



**Crown Resorts Limited**

Phase 1: Assessment of Patron Account Controls

26 March 2021

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26 March 2021

Ms Toni Korsanos  
Chair, Crown Resorts Audit and Corporate Governance Committee  
Crown Resorts Limited  
Barangaroo  
Sydney, NSW 2000

Dear Ms Korsanis

**Deloitte Assessment of Patron Account Controls (Phase 1)**

In accordance with our engagement letter dated 22 February 2021, we are pleased to provide you with our final Phase 1 report, containing the observations from our review of patron account controls to address specific money laundering risks.

Should you have any queries regarding this final report, please do not hesitate to contact me or 

Yours sincerely

**Lisa Dobbin**  
**Partner**

Deloitte Financial Advisory Pty Ltd

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# Glossary

Term	Description
ANZ	Australia and New Zealand Banking Group
ANZ Transactive	ANZ banking portal
AML/CTF	Anti-Money Laundering/Counter Terrorism Financing
AMLCO	AML/CTF Compliance Officer
Cage Staff	Cage operations and Cage management
CBA	The Commonwealth Bank of Australia
CDD	Customer due diligence
Crown	Crown Resorts Ltd
Crown Melbourne	Crown Melbourne Limited
Crown Perth	Burswood Nominees Limited
DAB Account	Deposit Account Balance
ECDD	Enhanced customer due diligence
EFT	Electronic Funds Transfer
Engagement Letter	Deloitte's engagement letter dated 22 February 2021
FAQs	Frequently Asked Questions
GT and Initialism Review	Grant Thornton and Initialism review of the bank accounts operated by Crown Perth
ILGA	Independent Liquor & Gaming Authority
ML	Money Laundering
MLRO	Money Laundering Risk Officer
MS Teams Planner	Microsoft Teams Planner
OCDD	Ongoing customer due diligence
Patron Accounts	Patron deposit bank account
Patron Account Controls	A series of processes and controls established by Crown for Patron Accounts
Phase 1 Crown Entities	Crown Melbourne Limited; Burswood Nominees Limited; Crown Sydney Gaming Pty Ltd
Review	Deloitte's review into specific transactional activity across Crown's Australian operation
Riverbank	Riverbank Investments Pty Ltd
ROF	Return of funds
Sentinel	In House developed solution adopted by Crown for Transaction Monitoring

Term	Description
SLA	Service Level Agreement
Southbank	Southbank Investments Pty Ltd
SYCO	Systems Control
TA	Transfer Acknowledgement
The Act	Anti-Money Laundering and Counter-Terrorism Act 2006 (the Act)
The Inquiry	Inquiry established by the ILGA into Crown under section 143 of the Casino Control Act 1992 (NSW)
The Rules	AML/CTF Rules Instrument 2007 (No.1)
TMP	Transaction Monitoring Program
TMS	Transaction Monitoring System
TR	Transfer Request
UAR	Unusual Activity Report
UAR Investigations Guideline	Anti-Money Laundering and Counter-Terrorism Financing - Guidelines for completing Crown AML/CTF investigations
WOL	Withdrawal of licence

# 1 Executive Summary

## 1.1 Background and scope

With specific regard to two money laundering typologies identified as part of work previously undertaken by Grant Thornton and Initialism (the **GT and Initialism Review**)<sup>1</sup> with respect to the Southbank<sup>2</sup> and Riverbank<sup>3</sup> Patron Accounts, Deloitte has assessed the design effectiveness and the operating effectiveness of the **Patron Account Controls**, as applied to the patron deposit bank accounts (**Patron Accounts**) for each of Crown Melbourne Limited (**Crown Melbourne**), Burswood Nominees Limited (**Crown Perth**) and Crown Sydney Gaming Limited (**Crown Sydney**), together, the **Phase 1 Crown Entities**, from 1 December 2020 to 22 February, 2021.

For the purposes of this review, Patron Account Controls specifically comprise:

- Controls over electronic funds transfers to and from the Patron Accounts;
- Controls over deposits of cash into the Patron Accounts; and
- Crown's current transaction monitoring (**TM**) program insofar as it is applied to the Patron Accounts.

The specific details of these controls is set out in section 33.3 of this report.

The two specific money laundering typologies with respect to which our review has been performed are:

- Structured cash deposits
  - Where cash payments are structured in a manner of several split cash transactions to avoid a single large transaction being reported in threshold transaction reports
- Cuckoo smurfing using structured cash deposits, large cash deposits and third-party electronic funds transfers
  - Where the flow of a legitimate payment is intercepted and replaced with deposits of illicit funds (by one or more third parties/individuals).

In this Phase 1, we have focussed only on the Patron Account Controls. Deloitte notes that the Patron Account Controls are part of a broader suite of AML/CTF controls that are collectively intended to mitigate Crown's ML/TF risk, including cash structuring and cuckoo smurfing. These controls include customer due diligence, enhanced customer due diligence and ongoing due diligence, which includes monitoring of transactional and gaming activity undertaken by the patron within Crown's gaming offerings. They also include risk assessments to inform the adequacy of these control measures. For the purposes of Phase 1, we have focussed only on the Patron Account Controls. Deloitte will review the broader control suite as part of our work in Phase 3, which will be the subject of a future report.

Due to limitations on Deloitte's access to Crown Perth patron data, as of the date of this report, Deloitte's review of the Patron Account Controls with respect to Crown Perth is of design effectiveness only. Operational effectiveness testing will be undertaken with respect to

<sup>1</sup> Grant Thornton Reports:

- Grant Thornton Crown Resorts Limited – Southbank Pty Ltd Statement Analysis: "Forensic Data Analytics for Crown Resorts Limited ("Crown")" (26 November 2020)
- Grant Thornton interim report re Southbank: "Forensic Data Analytics for Crown Resorts Limited ("Crown")" (17 November 2020)
- Grant Thornton Riverbank report: "Forensic Data Analytics for Crown Resorts Limited ("Crown")" (16 November 2020)

Initialism report:

- "Review of Riverbank and Southbank bank accounts for Indications of Money Laundering" (16 November 2020)

<sup>2</sup> Southbank Investments Pty Ltd

<sup>3</sup> Riverbank Investments Pty Ltd

Crown Perth once appropriate licensing access for Deloitte personnel has been secured from the West Australian Gaming and Wagering Commission by Crown, and an addendum to this report will be prepared at that time.

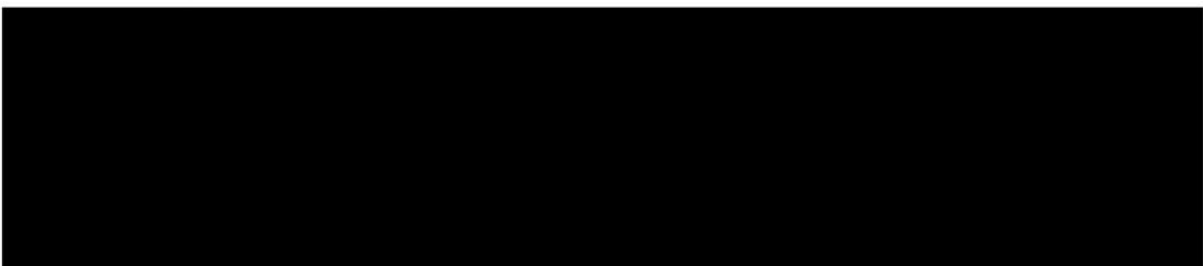
As Crown Sydney had not commenced gaming operations at the time of the Phase 1 work, no review was performed in connection with Crown Sydney.



### 1.3 Patron Account Controls - Design Effectiveness

Deloitte's assessment of the design effectiveness of the Patron Account Controls was considered through two lenses: (1) the extent to which they address the specific activity as highlighted in the Southbank and Riverbank accounts i.e. cash structuring and cuckoo smurfing; and (2) overall design effectiveness aligned with industry practice, including, for example, that the controls are documented to an appropriate level of specificity, have clear accountabilities and timeframes, are appropriately resourced and governed, and are sustainable.

In performing our review, we have also considered relevant industry practices in North America and Latin America in connection with controls over bank transactional activity within casino patron accounts. Our research indicates that controls range, dependent on maturity, with some casino operators having no controls over this channel, some performing manual monitoring similar to that undertaken by Crown, and some having sophisticated automated controls that monitor transactions against overall patron profiles to identify instances of anomalous activity. In this respect we also note from a casino industry practice perspective that our experience is that these types of controls are only performed manually where volumes are sufficiently low to be sustainable.

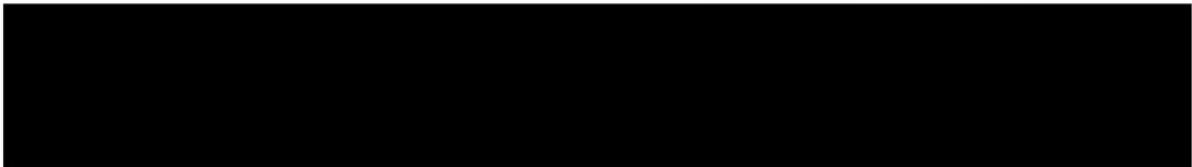




**1.4 Patron Account Controls – Operational Effectiveness**

Deloitte reviewed all transactions on the bank statements of the Patron Accounts pertaining to Crown Melbourne for the Review Period for indicia of cash deposits, third party transfers or transfers that were otherwise not aligned with Crown’s requirements for use by patrons of the Patron Accounts. Deloitte also reviewed the extent to which the Patron Account Controls have been consistently applied during the Review Period pursuant to their documented design.

As a result of testing performed, Deloitte did not identify any patron cash deposits. Deloitte also observed 48 instances where electronic funds transfer transactions were rejected by Crown on the basis that they were transactions which are not in line with the policies.



**Table 1: Table of deficiencies identified from testing**

Deficiency Type	Possible Cash deposits	Third party/Patron name or ID number missing	Misleading Narrative	Total
Number of Deficiencies	0	2	0	2

Further, testing of the processes supporting the Patron Account Controls highlighted inconsistencies in either or both: (a) the application of all of the elements of the process, or (b) in the evidence kept on file as a record of the process.

Deloitte acknowledges that there is significant variation in both how a transaction may be presented in Crown’s bank statement, and the evidence that a patron may present at the Cage to demonstrate that he or she has met Crown’s requirements. However, it is Deloitte’s view that these inconsistencies are largely a product of the deficiencies observed in the design of the Patron Account Controls. Examples of the inconsistencies observed in our testing include:

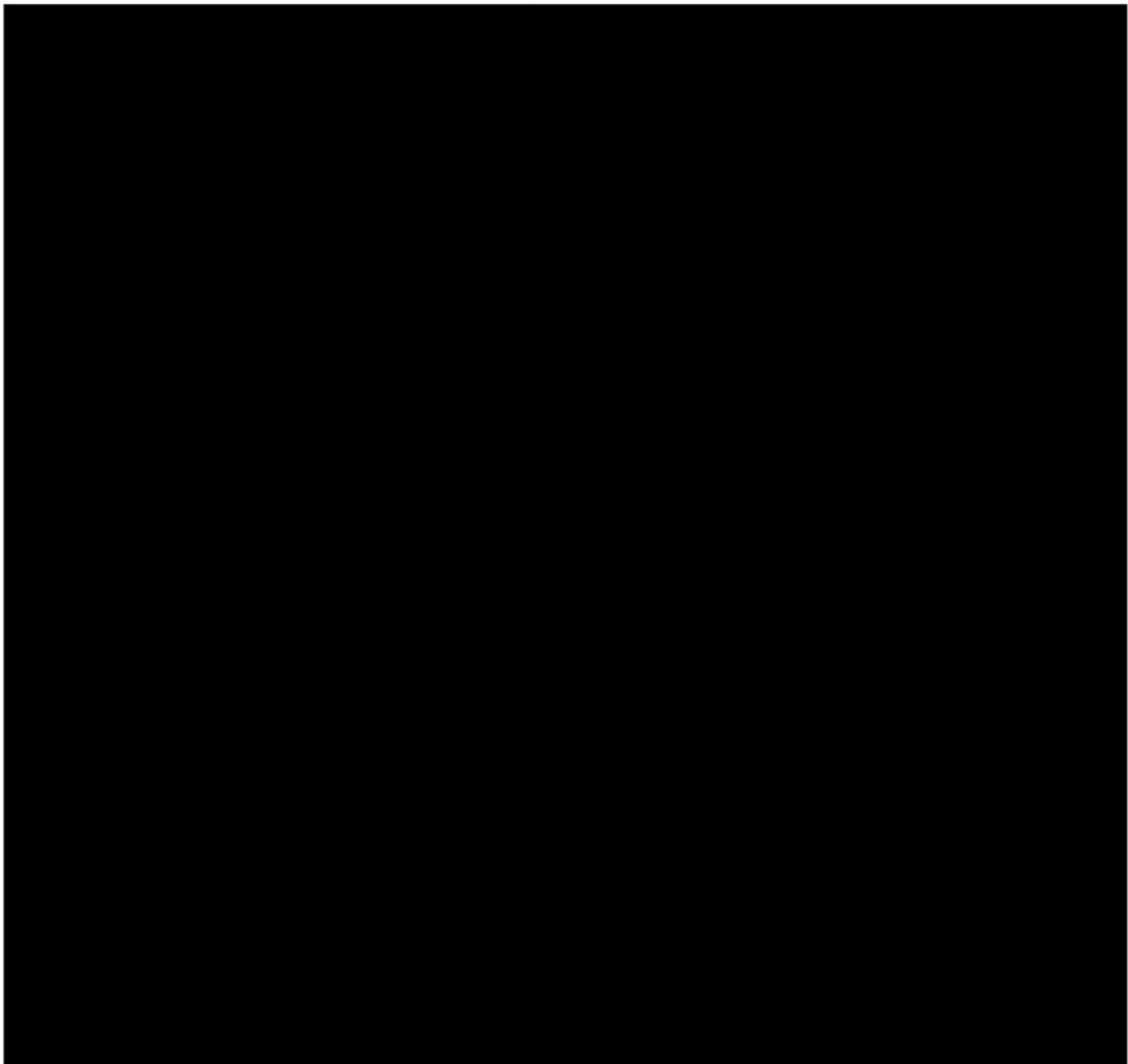


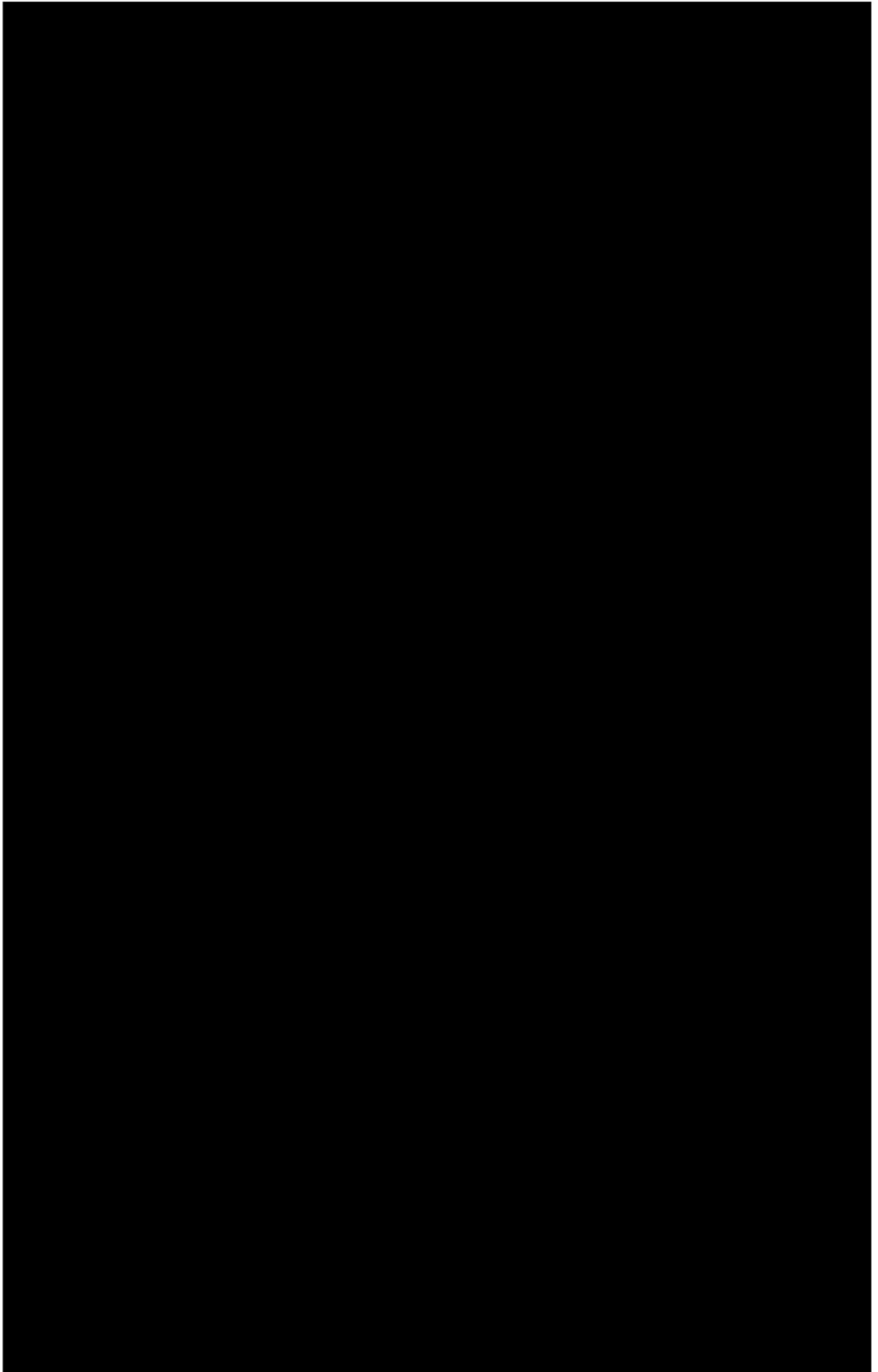


### **1.5 Summary of Deloitte's design and operational effectiveness observations and recommendations**

Our observations are set out in detail in sections 5 and 6, and Appendix A: Summary of Observations of this report. A summary of our observations on both the design and operational effectiveness of the Patron Account Controls are presented below.

Our observations in respect of the assessment of the patron account controls and the overall transaction monitoring program can be considered under the following four key themes, against each of which we outline a summary of our observations and recommendations:





- (c) Deloitte also notes that a key distinguishing feature of practices in North America is that banks would typically not accept a cash deposit for the benefit of a casino bank account other than by the authorised signatories. This may be a structural difference that ANZ cannot overcome, but we recommend that Crown have further discussions with ANZ about the potential to initiate a hard control at the branch.

It is evident to Deloitte from our work in this Phase 1, and the discussions and interactions we have had with relevant Crown staff, that Crown is constructively embracing the opportunity to address ML risk within the bank account channel. In this respect, Deloitte notes:

- The Patron Account Controls represent a significant and positive shift in the way that Crown operates the Patron Accounts
- Controls to assess and validate incoming transfers to Patron Accounts had been in place for a period of time before the Patron Account Controls were established. We understand that Crown have iteratively enhanced the Patron Account Controls over the calendar year 2020 to address the specific ML risks identified from the GT and Initialism Review and that this happened during a period of operational disruption brought about by the COVID-19 pandemic.
- Crown is continuing to discuss with its bank, ANZ, opportunities to enhance the data available to Crown to facilitate the Patron Account Controls
- Crown is actively scoping the automation of the Line 2 Patron Account monitoring
- Crown's Line 2 team has been in a rapid growth phase, and that a new Group Chief Compliance and Financial Crime Officer commenced with Crown in early March 2021.

An aggregated table of all observations made in Phase 1, organised by theme, is set out at Appendix A: Summary of Observations.

# 2 Scope

## 2.1 Scope of Phase 1

As set out in our Engagement Letter, Deloitte's Review is to be conducted in three phases. This report pertains specifically to Phase 1: Assessment of Patron Account Controls.

Deloitte's Phase 1 review has been performed in connection with Patron Accounts held in the names of the Phase 1 Crown Entities.

The composition of the Patron Accounts (see Appendix C: Crown Patron Account Details) will be subject to review and final composition and confirmed by Deloitte as part of Phase 2 of the Review. To the extent that Phase 2 identifies additional Patron Accounts, Deloitte will extend this Phase 1 scope of work and perform additional work on those Patron Accounts.

Pursuant to our Engagement Letter, the scope of Phase 1 was as follows:

- With specific regard to money laundering / terrorism financing (ML/TF) typologies/risks identified as part of work previously undertaken by Grant Thornton and Initialism with respect to the Southbank and Riverbank Patron Accounts, assess the design effectiveness and the operating effectiveness of the Patron Account Controls, as applied to the Patron Accounts for each of the Phase 1 Crown Entities from 1 December 2020 to the date of commencement of our engagement.
- In this phase of the work, the Patron Account Controls specifically comprise:
  - Controls over electronic funds transfers to and from the Patron Accounts;
  - Controls over deposits into, and withdrawals of cash from the Patron Accounts; and
  - Crown's current TM program insofar as it is applied to the Patron Accounts.

