



Memorandum

To: Ken Barton (Chief Executive Officer)

From: Claude Marais (General Manager – Legal and Compliance)

Date: 13 October 2020

Subject: **Riverbank Investments Pty Ltd (Riverbank) and Southbank Investments Pty Ltd (Southbank) Aggregation of Cash Deposits “Commercial in Confidence”**

Dear Ken,

1. Further to the Memorandum dated 29 September 2020, please note that, in circumstances in which two or more cash deposits under \$10,000 were identified within a 72 hour period, to determine an “instance” (being a potential singular structuring event), the bank statement was further reviewed for any other cash deposits under \$10,000 outside of the 72 hour period that formed part of the same aggregated credit transaction recorded in SYCO against the nominated patron.
2. Accordingly, for the avoidance of doubt, there are instances in which multiple cash deposits under \$10,000 have occurred over a number of days but are still recorded as one instance (including, for example, one instance in which 77 cash deposits were made between 9 June 2016 to 20 June 2016 and formed part of same aggregated credit transaction recorded in SYCO (TA048167) in which a total of \$600,000 was credited as one aggregated transaction to the nominated patron. This credited amount related to the redemption of a casino credit marker (used for gaming purposes) and this “instance” contained two or more cash deposits under \$10,000 identified within a 72 hour period (for example, 15 cash deposits under \$10,000 were made on 9 June 2016).
3. To this end, the Memorandum dated 29 September 2020, subject to the above clarification, should remain unchanged (and remains limited only those matters expressly forming part of the internal review scope) and as previously advised we will further update you as our investigations progress, which will include an external validation and review (by forensic auditors) of the Crown assessment.

Yours sincerely,

Claude Marais
General Manager – Legal and Compliance

