

From: [Marshall, Caroline](#)
To: [Neil Jeans](#)
Cc: [Haig, Peter](#); [Kerrigan, Christopher](#); [Sherwood, Simon](#)
Subject: PRIVILEGED AND CONFIDENTIAL: Crown - new engagement [Allens-File-DMS.FID2034257]
Date: Monday, 22 February 2021 4:20:47 PM
Attachments: [image002.png](#)
[image003.png](#)

Privileged and confidential

Hi Neil,

I hope you had a good weekend. As promised, below please find the detailed scope for the review we discussed last week:

Scope:

- Assess Crown's bank statement data provided by Crown for the patron accounts for Crown Melbourne Limited and Burswood Nominees Limited (together, the **Patron Accounts**) between 1 December to 16 February and confirm whether any of the following types of transactions occurred on the Patron Accounts during that period:

Potential structuring / smurfing

- two or more cash deposits of <\$10,000 each, totalling \$10,000 or more in a 24hr period for a single customer;
- two or more cash deposits of <\$10,000 each, totalling \$10,000 or more in a 48hr period for a single customer;
- two or more cash deposits of <\$10,000 each, totalling \$10,000 or more in a 72hr period for a single customer;

Other transactions

- telegraphic transfer deposits with transaction descriptions that do not appear associated with a gaming purpose;
- cash deposits;
- telegraphic transfer deposits from third parties (including money remitters), being any deposits not from a patron's personal bank account;
- telegraphic transfer deposits that do not appear to state patron's full name and / or Crown Rewards number.

Reporting:

- Please provide Initialism's findings in the following format:

Crown Entity	Bank Account	Transaction Date and Value	Type of transaction identified
Burswood Nominees Limited	Patron Deposit Account with ANZ	16 January 2021 / \$37,000	[Two or more cash deposits of <\$10,000 each, totalling \$10,000 or more in a 48hr period for a single customer]
	Patron Deposit Account with ANZ	11 January 2021 / \$87,000	[Cash deposit]
Crown Melbourne Limited			

Fees:

- We are in the process of raising your revised hourly rates with Mary and will provide you with an update as soon as we have the green light from her. We will also sign the broader Initialism retainer you sent through over the weekend once we have spoken to her.

Call tomorrow:

Unfortunately we have had an urgent Crown meeting scheduled for tomorrow morning – would you be available to discuss the above at 5pm tomorrow instead?

We trust the above is all you need to formally commence the engagement, but please do let us know if you need anything else.

Best wishes,

Caroline

Caroline Marshall
Senior Associate, Allens

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From: Neil Jeans, **Confidential**

Sent: Friday, 19 February 2021 3:04 PM

To: Sherwood, Simon, **Confidential**

Cc: Marshall, Caroline, **Confidential**, Haig, Peter, **Confidential**, Kerrigan, Christopher, **Confidential**

Subject: RE: Crown - new engagement [Allens-File-DMS.FID2034257]

Hi Simon

Thanks for this – I'll prepare an engagement letter over the weekend

However, I intended to have a conversation re hourly rates – we heavily discounted our standard rates (25% - 30%) because the initial engagement was limited.

As the ongoing scope is broader and likely to be more involved, I propose applying our standard rates of \$450 for me and \$400 for the SME's per hour.

Happy to discuss with you and or Nick

Best

Neil

Neil Jeans
Principal - Initialism Pty Ltd

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From: Sherwood, Simon [Confidential]
Sent: Friday, 19 February 2021 1:34 PM
To: Neil Jeans [Confidential]
Cc: Marshall, Caroline [Confidential]; Haig, Peter [Confidential]; Kerrigan, Christopher [Confidential]
Subject: Crown - new engagement [Allens-File-DMS.FID2034257]

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Dear Neil,

Thank you for your time earlier in the week. As discussed, we would like to engage you on behalf of Crown to provide advice and support regarding AML/CTF matters for purposes of us providing legal advice to Crown in relation to at the least the following matters:

- implementation of the Crown Joint AML/CTF Program;
- data and information inputs used or that may be required to be used in the Transaction Monitoring Program; and
- Crown's engagement with various regulatory bodies, including the NSW Independent Liquor and Gaming Authority.

We propose that the engagement be on the same terms as your previous engagement by Minter Ellison on behalf of Crown, save that the services to be provided would be described in the following terms:

Allens hereby engages Initialism to provide AML/CTF professional advisory services for the purpose of Allens advising its client Crown Resorts Limited. Initialism will provide advice and support regarding AML/CTF matters as instructed by Allens. The matters may include but not be limited to:

- *Implementation of the Crown Joint AML/CTF Program;*
- *Reviewing the data and information inputs used or that may be required to be used in the Transaction Monitoring Program; and*
- *Providing all other professional advisory services related to the above matters as requested by Allens.*

Subject to any questions or comments that you have, we would be grateful if you could provide us with a draft engagement letter covering the proposed services set out above.

Regards

Simon Sherwood
Managing Associate, Allens
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