## 2.2 Modifications to scope of Phase 1 following commencement of work

Soon after commencing the Phase 1 work, Crown determined that licencing would be required to enable Deloitte to review any data pertaining to patrons of Crown Perth. This was not able to be completed prior to the completion of Phase 1, and as such, within this report, Deloitte's review of the Patron Account Controls with respect to Crown Perth is of design effectiveness only. Operational effectiveness testing will be undertaken with respect to Crown Perth once licencing has been secured, and an addendum to this report will be prepared at that time.

As Crown Sydney had not commenced gaming operations at the time of Deloitte performing the Phase 1 work, Deloitte observed no patron activity in the Crown Sydney Patron Accounts and no Patron Account Controls operating. As such, no review was able to be performed.

# 3 Context

## 3.1 The Patron Accounts

Crown has established the Patron Accounts, in the name of specific Crown entities, to provide a mechanism for patrons to transfer funds to Crown in order to fund their gaming activity. These accounts operate in an omnibus manner, similar in nature to a trust account, with the funds able to be applied to patron's internal gaming accounts based on their Crown rewards number and name. These internal gaming accounts can be established by patrons for use at Crown properties and are referred to as "**DAB accounts**".

The Patron Accounts include AUD and other currency accounts that enable Patrons to make direct payments to Crown (because those patrons hold overseas accounts), to fund gaming activity in the Crown properties in Australia (see Appendix C: Crown Patron Account Details).

Patron Accounts held in the name of the Riverbank and Southbank legal entities were closed by the Commonwealth Bank of Australia (**CBA**) in December 2019, after which we understand that all patron deposits were required to be made using the Patron Accounts of the primary Crown legal entities for each property i.e. Crown Melbourne and Burswood Nominees Ltd (**Crown Perth**).

## 3.2 Identification of ML/TF activity in the Southbank and Riverbank accounts

Timeline of key events related to the Patron account controls

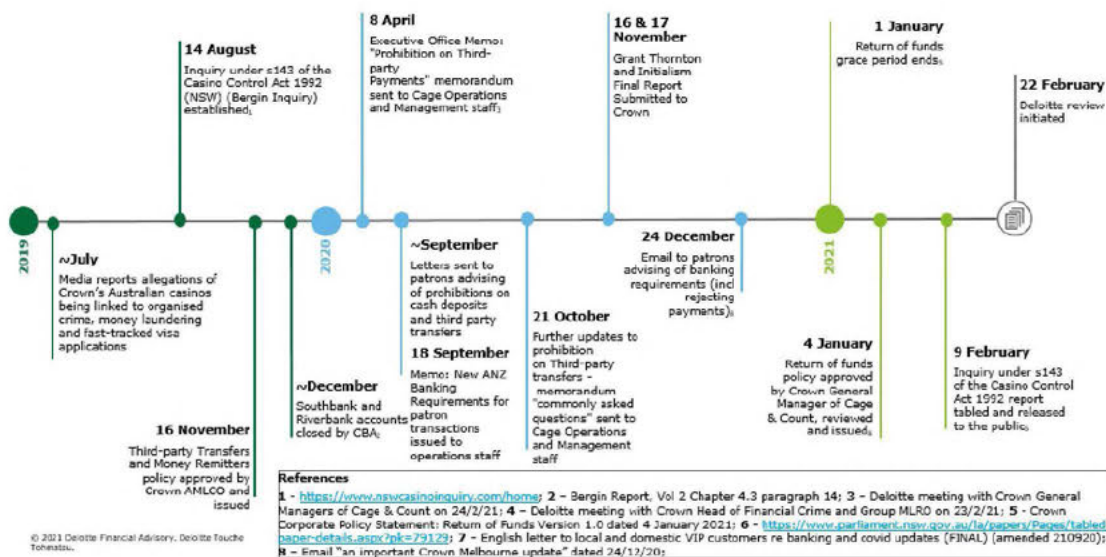


Figure 1: Timeline of key events related to the Patron Account Controls

On 14 August 2019, in response to money laundering and other allegations in the media, and in the context of Crown seeking to open its new casino in Sydney, ILGA established an inquiry (the **Inquiry**) under section 143 of the Casino Control Act 1992 (NSW) with The Hon PA Bergin SC being appointed to conduct the Inquiry.

In response to the allegations in the media and in the Inquiry, Grant Thornton and Initialism reviewed bank accounts operated by Crown Perth in the name of Riverbank and Crown Melbourne in the name of Southbank (the GT and Initialism Review).

The scope of this review was to identify any ML vulnerabilities associated with the Southbank and Riverbank bank accounts, by performing an analysis of the value of the transactions, timing of transactions, and nature of transactions within the accounts.

In undertaking their review, Initialism and Grant Thornton analysed cash deposits of <\$10,000 in Southbank and Riverbank accounts for indicators of "structuring" scenarios. In particular, Grant Thornton and Initialism applied three cash structuring scenarios by developing a model which ran the set of scenarios over the Riverbank and Southbank account data. The Riverbank and Southbank entities included bank data from ANZ and CBA, the transaction review covered the period July 2013 to December 2019 across both the CBA and ANZ held accounts. Initialism then reviewed the results of this data against the set of scenarios to identify potential indicators of ML.

The conclusions from the GT and Initialism Review were that the following ML typologies were observed in the Riverbank and Southbank bank accounts:

- Structured cash deposits
  - Where cash payments are structured in a manner of several split cash transactions to avoid a single large transaction being reported in threshold transaction reports
- Cuckoo smurfing using structured cash deposits, large cash deposits and third-party electronic funds transfers
  - Where the flow of a legitimate payment is intercepted and replaced with deposits of illicit funds (by one or more third parties/individuals).
  - This typology requires a complicit third party (e.g. a money remitter) which can divert funds that were to be legitimately paid (i.e. from a patron to Crown), to criminal actors. To replace the payment due to Crown, one or more payments are made by one or more other parties to Crown directly, which may include proceeds of crime.

### 3.3 The Patron Account Controls

In response to concerns about potential ML activity in the Patron Accounts, Crown introduced the Third Party Transfers and Money Remitters policy (version 1, issued 16 November 2020)<sup>4</sup> and "Return of Funds" policy (version 1, issued 4 Jan 2021)<sup>5</sup> to establish Patron Account controls. We note that a prohibition on third party payments was first initiated on 8 April 2020, and that amendments to the scope of the prohibition were incrementally made over the period, up until the final version on 16 November 2020, which formalised the prohibition transfers from remitters and money services businesses.

An overview of each of these policies is set out below, and are applicable to both Crown Melbourne and Crown Perth:

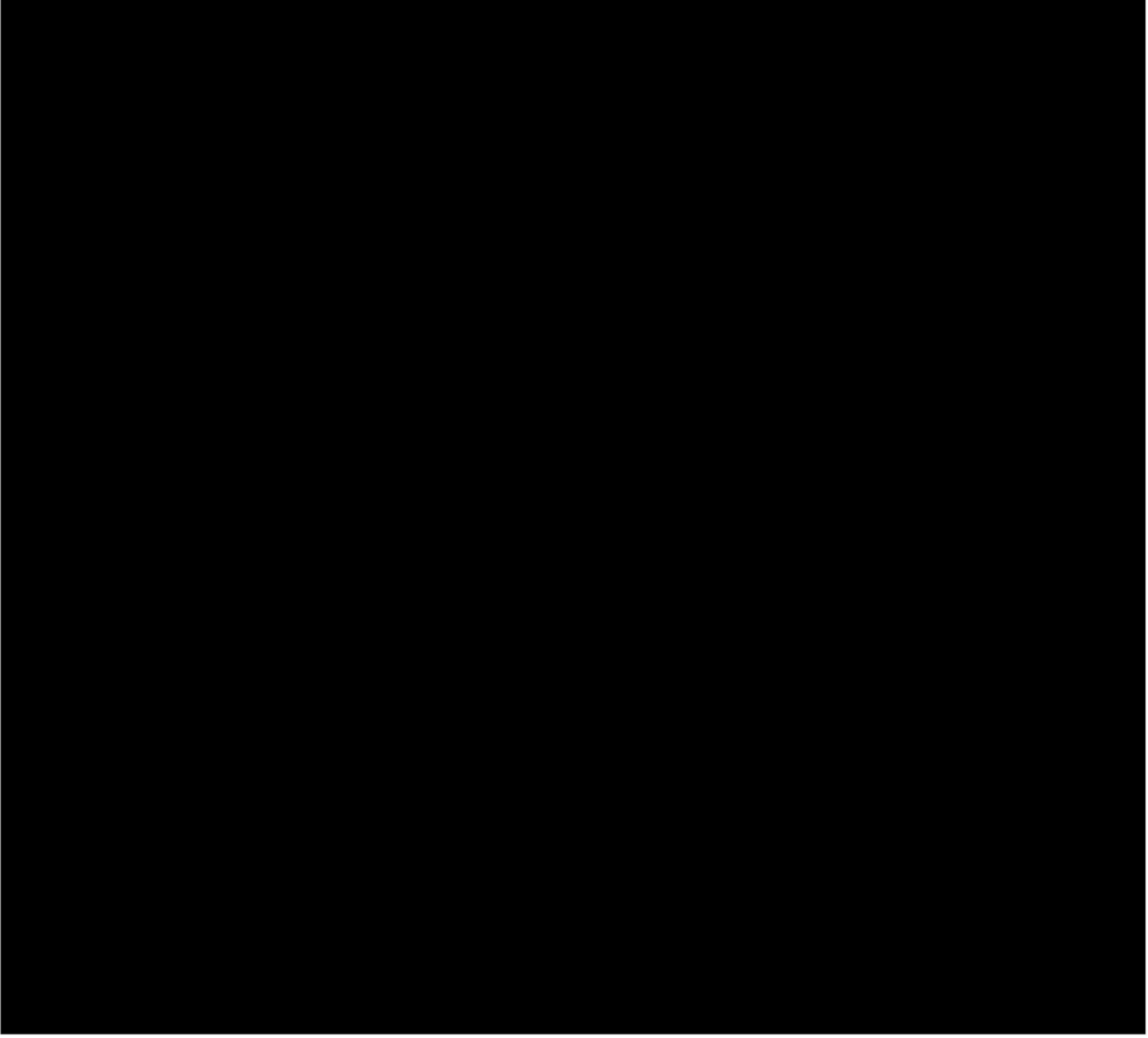
#### (a) Third Party Transfers and Money Remitters Policy

- This policy prohibits transfers from third parties (including money remitters) into or out of Crown's bank accounts for the benefit of patrons.
- Exceptions to this policy require prior approval from the relevant property's Chief Operating Officer and the AML/CTF Compliance Officer (**AMLCO**), pursuant to a specific exceptions procedure described in section 3 of the policy.

<sup>4</sup> AMLCTF Policy Statement – Third Party Transfers and Money Remitters (v.1.0 16 November 2020)

<sup>5</sup> Corporate Policy Statement – Return of Funds Policy (04 January 2021)

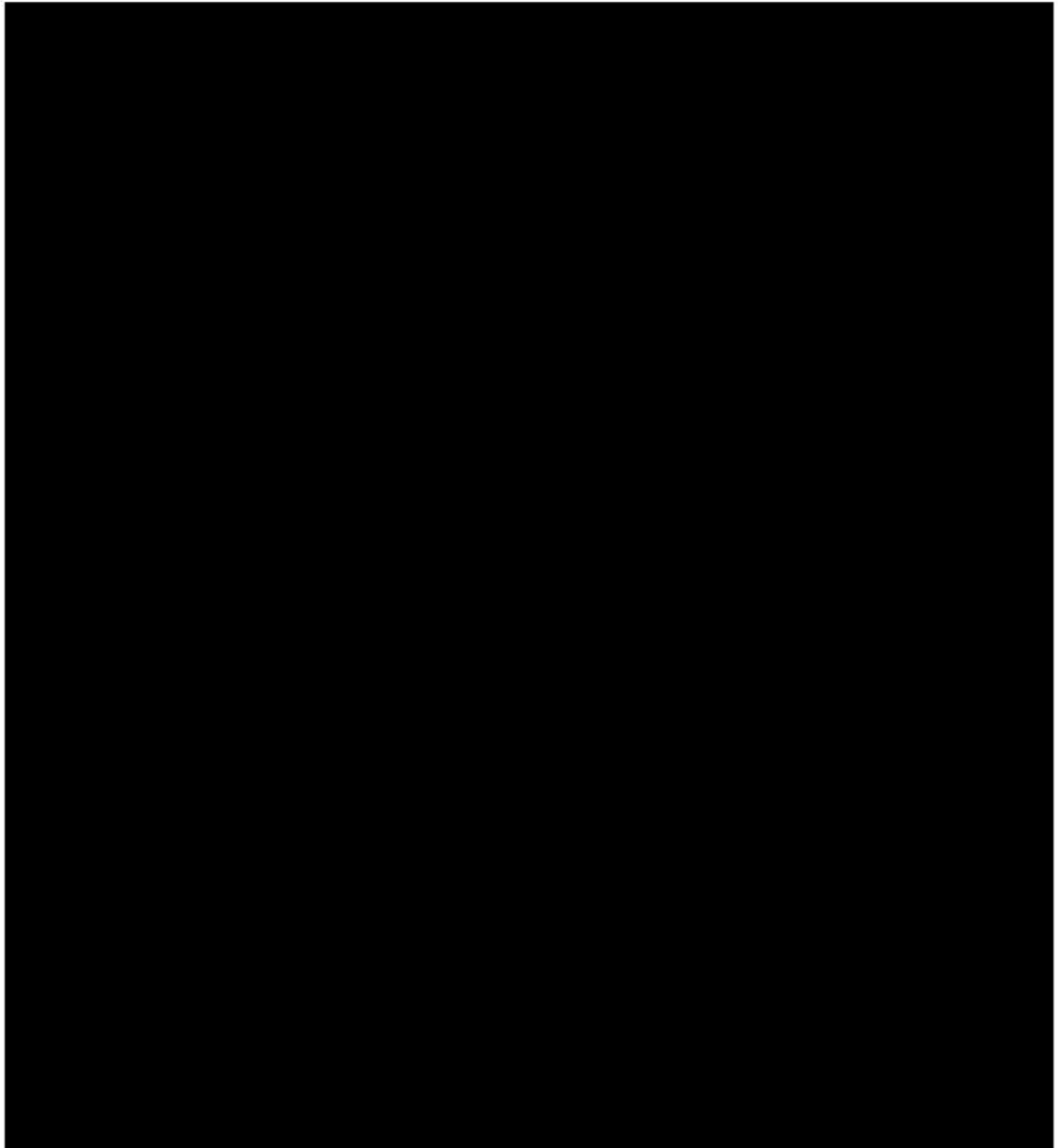
**(b) Return of Funds (ROF) policy**

- Section 2.3 of the ROF policy, provides that Crown will return all electronic funds transfers (**EFT**) made other than in accordance with the Third-Party Policy and Bank Transfer Notification. This includes cash deposits, payments made by third parties, payments where it is not clear that the account is held in the name of patron, payments that do not include the prescribed narrative (name and account number) and payments that are not supported by a receipt presented by the patron.
  - The funds are returned by reversing the EFT to the account from which the funds were sent, or for cash transactions, refunding the cash to the patron at the cage.
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<sup>6</sup> In addition to discussions with Crown personnel, documents relied upon to establish this process:

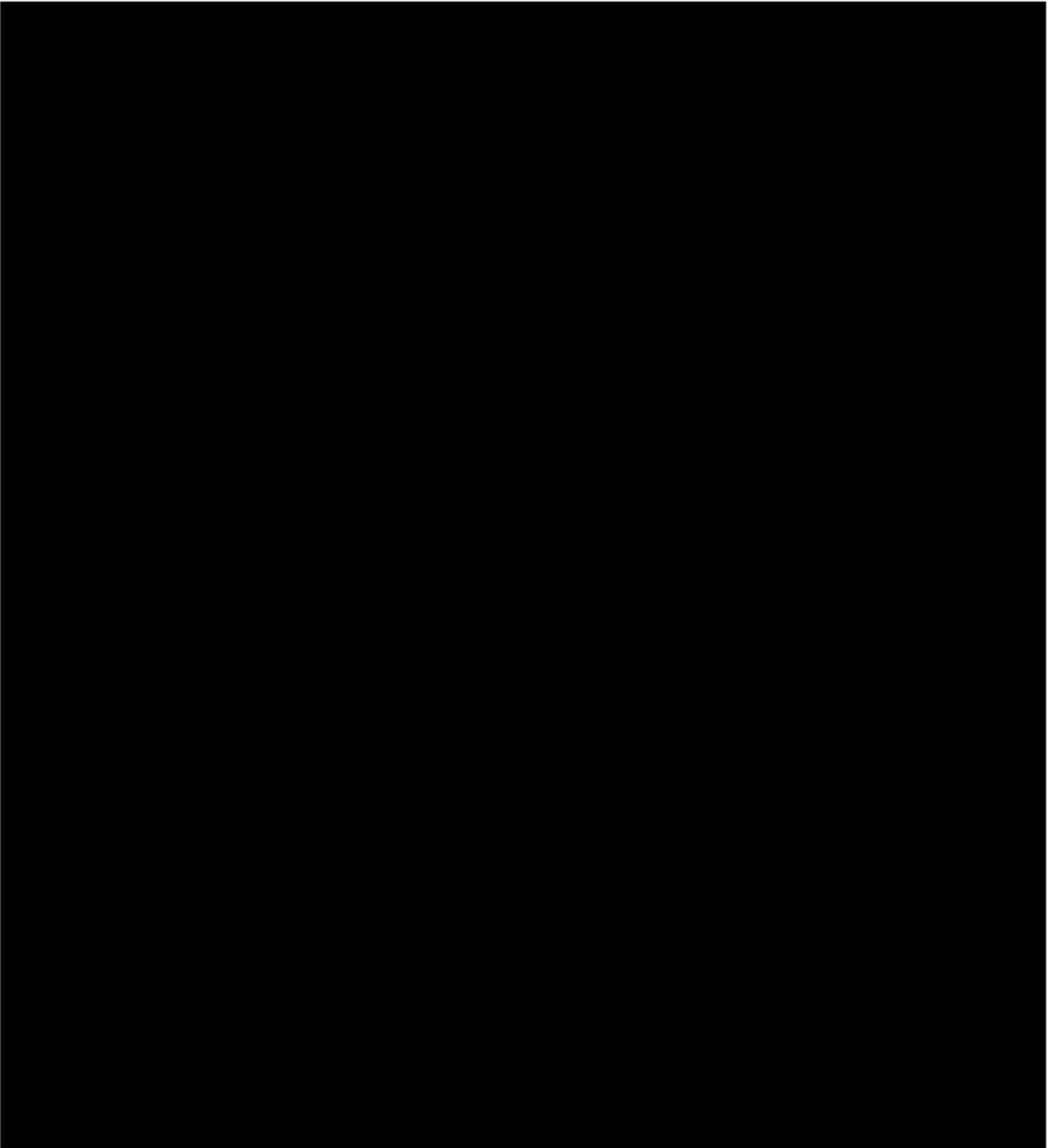
- Return of Funds Policy dated 4 January 2021
- Third Party Transfers and Money Remitters Policy dated 16 November 2020
- Executive Office Memorandum: Prohibition on Third-Party Payments dated 8 April 2020
- Executive Office Memorandum: Prohibition on Third-Party Transfers – Commonly asked questions dated 21 October 2020
- Excerpts from Cage SOP's
- Cage Guides:
  - Cash Deposits into Crown's Bank Accounts (ANZ)
  - Patron In-Branch Transfers
  - Telegraphic Transfers (TTs)

