

## STATEMENT

**Name:** Lisa Ann DOBBIN  
**Position:** Partner, Deloitte Touche Tohmatsu  
**Date:** 16 April 2021

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### STATES:

1. My full name is Lisa Ann Dobbin and I am a Partner within the Forensic team at Deloitte Touche Tohmatsu (**Deloitte**).
2. I graduated from Bond University in 2003 with a Bachelor of Laws. I practiced for 5 years as a lawyer in New South Wales and the United Kingdom, specialising in disputes and financial crime investigations, following which I joined Deloitte to specialise in financial crime investigations and advisory matters.
3. I was admitted as a partner of Deloitte in 2014.
4. I make this statement in response to the Request For Statement (RFS-Deloitte-001) issued by the Royal Commission into the Casino Operator and Licence on 7 April 2021 (the **Request**).
5. Within this statement, I address the matters identified in the Schedule to the Request under the headings "Project Libby" (Questions 37 – 53) and "Other work" (Questions 54 – 56).

### Project Libby

#### *Response to Question 37*

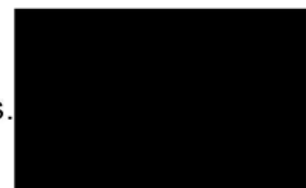
6. The nature and scope of the Project Libby review is described in our engagement letter dated 22 February 2021 [DTT.002.0001.6479] (**Engagement Letter**) and variation letter dated 19 March 2021 [DTT.002.0001.6480] (**Variation Letter**).

#### *Response to Question 38*

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Witness.



7. Deloitte was initially approached by Crown Resort Limited's legal advisors, Allens, to perform a review for the Crown Resort Limited (**Crown**) Board in response to specific suggestions made in the Bergin Report. This work was known within Deloitte as "Project Libby".
8. Deloitte received an indicative scope of work for Project Libby by email from Crown's legal advisors, Allens, on 13 February 2021 [DTT.007.0007.7478].
9. This indicative scope was in the form of a draft letter that Crown wished to send to the Independent Liquor and Gaming Association (**ILGA**) in NSW.
10. The purpose of the proposed work as described in the draft letter to ILGA was to address specific suggestions made in the Bergin Report as described at section 1 of our Engagement Letter.
11. Deloitte reviewed and proposed amendments to the indicative scope of work as described in the draft letter to ILGA. The letter was finalised by Crown and provided to ILGA and is at [DTT.002.0001.5701] (**ILGA Letter**).
12. The scope described in the letter to ILGA formed the basis for the scope of work that was ultimately finalised in our Engagement Letter.

*Response to Question 39*

13. The terms of Deloitte's engagement for Project Libby are set out in our Engagement Letter.
14. A high level overview of Deloitte's scope of work for Project Libby was also included in the ILGA Letter.
15. The scope of Phase Two of Project Libby was revised following feedback Crown received from ILGA on the scope of Project Libby in the Variation Letter. The specific variations included an extension of the review period for Phase Two to 7 years, and additional procedures with respect to the identification of Patron Accounts.

*Response to Question 40*

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16. Commissioner Bergin refers to a *“full and wide-ranging forensic audit of all of [Crown’s] accounts to ensure that the criminal elements that infiltrated Southbank and Riverbank have not infiltrated any other accounts”* at page 569, paragraph 16 of the Bergin Report.
17. It is my understanding that the term *“all accounts”* in Commissioner Bergin’s suggestion at paragraph 16, page 569 of the Bergin Report is a reference to accounts that have similar characteristics to the Riverbank and Southbank accounts; that is, all Crown accounts into which it is possible for patrons to deposit funds (**Patron Accounts**). The scope of Project Libby includes a review of all Patron Accounts associated with Crown’s casino operations.
18. Commissioner Bergin describes this audit as being *“in the context of a need for compliance with the provisions of the Casino Control Act apart from any need to comply with general auditing requirements and/or principles”*. The terms of Deloitte’s engagement for Project Libby differ from this in that the scope of Deloitte’s work in Project Libby does not include a review of the extent to which Crown is compliant with the provisions of the Casino Control Act. Further, Deloitte’s work in Project Libby is being undertaken in accordance with APES 215 Forensic Accounting Services issued by the Accounting Professional and Ethical Standards Board.
19. Commissioner Bergin references the main aim of the forensic audit as being *“to ensure that the casino operations are free from criminal influence and exploitation”*. The objective of Project Libby is to identify, to the extent that it is possible, transactions, patterns, or behaviours in the Patron Accounts that may be indicative of ML/TF typologies, based on relevant domestic and international regulatory guidance. While this is intended to be comprehensive and is aligned with the aim expressed by Commissioner Bergin, it is possible that there may be criminal activity within the Patron Accounts that cannot be detected as such from our review. This is because not all criminal activity will have sufficient suspicious indicators, or the required suspicious

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contextual information (for example, that a particular patron is suspected by law enforcement), to suggest that it is not legitimate.

