



**Review of Riverbank and Southbank bank accounts  
for Indications of Money Laundering**

**16<sup>th</sup> November 2020**



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## EXECUTIVE SUMMARY

Initialism has been engaged by Crown Resorts (Crown) to consider whether there are indications of money laundering through its bank accounts used to receive funds linked to gaming activity at its Perth and Melbourne casinos.

The review was limited to the Crown Perth operated bank account in the name of Riverbank Investments Pty Ltd and the Crown Melbourne operated bank account in the name of Southbank Investments Pty Ltd. The bank accounts were held at both ANZ and CBA.

Crown's bank accounts were operated in an omnibus fashion i.e., they were operated by Crown but offered customers the option of depositing money to the bank accounts, which was subsequently used to fund gaming activity in Crown's casinos. Crown's use of the bank accounts in this way is similar to "client" or "trust" accounts operated by other types of business.

Similar to other bank accounts offered by financial institutions, Crown had limited control over how deposits were made into its bank accounts, including the nature and type of payments received.

The nature of Crown's Riverbank and Southbank bank accounts, similar to other types of omnibus bank accounts, Initialism believes, resulted in a potential vulnerability that the bank accounts could be exploited for purposes of laundering the proceeds of criminal activity.

The indicators of money laundering risk through the acceptance of gaming-related payments in Crown's bank accounts may differ from the indicators available to the financial institution providing the bank account to identify potential money laundering risks. However, both sets of indicators are based on money laundering being the illegal process of making money generated by a criminal activity, appearing to have come from a legitimate source.

The process of laundering money typically involves three steps referred to as placement, layering, and integration. Each of these steps has the following unique characteristics:

- Placement introduces the proceeds of criminal activity into the legitimate financial system.
- Layering conceals the source of the money through a series of transactions, distancing the money from the criminal activity and is designed to make money appear legitimate.
- In the final step, integration allows the laundered money, which now has the appearance of legitimacy, to be used for whatever purposes the criminals have in mind for it.

Money laundering through Crown's Riverbank and Southbank bank accounts could include:

- Structuring cash deposits to avoid reporting thresholds at the placement stage of a money-laundering scheme; and
- Receiving third party electronic payments that are part of the layering and integration stage of a money-laundering scheme.

Section 142 of the AML/CTF Act establishes that structuring, in and of itself, is a criminal offence where there is an intention to structure to avoid threshold transaction reporting. Therefore, it is reasonable to assume that apparent structuring is indicative of money laundering.

It is Initialism's experience that structuring can be used in combination with a number of other money laundering techniques and therefore may be indicative of other types of money-laundering activity.

In addition to structuring cash deposits, electronic funds transfers from third parties may also be indicative of money laundering activity.

Smurfing and cuckoo smurfing can both involve the indicator of structuring of cash deposits to avoid reporting thresholds however, the underlying methods of smurfing and cuckoo smurfing differ significantly.

- Smurfing involves every element of the money laundering process being controlled by the criminal enterprise and is typically a placement activity.
- Cuckoo smurfing is more sophisticated, utilising innocent parties making and receiving legitimate payments, inserting illicit funds into a legitimate payment. Cuckoo smurfing can be used at the placement or layering stages of money laundering.

Cuckoo smurfing is predominately a money laundering typology associated with international remittance payments.

Given that the ownership and control of the Riverbank and Southbank bank accounts rested with Crown and the purpose for the payments made to Crown appeared legitimate, it is Initialism's opinion that any indications of structuring through the Riverbank and Southbank accounts are unlikely to be indicative of smurfing activity for the purpose of money laundering through Crown.

However, based on our understanding of the operation of Crown's bank accounts and the nature and purpose of the payments received, it is Initialism's opinion that any indication of structuring and larger cash deposits through Crown's bank accounts is more likely to be part of cuckoo smurfing activity for the purpose of money laundering. Additionally, it should be noted that cuckoo smurfing is not limited to cash transactions and can also involve electronic funds transfers from third parties.

Initialism's review was limited to information contained within the statements related to the Riverbank and Southbank bank accounts, the analysis by Grant Thornton of the bank statements for those accounts, and limited supporting material provided by Crown in relation to some of the payment types identified through Grant Thornton's analysis.

As part of this review, Initialism has not undertaken a full end to end review of each payment and its handling by Crown nor have we investigated the circumstances and origin of each payment deemed indicative of money laundering. In addition, Initialism did not include any review of Crown's identification, management and mitigation of the money laundering and terrorism financing risks reasonably faced by Crown, both historically and at the present time.

Initialism's review of the activity through the Riverbank and Southbank accounts has concluded that there is activity indicative of structuring and cuckoo smurfing. The indications of cuckoo smurfing identified by the review included:

- Cash deposits by third parties structured below the \$10,000 reportable threshold;
- Large cash deposits by third parties; and
- Electronic funds transfer by both domestic and international third parties.

The indicia identified indicate that the cuckoo smurfing exploited legitimate payments relating to gaming activity by Crown's customers, interceding in the payment flow and replacing legitimate funds en-route to Crown.

In addition to the cuckoo smurfing indicia identified, Initialism's review identified the use of payment descriptors that appear inconsistent with the apparent legitimate purpose of the payment received by Crown.

Whilst Initialism has not reviewed each instance where an inconsistent payment descriptor was applied, it is our opinion that an inconsistent payment descriptor on its own is not indicative of money laundering.

A descriptor on a payment may be inconsistent with its legitimate purpose in order to conceal the nature of the payment due to cultural or confidentiality considerations. Additionally, the payment description may be appended to the payment by intermediaries rather than by the customer initiating the payment.

## STRUCTURED CASH DEPOSITS

Structuring to avoid a threshold transaction reporting obligation being triggered is an activity associated with the placement stage of money laundering and is a technique deployed to avoid reporting requirements put in place to tackle money laundering and terrorist financing.

Structuring involves the deposit of multiple physical cash amounts under the reportable threshold to avoid the transaction being reported to AUSTRAC, which would otherwise potentially be scrutinised by AUSTRAC and other regulatory or law enforcement authorities, where a single deposit of physical cash over the threshold would result in the deposit being reported to AUSTRAC.

AUSTRAC's definition of structuring<sup>1</sup> includes:

*Where a person deliberately:*

- *splits cash transactions to avoid a single large transaction being reported in threshold transaction reports.*

AUSTRAC defines a threshold transaction<sup>2</sup> as:

*A 'threshold transaction' is the transfer of physical currency of A\$10,000 or more (or the foreign currency equivalent) as part of a designated service. A transfer can be either receiving or paying cash.*

The Financial Action Task Force's (FATF) Asia Pacific Group (APG) provide the following description of structuring<sup>3</sup>:

*A method involving numerous transactions (deposits, withdrawals, transfers), often various people, high volumes of small transactions and sometimes numerous accounts to avoid detection threshold reporting obligations.*

AUSTRAC guidance also states:

*Structuring can be a money laundering technique and is against the law under the AML/CTF Act.*

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<sup>1</sup> AUSTRAC definition of structuring <https://www.austrac.gov.au/glossary/structuring#:~:text=Structuring%20is%20where%20a%20person%20border%20movements%20of%20the%20cash.>

<sup>2</sup> AUSTRAC definition of a threshold transaction <https://www.austrac.gov.au/business/how-comply-guidance-and-resInitialism'sces/reporting/cash-transactions-over-10000-trr>

<sup>3</sup> Introduction to APG Typologies [http://www.apgml.org/methods-and-trends/page.aspx?p=a4a11dca-75f2-4dae-9c25-6215103e56da#:~:text=Structuring%20\(smurfing\)%3A%20A%20method%20avoid%20detection%20threshold%20reporting%20obligations.](http://www.apgml.org/methods-and-trends/page.aspx?p=a4a11dca-75f2-4dae-9c25-6215103e56da#:~:text=Structuring%20(smurfing)%3A%20A%20method%20avoid%20detection%20threshold%20reporting%20obligations.)

The criminal offence of structuring, where there is an intention to structure to avoid threshold transaction reporting, is set out in section 142 of the AML/CTF Act. Therefore, it is reasonable to assume that apparent structuring is indicative of money laundering.

In addition to indications of structuring contrary to section 142(1) of the AML/CTF Act being indicative of money laundering, it is also Initialism's experience that structuring can be used in combination with other money laundering techniques and therefore structuring may be indicative of other money laundering activity.

Structuring may be indicative of a money laundering technique called "smurfing", which is defined by AUSTRAC<sup>4</sup> as:

*A technique called 'smurfing' involves numerous third parties conducting transactions on behalf of criminals. Large cash amounts are broken into multiple smaller amounts and then given to third parties to deposit in accounts held in different financial institutions.*

Smurfing involves the use of bank accounts under the control of the criminal or criminal organisation that receives structured deposits. The technique of smurfing is used in the placement stage of money laundering. For example, a criminal group with \$100,000 in cash for laundering may use several "smurfs" to deposit anywhere from \$5,000 to \$9,000 in a number of geographically dispersed accounts.

Structured cash deposits may therefore be indicative of smurfing. However, the ownership and control of the bank accounts receiving the payments is an important indicator when determining whether any perceived structuring is indicative of smurfing activity for the purpose of laundering the proceeds of crime.

By way of illustrative example, part of the AUSTRAC civil claim against CBA involved the use of CBA's Intelligent Deposit Machines (IDMs) to structure payments that were part of the money laundering system used to launder at least \$177 million of the proceeds of methamphetamine (Ice) drug trafficking. This is, in Initialism's opinion, an example of smurfing as the structuring was of cash deposits by those that had control over the bank accounts receiving the deposits.

The ownership and control of the Riverbank and Southbank bank accounts rest with Crown. Therefore, it is Initialism's opinion that indications of structuring through the Riverbank and Southbank accounts are unlikely to be indicative of smurfing activity to launder money by Crown.

From around 2008, AUSTRAC coined the phrase "cuckoo smurfing" to describe a derivation of smurfing. AUSTRAC identified that criminal syndicates were reintroducing cash into the banking system by "hijacking" the lawfully earned funds of unsuspecting victims.

AUSTRAC formally identified cuckoo smurfing as an emerging threat in its 2011 typologies report<sup>5</sup> stating:

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<sup>4</sup> AUSTRAC 2011 Typologies Money transfer businesses and alternative remittance services <https://www.austrac.gov.au/business/how-comply-guidance-and-resInitialism'sces/guidance-resInitialism'sces/money-laundering-australia-2011#:~:text=Cuckoo%20smurfing.&text=It%20involves%20complicit%20remittance%20dealers,from%20legitimate%20transactions%20made%20overseas>.

<sup>5</sup> AUSTRAC 2011 Typologies Money transfer businesses and alternative remittance services <https://www.austrac.gov.au/business/how-comply-guidance-and-resInitialism'sces/guidance-resInitialism'sces/money-laundering-australia-2011#:~:text=Cuckoo%20smurfing.&text=It%20involves%20complicit%20remittance%20dealers,from%20legitimate%20transactions%20made%20overseas>.

*Cuckoo smurfing. This has emerged as a key money laundering methodology over the past decade. It involves complicit remittance dealers operating as 'go-betweens', depositing illicit funds (for instance, the proceeds from drug deals) into accounts of parties who are expecting transfers from legitimate transactions made overseas. In exchange, criminals receive matched payments overseas without leaving a money trail back to them.*

The cuckoo smurfing has usually been a money laundering typology associated with the remittance sector. Unlike smurfing, cuckoo smurfing involves the cover of legitimate transactions to conceal the money laundering activity. However, cuckoo smurfing may only involve one deposit compared to smurfing, which, by definition, involves more than one deposit.

AUSTRAC has previously explained their use of the term cuckoo smurfing stating:

*The term 'cuckoo smurfing' originated in Europe because of similarities between this typology and the activities of the cuckoo bird. Cuckoo birds lay their eggs in the nests of other species of birds which then unwittingly take care of the eggs believing them to be their own. In a similar manner, the perpetrators of this money laundering typology seek to transfer wealth through the bank accounts of third parties.*

Whilst structuring and cuckoo smurfing can be viewed as distinct and separate money laundering methods, there is evidence that structuring and cuckoo smurfing have been used in combination as part of money laundering activity in Australia.

In 2017, the issue of cuckoo smurfing was highlighted at a Victorian Bar conference in a presentation by Mr Christian Juebner about the impact of the Proceeds of Crime Act 2020<sup>6</sup>. This presentation highlighted the risk of cuckoo smurfing to law firms, using the example of Australian Significant Investor Visa applications from countries including China, Malaysia, and Vietnam. Mr Juebner set out an example of cuckoo smurfing as a four-step process which is illustrative of cuckoo smurfing indicia:

*Step 1 - A legitimate customer deposits funds with an alternative remitter in a foreign country for transfer into another customer's Australian bank account. This is a legitimate activity and is often a cheaper and faster alternative to using a mainstream bank.*

*Step 2 - Unbeknown to the customer, the alternative remitter is part of a wider criminal syndicate involved in laundering illicit funds. This criminal remitter, while remaining in the foreign country, provides details of the transfers, including the amount of funds, to a criminal based in Australia; This includes the account details of the intended recipient in Australia;*

*Step 3 - The Australian criminal deposits illicit cash profits from Australian crime syndicates into the bank account of the customer awaiting the overseas transfer. The cash is usually deposited in small amounts to avoid detection under transaction threshold reporting requirements. After an account balance check, the customer believes that the overseas transfer has been completed as legitimately arranged.*

*Step 4 The Australian criminal travels overseas and accesses the legitimate money that was initially deposited with the alternative remitter. The illicit funds have now been successfully laundered - the criminal owes nothing but a commission to the money launderer for their work.*

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<sup>6</sup> Victorian Bar <https://www.vicbar.com.au/file/5693/download?token=d7K54XcS>

*It is important to recognise the high level of sophistication and organisation required to successfully operate a cuckoo smurfing syndicate. The essential actors in a typical scenario are:*

- *an innocent customer seeking to transfer funds from overseas into Australia; This innocent customer could be either:*
  - *an innocent Australian customer overseas seeking to transfer funds into their own account in Australia, or*
  - *an innocent customer overseas seeking to transfer funds to another customer located in Australia*
- *a criminal alternative remitter located overseas*
- *a complicit, Australian-based criminal seeking to transfer funds overseas*
- *an organiser or coordinator in Australia*
- *associates of this organiser or coordinator who make third party deposits into the Australian customer's account.*

The example provided by Mr Juebner also highlights that another dimension, sometimes leveraged by cuckoo smurfing, is the need of customers making legitimate payments from an Australian perspective to navigate currency controls in their own country. Currency controls limit the amount of money that can be sent overseas without authorisation by or providing transparency to, the authorities in countries such as China and Malaysia.

A separate case originally heard in the Supreme Court in NSW and subsequently heard on appeal by the High Court of Australia<sup>7</sup> in 2019, provides a typology of cuckoo smurfing that involved indicia of structured cash deposits. In the appeal decision, the High Court stated that cuckoo smurfing:

*[I]t relies on identifying a person offshore who wishes to transfer funds to a bank account in Australia using a money remitter. The remitter withholds amounts corresponding to the amount of money he has been told is to be laundered in Australia; The customer's bank account details are provided to people in Australia; A team of depositors in Australia deposits cash into the bank account, generally at a series of bank branches and below the threshold for reporting transactions involving physical currency. The account holder sees deposits that match the amounts they intended to remit. Because the amounts of each deposit are below the threshold, there is generally no record that could enable regulatory agencies to intervene.*

In its 2020 Typologies Report<sup>8</sup>, the FATF Asia Pacific Group (APG) also identified a typology from AUSTRAC for cuckoo smurfing with the indicia of structured cash deposits:

*AUSTRAC supplied financial intelligence to assist a law enforcement investigation into an extensive international network of remittance service providers laundering millions of dollars out of Australia on behalf of organised crime syndicates and cancelled the registrations of several remittance providers.*

*Australia-based crime syndicate members used the remittance network to exchange funds obtained through criminal activities for legitimate, or 'clean', funds held overseas.*

<sup>7</sup> High Court Judgement August 2019 <http://eresinitialism'sces.hclnitialism'st.gov.au/downloadPdf/2019/HCA/39>

<sup>8</sup> APG Typologies 2020 Report (page 20) <http://www.apgml.org/methods-and-trends/page.aspx?p=8d052c1c-b9b8-45e5-9380-29d5aa129f45>

*The network, which operated mainly out of India but also had connections to the UK and the US, used Australian bank accounts, corporate structures, and complicit remitting agents in Australia and overseas to launder the funds.*

*The investigation identified Australian bank accounts that were receiving multiple cash deposits, structured to avoid triggering any threshold transaction reports by the banks. Further investigation connected the account holders with property purchases, and large amounts of cash suspected to be the proceeds of crime. The funds in the accounts were also shown to be inconsistent with the income tax declarations of the account holders.*

*Law enforcement in Australia, India, the US, and the UK made a number of arrests.*

*Two offenders in Australia were arrested and charged with offences relating to dealing in the proceeds of crime, while three offenders in India were charged on drug trafficking and ML offences. Authorities seized around AUD10 million (USD6.9 million) in assets.*

## **CUCKOO SMURFING USING STRUCTURED CASH DEPOSITS**

The structuring of cash deposits, in Initialism's opinion, will have the following indicia:

- The money is deposited through multiple cash deposits below the \$10,000 threshold
- The value of the cash deposits, in aggregate, is over the \$10,000 threshold
- The cash deposits occur within a short period of time
- The deposits during the period may have taken place at different locations (bank branches)

Cuckoo smurfing, in Initialism's opinion, also has specific indicia:

- There is a legitimate need to send money from overseas and deposit it in a foreign country.
- A money remitter is engaged to send the money overseas and deposit it in a foreign country.
- The money remitter accepts legitimate money in the foreign country
- The money remitter arranges for the funds to be made available and they or their counterpart in the receiving country arrange for illicit funds in the foreign country to be used to complete the deposit for the legitimate transaction
- The legitimate money is then made available, outside the foreign country where the deposit took place, to the person in control of the illicit funds before it is deposited.
- The person with the legitimate reason to send money to a foreign country is unaware that their transaction has been effected using illicit funds.
- The party receiving the funds in their bank account is not involved in the cuckoo smurfing activity and believes the funds are legitimate.

It is Initialism's opinion that indications of structured cash deposits into a bank account can also be indicative of cuckoo smurfing as part of money laundering activity.