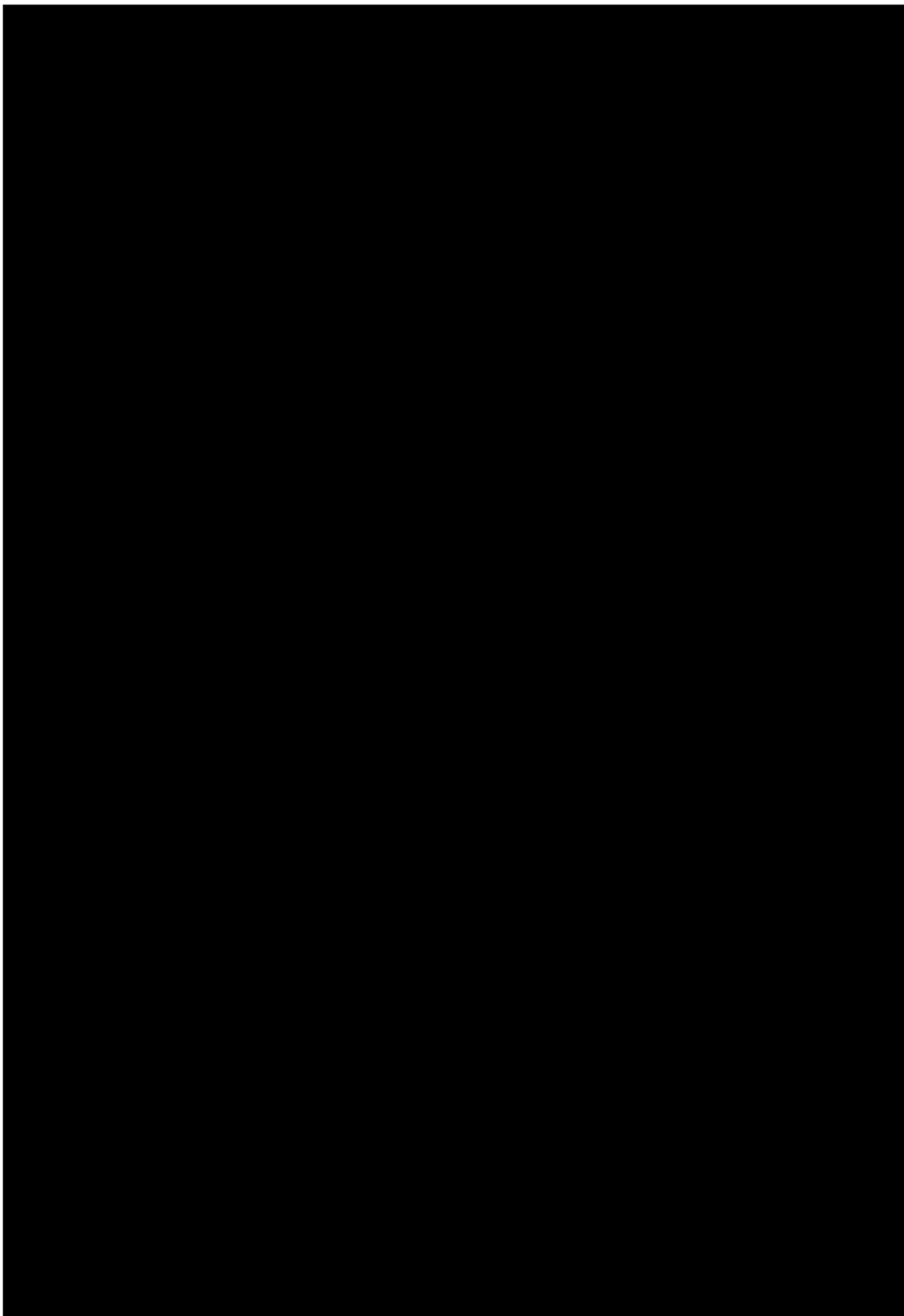


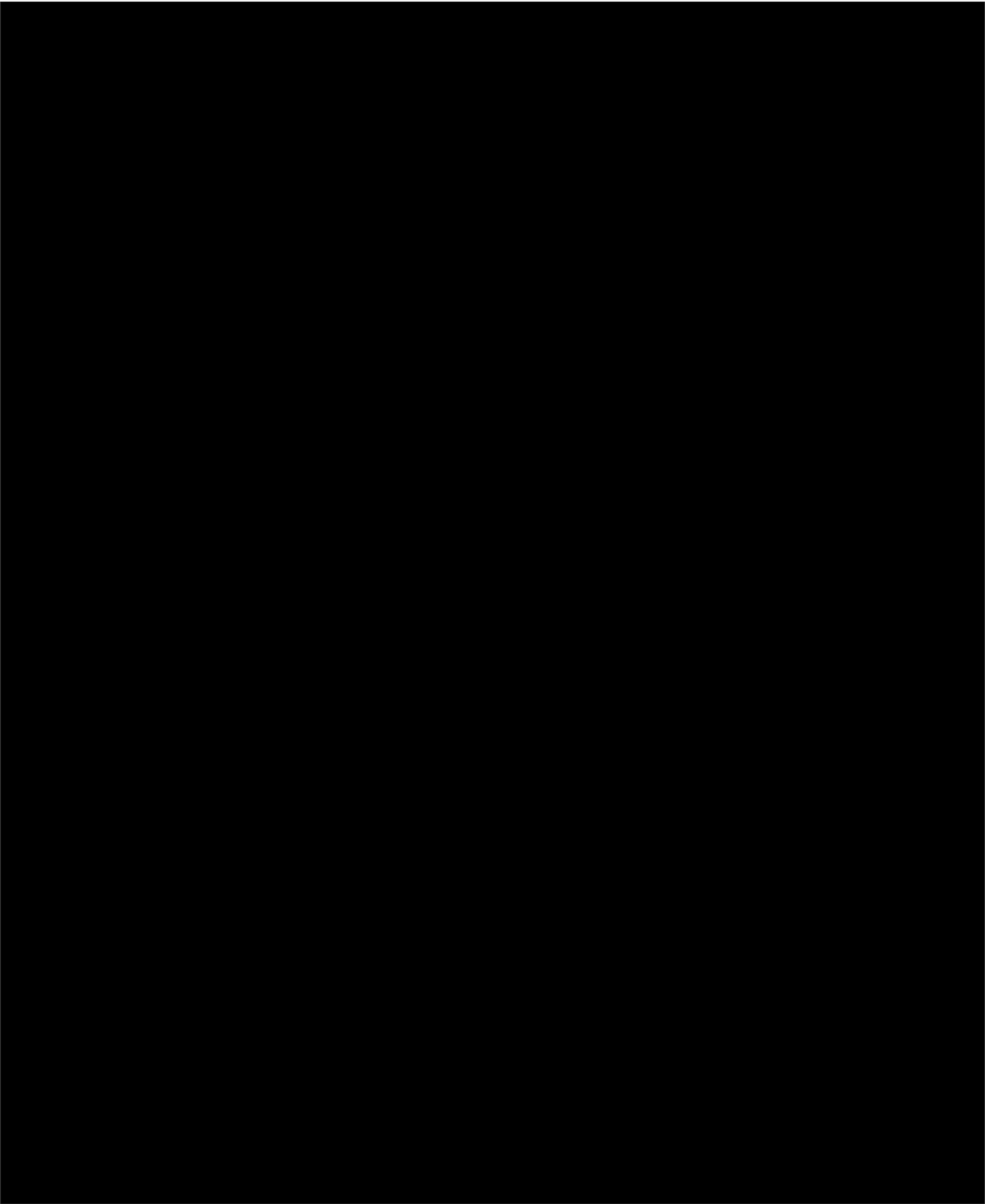
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<sup>7</sup> Return of Funds Policy dated 4 January 2021, sections 3.4 and 3.5









To support the Review, Deloitte has developed an overview of the end-to-end process for the Patron Account Controls (See Appendix E: Process Maps). This is based on Deloitte's understanding from walkthroughs with Crown staff, and review of policies and other documentation as referenced above. Deloitte validated this process with the Group Credit Manager and provided the Melbourne and Perth process flows to the General Manager of Cage and Count for Melbourne and former General Manager of Cage and Count for Perth respectively for their review and feedback.

### 3.4 AML/CTF regulatory requirements relevant to the Patron Account Controls

Crown has a Joint AML/CTF Program (Version 2, approved by the Board on 2 November 2020) that sets out the framework by which Crown addresses the regulatory requirements of the Anti-Money Laundering and Counter-Terrorism Act 2006 (the **Act**) and the AML/CTF Rules Instrument 2007 (No.1) (the **Rules**). In order to identify appropriate risk-based systems and controls, a reporting entity must therefore first assess the inherent ML/TF risk associated with its business and document this consideration. A key part of this framework is the Transaction Monitoring Program, which is underpinned by the ML/TF risk assessment. The Patron Account Controls are all a type of “manual” transaction monitoring. As such, these controls form part of Crown’s Transaction Monitoring Program<sup>9</sup>.

For the purposes of this Phase 1 work, we have assessed the design and operational effectiveness of the Patron Account Controls, in the context of the requirements of the Joint AML/CTF Program, as distinct from an assessment of the Joint AML/CTF Program holistically.

#### 3.4.1 Transaction Monitoring

As set out in rules 15.4 to 15.7 of the AML/CTF Rules, a transaction monitoring program is a component of an ongoing customer due diligence (OCDD) program, within Part A of an AML/CTF program. The transaction monitoring program must be designed, among other things, to support identification of complex, unusual large transactions or unusual patterns of transactions, which have no apparent economic or visible lawful purpose.

A transaction monitoring program must be risk-based, which means the systems and controls that comprise the program are to be commensurate and proportionate to the ML/TF risk of the business.

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<sup>9</sup> Section 6.1.1 of the Joint AML/CTF Program specifies that Crown’s Transaction Monitoring System comprises both manual and automated monitoring

# 4 Methodology and Approach

## 4.1 Methodology

Deloitte has assessed the Patron Account Controls with respect to design effectiveness and operational effectiveness.

### 4.1.1 Design effectiveness

Design effectiveness considers whether policies, processes, systems and controls are established to enable, if adequately executed, Crown to meet relevant obligations under the Act and the Rules and are commensurate with the relevant ML/TF risks. Deloitte's assessment of design effectiveness of the Patron Account Controls has been made with respect to the following:

- (a) Extent to which the Patron Account Controls address the specific ML/TF typologies/risks identified by Grant Thornton and Initialism with respect to the Southbank and Riverbank Patron deposit accounts (section 5.1); and
- (b) Overall design effectiveness aligned with industry practice, including, for example, that the controls are clear and documented to an appropriate level of specificity, have clear accountabilities, are appropriately resourced, are appropriately governed and are subject to change control and maintenance (section 5.2).

### 4.1.2 Operational effectiveness

Operational effectiveness considers whether policies, processes, systems, and controls are consistently applied. For reviewing the operational effectiveness testing of the Patron Account Controls, we requested and reviewed where possible, information and evidence of performance against design. Walkthroughs were also conducted with relevant Crown personnel in relation to the Patron Account Controls and overall AML/CTF program (with respect to Transaction Monitoring and Reporting) in order to understand the processes, systems and controls relevant to the Patron Account Controls. Our observations with respect to operational effectiveness are set out in Section 6.

## 4.2 Review Period

The review for Phase 1 (this phase) was based on the period 1 December 2020 to the date of commencement of Deloitte's engagement, 22 February 2021. Deloitte was informed that 1 December 2020 was the date from which the Patron Account Controls, in their current form, were largely operational. We note that COVID-19 restrictions were still in place during the majority of this Review Period, and that the broader COVID-19 context has naturally impacted patron volumes. As such, it is noted that this Review Period is likely not reflective of "normal" transactional volume for Crown.

## 4.3 Approach

In undertaking the Phase 1 review, Deloitte performed the following key activities:

### 4.3.1 Desk-based review of the Joint AML/CTF Program and Patron Account Controls documentation

We examined relevant documentation and data, including the AML/CTF Program and policies and procedures related to the Patron Account Controls (see Appendix B: Documents and files reviewed).

#### **4.3.2 Process walkthroughs held through video/phone conference**

Walkthroughs and discussions were conducted with Crown personnel from both the Cage and Count team (Cage operations and Cage management, also referred to throughout this report as “**Cage staff**”) and Line 2 AML teams in order to collect information about the Joint AML/CTF Program and operational processes, procedures and controls related to the Patron Accounts.

Specifically, Deloitte held walkthroughs and discussions with the following personnel for the purposes of Phase 1:

- Adam Sutherland – Group Senior Manager (Financial Crime)
- David Brown – General Manager, Cage and Count - Sydney (formerly GM, Cage and Count – Perth)
- Gabriella Plant - Credit Officer
- John Salomone – Chief Financial Officer
- Jon Yeats – Group Senior Manager Financial Crime – Customer Investigations
- Mary Gioras – Group Credit Manager
- Mike Ohlmus – Cage VIP Operations
- Nick Stokes - Head of Financial Crime and Group MLRO
- Stephen Hancock – General Manager Cage and Count - Melbourne
- Vasula Kessell - Financial Controller - Crown Perth
- Trent Ternes – Credit Collections Manager

#### **4.3.3 Records and selections**

Records were selected from the population over the Review Period and assessed. The sample size was determined based on a judgemental sample, considering the entire population and the frequency and the nature of the control (manual control versus automated control). The following selections were made:

- all transactions that were shown in the statement for the ANZ bank account ending '2834' (1143 transactions)
- TAs for 342 of 794 (43%) transactions that proceeded to have a TA issued
- 25 transactions relating to the return of funds made from the Crown Melbourne Patron Account
- 2 weekly UAR workbooks
- 23 UAR cases, which included 2 that proceeded to SMR lodgement

A full list of documents provided to us and our selections for operational effectiveness testing are set out in Appendix B: Documents and files reviewed.

# 5 Detailed Observations – Design Effectiveness

## 5.1 Design effectiveness of the patron account controls to address ML typologies identified by Initialism

Initialism identified two main ML typologies in their review of the Riverbank and Southbank accounts, namely: Cash structuring (see 5.1.1); and Smurfing, specifically cuckoo smurfing (see 5.1.2). Within this section, we have reviewed Crown’s Patron Account Controls from the perspective of their design effectiveness to address these specific typologies. In section 5.2, we consider and assess design effectiveness more broadly.

Deloitte recognises that there are inherent limitations of the banking system that inhibit Crown’s ability (and that of other financial institutions in the transactional chain) to identify in all cases, all instances of potentially illicit activity. In this sense, it is important to recognise that:

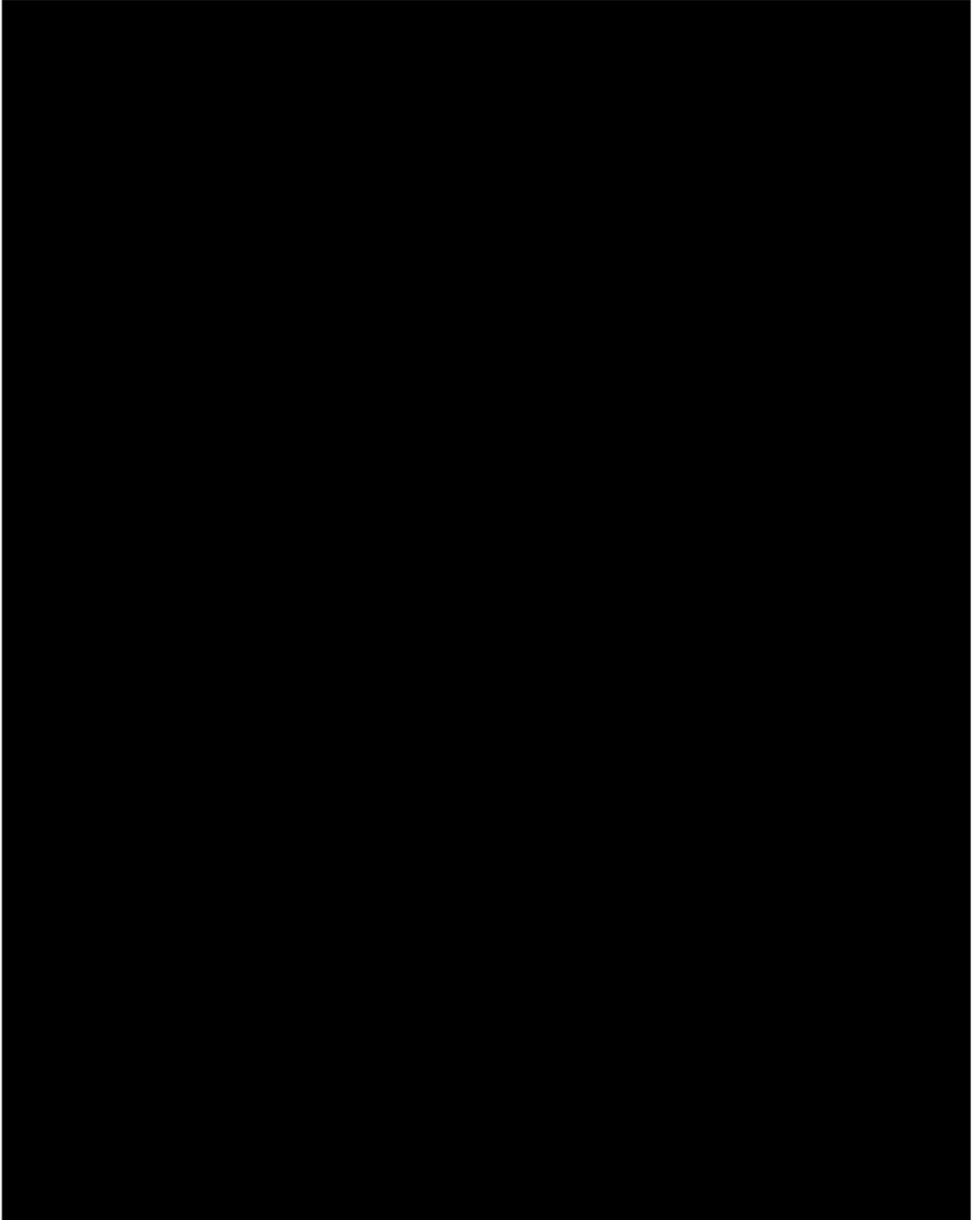
- it is not possible to completely eliminate the risk of money laundering activity;
- in seeking to address specific ML risks within the Patron Accounts, there are elements of the end-to-end transaction that Crown cannot control or influence, specifically, the transactional activity prior to receipt in the Patron Accounts; and
- the Patron Account Controls are part of a broader suite of AML/CTF controls that are collectively intended to mitigate the ML risk (including particularly customer due diligence (**CDD**), enhanced customer due diligence (**ECDD**) and ongoing due diligence (**OCDD**), which includes monitoring of transactional and gaming activity undertaken by the patron within Crown’s gaming offerings). For the purposes of this Phase 1 report, we have focussed only on the direct controls that Crown has developed specifically in response to the ML risks of transactional activity in the Crown Patron Accounts. We will review the broader control suite as part of our work in Phase 3, which will be the subject of a future report.

With respect to each typology, we have considered the design of the relevant controls, and our observations with respect to any limitations that impact the design effectiveness relevant to the specific typology. We have also sought to distinguish our observations in terms of (1) limitations which are within Crown’s ability to address; and (2) limitations which are not within Crown’s ability to address. These may be structural or regulatory limitations (e.g. privacy), or limitations that are within the control of another institution.