*Response to Question 41*

20. As described in paragraph 17 of this statement, only Patron Accounts are included in the scope of Project Libby. Accordingly, any other Crown bank accounts are not in scope for review. These include all accounts that are not used for patron-related transactions, for example, accounts used for payroll, payment of suppliers or corporate operations.

*Response to Question 42*

21. Project Libby is being undertaken in three phases, and is ongoing at the date of making this statement. These phases are described in detail in our Engagement Letter.

22. The approach taken or to be taken by Deloitte to each of the three phases is described in detail in Appendix 1 to our Engagement Letter.

23. For each Phase of work, Deloitte has agreed to deliver a final report, and also to deliver a documented assessment of any actions proposed by Crown in response to observations and recommendations made in the final report.

*Response to Question 43*

24. The scope of Deloitte's work is limited to that described in our Engagement Letter and Variation Letter. With respect to question 43, Deloitte's work in Phase Two is limited to performing a review of the Patron Accounts in order to identify transactions, patterns, or behaviours in the Patron Accounts that are indicative of ML/TF typologies, including the potential infiltration of criminal elements of Crown's bank accounts, based on current relevant domestic and international regulatory guidance. A key objective of this work is to identify transactions or patterns of transactions that may represent potential criminal activity within the Patron accounts.

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25. The way in which Deloitte is undertaking this work is set out in Appendix 1 of the Engagement Letter.

*Response to Question 44*

26. The objective of an effective AML/CTF Program and its associated processes, systems and controls is to identify, mitigate and manage the risk of ML/TF activity. In this sense, these processes, systems and controls should act as a “barrier” to criminal activity. In the context of an effective AML/CTF Program, the key barriers that could be erected against the infiltration of criminal elements of Crown’s bank accounts would include processes, systems and controls related to AML/CTF Program components such as:

- a. risk assessment
- b. customer due diligence
- c. ongoing customer due diligence (including refresh of customer due diligence and the transaction monitoring program)
- d. enhanced customer due diligence and
- e. employee due diligence.

27. Other barriers that may contribute to the mitigation of criminal infiltration of Crown’s bank accounts include the imposition by Crown of restrictions on the use of the bank accounts as a channel for patron deposits, for example, as described in section 3.3 of the Phase One Report [DTT.010.0002.0008]. However, as noted in section 1.2 of the Phase One report, there are structural limitations that impact Crown’s ability to enforce such restrictions.

*Response to Question 45*

28. There is a significant degree of complexity in the processes, systems and controls comprising an effective AML/CTF program. These processes, systems and controls are intended to operate in a coordinated way; for example, upfront processes, systems and controls such as risk assessment and customer due diligence are linked to and

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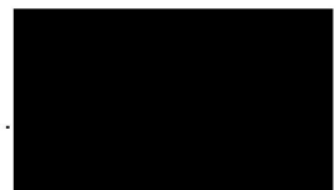
inform downstream components such as enhanced customer due diligence and transaction monitoring.

29. The detail of how each process, system and control works is specific to each organisation and is typically described in supporting documentation. However, I set out below a high level description of how each of these AML/CTF Program components typically operate.
30. Risk assessment involves an organisation proactively assessing the potential ML/TF risks inherent in their business, including the products/services they offer, the channels used to deliver those products/services, the customers/patrons they serve and the jurisdictions in which they operate. The insights generated from this assessment are then used to inform bespoke processes, systems and controls designed to identify, mitigate and manage those risks.
31. The objective of customer due diligence is to ensure that an organisation understands the identity of the customer prior to providing a designated service; in this case, a patron gaming account. Customer due diligence can help an organisation to identify customers that pose a higher risk of criminal activity, which typically triggers enhanced customer due diligence.
32. Enhanced customer due diligence requires an organisation to perform enhanced or additional procedures to determine the identity of the customer and the source of the customer's funds and wealth.
33. The objective of ongoing customer due diligence is to establish procedures to ensure that customer due diligence information is up to date, and also to monitor all customer transactions for indications of potentially suspicious activity (i.e. transaction monitoring).
34. Transaction monitoring may consist of system-based, automated monitoring, manual monitoring, or a combination of both. Transaction monitoring should be informed by the organisation's risk assessment, and be periodically refined to reflect internal and