Smurfing and cuckoo smurfing can both involve the indicia of the structuring of cash deposits to avoid reporting thresholds. However, the indicators of smurfing and cuckoo smurfing differ significantly.

- Smurfing involves every element of the money laundering process being controlled by the criminal enterprise and is typically a placement activity.
- Cuckoo smurfing is more sophisticated, utilising innocent parties making and receiving legitimate payments, inserting illicit funds into a legitimate payment. Cuckoo smurfing can be used at the placement or layering stages of money laundering



If cuckoo smurfing involves structured cash deposits it has the following indicia, which are a combination of the indicia of structuring cash deposits and cuckoo smurfing:

- There is a legitimate need to send money from overseas and deposit it in a foreign country.
- A money remitter is engaged to send the money overseas and deposit it in a foreign country.
- The money remitter accepts legitimate money in the foreign country
- The money remitter arranges for the funds to be made available and they or their counterpart in the receiving country arrange for illicit funds in the foreign country to be used to complete the deposit for the legitimate transaction
- The money is deposited through multiple cash deposits below the \$10,000 threshold
- The value of the cash deposits, in aggregate, is over the \$10,000 threshold
- The cash deposits occur within a short period of time
- The deposits during the period may have taken place at different locations (bank branches)
- The legitimate money is then made available outside the foreign country where the deposit took place to the person in control of the illicit funds before it is deposited.
- The person with the legitimate reason to send money to a foreign country is unaware that their transaction has been effected using illicit funds.

### **CUCKOO SMURFING USING OTHER THIRD-PARTY DEPOSITS**

Whilst third-party structured cash deposits are a leading indicator of cuckoo smurfing, cuckoo smurfing also occurs through bank accounts where electronic funds transfers expected from overseas are received from unexpected sources. This includes:

- third-party cash payments that are large cash deposits over the reporting threshold.
- third-party payments that are paid into bank accounts either in the country where the payment is expected to be received or in other countries.

Third-party payments on their own, in Initialism's opinion, are not indicative of cuckoo smurfing and in order to identify activity indicative of cuckoo smurfing, additional investigation should be undertaken to identify additional indicia. These indicia include:

- Variation in how the payment was sent against how it was received;
- Variations to the nature/type of the payment (for example cash or electronic transfer); and
- Variations to the structure of the payment (for example large single payment sent and multiple smaller payments received).

As cuckoo smurfing uses the cover of legitimate payment activity, another potential indicator of cuckoo smurfing is if the payment activity deviates from the usual payment methods undertaken by a customer.

As a result, in addition to the indicator of structured cash deposits, the indicia appropriate to identify cuckoo smurfing also include:

- Legitimate payments split into multiple large cash deposits;
- Legitimate payments from overseas customers being received from unrelated overseas third parties;
- Legitimate payments from overseas customers being received from unrelated domestic third parties;
- Unexpected type of third-party being involved with a payment such as companies.

## **STRUCTURING INDICIA SUPPORTED BY BANK STATEMENT DATA**

Bank account statements provide limited data and information about a deposit that could be used to identify whether the activity is indicative of structuring to avoid the \$10,000 threshold.

Based upon Initialism's review of the Riverbank and Southbank bank account statements, the indicia available to identify potential structuring are:

- The date of the deposit.
- Whether the deposit is cash.
- The amount deposited.
- A reference number (which may correlate to a customer number).

However, it is Initialism's opinion that the use of this data will only provide indicative results and additional indicia are required to identify potential structuring related to money laundering, including:

- The purpose of the deposits.
- How the deposit came to be made.
- The nature of the deposits with regard to location and timing.
- Whether the deposits are out of character for the customer based on previous transactional history and an understanding of the perceived money laundering and terrorism financing risks identified.

Notwithstanding the limited nature of the information available in the Crown bank account data and the limitations that impact on the ability to systematically draw conclusions based solely on the bank account data, it is Initialism's opinion that indications of structuring through Crown's bank accounts can be initially determined by identifying two or more cash deposits for a single customer in a short period, each under \$10,000 but totalling \$10,000 or more.

The identification of two or more cash deposits for a single customer in a short period, each under \$10,000 but totalling \$10,000 or more will identify any series of transactions which meet the indicia of structuring provided by AUSTRAC and section 142 of the AML/CTF Act.

Additionally, for completeness based on the FATF's definition of structuring, it is Initialism's opinion that the bank account data available could be used to identify another type of structured deposits by identifying where there is one cash deposit of less than \$10,000 and one or more wire transfers of less than \$10,000 or more, which total \$10,000 or more in a short period of time for a single customer.

## **CUCKOO SMURFING INDICIA SUPPORTED BY BANK STATEMENT DATA**

Notwithstanding the limited nature of the information available in the Riverbank and Southbank bank statement data and the limitations that impact on the ability to systematically draw conclusions based solely on the data, it is Initialism's opinion that the following indicia are available to identify cuckoo smurfing from the bank statement data:

- Structured cash deposits made by a third party;
  - Large cash deposits made by a third party;
  - Domestic electronic funds transfer received from an apparently unrelated third party;
  - International electronic funds transfer received from an apparently unrelated third party;
- and

- International electronic funds transfer received from an overseas money remitter.

These indicia may be indicative of payment activity linked to cuckoo smurfing. However, the results should be supplemented by additional indicia about the purpose of the payment by the customer to establish the legitimate purpose (i.e. it was in relation to gaming activity with Crown), to conclude an indication of cuckoo smurfing money laundering activity.

## **ANALYSIS OF BANK ACCOUNT ACTIVITY FOR INDICIA**

Initialism has worked with Grant Thornton to analyse Crown's Riverbank and Southbank bank accounts:

- Crown provided the bank account data to Grant Thornton and Initialism.
- Grant Thornton modelled and analysed the Crown bank account data and ran a series of scenarios requested by Initialism over that data; and
- Initialism undertook a review of the results of Grant Thornton's analysis of the bank account data against a set of scenarios based on the indicia available and limited supporting transaction information provided by Crown.

Grant Thornton's scenarios provided Initialism with the following indicia data sets based on the Riverbank and Southbank bank statement information:

- Instances where more than two cash deposits occurred in a short period of time, both less than \$10,000 but combined totalling \$10,000 for a single customer.
- Instances where one cash deposit and one electronic funds transfer occurred in a short period of time, both less than \$10,000 but combined totalling \$10,000 for a single customer
- Instances where multiple large cash deposits occurred in a short period for a single customer.
- Instances where payments were made on behalf of a customer by an overseas money remitter.
- Instances where international payments were made on behalf of a customer by an apparently unrelated third party.

Initialism reviewed the activity identified by Grant Thornton by applying indicia against the Crown Riverbank and Southbank bank statements, including but not limited to indicia of structuring of cash deposits.

Initialism then reviewed other information supplied by Crown in relation to the structuring activity identified to assess if there were other additional indicia of money laundering.

## CONCLUSIONS FROM REVIEW

The results of the review have been grouped into indicia for the money laundering typologies relevant to the use of Crown's Riverbank and Southbank bank accounts to accept legitimate payments from customer related gaming activity.

The analysis by Grant Thornton identified the following payments by type over the period under review:

	Number Cash Payments	Number Domestic Transfers	Number International Transfers	Total Number
Riverbank ANZ Account	340	50	118	508
Riverbank CBA Account	284	1,225	371	1,880
Southbank CBA Account	1,311	18,144	2,193	21,648
Total Number	1,935	19,419	2,682	

### Structured cash deposits

Initialism reviewed the activity identified by Grant Thornton by applying indicia against the Crown Riverbank and Southbank bank statements and is of the view that there are 117 instances that are indicative of structuring to avoid the \$10,000 cash reporting threshold through the Riverbank bank accounts and 53 instances that are indicative of structuring to avoid the \$10,000 cash reporting threshold through the Southbank bank account.

Initialism undertook further analysis of the structured payments and identified multiple patterns of indicia that, in Initialism's view, are also indicative of cuckoo smurfing. The patterns of indicia also indicate that cuckoo smurfing appears to have exploited legitimate payments relating to gaming activity by Crown's customers, replacing legitimate proceeds en-route to Crown and before their receipt by Crown in the Riverbank and Southbank accounts.

### Cuckoo smurfing using structured cash deposits

It is Initialism's opinion that the activity in the Riverbank and Southbank accounts is indicative of potential exploitation by cuckoo smurfing activity as part of money laundering schemes that made structured cash deposits below the reportable threshold into the Riverbank and Southbank bank accounts.

Initialism identified 180 incidents across the Riverbank and Southbank bank accounts, each represented a series of cash deposits for a customer. Leveraging additional information provided by Crown, Initialism established that the structured cash deposits appear to be the result of a legitimate payment related to gaming activity initiated by an overseas customer of Crown.

These incidents each appear to be indicative of either structuring by the customer or cuckoo smurfing based on the number of structured cash deposits at different branches, the round \$ value of the deposits, and the customer is not domiciled in Australia, and/or where the cash deposits have been made in a different State of Australia to Crown's premises, indicating the customer may not have been involved in the deposit of funds.

It is Initialism's opinion that the majority of incidents of structuring identified are indicative of cuckoo smurfing.

For more details of Initialism's analysis that led to this conclusion, please see Appendix A for the analysis of the structured cash deposits.

## **Cuckoo smurfing using large cash deposits**

It is Initialism's opinion that the activity on the Riverbank and Southbank accounts is indicative of potential exploitation by cuckoo smurfing activity as part of money laundering schemes that made large cash deposits above the reportable threshold into the Riverbank and Southbank bank accounts.

Initialism identified 49 incidents across the Riverbank and Southbank bank accounts, 16 in relation to Riverbank and 33 in relation to Southbank, where apparent multiple large cash deposits for the benefit of a Crown customer was unrelated to the incidents of structured cash deposits detailed above.

These incidents each appear to be indicative of cuckoo smurfing based on the number of deposits at different branches, the value of the deposits, and the customer is not domiciled in Australia, and/or or where the cash deposits have been made in a different State of Australia to Crown's premises, indicating the customer may not have been involved in the deposit of funds.

For more details of Initialism's analysis that led to this conclusion, please see Appendix B for the analysis of the large cash deposits.

## **Cuckoo smurfing using third-party electronic funds transfers**

It is Initialism's opinion that the activity in the Riverbank and Southbank accounts is indicative of potential exploitation using cuckoo smurfing techniques employed by money laundering syndicates that made third party electronic transfers into the Riverbank and Southbank bank accounts.

Initialism's review identified the following patterns of indicia regarding electronic funds transfers received by the Riverbank and Southbank bank accounts:

- International electronic funds transfers by a third party, who may be an individual, on behalf of a Crown customer;
- International electronic funds transfers by a third party, which may be a company, on behalf of Crown customer;
- International electronic funds transfers by a third party, which may be an overseas money remitter, on behalf of a Crown customer;
- Domestic electronic funds transfers by a third party (individual or company) on behalf of a Crown customer.

### **International transfers by a third-party individual on behalf of a Crown customer**

Initialism identified some transactions which appear to be made by individuals unrelated to Crown's customer. The payments appear to have been made in the name of the unrelated individual but contain either the Crown customer's name or a Crown customer number as part of the payment reference.

Whilst inconclusive on its own, the use of third-party individuals and the pattern of payments evidenced by the Riverbank and Southbank bank accounts, in Initialism's opinion, align to the indicia of cuckoo smurfing activity for the purposes of money laundering.

Some third party international electronic funds transfers from individuals also appear to be constructed in a particular way. The Riverbank and Southbank account evidence deposits from multiple third parties to a single customer, multiple deposits from the same third party to a single

customer in quick succession, and multiple deposits from the same third party to multiple customers over a short period of time.

For examples of the payments that led to Initialism's conclusions regarding the patterns of cuckoo smurfing indicia related to third-party payment by unrelated individuals, please see Appendix C.

#### **International transfers by a third-party company on behalf of a Crown customer**

Initialism identified some transactions which appear to be made by companies unrelated to Crown's customer. The payments appear to have been made in the name of the unrelated company but contain either the Crown customer's name or a Crown customer number as part of the payment reference.

Whilst inconclusive on its own, the use of third-party companies and the pattern of payments evidenced by the Riverbank and Southbank bank accounts, in Initialism's opinion, align to the indicia of cuckoo smurfing activity for the purposes of money laundering.

Some third party international electronic funds transfers from companies also appear to be co-constructed in a particular way. The Riverbank and Southbank account evidence multiple deposits from the same third party to a single customer in quick succession and multiple deposits from the same third party to multiple customers over a short period of time.

For examples of the payments that led to Initialism's conclusions regarding the patterns of cuckoo smurfing indicia related to international third-party payment by unrelated companies, please see Appendix D.

#### **International transfers by overseas money remitters on behalf of a Crown customer**

Initialism used information provided by Crown about known overseas money remitters to identify International transfers by overseas money remitters on behalf of Crown customers and identified 100 payments of this nature in the Riverbank accounts and 502 payments of this nature in the Southbank account.

Whilst the use of overseas money remitters alone is not indicative of money laundering or cuckoo smurfing. In some countries, it is Initialism's experience, money remitters are more widely used than with less efficient banking systems.

Based on information provided by Crown, Initialism's review also identified that some of the overseas money remitters making electronic funds transfers on behalf of Crown customers used unrelated company names to make the payments, concealing that the payment was made by an overseas money remitter.

Whilst inconclusive on its own, the use of overseas remitters and the pattern of payments by overseas money remitters as evidenced by the Riverbank and Southbank bank accounts, in Initialism's opinion, align to the indicia of cuckoo smurfing activity for the purposes of money laundering.

Some third party international electronic funds transfers from money remitters also appear to be constructed in a particular way. The Riverbank and Southbank account evidence multiple deposits from the same remitter to a single customer in quick succession and multiple deposits from the same third party to multiple customers over a short period of time.

Initialism's review also identified the use of inconsistent payment descriptors on some payments made by money remitters, these include descriptions such as "HEX PAYMENT" or "FOR

BUSINESS". It is Initialism's experience that descriptors can be used to conceal the nature of the payment due to cultural or confidentiality considerations. Additionally, the description may be appended to the payment by intermediaries rather than the payer (Crown customer) to avoid issues with effecting the payment into Australia.

For details of the payments that led to Initialism's conclusions regarding the patterns of cuckoo smurfing indicia related to overseas money remitters, please see Appendix E.

#### **Domestic transfers by a third-party on behalf of a Crown customer**

Initialism identified some transactions which appear to be made by domestic (Australian) third parties (individuals or companies) unrelated to Crown's customer. The payments appear to have been made in the name of the unrelated third party and contain either the Crown customer's name or a Crown customer number as part of the payment text.

Whilst inconclusive on its own, the use of domestic third parties evidenced by the Riverbank and Southbank bank accounts, in Initialism's opinion, align to the indicia of cuckoo smurfing activity for the purposes of money laundering.

Some third-party electronic funds transfers from domestic bank accounts also appear to be constructed in a particular way. The Riverbank and Southbank account evidence multiple deposits from the same remitter to a single customer in quick succession and multiple deposits from the same third party to multiple customers over a short period of time.

For examples of the payments that led to Initialism's conclusions regarding domestic payment by unrelated third parties, please see Appendix F.

#### **Inconsistent payment descriptors**

Additionally, during the review, Initialism identified several instances where payments into the Riverbank and Southbank bank accounts were accompanied by payment descriptions that conflicted with the underlying purpose of the payment to Crown.

Whilst Initialism has not reviewed each instance where an inconsistent description was applied, it is our opinion that an inconsistent description on its own is not indicative of money laundering activity however, it is our experience that it is problematic to systematically monitor descriptions on payments. Therefore, we understand that descriptions are used as a secondary element when reviewing a transaction or payment that has been deemed unusual due to other reasons.

The use of descriptions as a secondary indicator is because it would require prior knowledge of the purpose of each payment prior to processing to determine whether the description is inconsistent, and an acceptance that whilst the description of the payment is inconsistent there may be legitimate rationale used to conceal the nature of the payment due to cultural or confidentiality considerations. Additionally, the description may be appended to the payment by intermediaries rather than the payer (Crown customer) to avoid issues with effecting the payment.

For examples of the payments that include inconsistent descriptors please see Appendix G.

## APPENDIX A – REVIEW OF STRUCTURED CASH DEPOSIT INCIDENTS

Note that where a customer (PID) has received both structured deposits below the reportable threshold and also Quick-Cash deposits these are included in the Appendix A incidents.