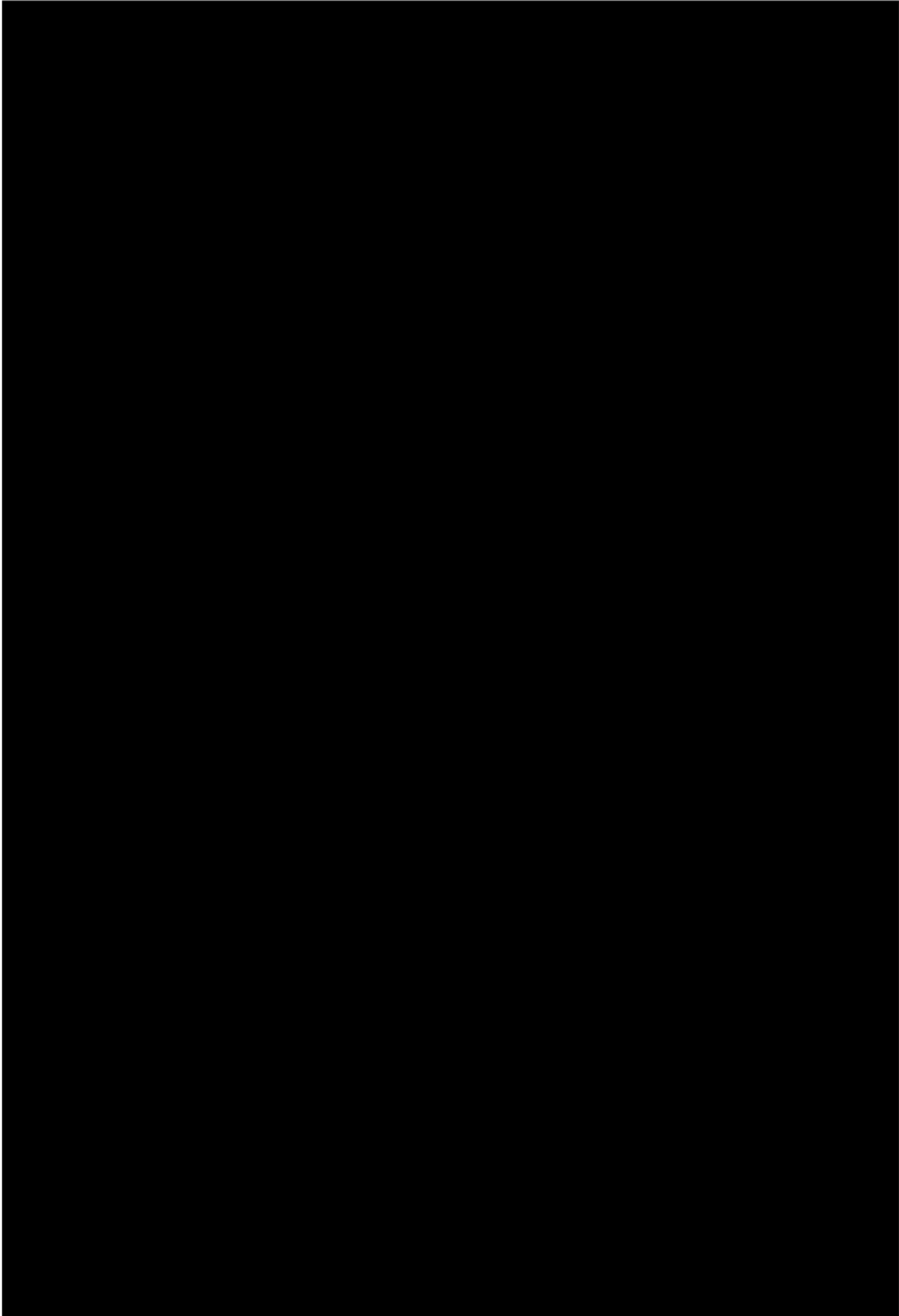
### 5.1.1 Cash structuring

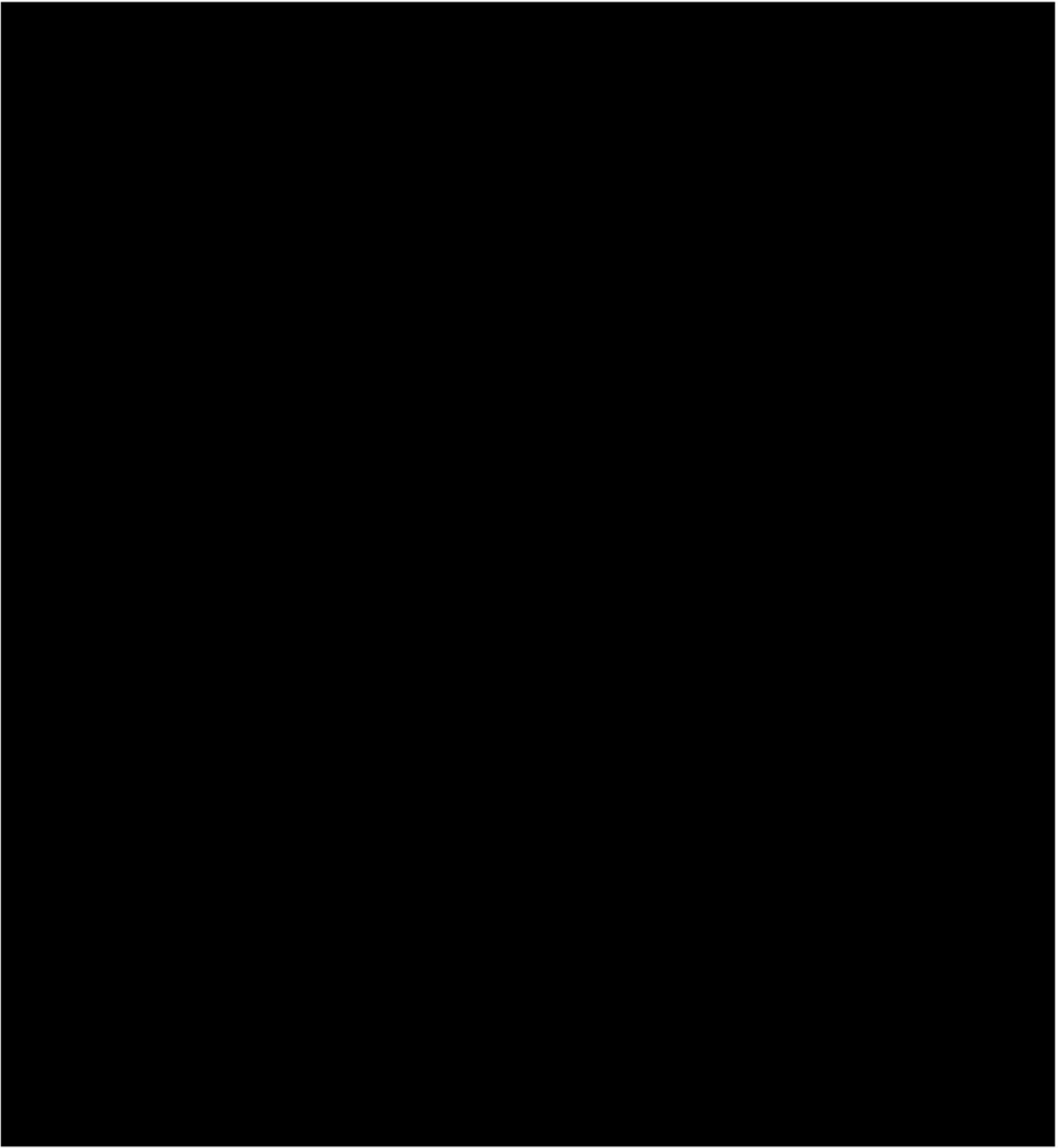
As described in section 3.3 above, Crown’s Return of Funds Policy now prohibits the use of cash deposits by patrons made into the Patron Accounts from being applied to a patron’s DAB account for use in Crown’s casinos. Specifically, patrons are only permitted to transfer funds from their personal bank accounts into the Crown Patron Accounts via EFT, and therefore any cash must first be deposited into a bank account. In this sense, Crown’s policy does not necessarily stop a patron from making a structured cash deposit, but it does have the effect of creating an additional layer between that activity and Crown (in this case, the bank or financial institution that receives the cash deposit).

It is important to note that the financial institutions receiving these cash deposits have always had the obligation to monitor these transactions for suspicious activity, including potential cash structuring, based on information available to them. However, prior to this policy, the financial institutions would not have had an ability to associate the potential structuring activity with a particular customer and any reports would necessarily have been made with respect only to Crown as the bank customer.









## Cuckoo Smurfing Overview

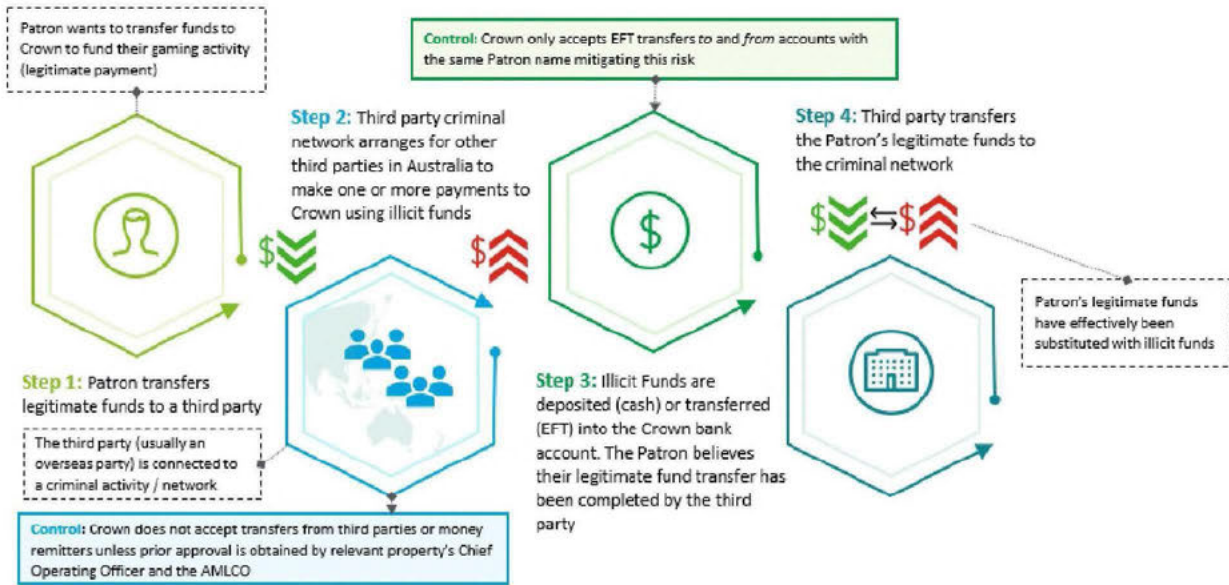
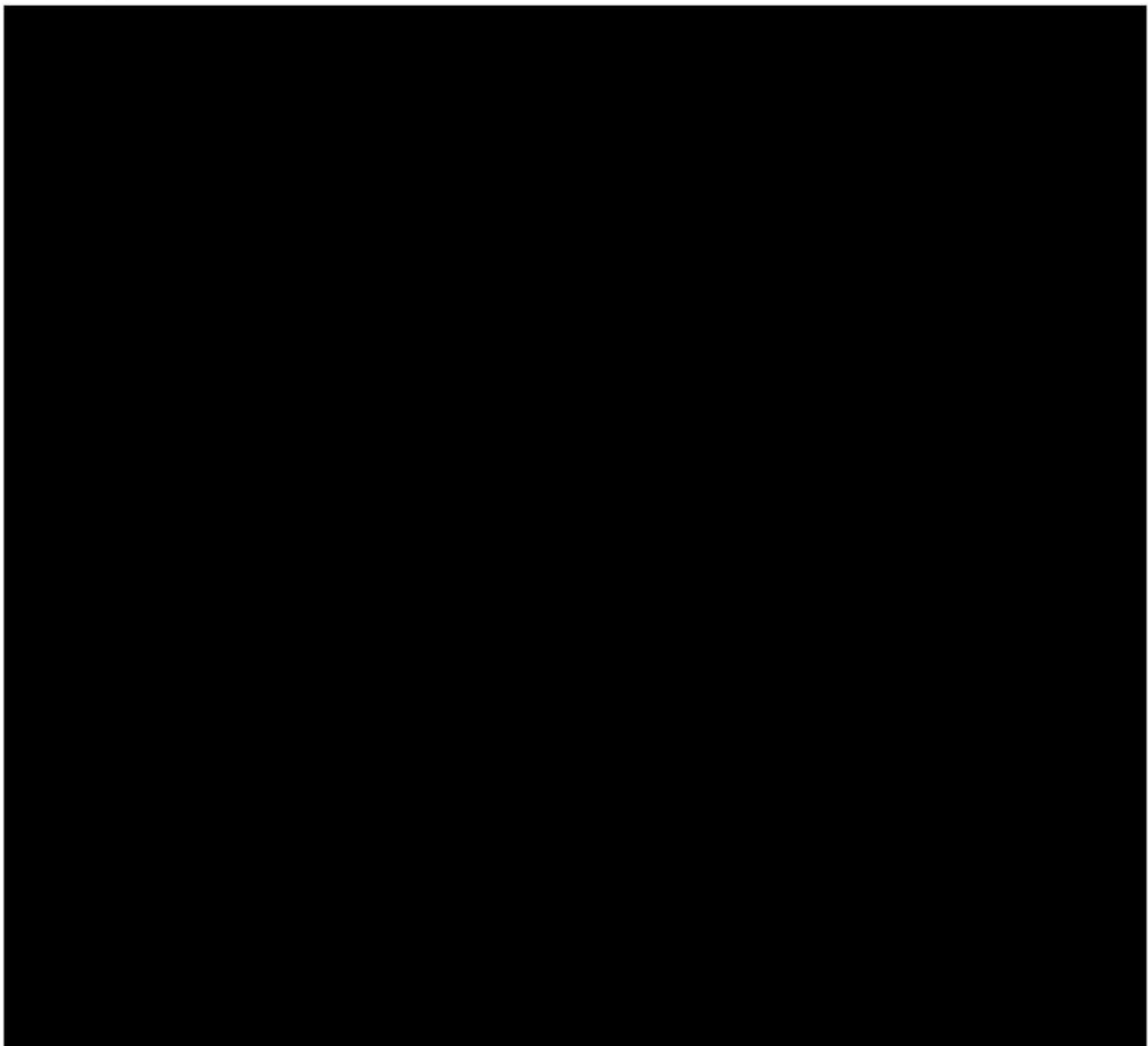
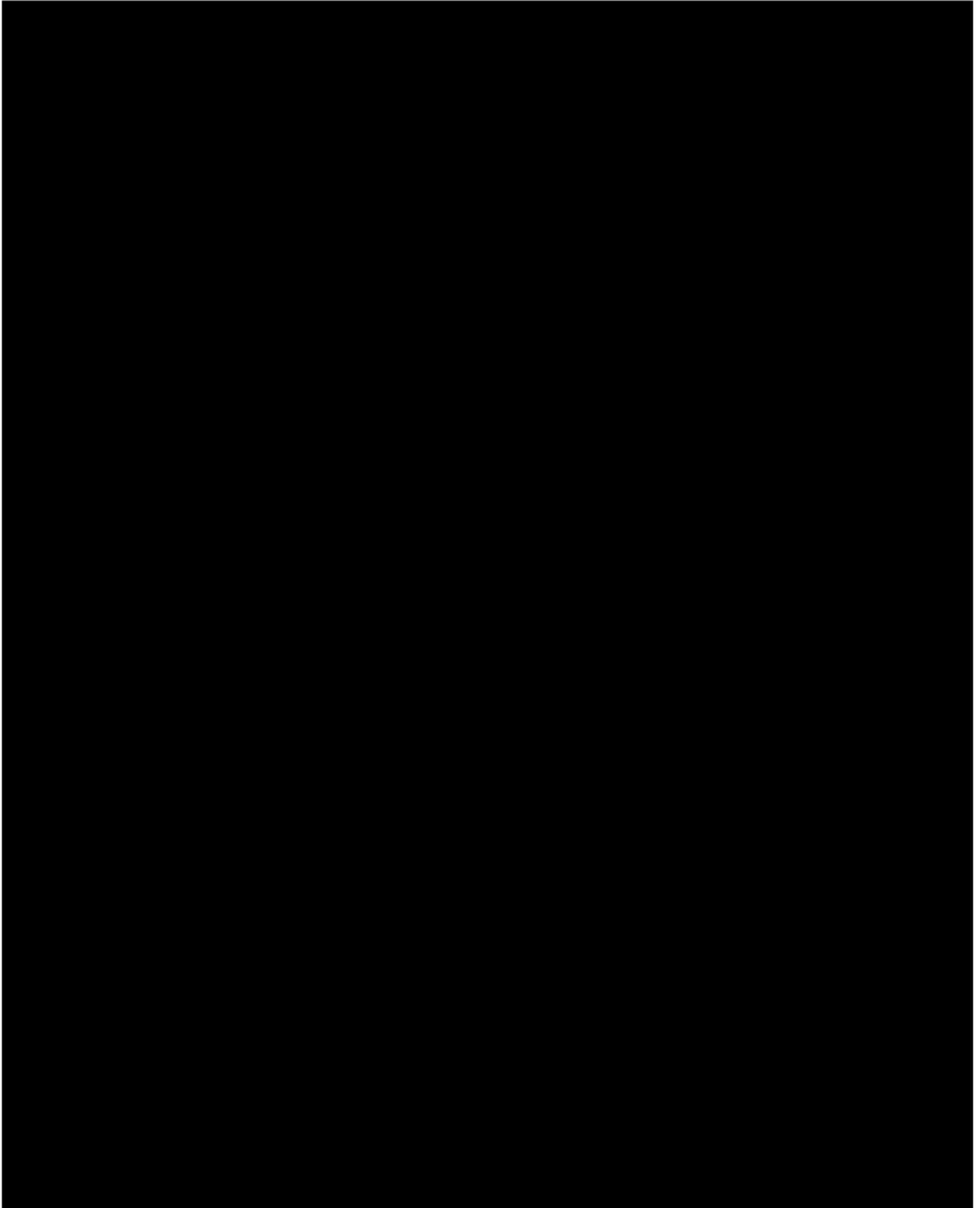


Figure 6: Diagram showing simple example of cuckoo smurfing and how the Patron Account Controls impact the scenario





### **5.1.3 Conclusions**

Notwithstanding the structural limitations identified in sections 5.1.1 and 5.1.2 above, Deloitte considers that the design of Crown's controls is effective in addressing cash structuring and cuckoo smurfing activity occurring in the Crown Patron Accounts. If executed correctly, they prevent both cash deposits (by refunding any cash deposits, in cash, at the cage when the patron seeks to redeem), and cuckoo smurfing. This is because all payments into the Patron

Accounts, for the credit of a patron's DAB account, must be demonstrated by the Patron as coming from an account in the Patron's name. This prevents other parties (related or unrelated) from making payments, which is an essential component of a cuckoo smurfing scheme.

Deloitte also considers that this conclusion remains the same, regardless of whether the cuckoo smurfing is affected using cash deposits, large cash deposits or third-party EFTs. This is because in each of these modalities, the key ingredient required is an ability to replace a payment from a patron direct to Crown, with one or more payments from one or more third parties. The requirement for all payments to be transferred directly from an account in the name of the patron means that such activity is not possible.

This conclusion must be read in conjunction with the broader observations we have made in section 5.2 below relevant to the design of these controls and processes.

## 5.2 Overall design effectiveness of the Patron Account Controls

As set out in section 3.4 above, as a form of manual transaction monitoring, the Patron Account Controls must be considered in the context of the requirements of the Joint AML/CTF Program. Accordingly, we have considered in our review the extent to which the Patron Account Controls align with those requirements, with respect to relevant sections, specifically the ML/TF Risk Assessment<sup>11</sup> and Transaction Monitoring<sup>12</sup>.

Deloitte has also reviewed the Patron Account Controls for overall design effectiveness aligned with industry practice, including, for example, that the controls are documented to an appropriate level of specificity, have clear accountabilities, are appropriately resourced and trained, are appropriately governed and are subject to change control and maintenance.

Our observations are set out below:

### 5.2.1 ML/TF risk assessment

We note that Crown has a number of AML/CTF initiatives underway, including a refresh of its ML/TF risk assessment. In the document titled "*Crown Entities ML/TF Risk Register*"<sup>13</sup>, Crown makes reference to structuring and smurfing risks and describes the controls that were in place at the time to mitigate these. The GT and Initialism Report further specified details of the cash structuring and smurfing (including cuckoo smurfing) risks associated with the Patron Accounts.

As noted above, in response to these risks, Crown developed new policy positions, namely, the prohibition on cash deposits and EFTs from third parties, and the Patron Account Controls to enforce these policy positions.

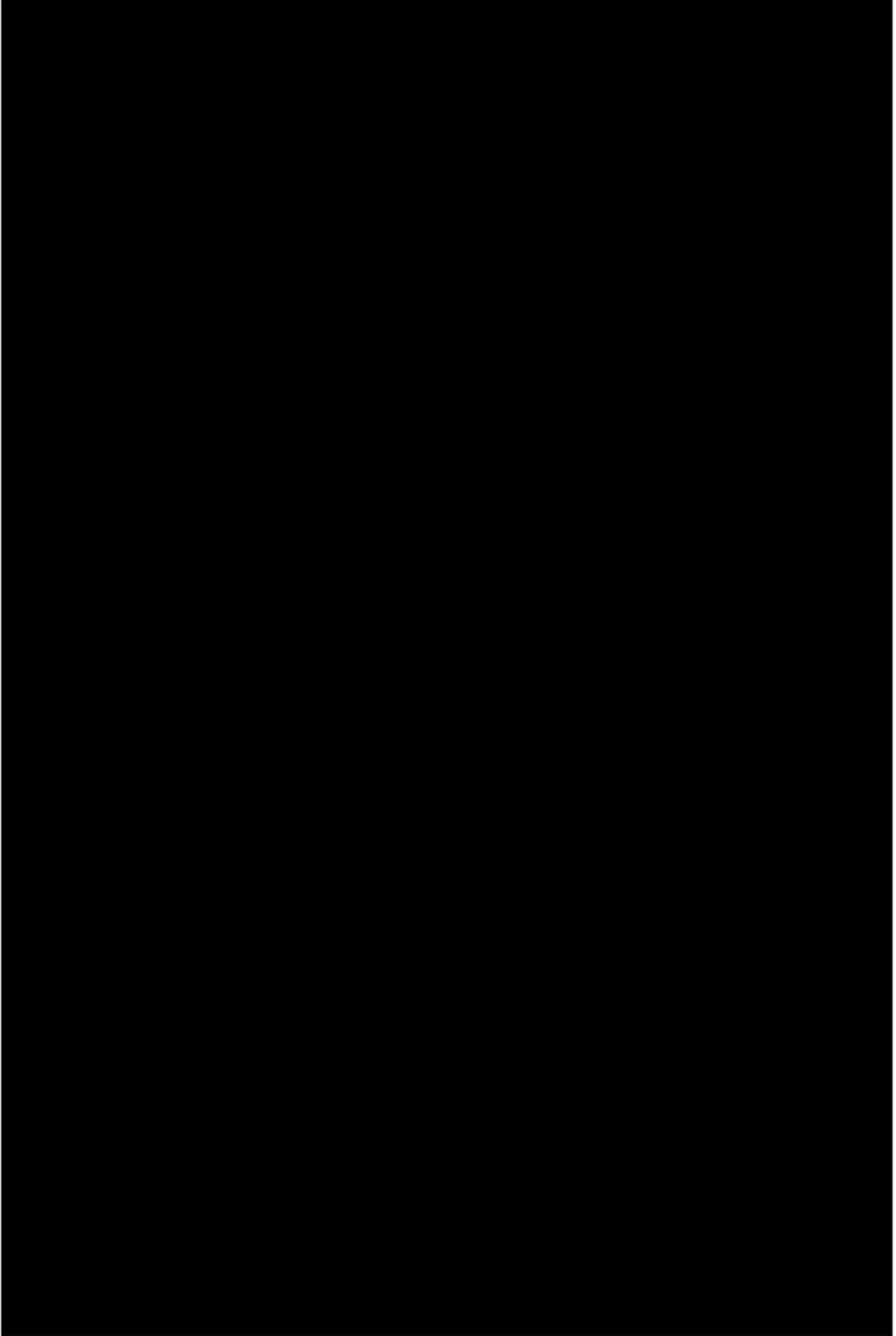
As per 9.1.3 of the Rules and AUSTRAC'S ML/TF Risk Assessment Guidance, an ML/TF risk assessment is expected to have regard to the nature, size and complexity of business and the type of ML/TF risk that might be reasonably faced, in relation to customer types, designated services, delivery channels and foreign jurisdictions. This risk assessment must then underpin the design of a reporting entity's systems and controls; in this case, the Patron Account Controls.