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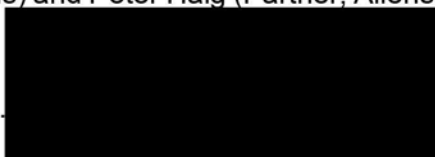
external intelligence, including analysis of the effectiveness of the current monitoring in detecting suspicious activity.

35. Employee Due Diligence typically consists of procedures to perform background checks and screening of individuals either prior to commencing employment with an organisation, or prior to taking on a new role in the organisation (particularly where this role may pose a higher risk of the facilitation of ML/TF). The nature and extent of Employee Due Diligence procedures should be informed by a risk assessment of all roles to determine the risk that a person in a particular role may be in a position to facilitate ML/TF.
36. Where an organisation identifies higher risk in the performance of any of these procedures, this may trigger a suspicious matter report and may also lead to the customer being exited from the organisation.
37. Section 3.3 of the Phase One report describes the way in which the restrictions imposed by Crown on the use of bank accounts operate.

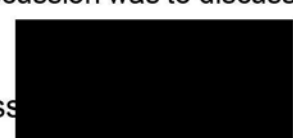
*Response to Questions 46 and 47*

38. For the purposes of Project Libby, Deloitte has conducted a series of discussions and walkthrough meetings with Crown staff. For the purpose of addressing questions 46 – 47 I have caused enquiries to be made within the Project Libby team, and set out the results of that enquiry at Appendix 1. Deloitte has not performed any “interviews” and our work has been based on documents provided by Crown and information gathered through the meetings set out at Appendix 1 and in paragraphs 39 – 41 below.
39. In addition to the discussions set out at Appendix 1, Deloitte held a project initiation meeting with Antonia Korsanas (Non-Executive Director and Chair of the Audit and Corporate Governance Committee), Jane Halton (Non-Executive Director and Chair of the Risk Management Committee), Steven Blackburn (Group Chief Compliance and Financial Crime Officer), Anne Siegers (Chief Risk Officer), Chris Kerrigan (Partner, Allens) and Peter Haig (Partner, Allens). The purpose of this discussion was to discuss

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the approach Deloitte was taking to Project Libby, and to verbally share initial interim observations.

40. Deloitte also has a regular cadence of check-in meetings three times a week with John Salamone (Chief Financial Officer – Australian Resorts) and Mary Gioras (Group Credit Manager). The purpose of these meetings is to facilitate the execution of Deloitte's work on Project Libby.

41. Deloitte has also established a twice-weekly Bank Account Statement Working Group, which includes Mary Gioras (Group Credit Manager), Trent Ternes (Credit Collections Manager) and Travis Costin (General Manager – Corporate Finance and Treasury) from Crown and Priya Chand from Allens who attends to help facilitate information requests and stay across progress. The purpose of this meeting is to discuss progress in collating relevant bank account statements, and clarifications on statements reviewed.

*Response to Question 48*

42. For the purpose of addressing question 48 I have caused enquiries to be made of Deloitte's financial systems and set out the results of that enquiry at Appendix 2.

*Response to Question 49*

43. Project Libby is currently in progress. Phase One has been completed, but for operational effectiveness testing with respect to the Patron Account Controls on transactions from Crown Perth, which is currently planned to commence in the week of 19 April 2021. Phase Two is underway and Phase Three is yet to commence, but for an initial document request that has been sent.

*Response to Question 50*

44. Deloitte does not propose to deliver interim reports for Project Libby.

*Response to Question 51*

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45. Deloitte will issue a final report at the conclusion of each Phase of Project Libby. The dates for the delivery of the final reports for Phases Two and Three have not yet been confirmed.

*Response to Question 52*

46. The final Phase One report is at [DTT.010.0002.0008]. Deloitte's assessment of Crown's proposed actions in response to the Phase One report is at [DTT.010.0002.0007].