### Riverbank Bank Account Review

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 cash deposits (less than \$10,000 each) on the same day (04/03/2014) at three different ANZ branches/ATMs in Central Sydney, all within less than 2km of each other;
- Purpose of funds deposited for 'Credit Redemption';
- Deposit locations: Close proximity;
- 'Credit Redemption' requested (05/03/2014) the day after cash deposited – no indication of client communication to apply 'Credit Redemption';
- Patron member level status 'VIP1' with Perth since 2007;
- Unexplained correlation between establishment where patron plays (assumption is in Perth) and the cash deposits in Sydney;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Not available to sign – indicating client was not present in Perth.
- Patron not ordinarily domiciled in Australia;

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the deposits have been made in a different State of Australia to Crown Perth's premises, indicating the Patron was not involved in the deposit of funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5725 – 2 cash deposits (less than \$10,000 each) on the same day (25/07/2013) at two different ANZ branches/ATMs in the Parramatta region, within less than 2km of each other;
- TA5807 – 3 cash deposits (less than \$10,000 each) on the same day (23/08/2013) at three different ANZ branches in the North Western Sydney region, within less than 20km of each other;
- Deposit locations: Within each date are close proximity, and in combination appear to be within a corridor;
- The series of apparent structured cash deposits occurred ~1 month apart;
- Purpose of funds deposited for 'Safekeeping/Credit Redemption';



- 'Credit Redemption' for TA5725 requested (30/07/2013), 5 days after cash deposited – 'Safekeeping/Credit Redemption';
- Patron appears to be a 'Representative' from Junket Operator [REDACTED] with specific restrictions in place for 'Representatives';
- 'Credit Redemption' for TA5807 requested (28/08/2013), 5 days after cash deposited – 'Credit Redemption';
- One Quick Cash deposit for \$16,360 on 16/10/2015 at a Sydney Branch
- Patron member level status 'VIP' with Perth since 1993;
- Nature and purpose of deposits appears to be to repay a portion of the gaming credit totalling more than \$74k;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Not available to Sign for both TA5725 and TA5807 - indicating client was not present in Perth.
- Patron not ordinarily domiciled in Australia;

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the deposits have been made in a different State of Australia to Crown Perth's premises, indicating the Patron was not involved in the deposit of funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA7173 - funds deposited in the following sequence:
  - 2 cash fund deposits (less than \$10,000 each) on the same day (21/05/2015) at two different CBA branches in the North Western Melbourne region, within less than 15km of each other;
  - 3 cash deposits (less than \$10,000 each) on the same day (22/05/2015) at two different CBA branches in the Western Melbourne region, within less than 20km of each other;
  - 3 cash deposits (less than \$10,000 each) on the same day (25/05/2015) at two different CBA branches in the Western Melbourne region, within less than 6km of each other (1 deposit of \$2) – one deposit conducted at an ATM/IDM with large denomination bills (151 \$50 bills and 2 \$20 bills);
  - 3 cash funds deposited (less than \$10,000 each) on the same day (26/05/2015) at three different CBA branches in the North Western Melbourne region, within less than 15km of each other;
  - 2 cash funds deposited (less than \$10,000 each) on the same day (27/05/2015) at two different CBA branches in the North Western Melbourne region, within less than 4km of each other;
- Deposit locations: Relatively close vicinity of branches;
- The series of apparent structured cash deposits occurred every weekday from Thursday 22 May to Wednesday 27 May 2015;

- Amounts deposited appear to be randomised amounts, all under \$10,000 with only 2 deposits having the same value;
- Three of the bank deposit slips provided as proof of deposit appear to have the Patron reference number photoshopped onto the copy of the bank deposit slip sent to the Cage;
- Purpose of funds deposited for 'Front Money' (money on account for the patron);
- The request to release the funds at the Cage occurred on the 28/05/2015 – patron signed to apply to account;
- Patron member level status 'VIP1' with Perth since 2003;
- 'Telegraphic Transfer Acknowledgement Form' appears to indicate that the person who prepared the form is also named as the authorised Cage Management employee;
- Patron not ordinarily domiciled in Australia;
- Patron Present: Signature provided – indicating client was present in Perth.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations on the same day, across 5 consecutive business days.

Additionally, this activity may be indicative of Cuckoo Smurfing as whilst the Patron was present to sign Requisition form in Crown Perth, the deposits have been made in a different State of Australia to Crown Perth's premises in the days prior to the redemption, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5887 – 3 cash deposits (less than \$10,000 each) on the same day (20/09/2013) at the same ANZ branch in the South Western Sydney region;
- TA5966 – 2 cash deposits (less than \$10,000 each) on the same day (04/11/2013) at the same ANZ branch in the South Western Sydney region;
- The series of apparent structured cash deposits occurred ~ 2 weeks apart;
- Amounts deposited appear to be randomised amounts, all under \$10,000;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 27/09/2013 & 06/11/2013
- Patron Present: Not available to sign for TA5887 and TA5966 (TA5966 appears to also include a signature) – indicating the client may not have been present in Perth;
- Patron not ordinarily domiciled in Australia;
- Patron member level status 'VIP' with Perth since 1993;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Internal Email: TA5966 email received from a Crown VP employee in Indonesia stating the amount will be received through mekarindo money changer. Not registered with AUSTRAC.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at the same locations on the same day, in two separate instances approximately 2 weeks apart.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the deposits have been made in a different State of Australia to Crown Perth's premises, indicating the Patron was not involved in the deposit of funds. Additionally, the Patron was not present to sign at least one of the Requisition forms at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits (of the same amount and less than \$10,000 each) on the same day (17/03/2015) two different CBA branches in the Sydney CBD;
- 1 Quick Cash deposit for \$49,874 in Perth on 24/12/2015
- Deposit locations: Relatively close vicinity of branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 17/03/2015 – patron did not sign;
- Patron member level status 'VIP' with Perth since 2002;
- Transaction Type: Cash Deposit – no further information;  
Patron Present: Not available to Sign - indicating client was not present in Perth.
- Patron not ordinarily domiciled in Australia;

Conclusion: this activity appears indicative of structuring due to 2 cash deposits under \$10,000 at various locations on the same day within close proximity.

Additionally, this activity may be indicative of Cuckoo Smurfing as most of the funds appear to have been made in a different State of Australia to Crown Perth's premises, indicating the Patron was not involved in the deposit of funds. The value of the Quick Cash deposit is large. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5862 – 3 cash deposits (less than \$10,000 each) on the same day (17/09/2013) at two different ANZ branches in the Western Sydney region;
- TA5982 – 2 cash deposits (less than \$10,000 each) on the same day (08/11/2013) at two different ANZ branches in the Sydney CBD;
- TA6097 – 6 cash deposits (less than \$10,000 each) on the same day (30/12/2013) at five different ANZ branches in the Northern Perth region;
- TA6229 – 2 cash deposits (less than \$10,000 each) on the same day (07/03/2014) at the same ANZ branch in the Sydney CBD region;
- Deposit locations:

- TA5862 - close proximity of branches;
- TA5982 - close proximity of branches;
- TA6097 – close proximity of branches;
- TA6229 - same branch;
- Amounts deposited appear to be consistent and set amounts, all under \$10,000 with whole round values deposited on a number of occasions;
- Purpose of funds deposited for 'Front Money' (money on account for the patron);
- The request to release the funds at the Cage occurred on:
  - TA5862 – 17/09/2013 – not available to sign;
  - TA5982 – 08/04/2013 – not available to sign;
  - TA6097 – 31/12/2013 – not available to sign;
  - TA6229 - 11/03/2014 – not available to sign.
- Patron member level status 'VIP' with Perth since 1995;
- Transaction Type:
  - TA5862 - handwriting on deposit vouchers is the same;
  - TA5982 - handwriting on deposit vouchers is the same;
  - TA6097 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6229 - "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present:
  - TA5862 - Not available to Sign - indicating client was not present in Perth;
  - TA5982 - Not available to Sign - indicating client was not present in Perth;
  - TA6097 - Not available to Sign - indicating client was not present in Perth;
  - TA6229 - Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email:
  - TA6097 - refer additional notes below;
- Additional Notes:
  - The December TA6097 funds appear to be for a different client according to the attachments in the TT information, which mentions a money changer entering the client number incorrectly;
  - This may explain why the December transactions occur in Perth, whilst the others are all in Syd.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at either the same or close locations on the same day, in 4 (3 excluding TA6097) separate instances across 7 months.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and made in a different State of Australia to Crown Perth's premises, indicating the Patron was not involved in the deposit of funds.

Additionally, the Patron was not present to sign the Requisition forms at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit at a branch in Sydney for \$49,000 on 25/06/2015

- 1 Quick Cash deposit at a branch in Sydney for \$50,000 on 30/06/2015
- TA7254 – 5 cash deposits (3 of which were less than \$10,000) on the same day (30/06/2015) at four different CBA branches in the Sydney CBD;
- Deposit locations: Relatively close vicinity of branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 01/07/2015 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2015 (relatively new patron);
- Transaction Type: Handwriting on the deposit vouchers is the same;
- Patron Present: Not available to Sign - indicating client was not present in Perth.
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on the same day, at 3 separate branches within close proximity.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been made in a different State of Australia to Crown Perth's premises, indicating the Patron was not involved in the deposit of funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA6299 - funds deposited in the following sequence:
  - 5 direct credits transferred on the same day (15/04/2014) from third parties;
  - 1 cash deposit (less than \$10,000) and 5 direct credits transferred on the same day (16/04/2014) from third parties;
- Deposit locations: Sydney area
- Third parties: 10 transfers performed by 5 to 6 third parties;
- Purpose of funds deposited for 'Safekeeping' (another term connoting front money);
- The request to release the funds at the Cage occurred on the 17/04/2014 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2014;
- Transaction Type: 1 cash and multiple direct credits from various parties, sometimes more than one direct credit from each party;
- Patron Present: Signature provided - indicating client was present in Perth.
- Patron not ordinarily domiciled in Australia.

Conclusion: This activity may be indicative of Cuckoo Smurfing as the funds appear to have been transferred into the account by a number of third parties, and the one cash deposit was made in a different State of Australia to Crown Perth's premises, indicating the Patron was not involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA6128 – 4 cash deposits (less than \$10,000 each) on the same day (20/01/2014) at two different ANZ branches in the Sydney region and 1 in WA;
- TA6129 – 3 cash deposits (less than \$10,000 each) on the same day (21/01/2014) at the exact same ANZ branches in the Sydney region as the day before;
- Deposit locations:
  - TA6128 - 2 x deposits at the same Syd branch and another at a Syd branch in relatively close proximity. 1 deposit potentially in WA;
  - TA6129 – exactly the same approach to branch deposits in Sydney as TA6128;
- The cash deposits on both days exhibited similarities i.e. a single cash deposit just below \$9,000 at one branch, a second deposit slightly less than the first at another branch, and then a smaller amount deposited at the same branch as the second deposit;
- Purpose of funds deposited for 'Safekeeping';
- The request to release the funds at the Cage occurred on the 23/01/2014 – patron did not sign;
- Patron member level status 'VIP' with Perth since 2000;
- Transaction Type:
  - TA6128 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6129 – "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present:
  - TA6128 - Not available to Sign - indicating client was not present in Perth;
  - TA6129 – Not available to Sign – indicating client was not present in Perth;
- Patrons not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on two consecutive days, at 2 separate branches within close proximity within Sydney, and 1 likely in Perth.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been mostly made in a different State of Australia to Crown Perth's premises, indicating the Patron was not involved in the deposit of funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 6 cash deposits (less than \$10,000 each) on the same day (09/12/2013) at six different ANZ branches in the Western Sydney region;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred on the 06/12/2013 – patron did sign;



- Request to release funds was supported by a facsimile from what appears to be a Money Services Business in Malaysia with confirmation of the total amount transferred to the Crown bank account;
- Patron member level status 'VIP1/2' with Perth since 2003
- Transaction Type: Seger SDN BHD confirmation only;
- Patron Present: Signature provided - indicating client was present in Perth.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on the same day, at different branches within Western Sydney.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been made in a different State of Australia to Crown Perth's premises, indicating the Patron was not involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA6050 – 5 cash deposits (less than \$10,000 each) on the same day (09/12/2013) at five different ANZ branches in the North Western Sydney region;
- TA6130 – 5 cash deposits (less than \$10,000 each) on the same day (21/01/2014) at five different ANZ branches in and around the Perth region;
- TA6158 – 9 cash deposits (less than \$10,000 each) on the same day (04/02/2014) at nine different ANZ branches in and around the Perth region;
- 1 Quick Cash deposit for \$50,000 at a branch south of Perth on 04/09/2014
- 2 cash deposits on (less than \$10,000 each) on the same day (15/07/2015) at different branches in Sydney and Western Sydney region;
- Deposit locations:
  - TA6050 – relatively close proximity – NSW;
  - TA6130 – relatively close proximity – WA;
  - TA6158 – relatively close proximity – WA;
  - Relatively close proximity - NSW
- Purpose of funds deposited for 'Safekeeping' account until a 'Credit Redemption' could be applied to the outstanding debts owed by the Patron;
- The request to release the funds at the Cage occurred on the 10/12/2013, 23/01/2014, and 05/02/2014 respectively – patron did not sign;
- Patron member level status 'VIP' with Perth since 2007;
- Transaction Type:
  - TA6050 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6130 – "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6158 - "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present:
  - TA6050 – Not available to Sign - indicating client was not present in Perth;
  - TA6130 – Not available to Sign – indicating client was not present in Perth;
  - TA6158 – Blank - indicating client was not present in Perth;
- Patrons not ordinarily domiciled in Australia;
- Internal Email: TA6050 – Yes – attaching cash deposit receipts.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relatively close proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5809 - funds deposited in the following sequence:
  - 3 cash deposited (less than \$10,000 each) on the same day (27/08/2013) at two different ANZ branches in the Sydney CBD region, within less than 1km of each other;
  - 2 cash deposits (less than \$10,000 each) on the same day (28/08/2013) at two different ANZ branches in the Sydney CBD region, within less than 2km of each other;
- Deposit locations: Relatively close proximity;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 28/08/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 1993;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party. Handwriting on deposit slips is the same;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on 2 consecutive dates at both the same and different branches within relatively close proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA7028 - funds deposited in the following sequence:



- 1 cash deposit (less than \$10,000) and 6 QuickCash deposits (all \$50,000) on the same day (20/03/2015) at four different CBA branches in the Sydney CBD region, within less than 3km of each other;
- 6 Quick Cash deposits each for \$50,000 at 3 different branches in Sydney on 20/03/2015
- 1 Quick Cash deposit for \$50,000 at a branch in Sydney on 23/03/2015
- 2 cash deposits (both of \$50,000) on the same day (23/03/2015) at the same CBA branch in the Sydney CBD region;
- Deposit locations: approximately 2 x deposit at each same branch, within relatively close proximity;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 23/05/2015 – patron did not sign;
- Internal e-mail correspondence indicates that the cash deposits were made by a Money Changer on behalf of the patron;
- Patron member level status 'VIP1' with Perth since 2001;
- Transaction Type: Very sizable Quick Cash deposits. Same writing on the two deposit slips provided;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes – mentions money changer.

Conclusion: This activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 cash deposits (less than \$10,000 each) on the same day (05/11/2013) at two different ANZ branches in the Western Sydney region;
- Deposit locations: 2 deposits at one branch and a third deposit at another within relatively close proximity;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 06/11/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2011
- Google Adverse Media Search: Appears to be in the ICIJ offshore leaks database – however, does not appear to indicate anything adverse.
  - [REDACTED]
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Not available to Sign - indicating client was not present in Perth.

- Patron not ordinarily domiciled in Australia;

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on the same day at 2 different branches within relatively close proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA6037 – 4 cash deposits (less than \$10,000 each) on the same day (29/11/2013) at 2 different ANZ branches in the South Western Sydney region;
- TA6036 – 11 cash deposits (less than \$10,000 each) on the same day (03/12/2013) at five different ANZ branches in the South Western Sydney region;
- Deposit locations:
  - TA6037 – close proximity of branches in NSW. Handwriting on provided deposit slips in attachment is similar;
  - TA6036 2 deposits at one branch and a third deposit at another within relatively close proximity;
- Two additional electronic transfers were made on the 28/11/2013 (narrative states "Transfer for credit 218925 from [name of Patron]) for 218925;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 04/12/2013 – patron did not sign as redemption done over e-mail;
- Request to release funds was supported by an e-mail from what appears to be an agent of a Junket Operator confirming the funds were sent by a Money Services Business with confirmation of the total amount transferred to the Crown bank account via scanned copies of the ANZ bank deposit receipts;
- Based on a cursory review, the Malaysian MSB does not appear to be a licensed
- Patron member level status 'VIP1/' with Perth since 1994.
- Transaction Type:
  - TA6037 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6036 – Deposit;
- Patron Present:
  - TA6037 - Not available to Sign - indicating client was not present in Perth;
  - TA6036 – Not available to Sign – indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email
  - TA6037 – Email chain refers to money changer Mekarindo abadi;
  - TA6036 – Email chain refers to money changer Mekarindo abadi;

Conclusion: in relation to [REDACTED] this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on the same day at 2 different branches within relatively close proximity to each other.

Additionally, in relation to [REDACTED] This activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

[REDACTED]  
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 7 cash deposits (less than \$10,000 each) on the same day (25/10/2013) at 7 different ANZ branches in the Sydney CBD and North Sydney regions;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred on the 30/10/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2013;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Deposit locations: 7 deposits at different branches within relatively close proximity
- 5 Quick Cash deposits of \$10,000 at 3 different branches in Sydney and 2 different branches in the South Western Perth area on 18/09/2014, 22/10/2014, 20/11/2014, 16/12/2014, 06/05/2015.

Conclusion: This activity appears indicative of structuring due to the number of cash deposits under \$10,000 on the same day at 7 different branches within relatively close proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been mostly deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.


[REDACTED]  
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5787 – 11 cash deposits (less than \$10,000 each) on the same day (19/08/2013) at eleven different ANZ branches in and around the Sydney and Western Sydney regions;

- TA6140 – deposits made over 2 days in the following sequence:
  - 5 cash deposits (less than \$10,000 each) on the same day (23/01/2014) at five different ANZ branches in and around the Perth region;
  - 6 cash deposits (less than \$10,000 each) on the same day (28/01/2014) at five different ANZ branches in the Sydney CBD region;
- Deposit locations:
  - TA5787 – appear to be in 2 clusters within close proximity;
  - TA6140 – relatively close proximity in two different states;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred on the 29/01/2014 – patron did sign;
- Patron member level status 'VIP1' with Perth since 1996;
- Transaction Type:
  - TA5787 – Branch Deposit. Similar writing of 2 different people in deposit slips;
  - TA6140 – "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present:
  - TA5787 – Signature provided - indicating client was present in Perth;
  - TA6140 – Signature provided – indicating client was present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: TA5787 – Yes.
- 1 Quick Cash deposit for \$50,000 in Sydney on 06/10/2014
- 1 Quick Cash deposit for \$50,250 in Perth on 27/01/2015
- 2 Quick Cash deposits for \$35,000 and \$34,950 in the Sydney area on 29/09/2015

Conclusion: This activity appears indicative of structuring due to the number of cash deposits under \$10,000 on either the same day or on 2 consecutive days at a number of different branches within close proximity of each other within the Sydney, Western Sydney, and Perth areas.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been mostly deposited in a different State of Australia to Crown Perth's premises, and in a similar pattern to deposits relating to other Patrons, indicating the Patron may not be involved in the deposit of those funds.

  
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits (less than \$10,000 each) on the same day (05/09/2013) at two different ANZ branches in the Sydney CBD and Western Sydney regions respectively;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 06/09/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2013;

- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Not available to Sign – indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes;
- Additional information:
  - Whilst this appears to be a once off payment, the handwriting on the deposit slip is similar or the same as the handwriting provided on multiple deposit slips for other clients.

