated with junket operations;
- (b) the risk of money laundering;
- (c) risks associated with cash and electronic transactions;
- (d) the risk of criminals infiltrating casino operations;
- (e) the risk of harm from casino gaming;
- (f) the calculation of the taxable revenue of the Perth Casino for casino tax purposes; and
- (g) the responsible service of gaming by Perth Casino.

32. Please see my answer to Topic 13.

**Topic 16: Whether the Department or GWC has done a risk assessment for problem gambling at Perth Casino.**

33. I am not aware of whether the Department or GWC has done a relevant risk assessment for problem gambling at Perth Casino.

**Topic 17: Whether the Department or GWC reviews the Perth Casino's Responsible Service of Gambling program as regards:**

- (a) the content of that program; and
- (b) the implementation of that program.

34. I am not aware whether the Department or GWC reviews the Perth Casino's Responsible Service of Gambling program.

**Topic 18: Whether Departmental officers acting as GWC inspectors are asked to be vigilant for signs by patrons at the Perth Casino that they are experiencing gaming-related harm and, if so, what they are trained to do in the event they observe such signs.**

35. I can only answer this question from my experience as an Inspector working in the Perth Casino floor and as a Senior Inspector Compliance.

36. I cannot recall being specifically asked to be vigilant or asking inspectors I managed to be vigilant for signs of gaming-related harm. I do remember being provided with some indicators or tell-tale signs for identifying problem gamblers (i.e. getting angry at gaming tables or electronic gaming machines, and dishevelled appearance from long periods of gambling).

**Topic 19: My understanding of the reason for the Department changing from the 'RG system' to the 'Sharperlight' or 'Navigate'**

**system to calculate the taxable revenue of the Perth Casino for casino tax purposes.**

37. My recollection is that the "RG System" was one of three legacy databases the Department maintained.
38. I understand that the move to "Navigate" was part of a process of combining the three legacy databases into a single database. I understand that "Sharperlight" is a reporting system linked to "Navigate".

**Topic 20: My understanding of the steps taken by officers or employees of the Department since 2015 to confirm the veracity of the calculation by Crown Perth of taxable revenue of the Perth Casino for casino tax purposes, including tax payable on poker tournaments and tax payable on jackpot prizes.**

39. I am not familiar with the current process by which the Department confirms the veracity of Crown Perth's calculation of taxable revenue nor do I have understanding of the process taken since 2015.
40. My general understanding, ~~based on my experience from around 2012 and earlier,~~ is that Inspectors could audit casino revenue and taxation by accessing details entered by casino staff into the "Sharperlight" portal and verifying that information against reports available from the Perth Casino. Inspectors can also review surveillance footage of the "soft count" process which shows the amount of revenue counted on a daily basis.

**Topic 21: My knowledge of whether the Department and/or GWC implemented the recommendations made by Gaming Laboratories Australia that were either set out or referred to in its report titled Audit of Revenue Procedures for Crown Perth Casino: Final Report in June 2015 and, if so, how these recommendations were implemented.**

41. I cannot recall being made aware of the recommendation made by Gaming Laboratories Australia and whether the Department and/or GWC implemented the recommendations and that is unsurprising given the role I was performing at that time.

**Topic 22: Your knowledge of whether:**

- (a) an inspection program was developed by the Department to assess adherence by the Perth Casino's

**Income Control Department to its Standard Operating Procedures; and**

**(b) an audit program to assess the investigation and notification adjustment to revenue as reported in the daily master game reports;**

**as proposed to the GWC in September 2017.**

42. I am not aware of whether an inspection program was developed by the Department to assess adherence by the Perth Casino's Income Control Department to its Standard Operating Procedures
43. I am also not aware of whether an audit program to assess the investigation and notification adjustment to revenue as reported in the daily master game reports was proposed to the GWC in September 2017.

## **Junkets**

**Topic 23: My knowledge of the circumstances leading to the deletion in 2010 of Part 3 of the Casino Control Regulations 1999, which was titled "Junkets and junket operators".**

44. I have no recollection of those amendments other than what I have read recently on Departmental files, although I understand I attended a ~~meeting~~ an operations meeting at the Casino where the amendments were discussed.