*Response to Question 53*

47. Deloitte's findings and conclusions arising from Phase One of Project Libby are set out in sections 1, 5, 6 and Appendix 1 of the Phase One report.

**Other work**

*Response to Questions 54 and 55*

48. For the purpose of addressing questions 54 – 55 I have caused enquiries to be made of Deloitte's financial systems and of the relevant engagement partners, and set out the results of that enquiry at Appendix 3.

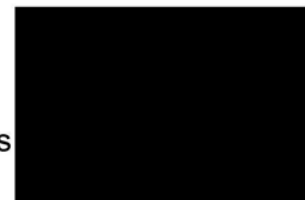
*Response to Question 56 - If Deloitte has been requested to undertake further work for Crown, outline the timeframe in which it expects to undertake and complete that work.*

49. For the purpose of addressing question 56 I have caused enquiries to be made of Deloitte's opportunity management system and of the relevant partners, and set out the results of that enquiry at Appendix 4.

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## APPENDIX 1

List of meetings held with Crown staff

Stakeholder(s) involved	Discussion topics
Nick Stokes (Head of Financial Crime and Group MLRO)	Phase 1 controls assessment and patron bank accounts
Mary Gioras (Group Credit Manager)	Patron bank accounts
Stephen Hancock (General Manager, Cage and Count – Melbourne) and David Brown (General Manager, Cage and Count – Sydney)	Patron bank accounts
Jasmeen Grover (Senior Group Manager – Gaming Solutions)	SYCO and Data Warehouse
Jon Yeats (Group Senior Manager Financial Crime)	Patron account control processes
David Brown (General Manager, Cage and Count – Sydney)	Patron account control processes
Mary Gioras (Group Credit Manager)	Patron account control processes
Jasmeen Grover (Senior Group Manager – Gaming Solutions); Mike Ohlmus (Cage VIP Operations Manager), Stephen Hancock (General Manager) and Mary Gioras (Group Credit Manager)	Walkthrough and showcase of SYCO screens for Patron Bank Accounts Review, viewing of telegraphic transfer and cash deposit and withdrawal SYCO screens
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) and Gabriella Plant (Credit Officer)	Walkthrough of end to end patron account control processes
Mike Ohlmus (Cage VIP Operations Manager); Stephen Hancock (General Manager, Cage and Count – Melbourne); Mary Gioras (Group Credit Manager)	Walkthrough to discuss testing outcomes
Nick Stokes (Head of Financial Crime and Group MLRO)	Discussion on future plans to automate patron bank account controls
Jon Yeats (Group Senior Manager Financial Crime)	Walkthrough Line 2 weekly process
Stephen Hancock (General Manager Cage and Count – Melbourne)	Cash deposits at bank branches
Vasula Kessell (Financial Controller – Crown Perth)	Return of funds process in Perth
Jon Yeats (Group Senior Manager Financial Crime)	Further clarification on Line 2 AML processes
John Salomone (Chief Financial Officer)	Walkthrough to clarify certain Crown Sydney bank accounts
Mary Gioras (Group Credit Manager)	Further clarification on potential TA deficiencies
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
Stephen Blackburn (Chief Compliance and Financial Crimes Officer); Nick Stokes (Head of Financial Crime and Group MLRO) and Adam Sutherland (Group Senior Manager)	Initial discussions on Phase 3 Controls Assessment

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Mary Gioras (Group Credit Manager); Trent Ternes (Credit Collections Manager) and Travis Costin (General Manager – Corporate Finance and Treasury)

Discussion on data request of patron accounts and non-patron accounts

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**APPENDIX 2**

List of Deloitte team members who have worked on Project Libby:

<b>Resource Name</b>	<b>Resource Level</b>	<b>Roles and Responsibilities</b>
Dobbin, Lisa	Partner	Partner responsible for the overall engagement (Project Libby)
Green, Mandy	Partner	Partner supporting the delivery of Project Libby
Tham, Tim	Partner	Partner supporting the delivery of Project Libby by providing leadership of data analytics support
Noble, Chris	Partner	Engagement Quality Assurance Partner
Stuart, Marina	Partner	Lead Risk Partner for Project Libby
Pilgram, Chris	Principal	Management of all non-email data transfers and associated governance / security protocols between Crown and Deloitte
Cass, Chris	Principal / Specialist Leader	Provision of subject-matter expert guidance around financial crime programs and ML/TF issues as required
Curry, Fred	Partner	Provision of expert advisory support on AML/CTF matters in the Casinos and Gaming Sector (United States)
Curwell, Paul	Director	Director - lead for Phase 2 workstream Director - secondary PMO support as required
Roberts, Caroline	Director	Director - lead for PMO work Director - lead for Phase 1 and Phase 3 workstream
Critchley, Chantelle	Sr Manager	Analyst - Phase 2
Sattar, Abdul	Sr Manager	Team Leader - Phase 2 workstream (excluding data analytics)
Gordon, Steven	Sr Manager	Team Leader - Phase 2 workstream (data analytics)
Regal, Olga	Manager	Provision of expert advisory support on AML/CTF matters in the Casinos and Gaming Sector (United States)
Zorzanello, Anthony	Sr Analyst	Analyst - Phase 1 and Phase 3 workstreams
Leask, Jay	Sr Analyst	Analyst - Phase 2
Fitzgibbons, Max	Sr Analyst	Analyst - Phase 2
Ireland, Jas	Sr Analyst	Analyst - Phase 2
Galea, Brandon	Sr Analyst	Analyst - Phase 2
Sanaee, Narges	Sr Analyst	Analyst - Phase 2
Lo, Grace	Manager	Team Leader - PMO and Phase 1 and Phase 2 workstreams
Jaja, Faith	Manager	Analyst - Phase 1 and 2
King, Jake	Manager	Day to day administration of data transfer protocols and conversion of files from PDF to CSV formats

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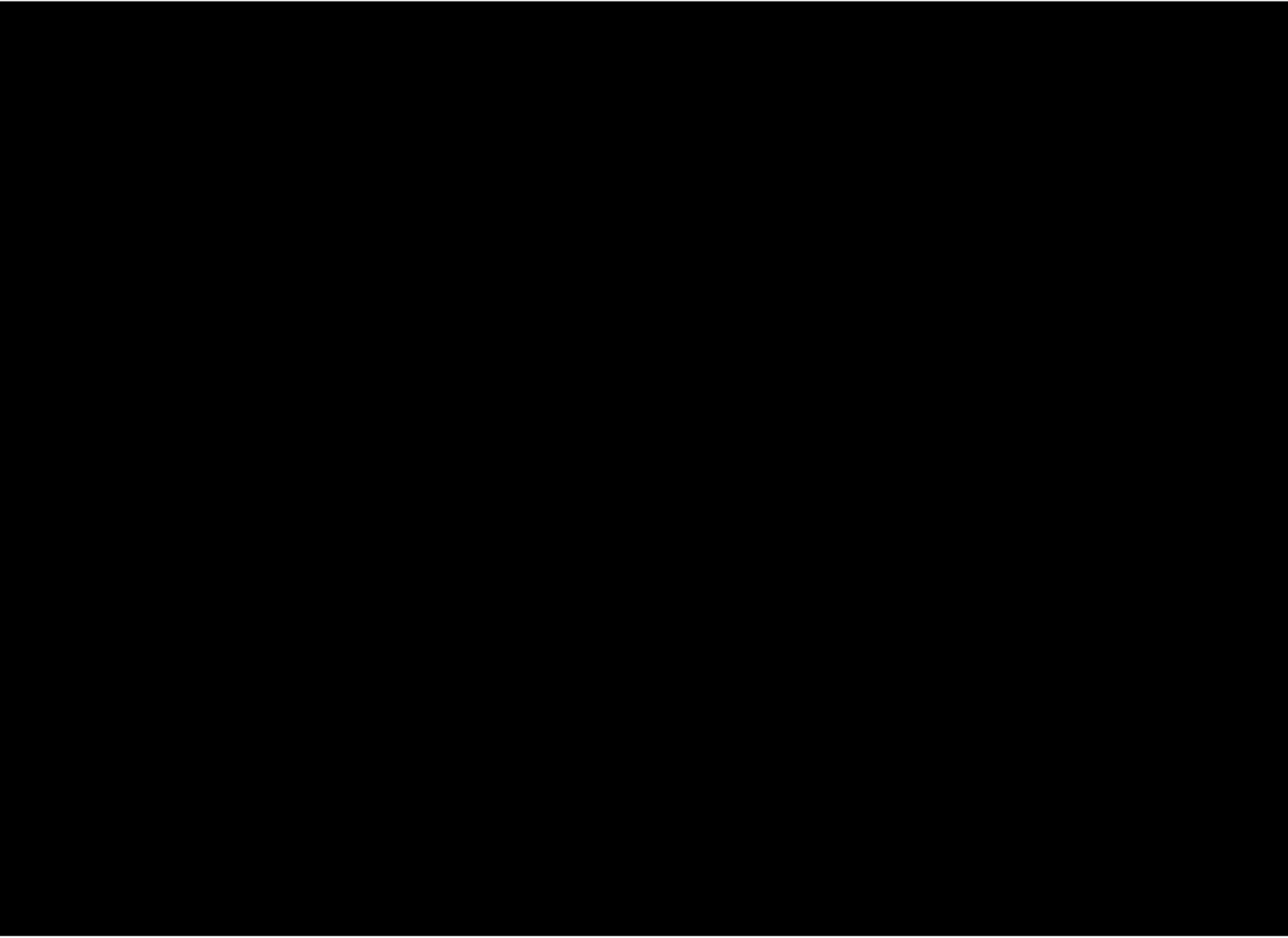
Vegunta, Yatindra	Manager	Preliminary data analysis and prioritisation - development of analytics based screening tools (Appendix 1)
Morison, Maxwell	Analyst	Analyst - PMO support, Phase 1, Phase 2 and Phase 3 workstreams
Tran, Anna	Analyst	Analyst – Phase 1 and Phase 2
Watkin, Charlie	Analyst	Analyst - Phase 2
Milligan, Connor	Analyst	Analyst - Phase 2
Song, Talia	Graduate	Analyst - Phase 2
Huang, Mary	Graduate	Analyst - Phase 2
Doctor, Adam	Graduate	Analyst - Phase 2
Ormsby, Karlene	Graduate	Analyst - Phase 2
Jovevski, Amanda	Graduate	Analyst - Phase 2
Li, Nathan	Graduate	Analyst - Phase 2