Conclusion: This activity appears indicative of structuring due to two cash deposits under \$10,000 on the same day or at different branches within the Sydney and Western Sydney areas.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5950 – 7 cash deposits (less than \$10,000 each) on the same day (25/10/2013) at seven different ANZ branches in and around the North Sydney region;
- TA7023 – 2 cash deposits (less than \$10,000 each) on the same day (19/03/2015) at two different CBA branches in the Sydney CBD region;
- TA7044 – 2 cash deposits (less than \$10,000 each) on the same day (24/03/2015) at two different CBA branches in the South Western Sydney region;
- TA7298 – 3 cash deposits (less than \$10,000 each) on the same day (15/07/2015) at three different CBA branches in the South Western Sydney region;
- TA7552 – 2 cash deposits (less than \$10,000 each) on the same day (28/09/2015) at two different CBA branches in the Sydney CBD region;
- Deposit locations:
  - TA5950 – Close proximity;
  - TA7023 – Close proximity;
  - TA7044 – Close proximity;
  - TA7298 – Close proximity;
  - TA7552 – Close proximity;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred between 30/10/2013 and 29/09/2015 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2009;
- Transaction Type:
  - TA5950 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA7023 – Cash Deposit;
  - TA7044 – Cash Deposit;

- TA7298 – Cash Deposit;
- TA7552 – Cash Deposit;
- Patron Present:
  - TA5950 – Not available to Sign - indicating client was not present in Perth;
  - TA7023 – Not available to Sign – indicating client was not present in Perth;
  - TA7044 – Blank - indicating client was not present in Perth
  - TA7298 – Not available to Sign - indicating client was not present in Perth;
  - TA7552 – Not available to Sign – indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: TA7044 – Yes

Conclusion: This activity appears indicative of structuring due to 5 instances of multiple cash deposits under \$10,000 on the same day at different branches within the Sydney, North Sydney, and Western Sydney areas.

Additionally, this activity may be indicative of Cuckoo Smurfing as a number of deposits appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA6034 – 5 cash deposits (less than \$10,000 each) on the same day (03/12/2013) at five different ANZ branches in and around the South Sydney region;
- TA6039 – cash deposits in the following sequence:
  - single cash deposit (less than \$10,000) on 03/12/2013 at an ANZ branch in the South Western Sydney region;
  - 2 cash deposits (less than \$10,000 each) on 04/12/2013 at two different ANZ branches in the Sydney CBD region
- TA6083 – 1 cash deposit (less than \$10,000) on 20/12/2013 at an ANZ branch in the North Sydney region and subsequently 7 cash deposits (less than \$10,000 each) on the same day at five different ANZ branches in and around the Perth CBD region
- Deposit locations:
  - TA6034 – Close proximity – NSW;
  - TA6039 – Close proximity – NSW;
  - TA6083 – Close proximity – WA;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred between 03/12/2013 and 23/12/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2009;
- Google Adverse Media Search:
  - Potential critical business dealings in 1997.
  - <https://www.economist.com/finance-and-economics/1997/12/18/asias-stockmarket-nightmare>



- Unclear if critical
- <https://www.theedgemarkets.com/article/big-money-alliance%E2%80%99s-bizarre-spat-and-chequered-past>
- Transaction Type:
  - TA6034 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6039 - "AGT", which leads to the conclusion paid in by an unknown party. The same handwriting appears in the deposit slips;
  - TA6083 - "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present:
  - TA6034 - Not available to Sign - indicating client was not present in Perth;
  - TA6039 - Not available to Sign - indicating client was not present in Perth;
  - TA6083 - Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on 3 days at different branches within the Sydney, South Sydney, Western Sydney, and Perth areas within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as a number of deposits appear to have been deposited by an unknown party rather than the Patron and the funds appear to have been mostly deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA6112 - 4 cash deposits (less than \$10,000 each) on the same day (09/01/2014) at four different ANZ branches in and around the South of Perth CBD region;
- TA6121 - 5 cash deposits (less than \$10,000 each) on the same day (10/01/2014) at five different ANZ branches in and around the Perth CBD region;
- TA6180 - 13 cash deposits (less than \$10,000) on the same day (14/02/2014) at nine different ANZ branches in the Sydney CBD region;
- Deposit locations:
  - TA6112 - Relatively close proximity - across Perth;
  - TA6121 - Relatively close proximity - across Perth;
  - TA6180 - Close proximity - Sydney;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred between 09/01/2014, 17/01/2014 and 14/02/2014 - patron did not sign;
- Patron member level status 'VIP' with Perth since 1992.
- Google Adverse Media Search:
  - Potential critical business dealings in 1997.
  - <https://www.economist.com/finance-and-economics/1997/12/18/asia-stockmarket-nightmare>
  - Unclear if critical

- <https://www.theedgemarkets.com/article/big-money-alliance%E2%80%99s-bizarre-spat-and-chequered-past>
- Transaction Type:
  - TA6112 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6121 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6180 - Branch Deposit;
- Patron Present:
  - TA6112 - Not available to Sign - indicating client was not present in Perth;
  - TA6121 - Not available to Sign - indicating client was not present in Perth;
  - TA6180 - Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on 3 days at different branches within the Sydney and Perth areas within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as a number of deposits appear to have been deposited by an unknown party rather than the Patron and a number of deposits were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- Deposits made on the same day (05/07/2017) in the following sequence:
  - TA9139 - 1 cash deposit (less than \$10,000) at a CBA branch in the North Melbourne region;
  - TA9140 - 1 cash deposit (less than \$10,000) at a CBA branch in the North Melbourne region;
- Deposit locations:
  - TA9139 - Hadfield - north of Melbourne
  - TA9140 - Broadmeadows - north of Melbourne
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 18/07/2017 - patron did not sign;
- Patron member level status 'VIP1' with Perth since 1996;
- Transaction Type:
  - TA9139 - Cash/transfer on receipt;
  - TA9140 - Cash Deposit;
- Patron Present:
  - TA9139 - blank - indicating client was not present in Perth;
  - TA9140 - Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: TA9139 - yes; TA9140 - yes;



Conclusion: This activity appears indicative of structuring due to 2 cash deposits under \$10,000 on the same day at different branches within the Northern Melbourne area within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing the deposits were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.



Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- Deposits made on the same day (05/07/2017) in the following sequence:
  - 3 cash deposits (less than \$10,000 each) on the same day (21/11/2013) at three different ANZ branches in the Sydney CBD and Western Sydney regions respectively;
  - 1 cash deposit (less than \$10,000) on 22/11/2013 at an ANZ branch in the Western Sydney region;
- Deposit locations: Close proximity
- Purpose of funds deposited for to the patron's Crown deposit account and subsequently requested to transfer funds to another patron's account at Crown Melbourne;
- The request to release the funds at the Cage occurred on the 25/11/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 1996;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Handwriting on written deposit slips is the same;
- Patron Present: Not available to Sign - indicating client was not present in Perth.
- Patron not ordinarily domiciled in Australia;

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on 2 days at different branches within the Sydney and Western Sydney areas within relatively close proximity of each other.

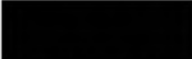
Additionally, this activity may be indicative of Cuckoo Smurfing as a number of deposits appear to have been deposited by an unknown party rather than the Patron and a number of deposits were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.



Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 12 cash deposits (less than \$10,000 each) on the same day (21/10/2014) at twelve different CBA branches in the Sydney CBD, North Western Sydney, and Western Sydney regions respectively;
- Deposit locations: Relatively Close proximity of branches;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred on the 23/10/2014 – patron did sign;
- Patron member level status 'VIP1' with Perth since 2014;
- Transaction Type: Cash Deposit;
- Patron Present: Signature provided - indicating client was present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes – email dated 23/10/2014 indicates the Patron is currently in Sydney and will be arriving in Perth on 24/10/2014

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on the same day at different branches within the Sydney, North Western Sydney, and Western Sydney areas within relatively close proximity of each other.

 Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5796 - 18 cash deposits (less than \$10,000 each) on the same day (20/08/2013) at eighteen different ANZ branches in and around the Sydney CBD, North Western Sydney, and Western Sydney regions respectively;
- TA5811 – deposits were made in the following sequence:
  - 8 cash deposits (less than \$10,000 each) on the same day (21/08/2013) at eight different ANZ branches in and around the Sydney CBD, North Western Sydney, Western Sydney regions respectively;
  - 7 cash deposits (less than \$10,000 each) on the same day (22/08/2013) at seven different ANZ branches in and around the Sydney CBD and Western Sydney regions respectively;
  - 4 cash deposits (less than \$10,000 each) on the same day (23/08/2013) at four different ANZ branches in and around the Sydney CBD and Western Sydney regions respectively;
- Deposit locations:
  - TA5796 – relatively close proximity – Sydney and Western Sydney;
  - TA5811 – relatively close proximity – Sydney and Western Sydney;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 21/08/2013 and 23/08/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2014;
- Transaction Type:
  - TA5796 - "AGT", which leads to the conclusion paid in by an unknown party. Handwriting of written deposit slips is the same;
  - TA5811 "AGT", which leads to the conclusion paid in by an unknown party. Handwriting of written deposit slips is the same (with 1 exception);
- Patron Present:
  - TA5796 – Not available to Sign - indicating client was not present in Perth;

- TA5811 – Not available to Sign – indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: TA5796 – Yes.

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on 4 consecutive days at different branches within the Sydney and Western Sydney areas within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits appear to have been deposited by an unknown party rather than the Patron and were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA7067 - 2 cash deposits (less than \$10,000 each) on the same day (10/04/2015) at two different CBA branches in the Sydney CBD region;
- TA7276 - 2 cash deposits (less than \$10,000 each) on the same day (10/07/2015) at two different CBA branches in the South Western Sydney region;
- TA7405 - 2 cash deposits (less than \$10,000 each) on the same day (21/08/2015) at two different CBA branches in the Eastern Sydney region;
- Deposit locations:
  - TA7067 – relatively close proximity of branches;
  - TA7276 – close proximity of branches;
  - TA7405 – relatively close proximity of branches;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred between the 08/04/2015, 10/07/2015 and 24/08/2015 – patron did sign;
- Request to release funds was supported by a facsimile from what appears to be a Money Services Business (referred to as a money changer in the UAR form) in Malaysia with confirmation of the total amount transferred to the Crown bank account;
- Patron member level status 'Platinum/Pearl/Mahogany' with Perth since 2007;
- Transaction Type:
  - TA7067 - Seger SDN BHD confirmation;
  - TA7276 - Seger SDN BHD confirmation. Seems to appear to as 2 x cash deposits in the transaction history at Lakemba and Campsie;
  - TA7405 – Cash Deposits;
- Patron Present:
  - TA7067 – Signature provided - indicating client was present in Perth;
  - TA7276 – Signature provided – indicating client was present in Perth;
  - TA7405 – Signature provided - indicating client was present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email:
  - TA7276 – Yes – refers to Money Changer

- Additional information: TA7276 example appears to demonstrate funds being “available” in the money changer confirmation, which is the tally of the deposits at different branches.

Conclusion: This activity appears indicative of structuring due to 2 cash deposits under \$10,000 on 3 occasions at different branches within the Sydney, South Western Sydney, and Eastern Sydney areas within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits were in a different State of Australia to Crown Perth’s premises, indicating the Patron may not have been involved in the deposit of those funds.

Initialism’s review of the bank account activity and supporting material provided by Crown established the following:

- Deposits made in the following sequence:
  - 6 cash deposits (less than \$10,000 each) on the same day (29/05/2014) at four different CBA branches in and around the Perth CBD and South of Perth;
  - 1 cash deposit (less than \$10,000) on 30/05/2014 at a CBA branch south of Perth;
- Deposit locations: Relatively Close proximity of branches;
- Purpose of funds deposited was for ‘Front Money’;
- Request to release funds was supported by an e-mail from what may be a company in Dubai with confirmation of the total amount transferred to the Crown bank account;
- the commercial tower where this company allegedly operates from was previously mentioned in the ICIJ’s offshore leaks databased;
- The request to release the funds at the Cage occurred between 31/05/2014 – patron did sign;
- Patron member level status ‘VIP’ with Perth since 2014;
- Transaction Type: Cash Deposit – writing on receipts is the same;
- Patron Present: Signature provided – indicating client was present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes.

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on 2 consecutive days at different branches within the Perth and South Perth areas within relatively close proximity of each other.

Initialism’s review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits (less than \$10,000 each) on the same day (01/09/2014) at the same ANZ branch in the South Perth region;
- Purpose of funds deposited for ‘Credit Redemption’;
- The request to release the funds at the Cage occurred on the 02/09/2014 – patron did not sign;

- Patron member level status 'Gold/Riverside' with Perth since 2005;
- Transaction Type: Cash Deposit;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;

Conclusion: This activity appears indicative of structuring due to 2 cash deposits under \$10,000 on the same day at the same branch within the South Perth area.

Additionally, this activity may be indicative of Cuckoo Smurfing the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits (less than \$10,000 each) on the same day (08/09/2015) at two different CBA branches in the Western Sydney and North Western Sydney regions;
- Deposit locations: Relatively Close proximity of branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 08/09/2015 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 1993;
- Transaction Type: Cash Deposit;
- Patron Present: Not available to Sign - indicating client was not present in Perth
- Patron not ordinarily domiciled in Australia.

Conclusion: This activity appears indicative of structuring due to 2 cash deposits under \$10,000 on the same day at different branches within the North Western Sydney areas within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 cash deposits (less than \$10,000 each) on the same day (25/11/2013) at three different ANZ branches in and around the Sydney CBD region;
- Deposit locations: Relatively Close proximity of branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 26/11/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2002;

- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party. Same writing on Deposit slips;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes.

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on the same day at different branches within the Sydney areas within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits appear to have been deposited by an unknown party rather than the Patron and were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5929 - 10 cash deposits (less than \$10,000 each) on the same day (11/10/2013) at six different ANZ branches in the Western Sydney and South Western Sydney regions as well as 7 electronic funds transfers for the benefit of the patron made by third-parties between 10/10/2013-17/10/2013 with no apparent connection to the patron;
- TA5997 - 6 cash deposits (less than \$10,000 each) on the same day (14/11/2013) at three different ANZ branches in the Western Sydney and South Western Sydney regions;
- TA6111 - 6 cash deposits (less than \$10,000 each) on the same day (06/01/2014) at six different ANZ branches in the Western Sydney and South Western Sydney regions;
- Deposit locations:
  - TA5929 – relatively close proximity of 6 branches, with 2 x deposits at 4 of the branches;
  - TA5997 – relatively close proximity of 3 branches, each with 2 x deposits;
  - TA6111 – close proximity and 3 x deposits at 2 branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on 18/10/2013, 15/11/2013 and 08/01/2014 – patron did not sign
- Confirmation of allocation of the various amounts to the patron's account came from a seemingly unknown source via a Crown intermediary in Indonesia;
- Patron member level status 'VIP1' with Perth since 2012;
- Transaction Type:
  - TA5929 – combination Transfer and "AGT", which leads to the conclusion paid in by an unknown party. Multiple Transfers from three different people;
  - TA5997 – Deposit and "AGT", which leads to the conclusion paid in by an unknown party ent. The writing on the deposit slips is the same;



- TA6111 - "AGT", which leads to the conclusion paid in by an unknown party. The writing on the deposit slips looks similar and by 2 people;
- Patron Present:
  - TA5929 – Not available to Sign - indicating client was not present in Perth;
  - TA5997 – Not available to Sign – indicating client was not present in Perth;
  - TA6111 – Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email:
  - TA5997 – yes – appears to potentially include communication between the person depositing (ie providing the deposit slips as evidence) and the person providing the information to Crown
  - TA6111 - yes – appears to potentially include communication between the person depositing (ie providing the deposit slips as evidence) and the person providing the information to Crown

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on 3 separate dates, at a combination of the same and different branches within the Western Sydney and Southern Western Sydney areas within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits appear to have been deposited by an unknown party rather than the Patron and were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 cash deposits (less than \$10,000 each) on the same day (28/11/2013) at three different ANZ branches in and around the North Melbourne region;
- 3 cash deposits (less than \$10,000 each) on the same day (29/11/2013) at three different ANZ branches in and around the North Melbourne region;
- Deposit locations: Relatively Close proximity of branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 24/12/2013 – patron did sign;
- Patron member level status 'VIP1' with Perth since 2013;
- Transaction Type: Deposit;
- Patron Present: Signature provided – indicating client was present in Perth;
- Patron not ordinarily domiciled in Australia.

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on 2 consecutive days, at a combination of the same and different branches within the Northern Melbourne area within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits (less than \$10,000 each) on the same day (16/08/2013) at two different ANZ branches in and around the Sydney CBD region;
- Deposit locations: Relatively Close proximity of branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 19/08/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2001;
- Transaction Type: Deposit and "AGT", which leads to the conclusion paid in by an unknown party. Same writing on the deposit slips;
- Patron Present: Not available to Sign – indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes.
- 1 Quick Case deposit for \$15,000 deposited in Perth on 24/12/2015

Conclusion: This activity appears indicative of structuring due to 2 cash deposits under \$10,000 on the same day, at different branches within Sydney in close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits appear to have been deposited by an unknown party rather than the Patron and were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 cash deposit (greater than \$10,000[\$180,000]) on 14/08/2014 at a CBA branch in the Sydney CBD region with an additional electronic funds transfer from a seemingly unrelated third-party for \$55,000;
- 4 cash deposits (less than \$10,000 each) on 15/08/2014 CBA branches in and around the Perth CBD region with an additional electronic funds transfer from a seemingly unrelated third-party for \$100,000;
- Deposit locations: Relatively Close proximity of branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 18/08/2014 – patron did sign;
- Patron member level status 'VIP1' with Perth since 2014;
- Transaction Type: Combination Cash and Transfers. One very large Cash Deposit;
- Patron Present: Signature provided – indicating client was present in Perth.
- Patron not ordinarily domiciled in Australia.



Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on the same day, at different branches within the Perth areas within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as a number of transfers appear to have been deposited by an unknown party rather than the Patron and there is a significant cash deposit in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 6 cash deposits (less than \$10,000 each) on the same day (02/01/2014) at five different ANZ branches in and around the Perth CBD region;
- Deposit locations: Relatively Close proximity of branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 19/08/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 1999;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia.

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on the same day, at different branches within the Perth area in relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits appear to have been deposited by an unknown party rather than the Patron, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.


Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA6210 - 19 cash deposits (less than \$10,000 each) over two days (27/02/2014 and 28/02/2014) at seventeen different ANZ branches in and around the Sydney CBD, North Western Sydney, and Western Sydney regions respectively;
- TA8287 – 5 cash deposits (less than \$10,000 each) on the same day (14/07/2016) at five different ANZ branches in and around the Western Sydney region;
- Deposit locations:
  - TA6210 – Close proximity – Sydney and Western Sydney;
  - TA8287 – relatively close proximity of branches;
- Purpose of funds deposited for 'Credit Redemption';

- The request to release the funds at the Cage occurred on the 28/02/2014 and 15/07/2016 respectively – patron did not sign;
- Request to release funds was supported by a facsimile from what appears to be a Money Services Business in Malaysia with confirmation of the total amount transferred to the Crown bank account;
- Patron member level status 'VIP' with Perth since 1995;
- Transaction Type:
  - TA6210 - Seger SDN BHD confirmation & "AGT", which leads to the conclusion paid in by an unknown party. Writing on provided deposit slips is the same;
  - TA8287 – cash deposits;
- Patron Present:
  - TA6210 – Not available to Sign - indicating client was not present in Perth;
  - TA8287 – Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: TA6210 – Yes.

Conclusion: This activity appears indicative of structuring due to multiple cash deposits under \$10,000 on two consecutive days, and later on a third date, at a combination of the same and different branches within the North Western Sydney and Western Sydney areas within relatively close proximity of each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as a number of deposits appear to have been deposited by an unknown party rather than the Patron and all were in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

  
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA6565 – 2 cash deposits (less than \$10,000 each) on the same day (04/08/2014) at the same CBA branch South West of Perth;
- 1 Quick Cash deposit for \$25,035 at a branch in Sydney on 18/09/2014;
- 1 Quick Cash deposit for \$30,000 at a branch in Sydney on 20/11/2014;
- 1 Quick Cash deposit for \$11,400 at a branch in Perth on 13/01/2015
- TA7222 – 2 cash deposits (less than \$10,000 each) on the same day (15/06/2015) at two different CBA branches in the Perth CBD region;
- 1 Quick Cash deposit for \$28,000 at a branch in Sydney on 26/08/015
- 1 Quick Cash deposit for \$44,400 at a branch in Sydney on 16/11/2015
- TA7923 – 2 cash deposits (less than \$10,000 each) on the same day (26/02/2016) at two different CBA branches in the Perth CBD region;
- TA8118 – 4 cash deposits (less than \$10,000 each) on the same day (11/05/2016) at four different CBA branches in the Western Sydney region;
- TA8503 – 2 cash deposits (less than \$10,000) on the same day (22/09/2016) at two different CBA branches in the Western Sydney region;
- Deposit locations:
  - TA6565 – Same branch;

- TA7222 – Close proximity;
- TA7923 – Close proximity;
- TA8118 – Close proximity;
- TA8503 – Close proximity;
- Purpose of funds deposited for 'Redemption';
- The request to release the funds at the Cage occurred between 04/08/2014 and 27/09/2016 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2006;
- Transaction Type:
  - TA6565 – Cash;
  - TA7222 – Cash – writing on deposit receipts is the same;
  - TA7923 – Cash;
  - TA8118 – Cash;
  - TA8503 – Cash – writing on deposit slips seems to be the same;
- Patron Present:
  - TA6565 – Not available to Sign - indicating client was not present in Perth;
  - TA7222 – Not available to Sign - indicating client was not present in Perth;
  - TA7923 – Not available to Sign – indicating client was not present in Perth;
  - TA8118 – Not available to Sign - indicating client was not present in Perth;
  - TA8503 – Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email:
  - TA7222 – yes;
  - TA7923 – yes;

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.


Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- Deposits were made in the following sequence:
  - 6 cash deposits (less than \$10,000 each) on the same day (16/09/2013) at six different ANZ branches in the Sydney CBD region;
  - 3 cash deposits (less than \$10,000 each) on the same day (17/09/2013) at three different ANZ branches in and around the Sydney CBD region;
- Deposit locations: Close proximity of branches;
- Purpose of funds deposited for 'Redemption';
- The request to release the funds at the Cage occurred on the 19/08/2013 – patron did sign;

- Request to release funds was supported by a facsimile from what appears to be a Money Services Business (referred to as a money changer in the UAR form) in Malaysia with confirmation of the total amount transferred to the Crown bank account;
- Patron member level status 'VIP1' with Perth since 2013;
- Transaction Type: Deposit and "AGT", which leads to the conclusion paid in by an unknown party. The writing on the deposit slips is the same. Also includes Seger SDN BHD confirmation;
- Patron Present: Signature provided – indicating client was present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes;

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.


Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

  
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits (less than \$10,000 each) on the same day (26/11/2013) at two different ANZ branches in and around the South Perth region;
- Deposit locations: Close proximity of branches;
- Purpose of funds deposited for 'Safekeeping/Redemption';
- The request to release the funds at the Cage occurred on the 27/11/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2002;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

  
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5872 – 3 cash deposits (less than \$10,000 each) on the same day (20/09/2013) at three different ANZ branches in the Western Sydney region and 1 cash deposit on the same day (20/09/2013) in the Sydney CBD region as well as 1 cash deposit on 23/09/2013 (less than \$10,000) at an ANZ branch in the Sydney CBD region;
- TA6098 – 2 cash deposits (less than \$10,000 each) on the same day (30/12/2013) at two different ANZ branches in the Sydney CBD and South Sydney regions;
- TA6416 – 3 cash deposits (less than \$10,000 each) on the same day (10/06/2014) at three different CBA branches in the Sydney CBD region;
- Deposit locations:
  - TA5872 – close proximity;
  - TA6098 – close proximity;
  - TA6416 – relatively close proximity;
- Purpose of funds deposited for 'Redemption';
- The request to release the funds at the Cage occurred between 2/09/2013 and 11/06/2014 – patron did not sign;
- Patron member level status 'VIP' with Perth since 2004;
- Transaction Type:
  - TA5872 - "AGT", which leads to the conclusion paid in by an unknown party. The writing on deposit slips is the same 2 people. These deposit slips accounts for more transactions than this customer;
  - TA6098 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6416 – Cash;
- Patron Present:
  - TA5872 – Not available to Sign - indicating client was not present in Perth;
  - TA6098 – Not available to Sign - indicating client was not present in Perth;
  - TA6416 – Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email:
  - TA5872 – yes;
  - TA6098 – yes;
- One Quick cash deposit for \$44,411 in Perth on 23/12/2015.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.


Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 8 cash deposits (less than \$10,000 each but in the same amounts of \$9,375) on the same day (21/11/2013) at eight different ANZ branches/ATMs in and around the Melbourne CBD region;
- 8 cash deposits (less than \$10,000 each but in the same amounts of \$9,375) on the same day (20/11/2013) at eight different ANZ branches/ATMs in and around the Melbourne CBD region;
- Deposit locations: Close proximity of branches;
- Purpose of funds deposited for 'Full Redemption';
- The request to release the funds at the Cage occurred on the 21/11/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2009;
- Transaction Type: Branch Deposit;
- Patron Present: Not available to Sign – indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

  
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for \$13,828 in Fremantle on 22/10/2014
- 2 cash deposits (less than \$10,000 each but in the same amounts of \$5000) on the same day (04/03/2015) at two different CBA branches/ATMs in and around the Western Sydney region;
- Deposit locations: Close proximity of branches;
- Purpose of funds deposited for 'Safekeeping';
- The request to release the funds at the Cage occurred on the 05/03/2016 – patron did not sign;
- Patron member level status 'Black/Mahogany' with Perth since 2007;
- Transaction Type: Cash;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.



Additionally, this activity may be indicative of Cuckoo Smurfing as some of the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits (less than \$10,000 each) on the same day (07/03/2014) at the same ANZ branches/ATMs in and around the South Western Sydney region as well as 8 further cash deposits (less than \$10,000 each) on the same day (10/03/2014) at 5 different ANZ branches/ATMs in and around the South Western Sydney region;
- Deposit locations: Close proximity of branches, and multiple use of the same branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 11/03/2014 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 1999;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party. Writing on the deposit slips is the same;
- Patron Present: Not available to Sign – indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits (less than \$10,000 each but the exact same amount of \$5,000) on the same day (28/02/2014) at two different ANZ branches/ATMs in and around the North Melbourne region;
- Deposit locations: Close proximity of branches;
- Purpose of funds deposited for 'Safekeeping';
- The request to release the funds at the Cage occurred on the 04/03/2014 – patron did not sign;

- Patron member level status 'VIP1' with Perth since 2012;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Not available to Sign – indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- TA5968 – cash deposits in the following sequence:
  - 2 cash deposits (less than \$10,000 each) on the same day (04/11/2013) at the same ANZ branches/ATMs in and around the South West Sydney region;
  - 1 cash deposit (less than \$10,000) on the 05/11/2013 at an ANZ branch/ATM in and around the South West Sydney region;
  - 2 cash deposits (less than \$10,000 each) on the same day (22/11/2013) at the same ANZ branch/ATM in and around the South West Sydney region;
- Deposit locations:
  - TA5968 – Close proximity & use of the same branch;
  - TA6015 – same branch;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred between the 06/11/2013 and 25/11/2013 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2012;
- Transaction Type:
  - TA5968 - "AGT", which leads to the conclusion paid in by an unknown party;
  - TA6015 - "AGT", which leads to the conclusion paid in by an unknown party. The same writing is on the deposit slips;
- Patron Present:
  - TA5968 – Not available to Sign - indicating client was not present in Perth;
  - TA6015 – Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not



be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 5 cash deposits (less than \$10,000 each) on the same day (27/08/2013) at five different ANZ branches/ATMs in and around the Sydney CBD region;
- Deposit locations: Close proximity of branches;
- Purpose of funds deposited for 'Credit Redemption';
- The request to release the funds at the Cage occurred on the 04/03/2014 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 1993;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- Cash deposits in the following sequence:
  - 5 cash deposits (less than \$10,000 each but in exactly the same amounts of \$9,500) on the same day (15/01/2014) at five different ANZ branches/ATMs in and around the Perth CBD and South Perth regions;
  - 6 cash deposits (less than \$10,000 each but in exactly the same amounts of \$9,500) on the same day (16/01/2014) at 6 different ANZ branches/ATMs in and around the Perth CBD and South Perth regions;
- Deposit locations: Close proximity of branches;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred on the 17/01/2014 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2001;

- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Signature provided - indicating client was present in Perth.
- Patron not ordinarily domiciled in Australia;
- Customer also received:
  - 2 Quick Cash deposits each for the amount of \$50,000 at the same branch in the Perth area on 22/08/2014
  - 1 Quick Cash deposit for \$20,000 in the Perth area on 26/09/2014
  - 2 Quick Cash deposits for \$45,000 and \$40,000 at 2 different branches in Sydney on 30/09/2014
  - 3 Quick Cash deposits, 2 for \$50,000 and 1 for \$40,000 at the same branch in Sydney on 29/04/2015

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 cash deposits (less than \$10,000 each) on the same day (11/12/2013) at three different ANZ branches/ATMs in and around the North Sydney and North West Sydney regions;
- Deposit locations: Close proximity of branches;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred on the 08/12/2013 (prior to the cash deposits being made) – patron did sign;
- CFO of Crown Perth authorised the "early release" of the funds to the patron;
- Request to release funds was supported by a facsimile from what appears to be a Money Services Business (referred to as a money changer in the UAR form) in Malaysia with confirmation of the total amount transferred to the Crown bank account;
- Patron member level status 'VIP1' with Perth since 2001;
- Transaction Type: Seger SDN BHD confirmation and "AGT", which leads to the conclusion paid in by an unknown party;
- Patron Present: Signature provided - indicating client was present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes – refers to "our money changer".

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 cash deposits (less than \$10,000 each) on the same day (22/11/2013) at three different ANZ branches/ATMs in and around the Western Sydney regions;
- Deposit locations: Close proximity;
- Purpose of funds deposited for 'Full Redemption';
- The request to release the funds at the Cage occurred on the 25/11/2013 – patron did not sign;
- Patron member level status 'Full' with Perth since 2011;
- Transaction Type: Deposit and "AGT", which leads to the conclusion paid in by an unknown party. The same writing is on the deposit slips;
- Patron Present: Not available to Sign - indicating client was not present in Perth;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.


Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 cash deposits (less than \$10,000 each) on the same day (21/02/2014) at three different ANZ branches/ATMs in and around the Sydney CBD region;
- Deposit locations: Close proximity;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred on the 18/02/2014 – patron did sign;
- Request to release funds was supported by a facsimile from what appears to be a Money Services Business (referred to as a money changer in the UAR form) in Malaysia with confirmation of the total amount transferred to the Crown bank account;
- What appears to be a Crown employed "recruiter/introducer/facilitator" in Malaysia requests early release of the funds to the patron prior to the actual deposits having been made to the bank account;
- Patron member level status 'VIP' with Perth since 2014;
- Transaction Type: Seger SDN BHD confirmation and "AGT", which leads to the conclusion paid in by an unknown party;

- Patron Present: Signature provided - indicating client was present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.


Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

 Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits (less than \$10,000 each) on the same day (25/10/2016) at two different CBA branches/ATMs in and around the Sydney CBD region;
- Deposit locations: Close proximity;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred on the 26/10/2016 – patron did not sign;
- Patron member level status 'VIP1' with Perth since 2003
- Transaction Type: Cash. Writing on deposit slips is the same;
- Patron Present: Blank – indicating client is not present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on each date at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds. Additionally, the Patron was not present to sign the Requisition form at Crown Perth, indicating the Patron was also likely not present in Australia at the time of the transactions.

 Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 6 cash deposits (less than \$10,000 each) on the same day (29/10/2013) at 5 different branches in and around the Sydney CBD region;
- Deposit locations: Close proximity;
- Purpose of funds deposited for 'Front Money';
- The request to release the funds at the Cage occurred on the 30/10/2013 – patron did sign;
- Transaction Type: "AGT", which leads to the conclusion paid in by an unknown party;

- Patron Present: Signed – indicating client present in Perth;
- Patron not ordinarily domiciled in Australia;
- Internal Email: Yes.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 on the same day at different branches within relative proximity to each other.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

## Southbank Bank Account Review

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- Cash funds deposited at different branches on the same days or consecutive days within the Western Sydney and South Sydney areas, in amounts of less than \$10,000:
  - 11/01/14 - 7 deposits at 3 branches in the South Sydney and North Western Sydney areas, in addition to 1 x transfer of \$15,000;
  - 13/01/2014 - 18 deposits at 6 different branches (in some instances there were multiple deposits at the same branch) in and around Western Sydney and South Western Sydney regions;
- Notation indicates the funds were paid into 'Safekeeping' on 13/01/2014 & 14/01/2014, and used on 20/01/2014 to redeem the outstanding from 6/12/2013 (noting the funds appear to have been used ahead of all deposits being made);
- Deposit locations: Relatively close proximity;
- Unexplained correlation between establishment where patron plays (assumption is in Melbourne) and the cash deposits in Sydney & Southern Sydney;
- Transaction Type: information provided states the Money Change is "More than likely PT Mekar Indo Abadi Sentosa (Authorised Money Changer) -no evidence on TA" however Initialism is unsure how this has been determined;
- An Adverse Media review of the Money Changer has identified articles where the Money charger was called as a witness into corruption - <https://www.merdeka.com/peristiwa/saksi-ini-akui-diminta-transfer-usd-14-juta-ke-perusahaan-rekan-setnov.html>
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations in a short timeframe.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been purportedly deposited by a Money Services Business in Malaysia who made the funds available in cash in Australia rather than a direct transfer from the Patron and the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron was not involved in the deposit of funds. Additionally, the funds appear to have been applied as "Safekeeping" and



then applied as a credit redemption, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- Cash funds deposited at different branches on the same days across 3 consecutive days within the Sydney and Western Sydney areas, in amounts of less than \$10,000:
  - 03/03/2014 15 deposits at 15 branches in the Sydney area
  - 04/03/2014 11 deposits at 11 branches in the Western Sydney area
  - 05/03/2014 3 deposits at 3 branches in the Sydney area between 12:30 and 13:18
- Notation indicates the funds were paid into 'Safekeeping' on 04/03/2014 used on 05/03/2014 to redeem the outstanding from 21/01/2014
- Deposit locations: Close proximity;
- Unexplained correlation between establishment where patron plays (assumption is in Melbourne) and the cash deposits in Sydney & Western Sydney;
- Patron not ordinarily domiciled in Australia.

Summary – transactions appear, in and of themselves, to be unusual (potential structuring) with no discernible connection to the patron (i.e. no indication of why funds were deposited in Sydney when the patron is a member of the Melbourne establishment).