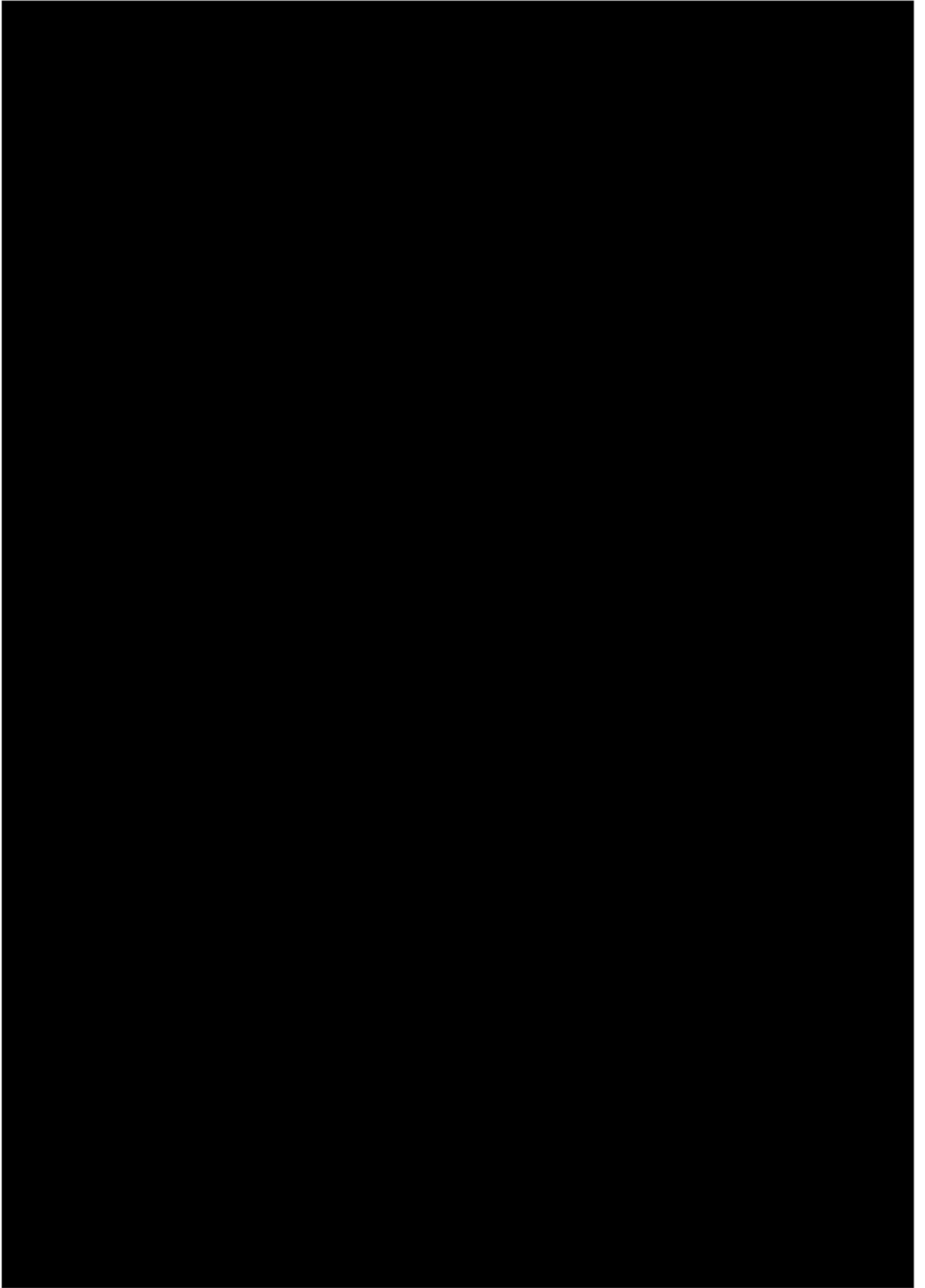
The Joint AML/CTF Program outlines Crown's risk-based approach to ML/TF risk, however at the time of this review, the ML/TF risk assessment had not yet been completed, or updated to reflect the risks identified in the GT and Initialism Report. Deloitte was informed that an

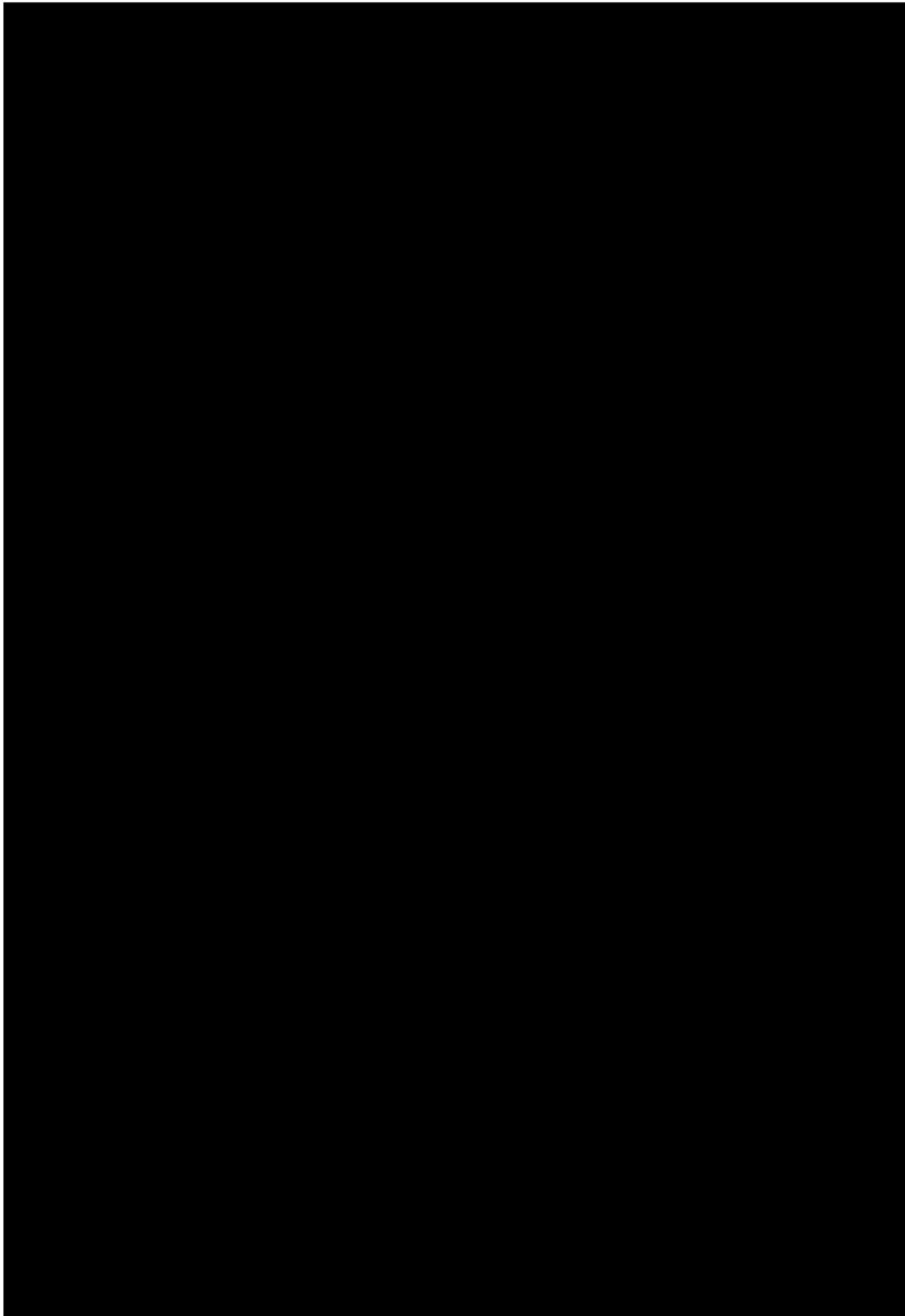
<sup>11</sup> As per 9.1.3 of the Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No.1)

<sup>12</sup> As per 15.4 of the Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No.1)

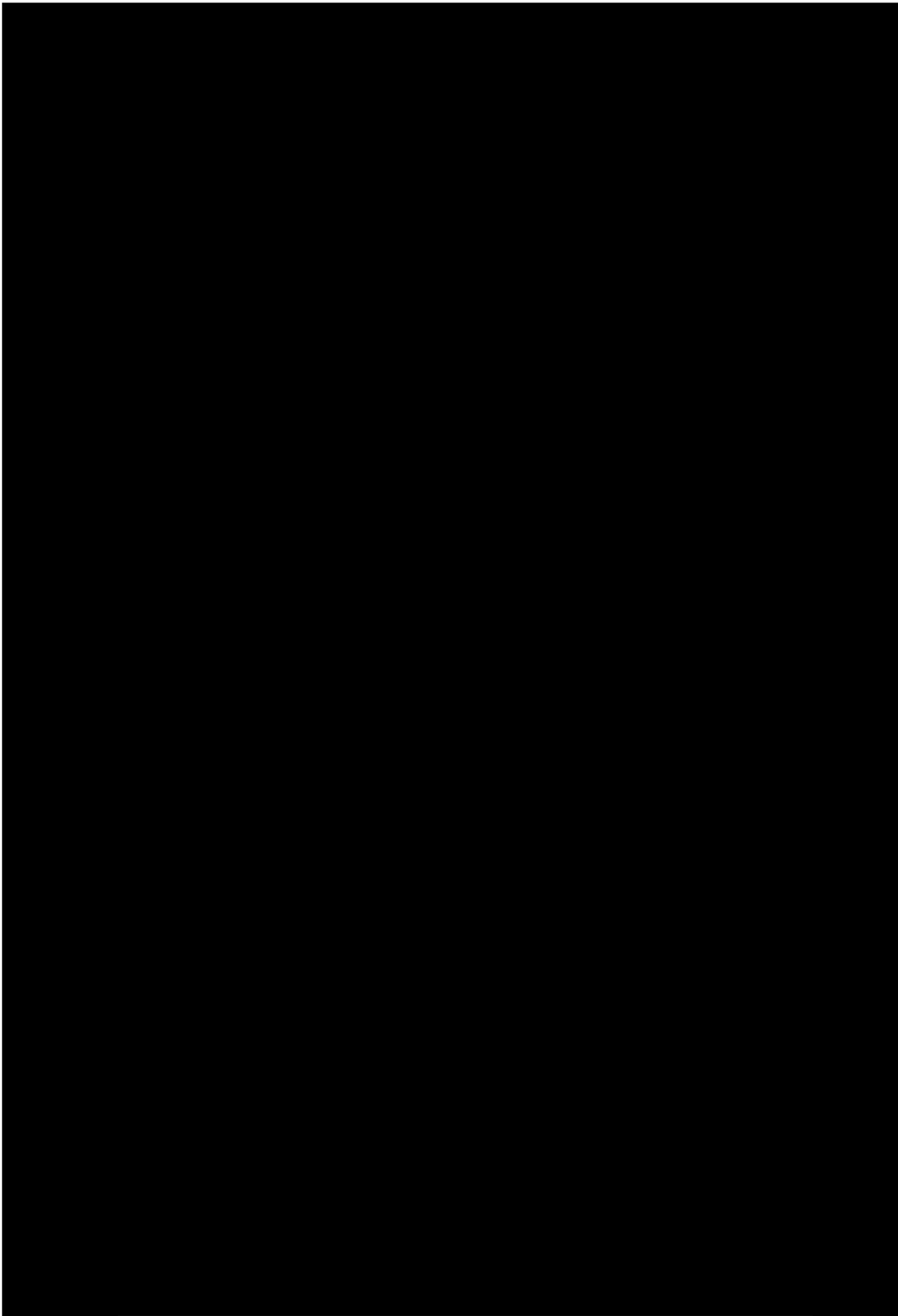
<sup>13</sup> Approved by the CEO of the Australian Resorts, Barry Felstead, on 13 March 2020. This approval included the explicit incorporation of the ML/TF Risk Register as part of the Joint AML/CTF Program

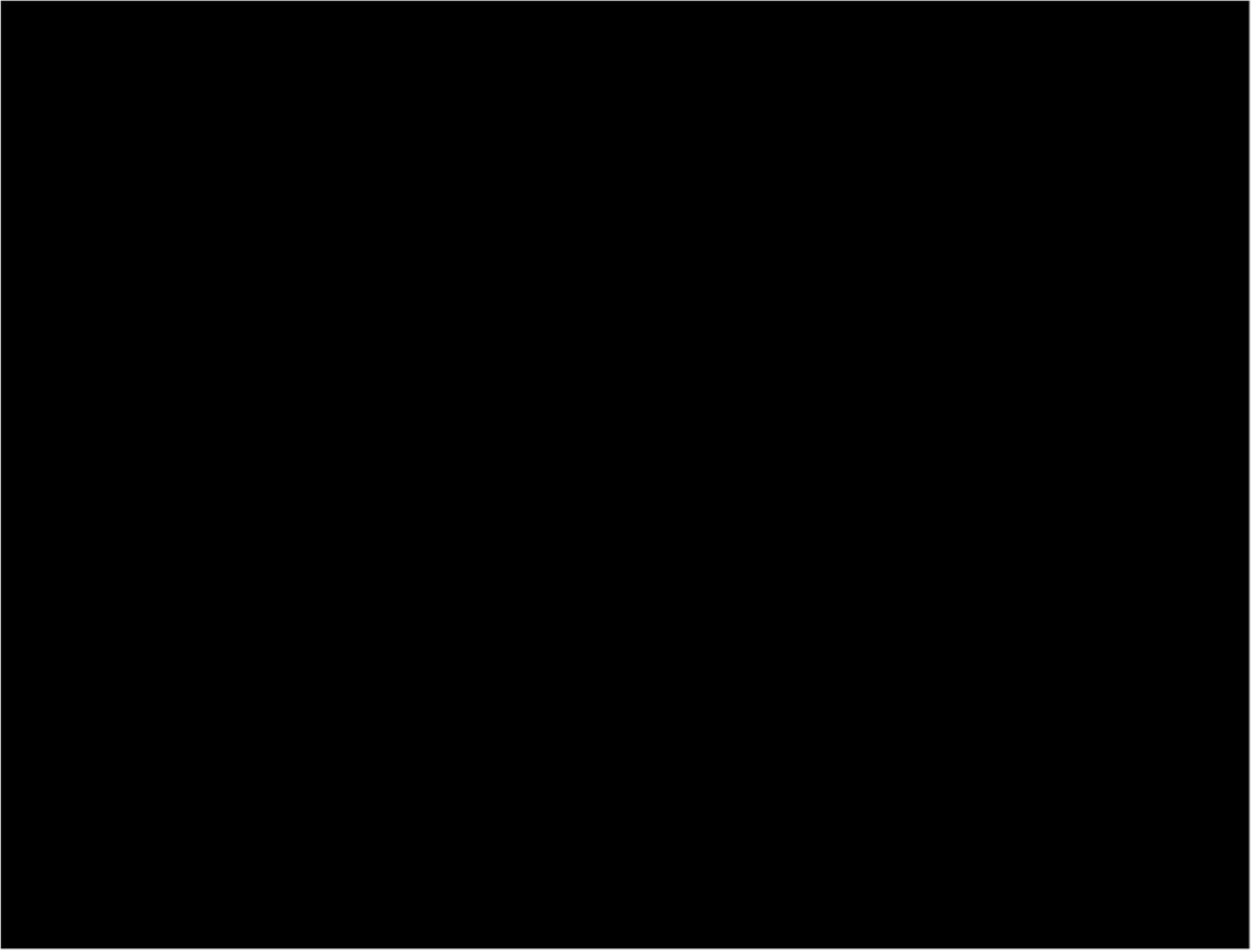












# 6 Detailed Observations - Operational Effectiveness

In order to assess the end-to-end operational effectiveness of the Patron Account Controls, the following core processes and controls were reviewed:

1. Patron deposits/transfers into the Crown Patron Accounts (see 6.1)
2. Return of Funds (see 6.2)
3. Line 2 Weekly Review of the Crown Patron Accounts (see 6.3)
4. UAR Review and SMR Submission (see 6.4).

## 6.1 Patron deposits/transfers into the Crown Patron Accounts

### 6.1.1 Test objective

The objective of this test was to assess the extent to which Crown received deposits or transfers during the Review Period that were not in line with their policies against third party transfers and cash deposits. We also sought to assess the extent to which any such transactions triggered the return of funds process, and that this process was carried out effectively pursuant to design.

As an additional step, for transfers that were processed (i.e. appeared to be in line with Crown's policies), and which therefore resulted in a TA, we also assessed a sample of these to test the extent to which those transactions met Crown's policies.

### 6.1.2 Methodology

We executed our testing in four parts:

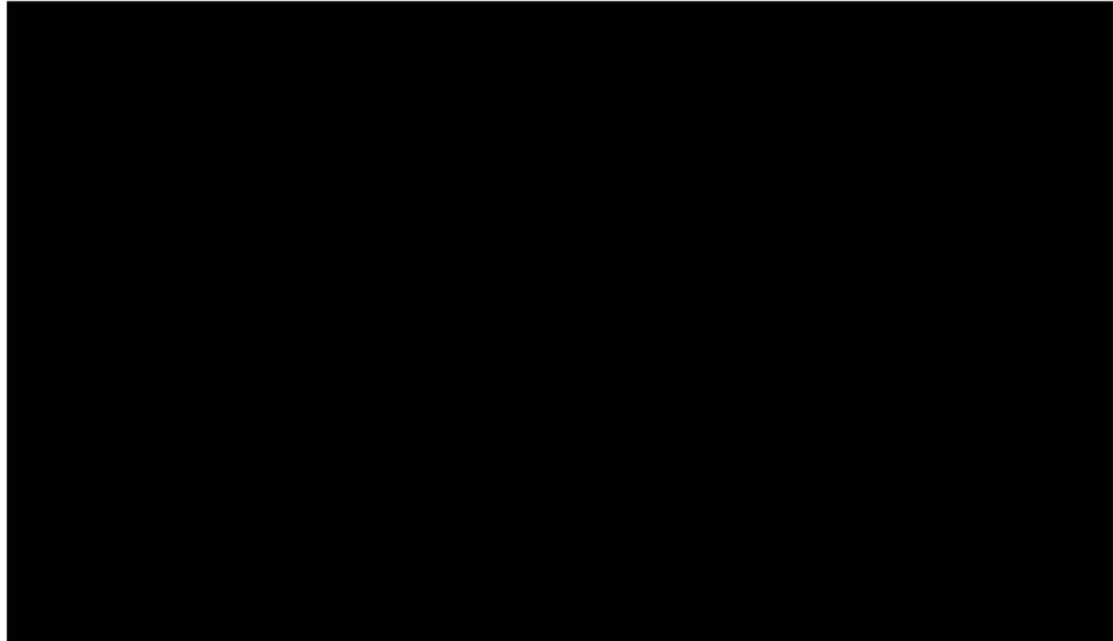
1. **Stage 1:** We completed a review of the transactional detail of all transactions that were shown in the statement for the ANZ bank account ending '2834' for the period 1 Dec 2020 to 21 Feb 2021 (a total of 1,143 unique transactions). In addition, the bank statements contained opening and closing balance detail for four foreign currency Patron Accounts. These accounts did not have any patron transactional activity during the Review Period

The purpose of this review was to identify the following:

- (a) Transactions that appeared to be cash deposits
  - (b) Transactions that appeared to be from a third party (including money remitters), or where there was insufficient information in the bank account statement to determine definitively that the transfer was from an account in the patron's own name
  - (c) Transactions that did not include the required narrative pursuant to the policy.
2. **Stage 2:** Any deficiencies identified in stage 1 were then reconciled against either the Return of Funds log (for EFT transfers); or SYCO records (for cash deposits). In this stage, we also assessed the extent to which Crown executed the return of funds in accordance with the process as designed.
  3. **Stage 3a:** For any deficiencies identified in stage 1 which remained unresolved in Stage 2, we reviewed the TAs (being transactions that were accepted by Crown during the Review Period and resulted in a credit of the transferred funds to a patron's DAB account).

