



OFFICIAL

Ref: 9688825

28 June 2019

Joshua Preston
Chief Legal Officer – Australian Resorts
Crown Resorts

By email: 

Dear Mr Preston,

Crown Melbourne – Review of Internal Control Statements – Consultation with AUSTRAC

Thank you for your letter dated 30 May 2019 attaching a number of Internal Control Statements (ICSs). In this letter you asked for AUSTRAC's views on the changes proposed by Crown Melbourne Limited (**Crown**) to these ICSs. We note that these changes, and your request for AUSTRAC input, were made pursuant to Recommendation 17 of the Sixth Review of the Casino Operation and Licence of July 2018 (**the Review**).

Following your letter you attended AUSTRAC's offices on 14 June 2019 to discuss the above (**the meeting**). At the meeting you also outlined the progress Crown is making toward implementing a new Anti-Money Laundering and Counter-Terrorism Financing Program (**AML/CTF Program**) which you expect to go before your Board for approval in August 2019.

Having considered your letter and the matters discussed at our subsequent meeting, it is AUSTRAC's view that how Crown addresses Recommendation 17 of the Review is a matter for Crown and that it is not appropriate for AUSTRAC to provide comment upon ICSs. AUSTRAC's role is to supervise Crown's compliance with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* and *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No.1)* including via its AML/CTF Program.

As such, AUSTRAC will continue to supervise Crown to ensure it adheres to AML/CTF laws designed to identify and mitigate its money laundering and terrorism financing risks.

We further note that the Review contains commentary adjacent to Recommendation 17 which states that:

"it would be beneficial if Crown Melbourne identified opportunities for regulators..... to assist in delivering enhanced AML/CTF training for casino staff."

As discussed at the meeting, AUSTRAC does not provide training to reporting entities. We do however continue to encourage Crown to review the money laundering typologies and other guidance produced by AUSTRAC and to build these into its internal training programs.

Correspondence

Personal Information 

www.austrac.gov.au

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Should you have any queries regarding the above please contact me on [REDACTED] or by email

[REDACTED]

Yours sincerely

[REDACTED] Personal Information

Acting Director, Regulatory Operations

AUSTRAC