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations in a short timeframe.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been purportedly deposited in cash in a different state to where the Patron was to allegedly play therefore indicating the Patron was not involved in the deposit of funds. Additionally, the funds appear to have been applied as "Safekeeping" and then applied as a credit redemption, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- Cash funds deposited at different branches on the same day within the Sydney, in amounts of less than \$10,000:
- 24/07/2014 - 3 deposits at 3 branches in the Sydney area
  - Notation indicates the funds were used on 25/07/2014 to redeem the outstanding
- Deposit locations: Close proximity;
  - Unexplained correlation between establishment where patron plays (assumption is in Melbourne) and the cash deposits in Sydney;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations in a short timeframe.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been purportedly deposited in cash in a different state to where the Patron was to allegedly play therefore indicating the Patron was not involved in the deposit of funds. Additionally, the funds appear to have been applied for an outstanding credit redemption, indicating the Patron was also likely not present in Australia at the time of the transactions.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 cash deposits at 3 different branches on the same day (10/06/2015) within the Perth region, in amounts of less than \$10,000;
- Notation indicates the funds were paid into the account as Front Money on 6/5/15 (note this appears to be ahead of the deposits being made) and notation indicates;
- Notation also includes "Reference to Money changer on email but name not noted" and "Early Released PL/HH"
- Deposit locations: Close proximity;
- Unexplained correlation between establishment where patron plays (assumption is in Melbourne) and the cash deposits in Perth;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations in a short timeframe.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been purportedly deposited by a Money Services Business who made the funds available in cash in Australia rather than a direct transfer from the Patron, indicating the Patron potentially was not involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 Cash funds deposits at 3 different branches on 3 consecutive days from 20/05/2015 to 22/05/2015 within the Western Melbourne area, in amounts of less than \$10,000.
- Notation indicates the funds were paid into Safekeeping on 27/05/2015 and used on 27/06/2015 to redeem outstanding from 01/03/2015
- Additional Notes indicate the deposits were confirmed by a Money Changer
- Deposit locations: Close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations in a short timeframe.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been purportedly deposited by a Money Services Business who made the funds available in cash in

Australia rather than a direct transfer from the Patron, indicating the Patron potentially was not involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Cash funds deposits at 2 different branches on the same day (24/06/2015) within the Sydney CBD area, in amounts of less than \$10,000 each.
- Notation indicates the funds were paid into account as "Front Money" on 26/06/2015 and.
- Request to release funds was supported by a letter from what appears to be a Money Services Business in Malaysia with confirmation of the total amount transferred to the Crown bank account;
- Deposit locations: Close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been purportedly deposited by a Money Services Business in Malaysia who made the funds available in cash in Australia rather than a direct transfer from the Patron and the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron was not involved in the deposit of funds. Additionally, the Patron was purportedly arriving in Melbourne on the 26/06/2015 indicating they may not have been in Australia when the deposits were made.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Cash funds deposits at 2 different branches on the same day (30/06/2015) within the Sydney CBD area, in amounts of less than \$10,000 each.
- 2 cash deposits at two different branches on the same day (5/8/2016) within the North East Melbourne region, in amounts less than \$10,000 each;
- Notation indicates the funds were paid into account as "Front Money" on 26/06/2015.
- Request to release funds was supported by a letter from what appears to be a Money Services Business in Malaysia with confirmation of the total amount transferred to the Crown bank account;
- Deposit locations: Close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been purportedly deposited by a Money Services Business in Malaysia who made the funds available in cash in Australia rather than a direct transfer from the Patron, indicating the Patron was not involved in the deposit of funds.



Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Cash funds deposits at 2 different branches on the same day (02/07/2015) within the Sydney CBD area, in amounts of less than \$10,000 each.
- 3 cash funds deposits at 3 different branches on the same day (06/11/2015) within the Western Sydney area, in amounts of less than \$10,000 each;
- 2 QuickCash deposits at the same branch/ATM in the South Perth region on 12/09/2014, in 2 large amounts of \$42,000 and \$50,000, respectively.
- 2 QuickCash deposits at two different branches/ATMs in the Perth CBD region on 15/09/2014, in 2 large amounts of \$65,840 and \$50,000, respectively.
- 1 QuickCash deposit at a branch/ATM in the South Perth region on 16/09/2014, in 1 large amount of \$50,000.
- 2 QuickCash deposits at the same branch/ATM in the South Perth region on 16/09/2014, in 2 large amounts of \$30,000 and \$50,000, respectively.
- 2 QuickCash deposits at the same branch/ATM in the Sydney CBD region on 19/09/2014, in 2 large amounts of 34,700 and \$40,082, respectively.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 22/09/2014, in 1 large amount of \$45,000.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 23/09/2014, in 1 large amount of \$45,000.
- 2 QuickCash deposits at two different branches/ATMs in the Sout Perth region on 27/10/2014, in 2 large amounts of \$50,000 each.
- 1 QuickCash deposit at a branch/ATM in the South Perth region on 28/10/2014, in 1 large amount of \$53,050.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 24/11/2014, in 1 large amount of \$53,390.
- 3 QuickCash deposits, two occurring at two different branches/ATMs in the Sout Perth region and 1 occurring at a branch/ATM in the Sydney CBD region on 25/11/2014, in 3 large amounts of \$50,000 each.
- 4 QuickCash deposits at four different branches/ATMs in the Sout Perth region on 27/11/2014, in 2 large amounts of \$50,000 each and another two amounts of \$54,082 and \$49,950, respectively.
- 2 QuickCash deposits at the same branch/ATM in the South Perth region on 05/01/2015, in 2 large amounts of \$36,000 and \$50,000, respectively.
- 2 QuickCash deposits at two different branches/ATMs in the Sout Perth region on 07/01/2015, in 2 large amounts of \$20,186 and \$50,000, respectively.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 08/04/2015, in 1 large amount of \$50,000.
- 3 QuickCash deposits, two occurring at the same branch/ATM in the Sout Sydney CBD region and 1 occurring at a branch/ATM in the Sydney CBD region on 09/04/2015, 2 in large amounts of \$50,000 each and 1 in a large amount of \$50,050.
- 2 QuickCash deposits at two different branches/ATMs in the South Sydney CBD region on 10/04/2015, in 2 large amounts of \$50,000 each.
- 3 QuickCash deposits at three different branches/ATMs in the Sydney CBD region on 13/04/2015, in 3 large amounts of \$40,000 each

- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 14/04/2015, in 1 large amount of \$40,000.
- 2 QuickCash deposits at the same branch/ATM in the South Sydney CBD region, in 2 large amounts of \$39,940 and \$50,000 respectively and 3 QuickCash deposits at three different branches/ATMs in the Sydney CBD region on 17/04/2015, in 2 large amounts of \$50,000 each and 1 large amount of \$39,215.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 20/04/2015, in 1 large amount of \$50,000.
- 2 QuickCash deposits at two different branches/ATMs in the South Sydney CBD region on 08/05/2015, in 2 large amounts of \$50,000 each.
- 4 QuickCash deposits at four different branches/ATMs in the Sydney CBD region on 11/05/2015, in 4 large amounts of \$50,000 each.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 31/08/2015, in 1 large amount of \$50,000.
- 4 QuickCash deposits at 3 different branches/ATMs in the Sydney CBD region on 07/10/2015, in 2 large amounts of \$35,000 each and another 2 large amounts of \$40,000 and \$56,986.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 08/10/2015, in 1 large amount of \$47,730.
- 2 QuickCash deposits at two different branches/ATMs in the South Sydney CBD region on 09/10/2015, in 2 large amounts of \$50,000 each.
- 2 QuickCash deposits at two different branches/ATMs in the South Sydney CBD region on 14/10/2015, in 2 large amounts of \$30,000 and \$26,986, respectively.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 20/10/2015, in 1 large amount of \$50,000.
- 4 QuickCash deposits at 4 different branches/ATMs in the Sydney CBD region on 27/10/2015, in 3 large amounts of \$50,000 each and 1 large amount of \$49,500.
- 5 QuickCash deposits at 5 different branches/ATMs in the Sydney CBD region on 28/10/2015, in 5 large amounts of \$50,100, \$35,460, \$50,000, \$30,000, and \$58,230, respectively.
- 5 QuickCash deposits at 5 different branches/ATMs in the Sydney CBD region on 29/10/2015, in 4 large amounts of \$50,000 each and 1 large amount of \$33,912.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 30/10/2015, in 1 large amount of \$50,000.
- 2 QuickCash deposits at two different branches/ATMs in the Sydney CBD region on 04/11/2015, in 2 large amounts of \$30,000 and \$40,000, respectively.
- 1 QuickCash deposit at a branch/ATM in the Western Sydney region on 15/11/2015, in 1 large amount of \$24,000.
- 2 QuickCash deposits at two different branches/ATMs in the Sydney CBD region on 17/11/2015, in 2 large amounts of \$50,000 and \$49,950, respectively.
- 2 QuickCash deposits at two different branches/ATMs in the Western Sydney region on 18/11/2015, in 2 large amounts of \$45,000 and \$43,680, respectively.
- 1 QuickCash deposit at a branch/ATM in the Western Sydney region on 22/11/2015, in 1 large amount of \$45,000.
- 2 QuickCash deposits at two different branches/ATMs in the South Perth region on 05/01/2016, in 2 large amounts of \$50,000 each.

- 1 QuickCash deposit at a branch/ATM in the East Perth region on 07/01/2016, in 1 large amount of \$50,000.
- 7 QuickCash deposits at 7 different branches/ATMs in and around the Perth region on 08/01/2016, in 7 large amounts of \$46,000, \$50,000, \$30,000, \$40,000, \$36,496, \$45,000, and \$35,000, respectively.
- Notation indicates the funds were paid into account as "Front Money" on 26/06/2015.
- Single, large electronic funds transfer of \$190,000 on 09/07/2015 was received and release of funds was supported by a letter from what appears to be a Money Services Business in Malaysia with confirmation of the total amount transferred to the Crown bank account and a receipt from a bank in Malaysia;
- Deposit locations: Close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been purportedly deposited by a Money Services Business in Malaysia who made the funds available in cash in Australia rather than a direct transfer from the Patron and the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron was not involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 6 Cash deposits at 6 different branches on the same day (19/03/2016) within the Sydney CBD area, in amounts of less than \$10,000 each.
- 5 cash deposits at 5 different branches on the same day (14/03/2016) within the Sydney CBD area, in amounts of less than \$10,000 each;
- Notation indicates the funds were paid into account as "Safekeeping" on 29/03/2016 and funds used to for "Credit Redemption" outstanding on 05/04/2016.
- Deposit locations: Close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron was not involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 77 Cash deposits at a large number of branches between 09/06/2016 and 20/06/2020 within the Sydney CBD and Greater Sydney areas, in amounts of less than \$10,000 each.
- 13 cash deposits at 13 different branches on 24/06/2016 within the Sydney CBD area, in amounts less than \$10,000 each.
- Additional large electronic funds transfer (\$475,500) from a Malaysian bank received on 29/06/2016 with the receipt provided as proof payment.
- Notation indicates the funds were paid into account as "Safekeeping" on 24/06/2016 and funds used for "Credit Redemption" outstanding on 30/06/2016.
- Deposit locations: Close proximity;
- PID refers to a junket operator.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by unknown third parties rather than the members of the junket and the deposits have been made in a different State of Australia to Crown Melbourne's premises, potentially indicating that the members of the junket were not involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 18 Cash deposits at a large number of branches on 13/07/2017 within the Greater Perth and Western Sydney area, in amounts of less than \$10,000 each.
- Notation indicates the funds were paid into account for outstanding redemption on 14/07/2017 - no receipts or other information other than email from VIP Finance to Cage.
- Deposit locations: Generally, in close proximity;
- Patron not ordinarily domiciled in Australia.
- 1 Quick Cash deposit of \$30,000 at a branch in Sydney on 03/06/2015

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at various locations on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the funds appear to have been deposited by an unknown party rather than the Patron and some of the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron was not involved in the deposit of funds. Additionally, the Patron was not present to sign the Requisition form at Crown Melbourne and VIP Finance sent an e-mail to the Cage to release the funds, indicating the Patron was also likely not present in Australia at the time of the transactions.

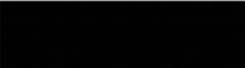
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 10 cash deposits at 10 different branches in relatively close proximity on 19/11/2013 in the Sydney CBD area, in amounts of less than \$10,000 each;

- 1 QuickCash deposit at a branch/ATM in the South Sydney region on 11/06/2015, in 1 large amount of \$25,000.
- Deposit locations: relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited at 10 branches within relatively close proximity on the same day.


Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

  
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 7 cash deposits at 7 different branches in relatively close proximity on 27/11/2013 in the Sydney area, in amounts of less than \$10,000 each;
- Deposit locations: relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited at 7 branches within relatively close proximity on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

  
Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 8 cash deposits at 8 different branches in relatively close proximity on 28/11/2013 in the Sydney and Western Sydney areas, in amounts of less than \$10,000 each;
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 04/09/2014, in 1 large amount of \$41,517.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 21/11/2014, in 1 large amount of \$50,848.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 22/01/2015, in 1 large amount of \$50,000.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 13/04/2015, in 1 large amount of \$52,817.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 22/05/2015, in 1 large amount of \$37,068.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 08/09/2015, in 1 large amount of \$49,343.
- 2 QuickCash deposits at what appears to be the same branch/ATM in the Sydney CBD region on 29/09/2015, in 2 large amounts of \$31,980 and \$30,000, respectively.

- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 16/11/2015, in 1 large amount of \$47,000.
- Deposit locations: relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited at 8 branches within relatively close proximity on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 5 cash deposits at 4 different branches in close proximity on 25/03/2014 in the Sydney area, in amounts of less than \$10,000 each;
- Deposit locations: close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited at 4 branches within close proximity on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 5 cash deposits at different branches in close proximity on 30/05/2014 in the Sydney area, in amounts of less than \$10,000 each;
- Deposit locations: close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited at 5 branches within close proximity on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 4 cash deposits at different branches in close proximity on 30/05/2014 in the Sydney area, in amounts of less than \$10,000 each;
- Deposit locations: close proximity;

- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited at 4 branches within close proximity on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits at different branches in relatively close proximity on 16/10/2014 in the South Western Perth area, in amounts of less than \$10,000 each;
- Deposit locations: relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited at 2 branches within relatively close proximity on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits at different branches in relatively close proximity on 04/08/2014 in the Perth area, in amounts of less than \$10,000 each, totalling just under \$10,000;
- 3 cash deposits at 2 branches in relatively close proximity on 26/11/2014 in the Perth and North Eastern Perth area, in amounts of less than \$10,000 each;
- Deposit locations: the same or relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited on two occasions in the same branch or in locations within relatively close proximity on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits at different branches in close proximity on 04/12/2014 in the Brisbane area, in amounts of less than \$10,000 each;



- Deposit locations: close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited in two close locations on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits at the same branch on 14/05/2015 in the Western Sydney area, in amounts of less than \$10,000 each;
- 2 cash deposits at different branches on 23/12/2015 in the Sydney and Northern Sydney area in amounts of less than \$10,000 each;
- Deposit locations: the same or relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 deposited on 2 occasions at the same or locations in relatively close proximity on the same day of each occasion.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 5 cash deposits at 3 different branches on 24/06/2015 in the Sydney area, in amounts of less than \$10,000 each;
- 1 QuickCash deposit at a branch/ATM in the Melbourne CBD region on 14/01/2015, in a single large amount of \$50,000
- Deposit locations: relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at the same or locations in close proximity on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.



Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 4 cash deposits at the same branch on 29/06/2015 in the Northern Adelaide area, in amounts of less than \$10,000 each;
- Deposit locations: relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at the same location on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 cash deposit at a branch in the Sydney area pm 22/09/2015 for an amount less than \$10,000
- 6 cash deposits at different branches on 23/09/2015 in the Western Sydney area, in amounts of less than \$10,000 each;
- 1 QuickCash deposit at a branch/ATM in the South Perth region on 08/10/2014, in a single large amount of \$50,000.
- 1 QuickCash deposit at a branch/ATM in the South Perth region on 09/10/2014, in a single large amount of \$32,000.
- Deposit locations: relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at different locations in relatively close proximity on 2 consecutive days.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 cash deposit at a branch on 10/11/2015 in the Sydney area, in an amount of less than \$10,000;
- 2 cash deposits at the same branch on 11/11/2015 in the Sydney area, in amounts of less than \$10,000 each;
- Deposit locations: combination of the same branch and relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at either the same location or relatively close locations on 2 consecutive days.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits at different branches on 05/08/2016 in the North Eastern Melbourne area, in amounts of less than \$10,000 each;
- Deposit locations: relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at relatively close locations on the same day.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits at different branches on 05/08/2016 in the North Eastern Melbourne area, in amounts of less than \$10,000 each;
- Deposit locations: relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at relatively close locations on the same day.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 cash deposits at the same ATM on 12/09/2017 in the Northern Adelaide area, in amounts of less than \$10,000 each;
- 2 cash deposits, 1 at an ATM and another in branch in two different locations in the Northern Adelaide area, in amounts of less than \$10,000 each;
- 4 ATM and 1 in branch cash deposits on 15/09/2017 at the same branch in the Northern Adelaide area, in amounts of less than \$10,000 each;
- Deposit locations: combination of the same branch and relatively close proximity;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at either the same location or relatively close locations on 3 consecutive days.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 Cash deposits at the same branch on 18/04/2019 within the South Western Sydney area, in amounts of less than \$10,000 each.
- Deposit locations: Same branch;

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at the same location on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Cash deposits at the same branch on 27/10/2015 in Cairns, in amounts of less than \$10,000 each.
- Deposit locations: Same branch;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at the same location on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Cash deposits at the same branch on 14/06/2017 in Western Sydney, in amounts of less than \$10,000 each.
- Deposit locations: Same branch;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at the same location on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Cash deposits at the same branch on 13/07/2018 in South of Brisbane, in amounts of less than \$10,000 each.

- Deposit locations: Same branch;
- Patron not ordinarily domiciled in Australia.

Conclusion: this activity appears indicative of structuring due to the number of cash deposits under \$10,000 at the same location on the same day.

Additionally, this activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

## APPENDIX B – REVIEW OF QUICK CASH ONLY DEPOSIT INCIDENTS

The following are incidents where the customer (PID) has received standalone Quick-Cash deposits.

Note that where a customer (PID) has received both structured deposits below the reportable threshold and also Quick-Cash deposits these are included in Appendix A incidents.

### Riverbank Bank Account Review

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 6 Quick Cash deposits in equal amounts of \$50,000 each at 6 different Branches around the South Western Perth area on 3/10/2014;
- 2 Quick Cash deposits of \$50,000 and \$30,000 at 2 different Branches in the Perth area on 6/10/2014;
- 1 Quick Cash deposit of \$50,000 at a Branch in Perth on 7/10/2014;
- 10 Quick Cash deposits in randomised amounts between \$15,700 and \$48,500 at 4 different Branches around Perth area on 4/11/2014;
- 1 Quick Cash deposit of \$50,000 at a Branch in Perth on 5/11/2014;
- 1 Quick Cash deposit of \$50,000 at a Branch in East Perth on 6/11/2014;
- 2 Quick Cash deposits in equal amounts of \$50,000 each at 2 different Branches, in the Sydney area on 11/11/2014;
- 2 Quick Cash deposits in equal amounts of \$50,000 each at 2 different Branches, in the Sydney area on 13/11/2014;
- 1 Quick Cash deposit of \$50,000 at a Branch in Sydney on 14/11/2014;
- Deposit locations: different branches in relatively close proximity on the same day, consecutive days and across 2 States;
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the number of deposits at different branches, and the value of the deposits. Additionally, some deposits appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Quick Cash deposits in equal amounts of \$50,000 each at 2 different Branches, in the Sydney area on 16/10/2015;
- Deposit locations: different branches in relatively close proximity.