**Stage 3b:** In addition, we also selected a random sample of TAs for a detailed review against the process as designed.

Our sample population in this stage comprised of 89 unique TAs, representing 100% of the transactions identified from Stage 2 (stage 3a), and 253 unique TAs (stage 3b) from a total of population of 794 TAs (approx. 32%). For each TA within this sample population we assessed the following:



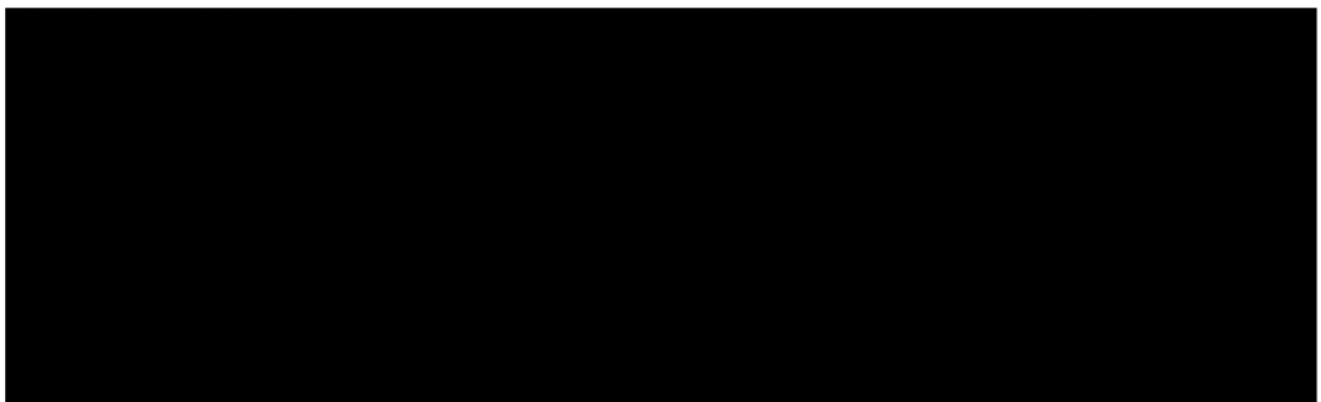
4. **Stage 4:** Any deficiencies that were not resolved through the review of TA packs were communicated to the relevant personnel at Crown for further investigation. This stage provided Crown with an opportunity to explain their rationale for approving these transactions and provide Deloitte with any additional supporting documents as applicable.

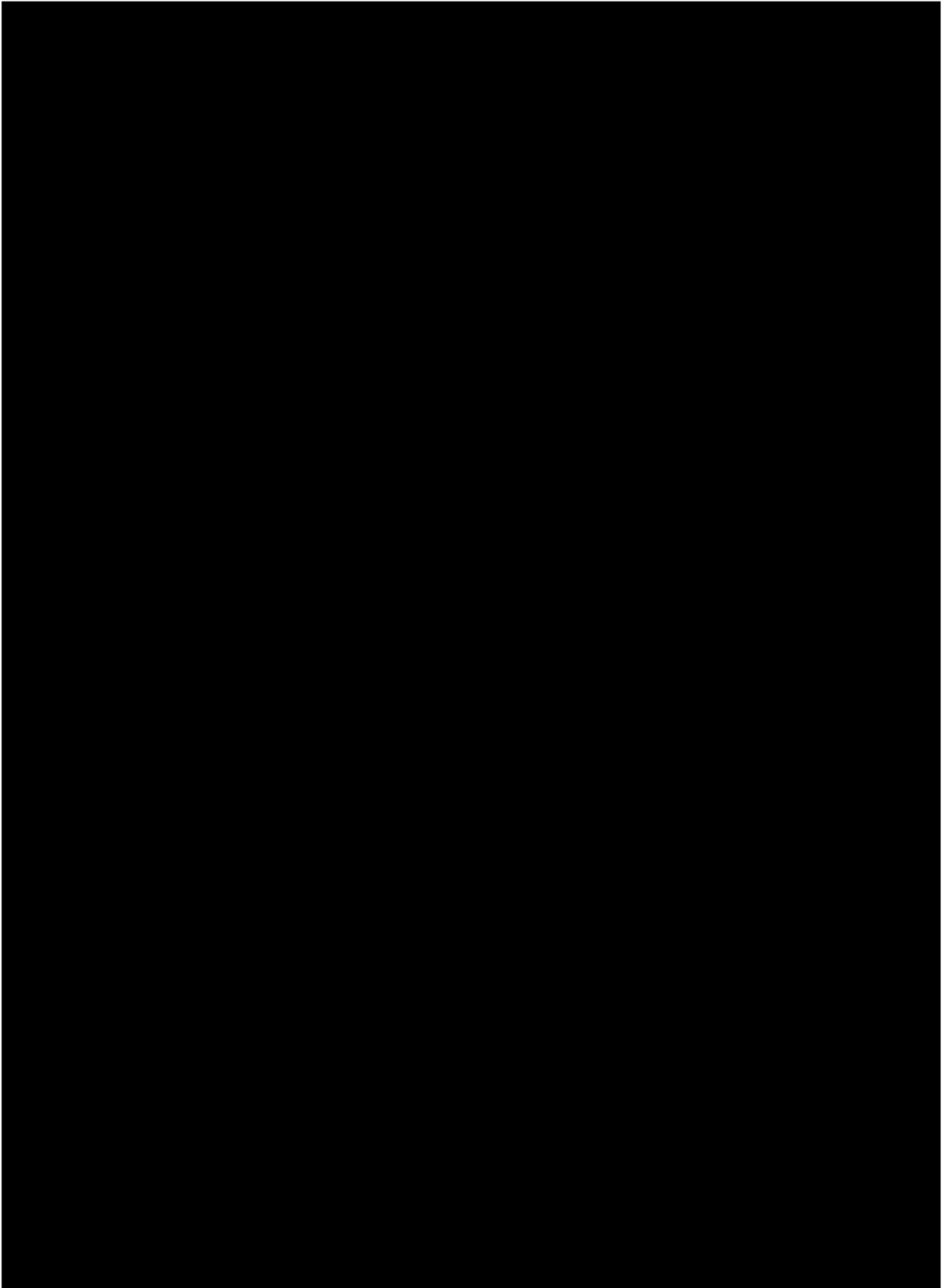
The documents relied upon to perform this testing, covering the Review Period, were:

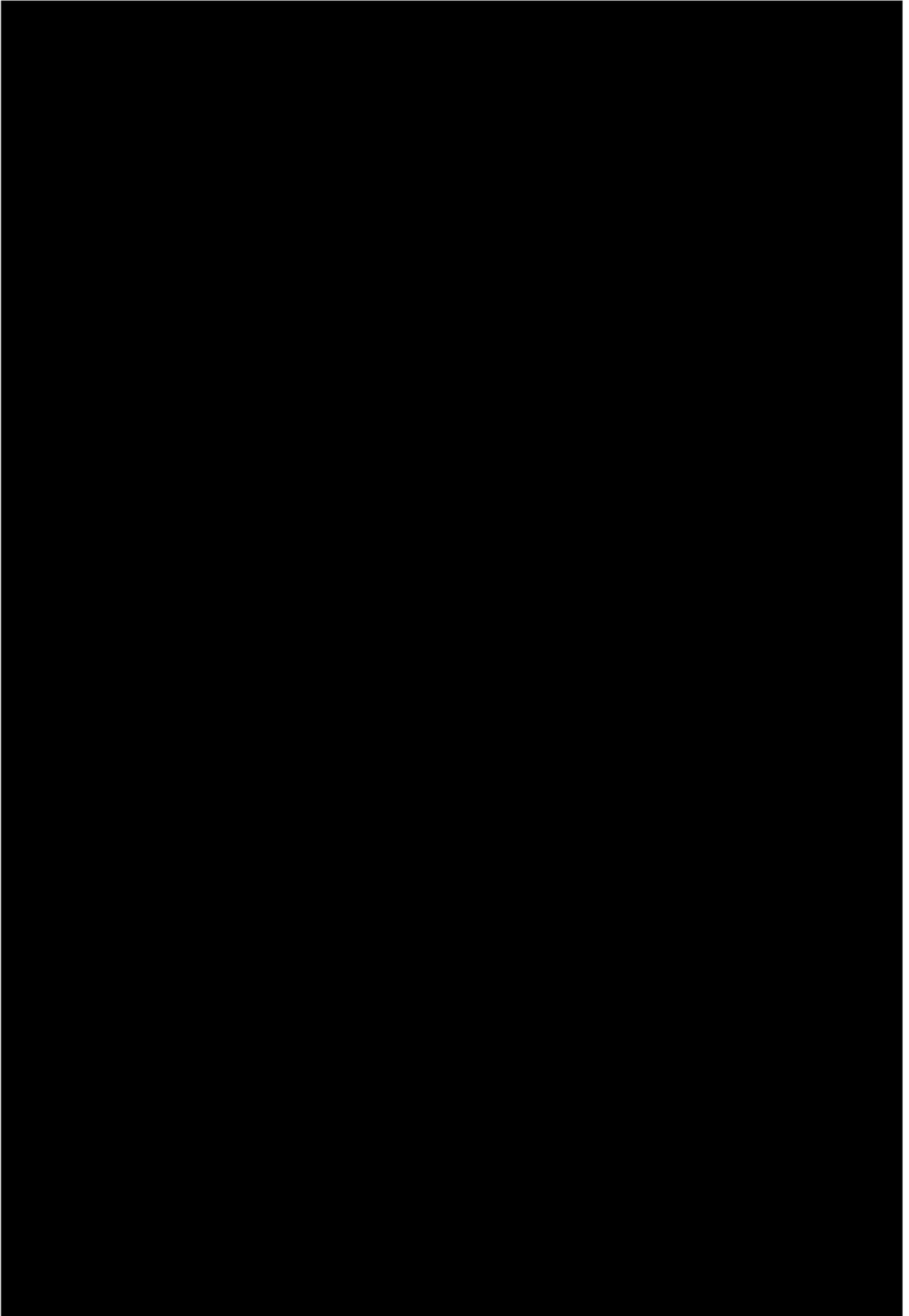
1. ANZ Account statement Reports for the account number [REDACTED] 2834 for December 2020, January 2021 and February 2021 (see Appendix C: Crown Patron Account Details). Deloitte used this material to select specific TA samples which pertained to remaining deficient transactions after Stage 1 and 2 reviews.

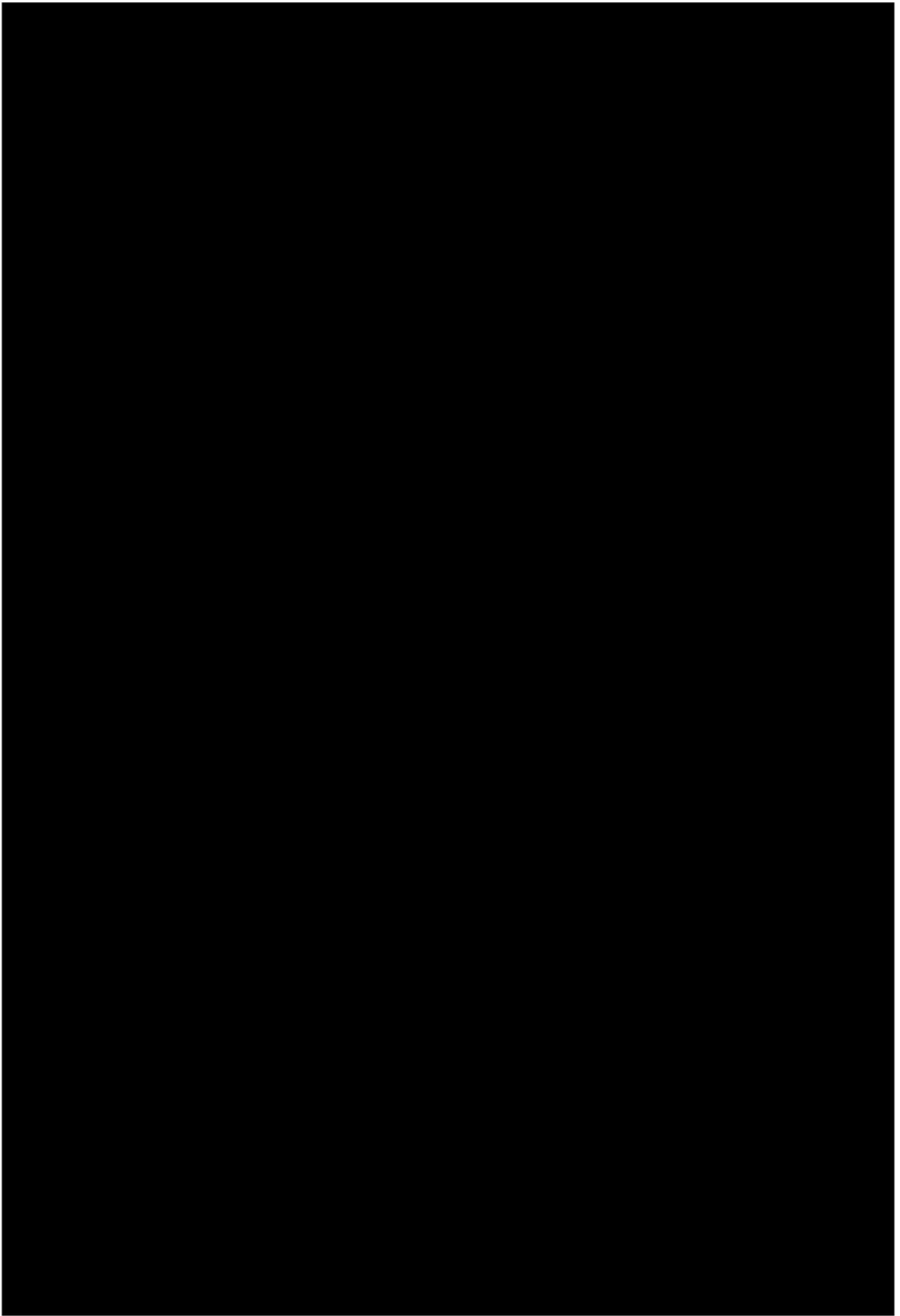


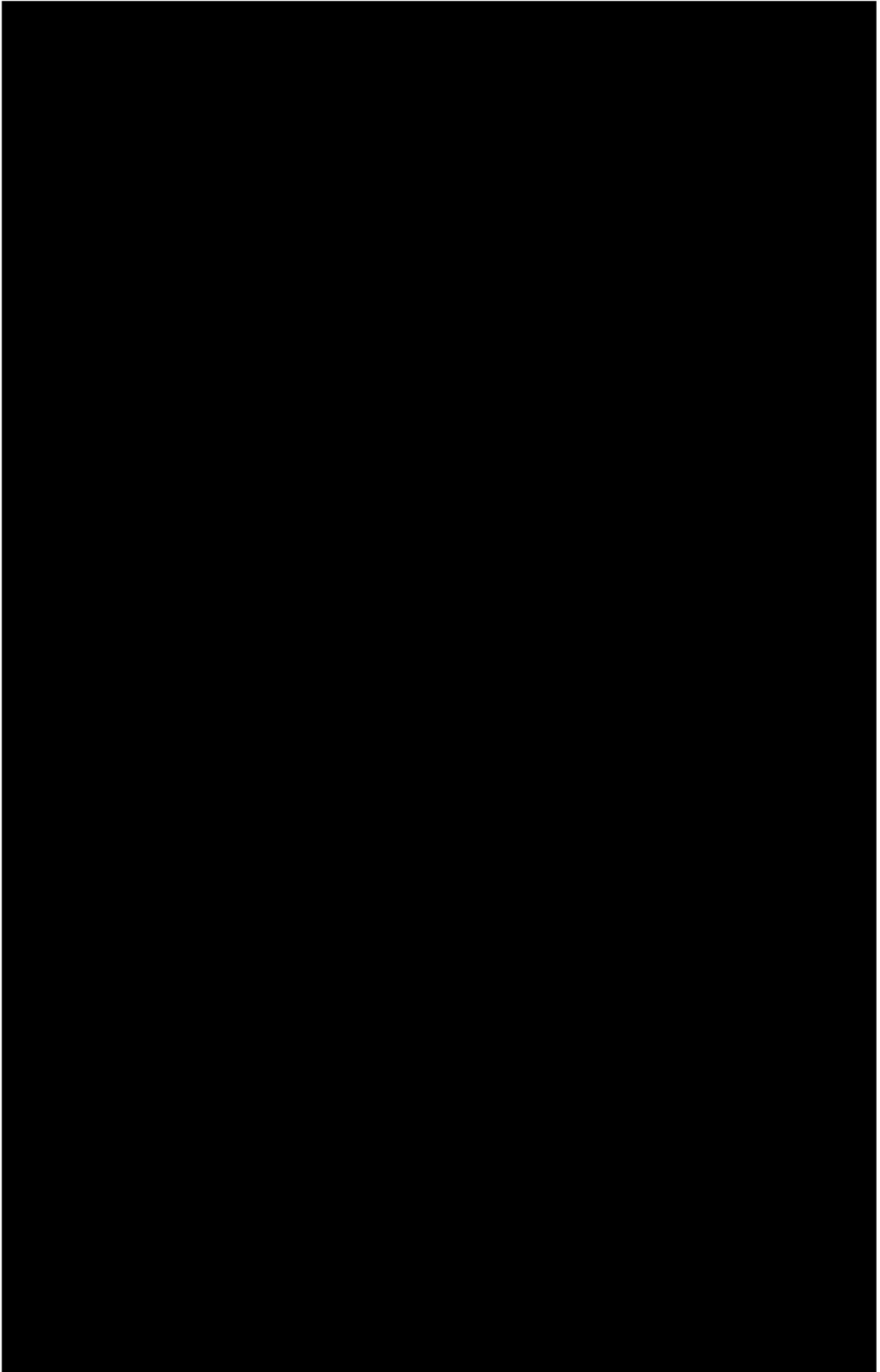
### 6.1.3 Results and observations













## 6.2 Return of Funds process

### 6.2.1 Test objective

A sample of 25 of 69 transactions for the Review Period from the return of funds log were reviewed, to test whether the funds identified as not meeting the requirements of the Return of Funds policy, were returned to the patron, in accordance with the process documented in the Return of Funds policy.

### 6.2.2 Methodology

For the Relevant Period, there were 69 transactions in the Return of Funds Log. Pursuant to our testing in 1.1, it was noted that 48 transactions were subject to Return of Funds as a result of the Third party policy. Deloitte understands that the remaining 21 transactions were returned for other reasons, including, for example at a patron's request.

Deloitte selected 25 sample transactions from the Return of Funds Log to confirm that funds received from patrons which did not meet the Return of Funds Policy requirements had been returned to the patron's account, pursuant to Crown's procedure. The sample 25 transactions were selected across the "reason for return" categories of: scripting issues, account issues, third party transactions and funds cancelled. With respect to the samples, Deloitte undertook the following steps:

1. For each sample transaction identified in the return of funds log, reconcile the date of credit, date of debit and transaction amount to the bank statement to verify that the funds were returned to the customer.
2. For any exceptions identified in step 1, perform a walkthrough via screenshare with Credit team to reconcile the return transaction to the bank statement. Where required, review ANZ Transactive portal to verify return of funds.