**Topic 24: My knowledge of concerns about junket operators operating at the Perth Casino raised by Compliance Inspector Vanessa Webb and conveyed to Mr Michael Connolly in February 2017, including but not limited to the detail of any discussions you had about those concerns and any meetings you attended at which those concerns were discussed.**

45. I cannot recall the concerns about junket operators operating at Perth Casino raised by Compliance Inspector Vanessa Webb and conveyed to Michael Connolly in February 2017.
46. I have been shown the document DLG.0017.0001.0001, which appears to be notes of a meeting that I am recorded as attending where such concerns were raised.
47. I do not recall that meeting and I am not sure why I would have been in attendance. However, it was not uncommon for Michael Connolly to pull

me into informal meetings concerning casino related work at short notice given my background experience in casino matters.

**Topic 25: My knowledge of communications between Mr Connolly and AUSTRAC between March 2017 and October 2017.**

48. I am not aware of communications between Mr Connolly and AUSTRAC between March 2017 and October 2017.

**Topic 26: My knowledge of the *AUSTRAC Information Report - Casino Junkets Campaign* dated 14 July 2017 and any enquiries made, investigations undertaken or other response by the GWC or the Department following the release of that Report.**

49. I am not aware of the AUSTRAC Information Report - Casino Junkets Campaign dated 14 July 2017.
50. I am not aware of any enquiries made, investigations undertaken or other response by the GWC or DLGSC following the release of that Report.

**Topic 27: My knowledge of the amendment made by Mr Connolly to the Casino Manual (Operations) on 11 April 2017 to delete Part 16 of Section 03A of the Casino Manual (Operations), which was headed "Junket Programme".**

51. I believe that the amendment arose because the Casino was undertaking a review of the Casino Manual. My understanding was that given the junket regulations had been repealed back in 2010, the reference to junkets was a "hangover" that had not been removed from the manual.
52. As I understand it, the requirement for the casino to provide the junket manifest was deleted because the Department and GWC were no longer dealing with junkets.

**Topic 28: My knowledge of whether a review of junket regulation as part of a broader Gambling Compliance Review was conducted by the Department in 2017 or subsequently, and, if so, the outcomes of that review.**

53. I am not aware of whether a review of junket regulation as part of a broader Gambling Compliance Review was conducted by the Department in 2017 or subsequently, and, if so, the outcomes of that review.

## **Conflicts of interest**

**Topic 29: The information I have been given during the course of my employment with the Department about conflicts of interest and how to deal with them.**

54. During the course of my employment with the Department I have been provided with the various departmental policies that govern conflicts of interest, including the most recent policy governing conflicts of interest.
55. More recently, under the former Director General (Mr Duncan Ord) and the current A/Director General (Ms Lanie Chopping) further information has been provided about conflicts of interest and how such conflicts should be dealt with. Such information has provided greater context around what may or may not constitute a conflict of interest and how those conflicts should be dealt with.

**Topic 30: Whether I have or have had any conflicts of interest during the course of your employment with the Department. If so, provide details of the conflicts and any actions taken in respect of the conflicts.**

56. I had a conflict of interest in the mid-2000s. My daughter worked as a croupier at Crown Perth for a few years from around 2001 to 2007 when I was an inspector and for a short time, the Senior Inspector Compliance.
57. My colleagues, including the Director General at the time, at the Department were aware of her employment, but it was not formally recorded in any way.
58. I cannot recall there being any formal actions required in respect of the conflict, but I did not conduct audits or inspections that would have involved my daughter or the gaming tables at which she was working. Beyond that I cannot remember any further action being taken in respect of the conflict.
59. However, there was an occasion in February 2007, when I contacted a Burswood employee on my daughter's behalf and was contacted by an employee of Burswood. In short, my daughter was involved in a motor vehicle accident on her way home from work and was hospitalised. That same day, I telephoned the on duty Gaming Shift Manager to inform him of the accident and advised she would not be at work for some weeks as a result of the injury. The following day, the Executive General Manager