This activity may be indicative of Cuckoo Smurfing based on the number of deposits at different branches on the same day, and the value of the deposits. Additionally, deposits appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for of \$49,357 at a branch in Sydney on 16/10/2015.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the cash deposit. Additionally, the deposit appears to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for of \$50,000 at a branch in Sydney on 16/10/2015.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the cash deposit. Additionally, the deposit appears to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 3 Quick Cash deposits, 2 in equal amounts of \$50,000 and 1 for \$35,221 at 3 different Branches, in the South Western Perth area on 21/10/2014;
- Deposit locations: different branches in relatively close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the number of deposits at different branches on the same day, and the value of the deposits.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for of \$35,746 at a branch in the Fremantle area on 17/09/2014.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the cash deposit.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Quick Cash deposits in the amounts of \$30,000 and \$25,836 each at 2 different Branches around the Sydney area on 28/10/2015;
- 1 Quick Cash deposit for \$29,000 at a different branch in Sydney on 16/11/2015;
- Deposit locations: different branches in relatively close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the number of deposits at different branches, and the value of the deposits. Additionally, the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Quick Cash deposits in the amounts of \$50,000 and \$41,580 each at 2 different Branches, 1 within the Sydney area and the other West of Sydney on 08/09/2015;
- 1 Quick Cash deposit for \$40,000 at the same branch West of Sydney on 10/09/2015;
- Deposit locations: different branches in relatively close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the number of deposits at different branches, and the value of the deposits. Additionally, the funds appear to have been deposited in different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Quick Cash deposits in the amounts of \$50,000 and \$34,944 each at the same Branch, south of Perth on 25/08/2014;
- 1 Quick Cash deposit for \$36,008 at a branch in Sydney on 11/12/2014;
- 1 Quick Cash deposit for \$50,000 at a branch in Melbourne on 12/12/2014;
- Deposit locations: 2 of the deposits on the same day at the same branch, and 2 other deposits made on consecutive days in different States.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the number of deposits at different branches, the branch locations within different states of Australia, and the value of the deposits. Additionally, some of the funds appear to have been deposited in different States of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for of \$26,660 at a branch in the Sydney area on 31/03/2015.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the cash deposit and the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for \$50,000 at a branch in Sydney on 13/11/2014;
- 1 Quick Cash deposit for \$33,200 at a branch in Sydney on 14/11/2014;
- Deposit locations: different branches in relatively close proximity on consecutive days.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the number of deposits at different branches on consecutive days, and the value of the deposits. Additionally, the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 4 Quick Cash deposits, 3 for \$50,000 and 1 for \$49,950 at different branches in Sydney on 27/08/2015;
- Deposit locations: different branches in close proximity;
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the number of deposits at different branches on the same day, and the value of the deposits. Additionally, the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Quick Cash deposits for \$50,000 and \$42,223 at two different branches in the South West Perth area on 21/10/2014;
- 1 Quick Cash deposit for \$32,645 at a branch in Sydney on 27/08/2015;
- Deposit locations: 2 of the deposits on the same day at different branches in relatively close proximity.



- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the number of deposits at different branches on the same day, and the value of the deposits. Additionally, some funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for \$50,000 at a branch in the South Perth area on 21/10/2014;
- 1 Quick Cash deposit for \$32,980 at a branch in Sydney on 30/09/2015
- Deposit locations: different branches in different States.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the deposits. Additionally, some funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for \$50,590 at a branch in Sydney 21/06/2015.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the deposit. Additionally, the funds appear to have been deposited in a different State of Australia to Crown Perth's premises, indicating the Patron may not be involved in the deposit of those funds

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Quick Cash deposits for \$50,000 and \$42,308 at two different branches in the South Western Perth area on 22/10/2014;
- Deposit locations: different branches in relatively close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the deposits occurring at different branches within relative proximity of each other, and the value of the deposits.

### **Southbank Bank Account Review**

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:



- 1 QuickCash deposit at a branch/ATM that appears to be in Central Perth (no evidence to validate this observation) on 09/12/2014, in 1 large amount of \$20,000.
- 1 QuickCash deposit at a branch/ATM in the Southern Perth region on 10/12/2014, in 1 large amount of \$30,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 19/11/2014, in 1 large amount of \$50,000.
- 2 QuickCash deposits at a branch/ATM in the Sydney CBD region on 20/03/2015, in 2 large amounts of \$37,000 and \$40,000, respectively.
- Deposit locations: combination of the same branch and close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Southern Perth region on 09/10/2014, in 1 large amount of \$50,000.
- 2 QuickCash deposits at a branch/ATM in the Southern Perth region on 10/10/2014, in 2 large amounts of \$19,900 and \$50,000, respectively.
- Deposit locations: combination of the same branch and close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Southern Perth region on 09/10/2014, in 1 large amount of \$50,000.
- 2 QuickCash deposits at 2 different branches/ATMs in the Southern Perth region on 10/10/2014, in 2 large amounts of \$19,900 and \$50,000, respectively.

- Deposit locations: combination of the same branch and close proximity This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.
- Understood Patron domiciled outside Australia.

[REDACTED]  
Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Perth CBD region on 31/12/2015, in 1 large amount of \$50,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]  
Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Perth CBD region on 31/12/2015, in 1 large amount of \$50,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]  
Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Perth region on 31/12/2015, in 1 large amount of \$50,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]  
Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the South West Perth region on 21/10/2014, in 1 large amount of \$10,802.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the East Perth region on 31/12/2015, in 1 large amount of \$13,480.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the South East Perth region on 27/11/2014, in 1 large amount of \$25,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the South Perth region on 15/12/2014, in 1 large amount of \$20,000.
- 1 QuickCash deposit at a branch/ATM in the South Sydney region on 08/09/2015, in 1 large amount of \$20,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 2 QuickCash deposits at 2 different branches/ATMs in the Sydney CBD region on 13/11/2014, in 2 large amounts of \$43,379 and \$50,000, respectively.
- Deposit locations: close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the South Perth region on 19/12/2014, in 1 large amount of \$50,050.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 2 QuickCash deposits at 2 different branches/ATMs in the Sydney CBD region on 17/04/2015, in 2 large amounts of \$40,140 and \$20,245, respectively.
- Deposit locations: close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the East Adelaide region on 12/04/2016, in 1 large amount of \$100,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 2 QuickCash deposits at the same branch/ATM in the Sydney CBD region on 16/01/2015, in 2 large amounts of \$33,373 and \$50,000, respectively.
- 3 QuickCash deposits at 3 different branches/ATMs in the Sydney CBD and Melbourne CBD regions on 16/01/2015, in 3 large amounts of \$50,000 each.

- 1 QuickCash deposits at a branch/ATM in the Melbourne CBD region on 20/01/2015, in 1 large amount of \$50,000.
- Deposit locations: combination of the same branches and close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the South Perth region on 10/10/2014, in 1 large amount of \$51,550.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 4 QuickCash deposits at a branch/ATM in the South Perth region on 24/09/2014, in 4 large amounts of \$50,000 each.
- Deposit locations: close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 20/04/2015, in 1 large amount of \$34,905.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 30/04/2015, in 1 large amount of \$20,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 20/04/2015, in 1 large amount of \$34,905.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 2 QuickCash deposits at the same branch/ATM in the South Sydney CBD region on 02/04/2015 and 07/04/2015, in 2 large amounts of \$35,000 each.
- Deposit locations: close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 18/03/2015, in 1 large amount of \$42,322.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 07/04/2015, in 1 large amount of \$35,000.
- Deposit locations: close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 3 QuickCash deposits at 3 different branches/ATMs in the Sydney CBD region on 08/09/2015, in 3 large amounts of \$50,050, \$35,050, and \$40,000, respectively.
- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 09/09/2015, in 1 large amount of \$50,000.
- Deposit locations: close proximity.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the South Perth region on 09/10/2014, in 1 large amount of \$18,997.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Perth region on 28/10/2014, in 1 large amount of \$17,559.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 08/12/2015, in 1 large amount of \$20,000.
- Understood Patron domiciled outside Australia.



This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the Sydney CBD region on 23/06/2015, in 1 large amount of \$50,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown (if any) established the following:

- 1 QuickCash deposit at a branch/ATM in the South Sydney CBD region on 10/04/2015, in 1 large amount of \$50,000.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing as the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for \$33,334 at a branch in Sydney on 22/08/2014;
- 1 Quick Cash deposit for \$50,000 at a branch in Sydney on 09/09/2015;
- Deposit locations: NA, transactions ~1 year apart.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the deposits. Additionally, the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for \$40,000 at a branch in Sydney on 16/11/2015;
- 1 Quick Cash deposit for \$30,000 at a branch in Sydney on 17/11/2015;
- Deposit locations: Relatively close proximity.
- Understood Patron domiciled outside Australia.



This activity may be indicative of Cuckoo Smurfing based on the value of the deposits and that they were made at two different branches within close proximity on consecutive days. Additionally, the deposits have been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 2 Quick Cash deposits for \$50,000 and 59,000 at a branch south of Perth on 12/09/2014;
- 1 Quick Cash deposit for \$35,505 at a branch in Sydney on 12/09/2014;
- Deposit locations: the same or different States.
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the deposits and due to two deposits being made at the same branch and a third deposit at a branch in a different state on the same day. Additionally, the deposits have all been made in a different of State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for \$40,229 at a branch south of Perth on 09/09/2014;
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the deposit. Additionally, the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

[REDACTED]

Initialism's review of the bank account activity and supporting material provided by Crown established the following:

- 1 Quick Cash deposit for \$20,00 at a branch in Sydney on 06/05/2015;
- Understood Patron domiciled outside Australia.

This activity may be indicative of Cuckoo Smurfing based on the value of the deposit. Additionally, the deposit has been made in a different State of Australia to Crown Melbourne's premises, indicating the Patron may not have been involved in the deposit of funds.

## APPENDIX C – INTERNATIONAL TRANSFERS BY THIRD-PARTY INDIVIDUALS

Initialism identified some transactions which appear to be made by individuals unrelated to Crown's customer. The payments appear to have been made in the name of the unrelated individual but contain either the Crown customer's name or a Crown customer number as part of the payment reference.

Whilst inconclusive on its own, the use of third-party individuals and the pattern of payments evidenced by the Riverbank and Southbank bank accounts, in Initialism's opinion, align to the indicia of cuckoo smurfing activity for the purposes of money laundering.

### Riverbank – ANZ Account

5/07/2013		\$ 249,978.00
18/07/2013		\$ 25,000.00
31/07/2013		\$ 499,968.00
2/08/2013		\$ 34,978.00
23/08/2013		\$ 185,235.00
28/08/2013		\$ 299,988.00
10/09/2013		\$ 419,975.00
12/09/2013		\$ 429,975.00
27/09/2013		\$1,986,980.00
29/10/2013		\$ 199,975.00
28/02/2014		\$ 49,965.00
28/02/2014		\$ 49,985.00

### Riverbank – CBA Account

18/09/2014		499,965.00
23/09/2014		500,000.00
18/03/2015		229,970.00
18/03/2015		239,970.00

20/03/2015		254,970.00
20/03/2015		239,970.00
24/03/2015		259,970.00
24/03/2015		244,970.00
14/04/2015		186,541.00
15/04/2015		379,970.00
15/04/2015		359,970.00
28/09/2016		49,985.00
7/02/2017		48,436.00
24/01/2018		270,000.00
20/02/2018		200,000.00

### Southbank – CBA Account

12/05/2014		\$ 263,968.00
20/08/2014		\$ 150,000.00
9/09/2014		\$ 259,978.00
9/09/2014		\$ 239,978.00
9/09/2014		\$ 244,978.00
10/09/2014		\$ 254,978.00
16/10/2014		\$ 56,982.00
16/10/2014		\$ 56,982.00
16/10/2014		\$ 56,982.00
17/10/2014		\$ 54,482.00
17/10/2014		\$ 54,482.00
20/10/2014		\$ 541,800.00
20/10/2014		\$ 1,000,000.00
10/11/2014		\$ 302,455.83
20/11/2014		\$ 184,200.00
24/11/2014		\$ 200,000.00
24/11/2014		\$ 1,461,221.43
16/12/2014		\$ 1,996,000.00

19/12/2014		\$ 300,000.00
19/12/2014		\$ 200,000.00
15/01/2015		\$ 386,473.42
15/01/2015		\$ 1,466,078.95
15/01/2015		\$ 35,985.00
11/06/2015		\$ 1,991,735.00
3/07/2015		\$ 900,347.80
7/07/2015		\$ 200,000.00
13/07/2015		\$ 50,000.00
14/07/2015		\$ 40,000.00
24/07/2015		\$ 97,034.14
20/08/2015		\$ 85,134.00
15/02/2016		\$ 75,000.00
4/03/2016		\$ 135,000.00
7/03/2016		\$ 139,971.00
29/03/2016		\$ 50,000.00
10/10/2016		\$ 80,000.00
10/10/2016		\$ 500,000.00
11/10/2016		\$ 400,000.00
3/04/2017		\$ 499,990.00
4/04/2017		\$ 499,990.00
2/06/2017		\$ 673,700.00
31/08/2017		\$ 10,000.00
12/02/2018		\$ 99,963.00
12/02/2018		\$ 89,963.00
15/02/2018		\$ 179,963.00
15/02/2018		\$ 229,963.00
15/02/2018		\$ 1,000,000.00
22/02/2018		\$ 2,000,000.00

22/02/2018		\$ 50,000.00
26/02/2018		\$ 199,963.00
27/02/2018		\$ 247,963.00
27/02/2018		\$ 251,963.00
1/03/2018		\$ 246,963.00
5/03/2018		\$ 252,963.00
6/03/2018		\$ 274,963.00
6/03/2018		\$ 273,963.00
7/03/2018		\$ 272,963.00
25/06/2018		\$ 500,000.00
26/06/2018		\$ 500,000.00
27/06/2018		\$ 500,000.00
29/06/2018		\$ 500,000.00
1/04/2019		\$ 20,000.00
1/04/2019		\$ 76,166.84
15/05/2019		\$ 70,000.00
17/05/2019		\$ 2,975,330.00
29/07/2019		\$ 500,000.00

## APPENDIX D – INTERNATIONAL TRANSFERS BY A THIRD-PARTY COMPANIES

Initialism identified some transactions which appear to be made by companies unrelated to Crown's customer. The payments appear to have been made in the name of the unrelated company but contain either the Crown customer's name or a Crown customer number as part of the payment text.

Whilst inconclusive on its own, the use of third-party companies and the pattern of payments evidenced by the Riverbank and Southbank bank accounts, in Initialism's opinion, align to the indicia of cuckoo smurfing activity for the purposes of money laundering.

### Riverbank – ANZ Account

None identified

### Riverbank – CBA Account

25/09/2014		199,989.00
25/09/2014		199,989.00
25/09/2014		199,989.00
30/09/2014		199,989.00
14/09/2015		145,000.00
28/04/2016		451,969.71

### Southbank – CBA Account

2/01/2014		\$ 8,749.00
26/02/2014		\$ 1,724,989.00
14/10/2014		\$ 541,800.00
20/11/2014		\$ 35,000.00
21/11/2014		\$ 249,836.60
26/11/2014		\$ 350,000.00
28/11/2014		\$ 16,935.00
28/11/2014		\$ 100,000.00
28/11/2014		\$ 999,975.00
28/11/2014		\$ 408,205.38
28/11/2014		\$ 199,975.00

1/12/2014		\$ 82,463.00
19/12/2014		\$ 1,200,000.00
6/01/2015		\$ 74,990.00
17/12/2015		\$ 4,126,758.00
30/03/2016		\$ 499,990.00
30/03/2016		\$ 499,970.23
8/04/2016		\$ 498,154.78
1/11/2016		\$ 300,000.00
20/01/2017		\$ 1,869,183.59
19/04/2017		\$ 337,691.08
20/04/2017		\$ 102,231.37
28/04/2017		\$ 60,000.00
26/07/2017		\$ 100,000.00
31/07/2017		\$ 100,000.00
19/09/2017		\$ 37,037.04
28/12/2017		\$ 499,992.50
23/01/2018		\$ 1,441,967.50
23/01/2018		\$ 1,399,977.40
11/12/2018		\$ 199,990.00
30/07/2019		\$ 150,000.00

## APPENDIX E – TRANSFERS BY OVERSEAS MONEY REMITTERS

Initialism used information provided by Crown about known overseas money remitters to identify International transfers by overseas money remitters on behalf of Crown customers and identified 100 payments of this nature in the Riverbank accounts and 502 payments of this nature in the Southbank account.

Based on information provided by Crown, Initialism's review also identified that some of the overseas money remitters making electronic funds transfers on behalf of Crown customers used unrelated company names to make the payments, concealing that the payment was made by an overseas money remitter.

Whilst inconclusive on its own, the use of overseas remitters and the pattern of payments by overseas money remitters as evidenced by the Riverbank and Southbank bank accounts, in Initialism's opinion, align to the indicia of cuckoo smurfing activity for the purposes of money laundering.