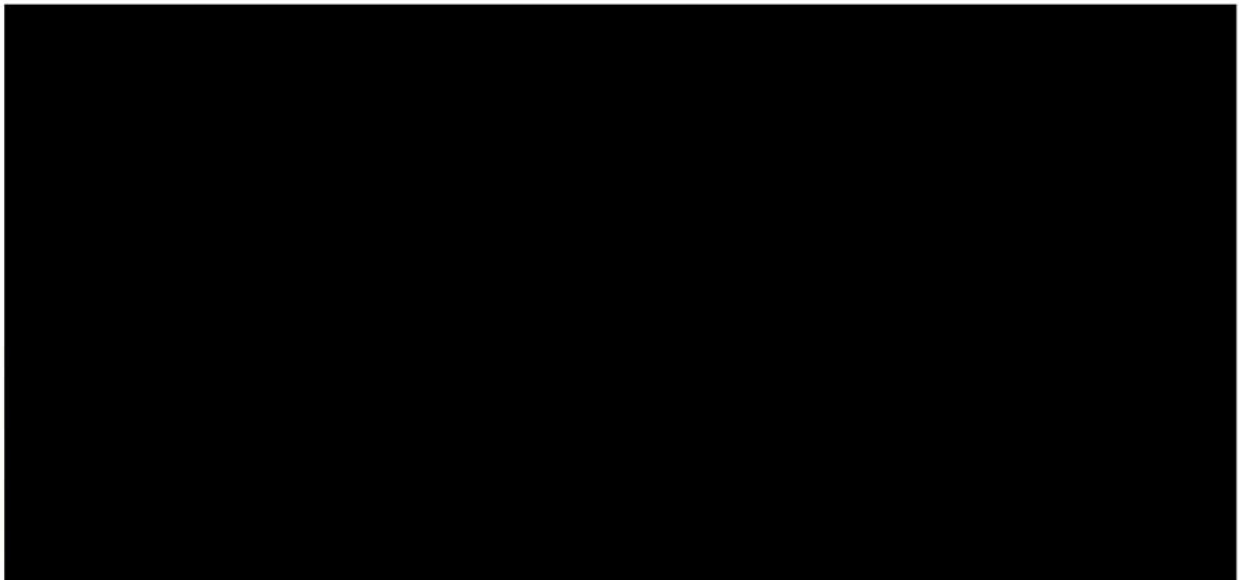
Note: This testing was in addition to the testing described in section 6.1.3.

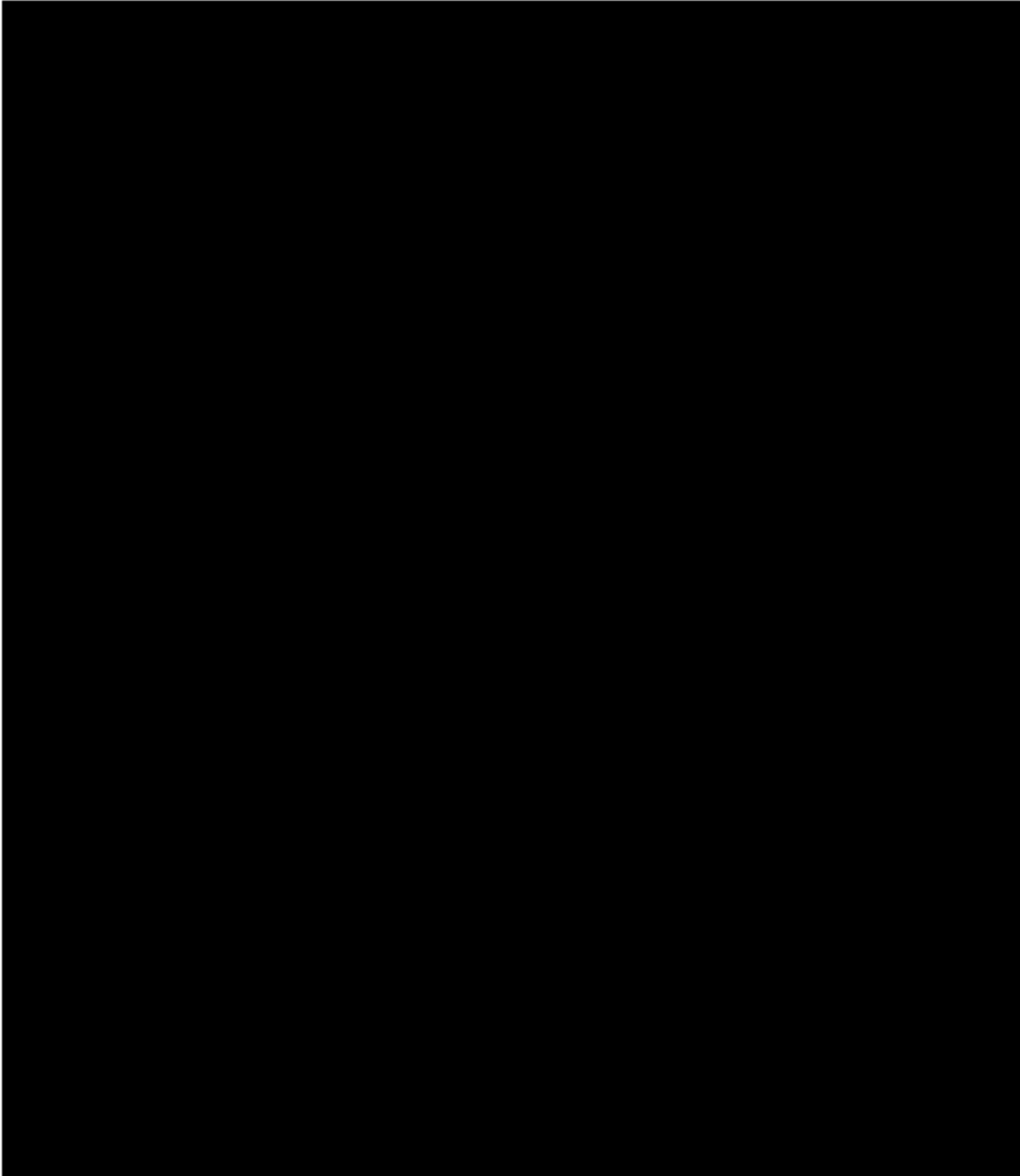
The documents which were provided for testing, covering the Review Period:

1. The Return of Funds log
2. ANZ Account statement Reports for the account number [REDACTED] 2834 for December 2020, January 2021 and February 2021 (see Appendix C: Crown Patron Account Details)

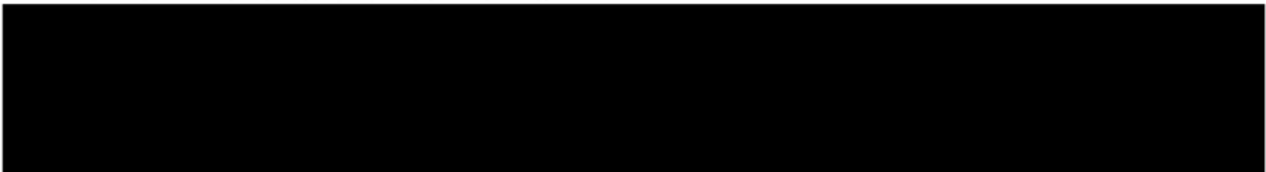
### 6.2.3 Results and observations

1. 25 of 25 transactions tested from the Return of Funds Log were confirmed to have been returned to the patron pursuant to the Return of Funds.

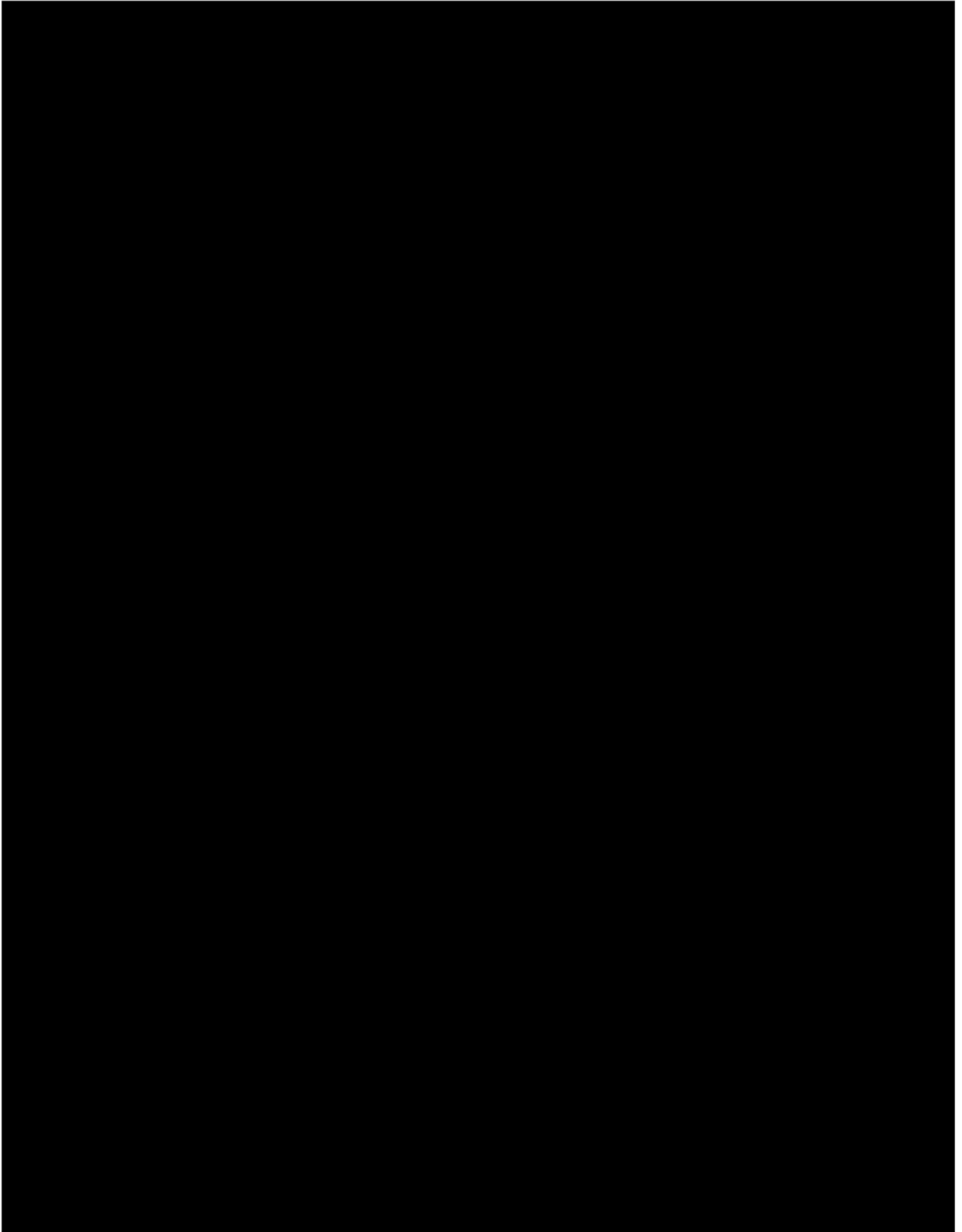


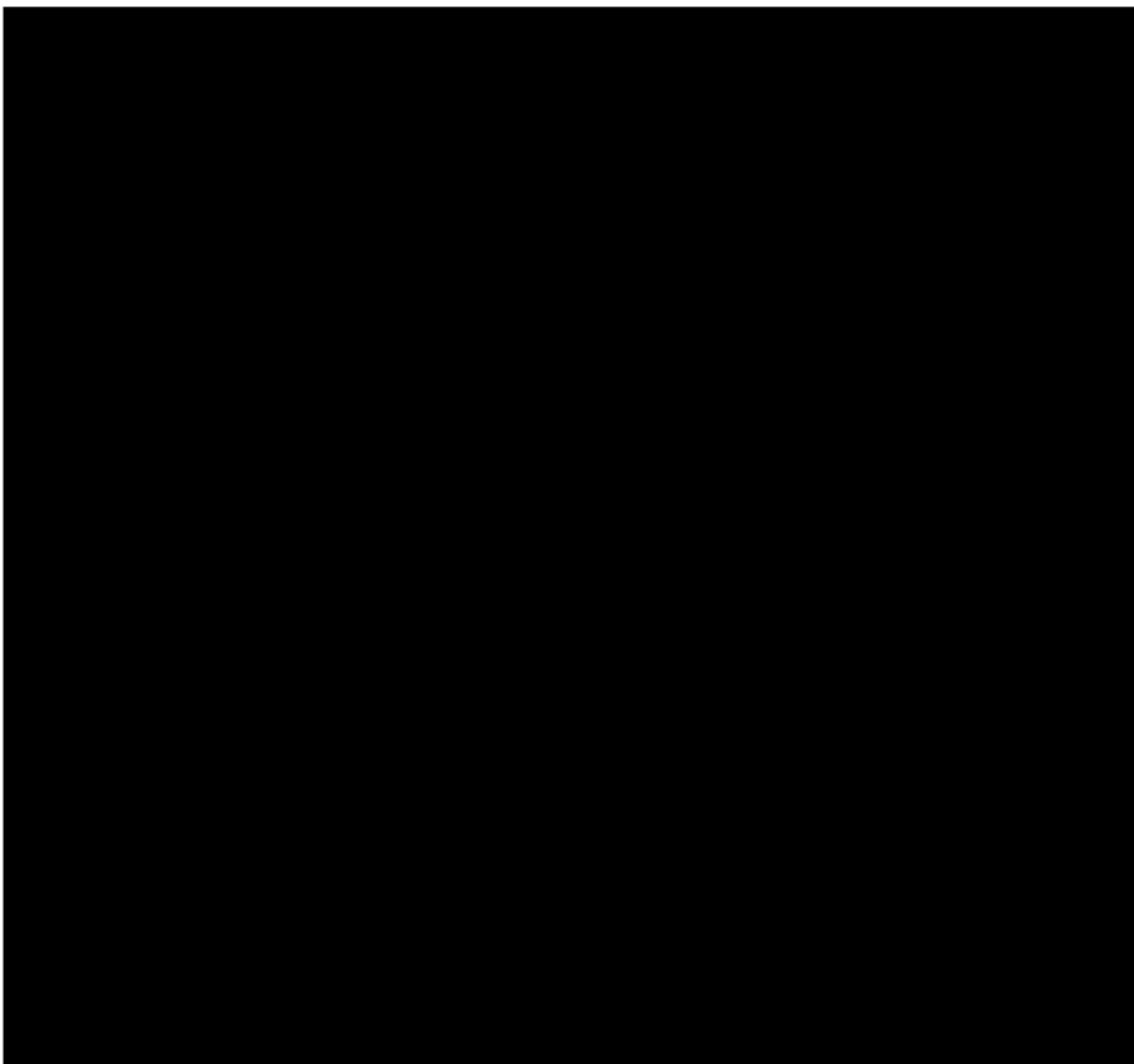


**6.3.3 Results and observations**



The results of our testing are detailed in Table 8 below: Line 2 AML Manual Bank Statement Review Testing Observations.

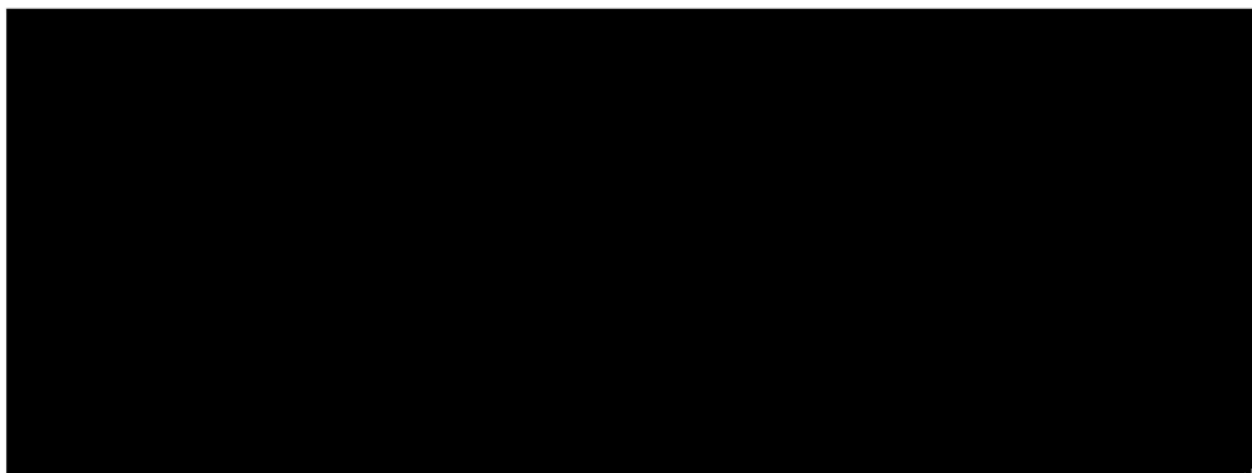


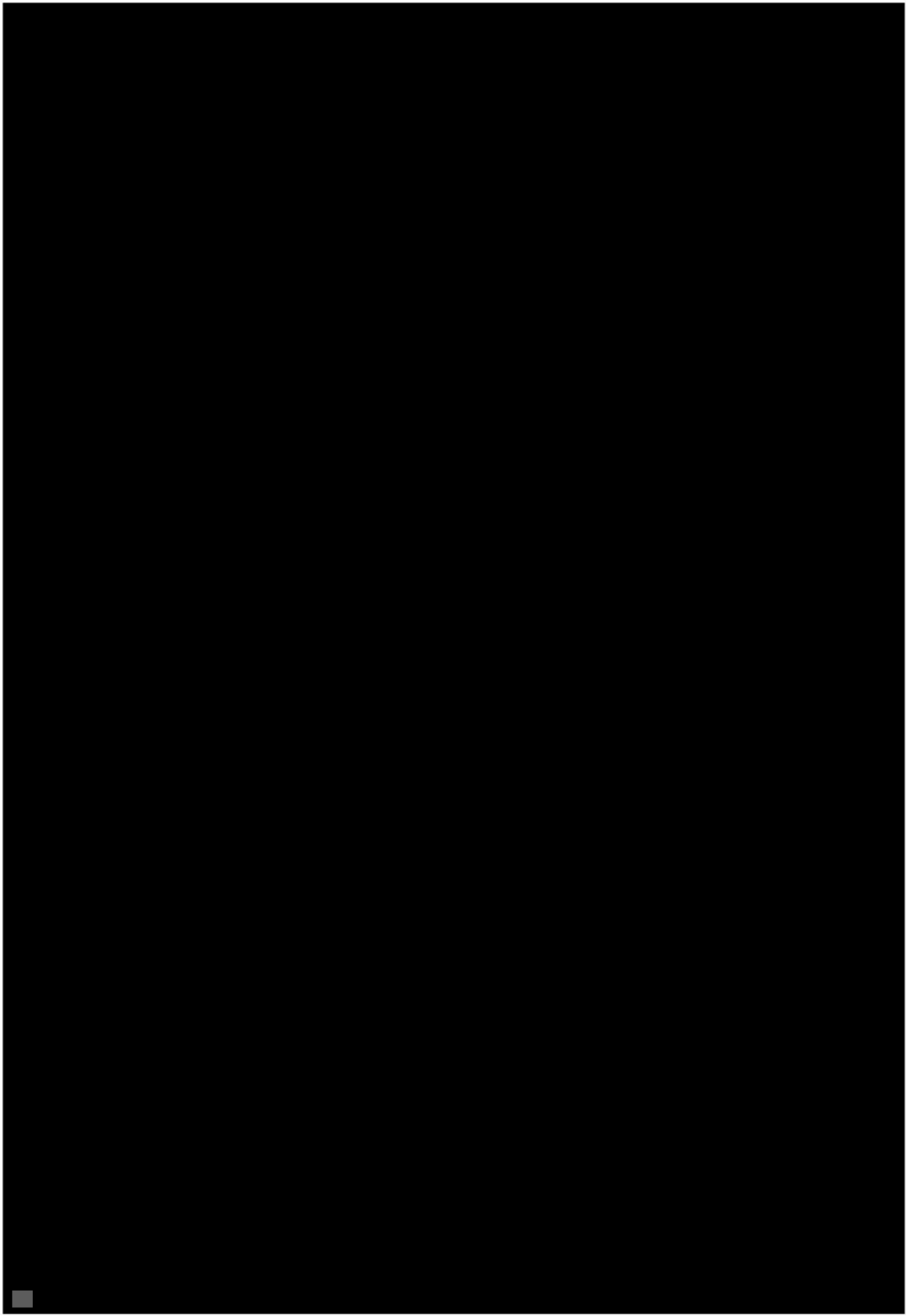


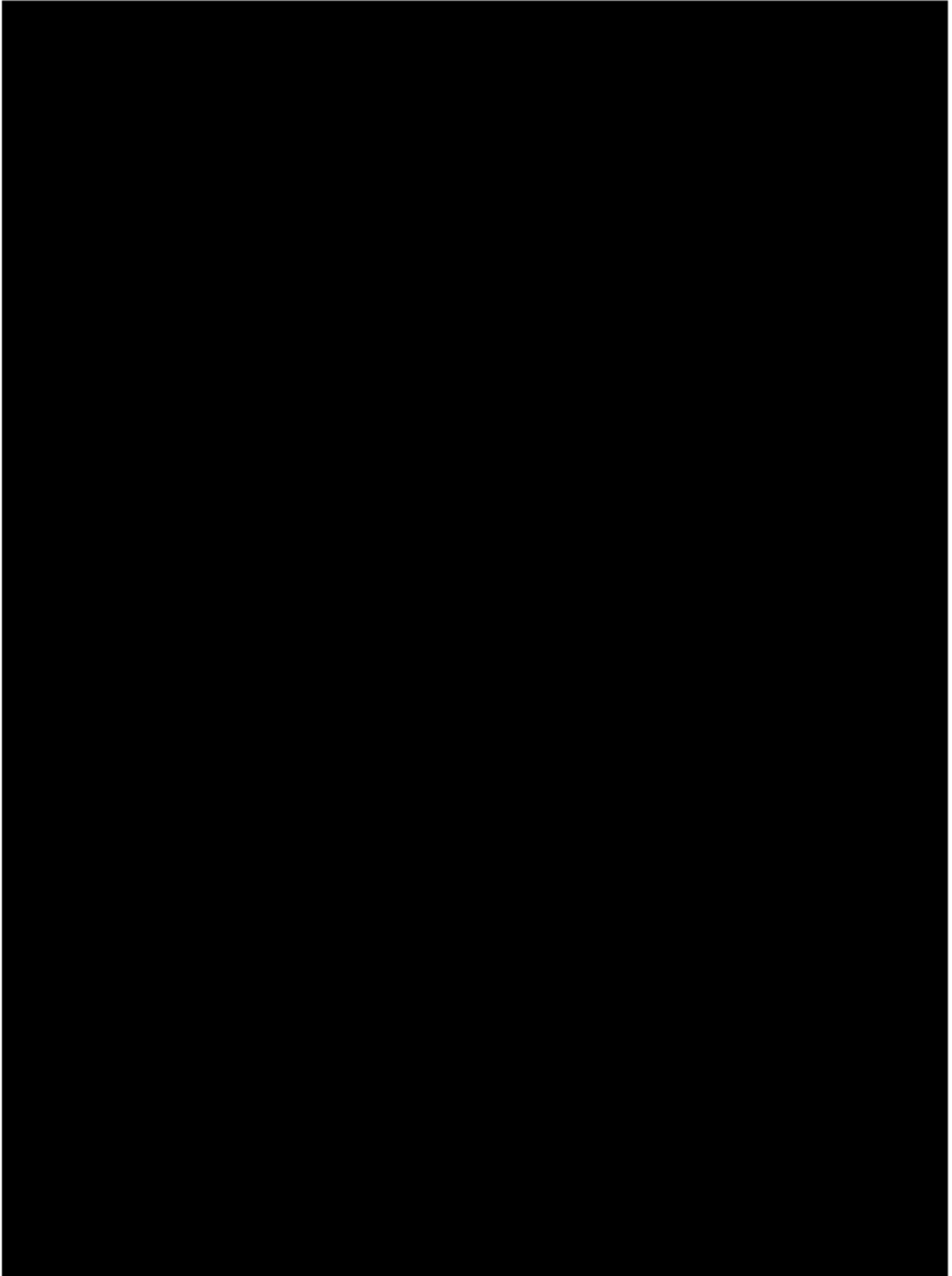
The following documents were provided for testing:

1. UAR documentation
2. AML Investigations report
3. SMR Decisioning template

#### **6.4.3 Results and observations**







# 7 Key assumptions and limitations

## 7.1 Assumptions and limitations

This report was prepared based on the following assumptions and limitations. The assumptions and limitations are applied to our 'Work' and 'Services' as described in the Engagement Letter:

- Our Services are intended to address the suggestions of the Bergin Report relating to the specific ML/TF activity observed in the Riverbank and Southbank accounts, and the extent to which similar or additional ML/TF activity may be observed in other Patron Accounts.
- Our Services will not review other activity unrelated to the Patron Accounts, for example behaviour on the casino floor, transactional activity within Crown's internal gaming accounts, and how Crown more broadly manages the money laundering and terrorism financing risks associated with such activity.
- The proposed services are advisory in nature. Our Work has been conducted in accordance with APES 215 Forensic Accounting Services issued by the Accounting Professional and Ethical Standards Board and will not constitute an assurance engagement in accordance with Australian Standards on Review or Assurance Engagements or any form of audit under Australian Auditing Standards, and consequently no opinions, or conclusions intended to convey assurance under these standards, are expressed.
- It is assumed that Crown's automated TMP does not operate with respect to the Patron Accounts (i.e. bank accounts held with financial institutions). All monitoring of transactions in these accounts is undertaken outside of the scope of the automated TMP.
- It is understood that at least some of the Relevant Controls have been in operation for a limited time (since 1 December 2020). Operational effectiveness testing will therefore be performed only with respect to this limited timeframe.
- In addition, the scope of the Controls Assessment work will not include:
  - Any form of assessment of source system data quality and/or completeness
  - Any form of implementation or operationalisation of any outcomes of our Work
  - Designing or implementing AML/CTF policy, procedures, processes and controls to support the Crown AML/CTF program.
  - Any form of retrospective review of performance of Crown's transaction monitoring program or other controls. The Assessment will cover current processes, controls and procedures only.
- Our Work will be based on our interpretation of the requirements of the AML/CTF Act and AML/CTF Rules; in effect at the date the Review commences, as well as our experience in conducting similar work across a variety of organisations. This includes our interpretation of the threshold at or beyond which transactions may be reasonably suspected to be indicative of money laundering or terrorism financing typologies. Our Report will set out our methodology for making this determination.
- To fulfil our Work, we will need to rely on information gathered through public record and commercial database research. Although information gathered from public record sources and commercial databases is generally accepted to be accurate, we cannot guarantee its veracity; in particular, we cannot monitor the speed with which these public record and commercial database sources update their records. We can therefore accept no responsibility for, and do not warrant the accuracy or completeness of, any of the information provided by such sources.

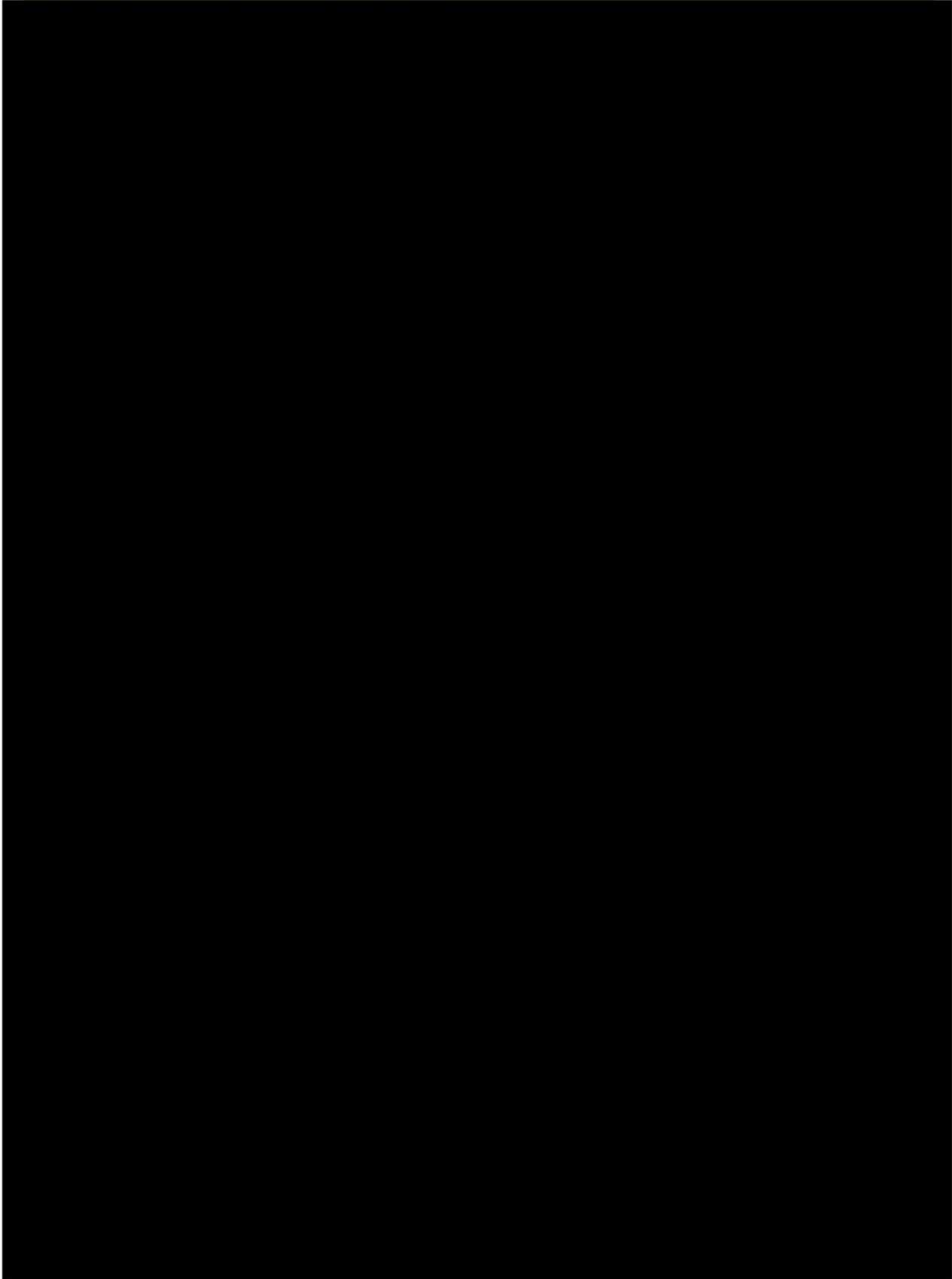
- Our Work does not constitute legal advice. It is not binding on ILGA, AUSTRAC or other interested regulators or agencies and there is no representation, warranty, or guarantee that these parties will agree with our work.
- Our Work will be based on the information provided to us, which we will assume is true, correct and complete. Unless as otherwise stated within the scope of the Services, we will not be responsible for validating data provided by Crown for the purposes of Conducting Our Work.
- Our Work and any attendant costing are predicated on all documentation and access to personnel requested being available in a timely manner.
- The Services will be limited by the time available to us, the agreed scope, the Information available, the accessibility of Information sources and clarity or lack of clarity of your objectives.
- We reserve the right to revise any finding or recommendation in our Work if material information becomes known to us after the date our Work is issued.
- There are no undue complications or delays in providing the Services.
- We will not be responsible for providing evidence or producing any documents in respect of the Services (except in response to a subpoena) unless you engage us specifically to do so. If we are asked to do these tasks this will be the subject of a separate engagement with you.
- To the extent that there is any inconsistency between the limits and conditions in this Letter and our Work, then the limits in the Work will prevail.



# Appendix A: Summary of Observations

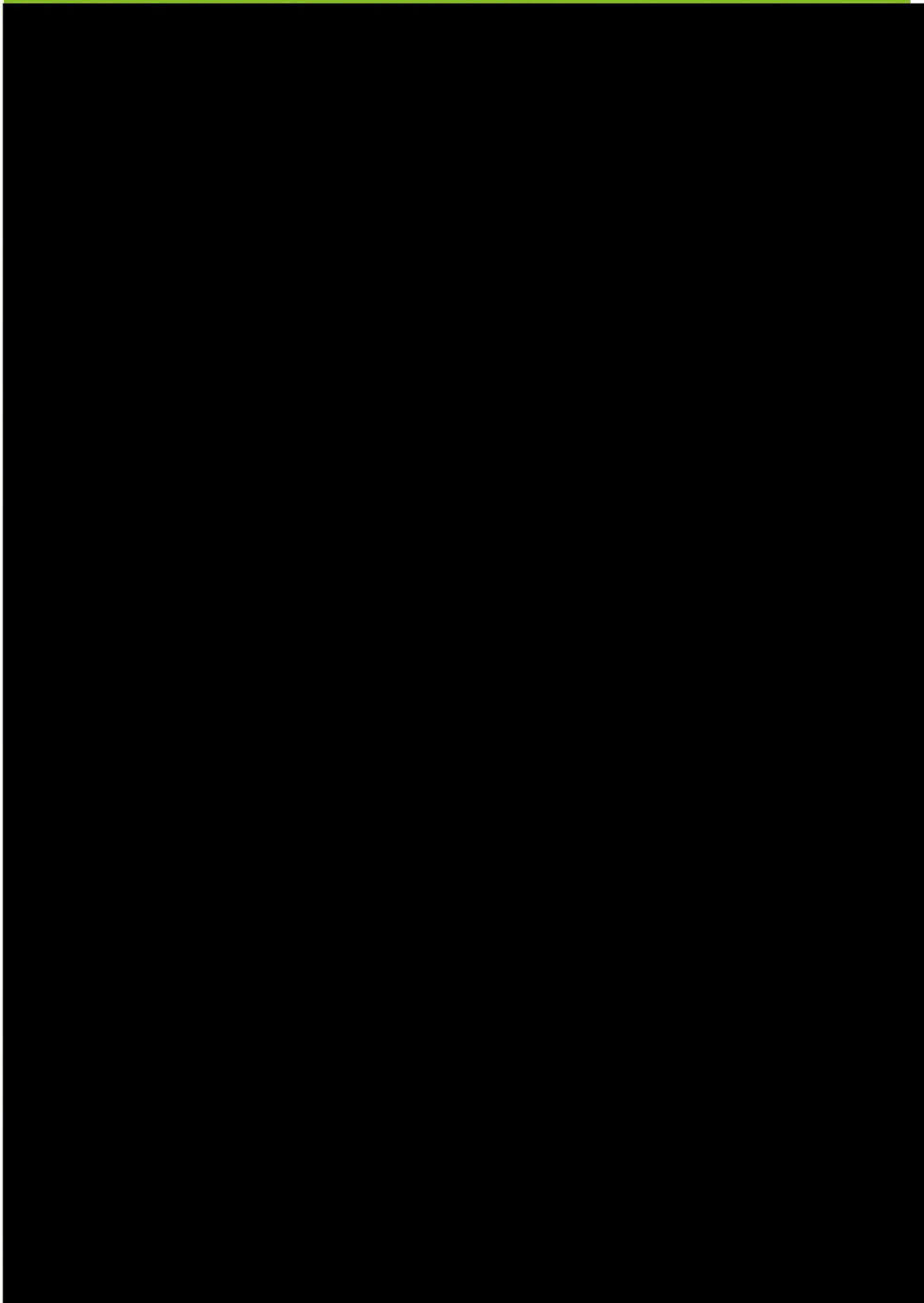
Observation reference	Theme	Observation
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Observation reference	Theme	Observation
[Redacted content]		

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Observation reference	Theme	Observation
[Redacted content]		

# Appendix B: Documents and files reviewed

## AML/CTF program

- Crown Resorts AML Policy & Procedures – Board Approval Version dates 30 October, 2020
- Crown resorts Part A – Board Approval Version dated 30 October, 2020
- Crown resorts Part B – Board Approval Version dated 30 October, 2020
- Crown Perth AML CTF Program dated November 2018
- Crown Melbourne AML CTF Program (v8) dated 23 November 2018
- Crown Melbourne AML Program – Annexure H – ECDD (undated)

## Corporate policy

- Corporate Policy Statement – Return of Funds Policy (04.01.2021)
- Melbourne Return of Funds Log 1 Dec 2020 – 22 Feb 2021 (Patron Info removed)
- Perth Return of Funds Log 1 Dec 2020 – 22 Feb 2021 (Patron Info removed)
- Memo - Prohibition on Third Party Payments 08042020
- Memo - Prohibition on Third Party Payments - Commonly Asked Questions – 21 Oct 2020

## Procedural documentation

- AML Investigation Report Template (undated)
- AMLCTF Manual Rule – Bank Account Monitoring (v.1.0 16 November 2020)
- AMLCTF Policy Statement – Third Party Transfers and Money Remitters (v.1.0 16 November 2020)
- DRAFT - Unusual Activity and Investigation Report Guidelines (undated)
- Memo – Sentinel Transaction Monitoring – February 2021
- SMR Decision Template (undated)
- Unusual Activity Report v.1.1 (Version 1.1 – 03/09/2020)
- Cage Guides – Cash Deposits into Crown bank Accounts (undated)
- Cage Guides – Patron in-branch transfers (undated)
- Cage Guides – Telegraphic Transfers TT's (undated)
- Excerpts from Cage SOP (undated)
- Funds into Crown – Excerpt from draft training manual (undated)
- Crown Entities MLTF Risk Register – Approved March 2020
- 200312 Memo to Barry Felstead – Crown Entities MLTF Risk Register – Crown Melbourne (Signed 13032020)
- 200312 Memo to Barry Felstead – Crown Entities MLTF Risk Register – Crown Perth (Signed 13032020)
- Crown Perth Cage Banking Process
- Memo – Updated Restrictions on cash deposits at the cage dated 18 February, 2021
- Crown Melbourne Cage Communications on Banking Protocols (dated Nov – Dec 2020)
- Credit Team Banking Duties Checklist (undated)
- Credit Team Return of Funds Training Document (undated)
- Statement of Operating Procedures – Patron Receipts and Payments - Gaming Bank Account- Crown Perth (v.1.0 08 March 2021)

## Banking statements and other records

- Crown Melbourne ANZ All Currencies 1 Dec 2020 – 18 Feb 2021
  - Crown Melbourne ANZ AUD 1 Dec 2020 – 22 Feb 2021
  - Crown Melbourne ANZ GBP 1 Dec 2020 – 22 Feb 2021
  - Crown Melbourne ANZ HKD 1 Dec 2020 – 22 Feb 2021

- Crown Melbourne ANZ LTD 1 Dec 2020 – 22 Feb 2021
- Crown Melbourne ANZ SGD 1 Dec 2020 – 22 Feb 2021
- Crown Melbourne ANZ USD 1 Dec 2020 – 22 Feb 2021
- 797 TT transfer acknowledgments dated from 1 Dec 2020 to 22 Feb 2021
- Monthly Bank Reconciliation documents – 1 each for Dec 2020, Jan 2021, Feb 2021
- 12 Manual Bank Statement Review Spreadsheets (from Line 2 AML) dated between 2 Dec 2020 and 23 Feb 2021

#### **Patron communications**

- Chinese – Letter to VIP International customers re banking and covid updates – final
- English - Letter to VIP International customers re banking and covid updates – final (21 September, 2020)
- LETTERHEAD CHINESE Letter to Local and Domestic VIP customers re banking and covid updates (FINAL)
- LETTERHEAD ENGLISH Letter to Local and Domestic VIP customers re banking and covid updates (FINAL) (amended 210920)
- LETTERHEAD VIETNAMESE Letter to Local and Domestic VIP customers re banking and covid updates (FINAL) (amended 210920)
- Example email setting out announcement regarding update to Crown Melbourne banking procedures

#### **Other documents**

- Proposed Financial Crime Team Structure dated 23.02.21
- Org Chart – Finance (March 2021)

# Appendix C: Crown Patron Account Details

Bank	Account Number	Currency (\$)
		AUD
		GBP
		HKD
		SGD
		USD



# Appendix D: Stakeholder walkthroughs and discussions

Date	Stakeholder engaged with	Discussion topics
23/02/2021	Nick Stokes (Head of Financial Crime and Group MLRO)	Phase 1 controls assessment and patron bank accounts
24/02/2021	Mary Gioras (Group Credit Manager)	Patron bank accounts
24/02/2021	Stephen Hancock (General Manager, Cage and Count – Melbourne) and David Brown (General Manager, Cage and Count – Sydney)	Patron bank accounts
25/02/2021	Jasmeen Grover (Senior Group Manager – Gaming Solutions)	SYCO and DW
25/2/2021	Jon Yeats (Group Senior Manager Financial Crime)	Patron account control processes
01/03/2021	David Brown (General Manager, Cage and Count – Sydney)	Patron account control processes
01/03/2021	Mary Gioras (Group Credit Manager)	Patron account control processes
03/03/2021	Nick Stokes (Head of Financial Crime and Group MLRO); Adam Sutherland (Group Senior Manager); Mary Gioras (Group Credit Manager); Jon Yeats (Group Senior Manager Financial Crime); Stephen Hancock (General Manager, Cage and Count); Gabriella Plant (Credit Officer) and Caroline Marshall (Allens)	Walkthrough of end to end patron account control processes
05/03/2021	Mike Ohlmus (Cage VIP Operations Manager); Stephen Hancock (General Manager, Cage and Count – Melbourne); Mary Gioras (Group Credit Manager)	Walkthrough to discuss testing outcomes
06/03/2021	Nick Stokes (Head of Financial Crime and Group MLRO)	Automation plans
08/03/2021	Jon Yeats (Group Senior Manager Financial Crime)	Walkthrough Line 2 weekly process
08/03/2021	Stephen Hancock (General Manager Cage and Count – Melbourne)	Cash deposits at bank branches
08/03/2021	Vasula Kessell (Financial Controller – Crown Perth)	Return of funds process in Perth
10/03/2021	Jon Yeats (Group Senior Manager Financial Crime)	Further clarification on Line 2 AML processes
11/03/2021	Mary Gioras (Group Credit Manager)	Further clarification on TA deficiencies
11/03/2021	Mike Ohlmus (Cage VIP Operations Manager); Stephen Hancock (General Manager, Cage and Count – Melbourne); Mary Gioras (Group Credit Manager); Trent Ternes (Credit Collections Manager)	Walkthrough to discuss testing outcomes

# Appendix E: Process Maps

**Process Map of the Patron Account Controls – Melbourne & Perth**

