

XX May 2019

Our ref: CD/19/9176

Mr Joshua Preston  
Chief Legal Officer – Australian Resorts  
Crown Melbourne Limited  
8 Whiteman Street  
SOUTHBANK VIC 3006

Dear Mr Preston

### Sixth Casino Review - recommendation 17

I refer to Crown Melbourne Limited's (Crown's) letter dated 2 July 2018 in which Crown accepted the 20 recommendations made in the Sixth Casino Review report.

At its meeting on 23 May 2019, the Victorian Commission for Gambling and Liquor Regulation (the Commission) considered a paper which provided an update on the status of Crown's progress in relation each of the nine recommendations due for completion on the 1 July 2019. This paper outlined the Commission staff's view on progress against each recommendation, based on formal consultation with Crown, and an updated copy of Crown's progress schedule<sup>1</sup> outlining action it has or will take to address each of the 20 recommendations.

In its meeting the Commission noted a risk that Crown may not meet the intended outcomes of recommendation 17.

Recommendation 17 requires Crown, by 1 July 2019, to undertake a robust review (with external assistance) of relevant control statements, including input from AUSTRAC, to ensure that anti-money laundering risks are appropriately addressed.

Based on discussions with Commission staff and Crown's written updates, Crown appears reluctant to undertake a review of any relevant internal control statements (ICSs) with input from AUSTRAC.

As a result, Crown could risk being non-compliant with the recommendation and be directed to take remedial action.

The Commission requests, at a minimum, the relevant ICSs, including the Junkets and Premium Player Programs ICS, are provided to AUSTRAC to inform the review and assist Crown in ensuring that AML risks are appropriately addressed through its AML program as well as the ICSs.

Please contact Jason Cremona, Licence Manager, Licence Management and Audit on [REDACTED] or email: [REDACTED] if you have any further enquiries.

Yours sincerely

<sup>1</sup> Updated 'Recommendations Table' as provided by Michelle Fielding via email on 2 May 2019

Alex Fitzpatrick  
**Director, Licensing**