Table Games telephoned me to inquire about my daughter's health and discussed her potential return to duties. I made a note of the conversations and provided it to the Director of Operations.<sup>13</sup>

**Topic 31: Whether I had or have had any friendships or other personal relationships with officers or employees of Perth Casino.**

60. Apart from my daughter, the only other Crown officer or employee I have had a personal relationship with was Mr Paul Hulme. I knew Mr Hulme from when he worked at the Department. During his employment at the Department we occasionally socialised. I would describe Mr Hulme as a friend with whom I caught up occasionally.
61. I do recall socialising with Mr Hulme after he commenced working at Crown on a fishing trip with Mr Connolly and Mr Claude Marais on Mr Connolly's boat. I joined Mr Connolly, Mr Hulme and Mr Marais for the day.
62. I cannot recall when the fishing trip was, or what role I held at the Department at the time. The earliest the trip could have been was 2013 and the latest it could have been was 2018. It most likely occurred in 2014/2015. That was the only time I attended a fishing trip with Mr Connolly at which Crown employees were present.
63. I also attended Mr Hulme's retirement party, which was hosted by Crown.

**Topic 32: My knowledge of any friendship or other personal relationships between Departmental officers, including Inspectors, and officers or employees of Perth Casino.**

64. I am aware that over the years a number of inspectors have had partners or children employed at the Perth Casino. For example, Mr Nicholas Toyne met his partner when she was employed at the Perth Casino.
65. I am also aware of Mr Connolly's friendship with Mr Marais and Mr Hulme.

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<sup>13</sup> DLG.0001.0013.0005 is a copy of the note that I made with my daughter's name redacted.

## **Gifts and benefits, including hospitality**

**Topic 33: The information I have been given during the course of my employment with the Department about gifts and benefits, including hospitality, and how to deal with them.**

- 66. During my time with the Department, I have been provided with various policies concerning gifts and benefits, including hospitality.
- 67. There was a file where we had to record gifts or refer gifts, including potential gifts through to the Director General.

**Topic 34: Whether I have received any gifts or benefits, including hospitality, from the Crown Group, including from its officers or employees. If so, provide details of the gifts or benefits and any actions taken in respect of them.**

- 68. I attended Mr Hulme's retirement party. See Topic 31.

**Topic 35: My knowledge of any gifts or benefits, including hospitality, provided by the Crown Group, including by its officers or employees, to other officers and employees of the Department.**

- 69. I am not aware of any other gifts or benefits provided by the Crown Group, apart from Mr Hulme's retirement party.

**Topic 36: My knowledge of and attendance at any functions at a venue at Crown Perth, for example, a retirement function or Christmas meal, attended by Departmental officers and employees. Specifically address who paid for those functions.**

- 70. See above for my answer in Topic 31 above relation to Mr Hulme's retirement party.
- 71. I am also aware that each year, the former Director General of the Department of Racing Gaming and Liquor, Mr Barry Sergeant, would take the Department's directors out for a Christmas lunch. On occasion those lunches would be held at restaurants within the Perth Casino complex.
- 72. I can recall attending one of the lunches when I was acting as a Director. From memory, the lunch was held at the Atrium buffet. I did not pay for the lunch, but I understood the lunch was paid for by the Department or Mr Sergeant.



**Topic 37: My knowledge as to whether the GWC or the Department conducted a risk assessment in relation to the Perth Casino licensee or its conduct prior to November 2020.**

73. I do not know if the GWC or the Department conducted any risk assessments in relation to the Perth Casino licensee or its conduct prior to November 2020.

I declare that this statement is true and correct to the best of my knowledge and belief and that I have made this statement knowing that if it is tendered in evidence I will be guilty of a crime if I have wilfully included in this statement anything which I know to be false or that I do not believe is true.

Contains sensitive information

Signed

Sandrino Del Prete

Date: 29 October 2021