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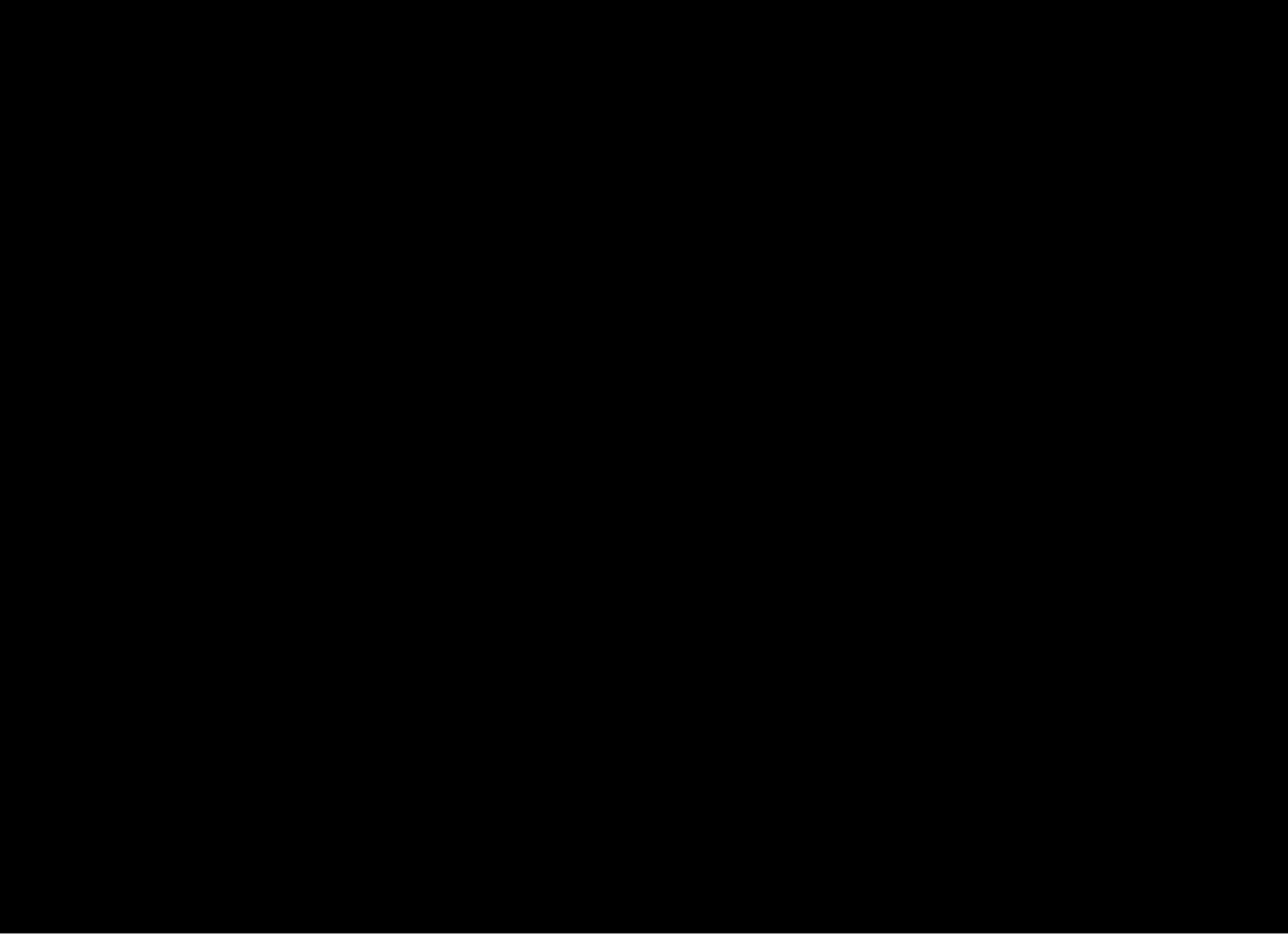










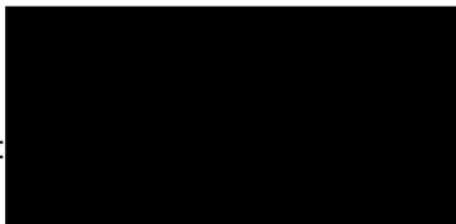


## APPENDIX 4

Overview of further Deloitte work being discussed with Crown

Crown entity	Engagement title of future work	Comments	Timeframe
Crown Resorts Limited	Ethical Decision Making Training (draft discussion document)	A draft discussion document has been provided to Crown with an indicative pricing to conduct a pilot for a selection of Perth employees regarding ethical decision making.	No decision has been made by Crown as yet to proceed with this engagement. Draft discussion paper provided to Crown on 7 April 2021.
Crown Melbourne Limited	Cloud Security Access Broker (CASB) and Data Loss Prevention (DLP) for Cloud Capability (proposal)	<p>Crown requires support with the implementation and operational enablement of CASB and DLP-for-cloud capability. The solution deployed will be the Forcepoint CASB Security Suite with DLP Cloud Applications.</p> <p>The first phase relates to the implementation of the foundational CASB and DLP-for-cloud solution. The second phase will initiate the operational aspects of the CASB and DLP-for-cloud capability.</p> <p>A proposal for potential services was provided to Crown during March 2021.</p>	Crown has deferred any decision making regarding this proposal until July 2021.
Crown Resorts Limited	Technical Standards for Gaming Machines	Deloitte has had exploratory discussions with Crown to support them in relation to their compliance with the VCLR's technical standards for gaming machines. At this stage, Deloitte will not be proceeding with any further discussions regarding this opportunity.	Not applicable

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<p>Crown Resorts Limited</p>	<p>Penetration Testing</p>	<p>Deloitte has had discussions with Crown to conduct a vulnerability assessment of the Crown Surveillance Network that will include authenticated and unauthenticated penetration testing of a selection of systems in the network.</p> <p>There has been no agreement regarding the commencement of this engagement and there is no signed engagement letter.</p>	<p>Not applicable</p>
<p>Crown Resorts Limited</p>	<p>Splunk Technical Capabilities</p>	<p>Deloitte has had several discussions with Crown over the last 12 month regarding opportunities to improve the technical deployment of Splunk.</p> <p>There has been no agreement regarding the commencement of engagements to support Crown in this regard and there is no signed engagement letter.</p>	<p>Not applicable</p>
<p>Crown Resorts Limited</p>	<p>Table Games Floorplan Data Analytics</p>	<p>Deloitte has been in discussion with Crown regarding support that we can provide in relation to using data analytics to optimise the staff allocation ratio for the Table Games Team. An outdated SoW was signed on 13 April 2021 in error and Crown management has been notified of this on 15 April 2021. We are currently working through updating the SoW and a new date for the project recommencement will need to be agreed to.</p>	<p>Not applicable</p>

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