### Riverbank – ANZ Account

9/07/2013		\$ 174,988.00
26/07/2013		\$ 499,965.00
26/07/2013		\$ 499,965.00
1/08/2013		\$ 499,965.00
14/08/2013		\$ 99,988.00
27/08/2013		\$ 137,485.00
6/09/2013		\$ 318,615.00
12/09/2013		\$ 439,978.00
30/09/2013		\$ 101,965.00
23/10/2013		\$ 100,828.00
24/10/2013		\$ 49,985.00
28/10/2013		\$ 49,985.00
30/10/2013		\$ 70,042.00
30/10/2013		\$ 309,975.00
5/11/2013		\$ 128,278.00
8/11/2013		\$ 156,988.00
21/11/2013		\$ 99,988.00
29/11/2013		\$ 130,495.00
31/12/2013		\$ 32,388.00
27/02/2014		\$ 129,995.00



28/02/2014		5,988.00
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### Riverbank – CBA Account

11/03/2015		55,990.00
11/03/2015		43,990.00
16/03/2015		49,990.00
29/04/2015		34,985.00
5/05/2015		419,968.00
8/09/2015		59,992.50
11/09/2015		139,286.20
3/11/2015		125,222.00
8/01/2016		517,549.62
10/03/2016		19,127.00
14/03/2016		539,953.34
31/03/2016		49,990.00
4/04/2016		179,303.94
7/04/2016		19,990.00
8/04/2016		499,953.68
19/04/2016		185,649.00
29/04/2016		44,848.00
29/04/2016		14,990.00
29/04/2016		33,990.00
5/05/2016		135,433.00
9/05/2016		44,490.00
9/05/2016		55,490.00
13/05/2016		49,990.00
17/05/2016		49,990.00
1/06/2016		41,043.00
6/06/2016		977,940.00
6/06/2016		999,976.00

9/06/2016		999,976.00
15/07/2016		49,976.00
27/07/2016		49,826.00
27/10/2016		76,950.00
27/10/2016		74,550.00
28/10/2016		38,985.00
10/11/2016		49,978.00
17/11/2016		194,968.00
18/11/2016		29,968.00
18/11/2016		59,968.00
21/11/2016		96,199.00
21/11/2016		29,990.00
23/11/2016		99,968.00
24/11/2016		49,968.00
28/11/2016		67,288.00
5/12/2016		150,118.00
15/12/2016		99,968.00
23/12/2016		40,309.00
28/12/2016		44,592.00
28/12/2016		30,113.00
29/12/2016		49,968.00
6/01/2017		44,968.00
9/01/2017		189,968.00
10/01/2017		130,817.00
12/01/2017		55,888.00
12/01/2017		160,723.00
1/03/2017		29,990.00
14/03/2017		1,963.00
20/03/2017		29,976.00
28/03/2017		29,976.00
4/08/2017		99,963.00
4/08/2017		104,963.00
16/08/2017		399,990.00
21/08/2017		99,963.00

29/08/2017		999,990.00
8/09/2017		499,990.00
8/09/2017		1,999,990.00
19/09/2017		1,322,813.00
28/09/2017		158,352.00
28/09/2017		149,963.00
9/10/2017		70,963.00
17/10/2017		262,522.00
18/10/2017		254,963.00
18/10/2017		259,963.00
8/11/2017		183,253.00
20/12/2017		244,963.00
20/12/2017		245,072.00
20/12/2017		239,963.00
21/12/2017		245,463.00
8/02/2018		199,963.00
15/02/2018		49,990.00
21/03/2019		299,963.00
27/03/2019		299,963.00

### Southbank – CBA Account

14/11/2013		\$ 1,388,888.90
21/11/2013		\$ 1,388,406.80
3/12/2013		\$ 137,938.00
3/12/2013		\$ 1,410,934.70
9/12/2013		\$ 891,300.78
9/12/2013		\$ 270,000.00
10/12/2013		\$ 118,918.00
10/12/2013		\$ 196,990.00
10/12/2013		\$ 390,658.00
30/12/2013		\$ 379,980.00
30/12/2013		\$ 1,100,000.00
30/12/2013		\$ 389,980.00
30/12/2013		\$ 298,945.00
30/12/2013		\$ 1,822,489.52
31/12/2013		\$ 267,886.00
7/01/2014		\$ 700,000.00
9/01/2014		\$ 500,000.00
14/01/2014		\$ 50,000.00
20/01/2014		\$ 300,000.00
20/01/2014		\$ 220,843.95
21/01/2014		\$ 365,811.25
28/01/2014		\$ 373,812.00
30/01/2014		\$ 199,980.00
30/01/2014		\$ 39,980.00
19/03/2014		\$ 301,398.00
21/03/2014		\$ 299,980.00
9/04/2014		\$ 2,000,000.00
9/04/2014		\$ 55,310.07
10/04/2014		\$ 857,632.93
15/04/2014		\$ 58,233.00
19/05/2014		\$ 247,980.00

28/05/2014		\$ 454,980.00
28/05/2014		\$ 149,980.00
29/05/2014		\$ 484,980.00
30/05/2014		\$ 467,980.00
30/05/2014		\$ 474,980.00
2/06/2014		\$ 477,980.00
2/06/2014		\$ 804,980.00
2/06/2014		\$ 382,082.00
2/06/2014		\$ 377,980.00
2/06/2014		\$ 194,980.00
3/06/2014		\$ 746,980.00
4/06/2014		\$ 622,040.00
5/06/2014		\$ 50,623.00
6/06/2014		\$ 241,778.00
26/06/2014		\$ 100,000.00
3/07/2014		\$ 151,184.25
11/07/2014		\$ 200,000.00
14/07/2014		\$ 400,000.00
15/07/2014		\$ 144,000.00
7/08/2014		\$ 1,989,690.00
11/08/2014		\$ 800,000.00
12/08/2014		\$ 579,310.00
13/08/2014		\$ 3,000,000.00
20/08/2014		\$ 450,000.00
26/08/2014		\$ 5,000,000.00
27/08/2014		\$ 5,000,000.00
10/10/2014		\$ 2,630,941.00
6/11/2014		\$ 1,000,000.00
17/12/2014		\$ 963,391.10
17/12/2014		\$ 500,000.00
13/02/2015		\$ 202,429.15
18/02/2015		\$ 10,387.00
20/02/2015		\$ 600,000.00
5/03/2015		\$ 29,986.00
10/04/2015		\$ 140,362.00
15/04/2015		\$ 748,985.00
17/04/2015		\$ 3,951,439.50
20/05/2015		\$ 66,990.00

20/05/2015		\$ 65,990.00
20/05/2015		\$ 67,558.00
20/05/2015		\$ 69,262.00
20/05/2015		\$ 67,990.00
22/05/2015		\$ 68,584.00
22/05/2015		\$ 67,786.00
22/05/2015		\$ 66,990.00
26/05/2015		\$ 1,000,000.00
27/05/2015		\$ 49,986.00
28/05/2015		\$ 49,986.00
28/05/2015		\$ 49,986.00
28/05/2015		\$ 49,986.00
11/06/2015		\$ 700,000.00
26/06/2015		\$ 255,704.00
1/07/2015		\$ 800,000.00
8/07/2015		\$ 79,650.00
8/07/2015		\$ 85,640.00
8/07/2015		\$ 84,680.00
9/07/2015		\$ 74,978.00
15/07/2015		\$ 49,990.00
22/07/2015		\$ 641,711.20
27/07/2015		\$ 600,000.00
29/07/2015		\$ 49,990.00
28/08/2015		\$ 440,934.15
31/08/2015		\$ 737,463.10
1/09/2015		\$ 423,280.40

3/09/2015		\$ 67,190.00
3/09/2015		\$ 68,490.00
3/09/2015		\$ 64,290.00
8/09/2015		\$ 349,992.50
26/10/2015		\$ 49,990.00
27/10/2015		\$ 69,952.38
28/10/2015		\$ 353,681.36
2/11/2015		\$ 189,226.82
3/11/2015		\$ 299,952.00
5/11/2015		\$ 599,952.25
9/11/2015		\$ 999,952.02
18/11/2015		\$ 99,951.78
1/12/2015		\$ 999,952.18
11/12/2015		\$ 1,199,952.65
11/12/2015		\$ 899,952.64
16/12/2015		\$ 1,149,952.43
17/12/2015		\$ 1,129,952.21
18/12/2015		\$ 1,041,618.12
18/12/2015		\$ 556,442.20
29/12/2015		\$ 299,952.43
8/01/2016		\$ 414,029.56
14/01/2016		\$ 1,000,000.00
1/02/2016		\$ 337,572.80
2/02/2016		\$ 1,063,781.70
3/02/2016		\$ 199,951.74
5/02/2016		\$ 999,952.14
17/02/2016		\$ 349,952.04
18/02/2016		\$ 999,951.81
4/03/2016		\$ 499,952.63
11/03/2016		\$ 30,481.00
14/03/2016		\$ 20,798.34
14/03/2016		\$ 239,970.00
14/03/2016		\$ 97,356.33
14/03/2016		\$ 99,953.33
14/03/2016		\$ 219,970.00



17/03/2016		\$ 39,965.00
18/03/2016		\$ 74,990.00
24/03/2016		\$ 93,887.00
31/03/2016		\$ 54,990.00
1/04/2016		\$ 44,990.00
4/04/2016		\$ 31,499.93
8/04/2016		\$ 71,830.00
8/04/2016		\$ 82,040.00
11/04/2016		\$ 65,215.00
11/04/2016		\$ 67,340.00
11/04/2016		\$ 62,855.00
13/04/2016		\$ 44,740.00
13/04/2016		\$ 55,240.00
15/04/2016		\$ 48,215.00
15/04/2016		\$ 51,765.00
20/04/2016		\$ 32,405.00
27/04/2016		\$ 400,000.00
28/04/2016		\$ 350,000.00
4/05/2016		\$ 199,976.00
4/05/2016		\$ 239,976.00
4/05/2016		\$ 83,674.00
5/05/2016		\$ 47,710.00
5/05/2016		\$ 49,990.00
9/05/2016		\$ 199,956.00
11/05/2016		\$ 48,565.00
11/05/2016		\$ 52,640.00
11/05/2016		\$ 50,315.00
11/05/2016		\$ 45,810.00
12/05/2016		\$ 99,976.00
18/05/2016		\$ 999,976.00
19/05/2016		\$ 63,190.00
19/05/2016		\$ 77,490.00
19/05/2016		\$ 55,990.00

20/05/2016		\$ 70,490.00
20/05/2016		\$ 63,916.00
23/05/2016		\$ 78,010.00
23/05/2016		\$ 54,990.00
23/05/2016		\$ 64,990.00
24/05/2016		\$ 201,246.00
24/05/2016		\$ 1,219,488.00
25/05/2016		\$ 73,490.00
25/05/2016		\$ 69,790.00
25/05/2016		\$ 56,690.00
27/05/2016		\$ 74,990.00
31/05/2016		\$ 1,016,236.00
2/06/2016		\$ 81,990.00
2/06/2016		\$ 59,990.00
2/06/2016		\$ 87,123.00
3/06/2016		\$ 999,976.00
6/06/2016		\$ 203,228.00
6/06/2016		\$ 612,221.00
8/06/2016		\$ 78,190.00
8/06/2016		\$ 77,490.00
8/06/2016		\$ 71,563.00
15/06/2016		\$ 999,976.00
20/06/2016		\$ 808,926.00
21/06/2016		\$ 29,117.00
27/06/2016		\$ 95,970.00
27/06/2016		\$ 96,318.00
29/06/2016		\$ 1,001,964.00
29/06/2016		\$ 475,485.00
1/07/2016		\$ 999,976.00
7/07/2016		\$ 71,615.00
7/07/2016		\$ 65,465.00
7/07/2016		\$ 69,240.00

11/07/2016		\$ 999,980.00
12/07/2016		\$ 599,978.00
13/07/2016		\$ 149,978.00
14/07/2016		\$ 249,978.00
15/07/2016		\$ 288,438.00
19/07/2016		\$ 1,149,976.00
19/07/2016		\$ 320,489.00
20/07/2016		\$ 630,228.00
25/07/2016		\$ 191,059.00
25/07/2016		\$ 193,774.00
25/07/2016		\$ 24,866.00
25/07/2016		\$ 119,985.00
26/07/2016		\$ 877,169.00
26/07/2016		\$ 97,442.00
26/07/2016		\$ 79,985.00
27/07/2016		\$ 1,000,976.00
27/07/2016		\$ 47,899.00
28/07/2016		\$ 1,056,976.00
28/07/2016		\$ 1,001,976.00
28/07/2016		\$ 99,336.00
28/07/2016		\$ 200,000.00
29/07/2016		\$ 959,764.00

29/07/2016		\$ 1,051,980.00
2/08/2016		\$ 997,976.00
2/08/2016		\$ 1,054,976.00
2/08/2016		\$ 200,000.00
3/08/2016		\$ 1,055,976.00
3/08/2016		\$ 72,403.00
3/08/2016		\$ 59,042.00
3/08/2016		\$ 1,011,976.00
5/08/2016		\$ 987,980.00
5/08/2016		\$ 833,964.00
5/08/2016		\$ 99,985.00
8/08/2016		\$ 754,396.00
8/08/2016		\$ 801,976.00
8/08/2016		\$ 49,525.00
9/08/2016		\$ 159,976.00
9/08/2016		\$ 192,337.00
9/08/2016		\$ 199,985.00
10/08/2016		\$ 521,976.00
12/08/2016		\$ 49,985.00
12/08/2016		\$ 49,985.00
17/08/2016		\$ 80,415.00

17/08/2016		\$ 78,801.00
18/08/2016		\$ 139,976.00
18/08/2016		\$ 99,985.00
18/08/2016		\$ 99,985.00
22/08/2016		\$ 199,985.00
23/08/2016		\$ 99,985.00
24/08/2016		\$ 164,980.00
30/08/2016		\$ 134,976.00
30/08/2016		\$ 49,976.00
31/08/2016		\$ 99,976.00
1/09/2016		\$ 165,825.00
1/09/2016		\$ 50,615.00
1/09/2016		\$ 49,365.00
2/09/2016		\$ 377,273.00
2/09/2016		\$ 82,305.00
2/09/2016		\$ 78,835.00
5/09/2016		\$ 64,830.00
6/09/2016		\$ 99,985.00
6/09/2016		\$ 100,985.00
6/09/2016		\$ 199,985.00

7/09/2016		\$ 199,976.00
7/09/2016		\$ 38,495.00
7/09/2016		\$ 38,660.00
7/09/2016		\$ 126,168.00
8/09/2016		\$ 199,976.00
12/09/2016		\$ 179,210.00
13/09/2016		\$ 189,260.00
15/09/2016		\$ 206,326.00
19/09/2016		\$ 261,534.00
19/09/2016		\$ 74,985.00
22/09/2016		\$ 119,985.00
22/09/2016		\$ 468,726.00
22/09/2016		\$ 199,976.00
22/09/2016		\$ 99,976.00
22/09/2016		\$ 299,976.00
26/09/2016		\$ 999,980.00
29/09/2016		\$ 149,976.00
29/09/2016		\$ 499,976.00
29/09/2016		\$ 783,550.00
30/09/2016		\$ 1,229,976.00

30/09/2016		\$ 1,209,976.00
30/09/2016		\$ 1,351,299.89
30/09/2016		\$ 100,000.00
4/10/2016		\$ 1,189,976.00
4/10/2016		\$ 1,169,976.00
5/10/2016		\$ 129,976.00
5/10/2016		\$ 1,199,976.00
5/10/2016		\$ 299,976.00
6/10/2016		\$ 199,970.00
7/10/2016		\$ 1,099,976.00
10/10/2016		\$ 899,976.00
10/10/2016		\$ 229,978.00
11/10/2016		\$ 72,990.00
11/10/2016		\$ 62,008.00
12/10/2016		\$ 190,816.00
12/10/2016		\$ 69,978.00
12/10/2016		\$ 139,968.00
14/10/2016		\$ 244,968.00
14/10/2016		\$ 309,970.00
14/10/2016		\$ 289,970.00
14/10/2016		\$ 1,049,976.00
14/10/2016		\$ 254,968.00



17/10/2016		\$ 99,985.00
21/10/2016		\$ 99,976.00
25/10/2016		\$ 158,211.00
31/10/2016		\$ 199,985.00
11/11/2016		\$ 149,976.00
11/11/2016		\$ 154,032.00
15/11/2016		\$ 94,628.00
17/11/2016		\$ 149,976.00
22/11/2016		\$ 949,976.00
25/11/2016		\$ 199,990.00
9/12/2016		\$ 99,968.00
13/12/2016		\$ 68,580.00
13/12/2016		\$ 79,990.00
22/12/2016		\$ 199,968.00
27/01/2017		\$ 129,990.00
27/01/2017		\$ 130,990.00
30/01/2017		\$ 128,990.00
30/01/2017		\$ 126,932.00
6/03/2017		\$ 431,011.00
13/03/2017		\$ 288,576.00
3/04/2017		\$ 115,919.00
6/04/2017		\$ 138,468.00

7/04/2017		\$ 203,466.00
3/05/2017		\$ 39,690.00
4/05/2017		\$ 109,978.00
4/05/2017		\$ 89,978.00
5/05/2017		\$ 89,618.00
8/05/2017		\$ 109,558.00
9/05/2017		\$ 99,978.00
30/05/2017		\$ 57,917.00
1/06/2017		\$ 286,562.00
9/06/2017		\$ 86,990.00
16/06/2017		\$ 499,992.50
20/06/2017		\$ 92,585.09
21/06/2017		\$ 915,880.35
23/06/2017		\$ 299,617.97
3/07/2017		\$ 24,999.90
5/07/2017		\$ 259,978.00
7/07/2017		\$ 249,978.00
20/07/2017		\$ 89,990.00
4/08/2017		\$ 75,273.00
21/08/2017		\$ 239,978.00
22/08/2017		\$ 259,978.00
28/08/2017		\$ 907,399.50
5/09/2017		\$ 199,978.00
5/09/2017		\$ 99,978.00
5/09/2017		\$ 99,978.00
19/09/2017		\$ 46,356.00
27/09/2017		\$ 99,197.00
3/10/2017		\$ 99,990.00
11/10/2017		\$ 284,963.00
12/10/2017		\$ 264,963.00
23/10/2017		\$ 99,992.50

24/10/2017		\$ 148,222.00
26/10/2017		\$ 89,990.00
27/10/2017		\$ 74,978.00
16/11/2017		\$ 30,655.00
28/11/2017		\$ 287,500.00
29/11/2017		\$ 293,160.00
29/11/2017		\$ 292,280.00
13/12/2017		\$ 1,955,600.50
19/12/2017		\$ 971,658.50
20/12/2017		\$ 199,963.00
20/12/2017		\$ 99,963.00
20/12/2017		\$ 39,980.00
3/01/2018		\$ 234,963.00
3/01/2018		\$ 239,963.00
3/01/2018		\$ 241,446.00
3/01/2018		\$ 241,963.00
5/01/2018		\$ 108,350.00
11/01/2018		\$ 234,605.00
11/01/2018		\$ 252,340.00
11/01/2018		\$ 271,415.00
11/01/2018		\$ 241,560.00
16/01/2018		\$ 19,474.00
18/01/2018		\$ 261,535.00
18/01/2018		\$ 220,260.00
19/01/2018		\$ 960,197.00
19/01/2018		\$ 257,335.00
19/01/2018		\$ 260,790.00
19/01/2018		\$ 233,090.00
25/01/2018		\$ 919,810.00
30/01/2018		\$ 975,976.00
31/01/2018		\$ 1,587,679.53

31/01/2018		\$ 1,551,977.53
31/01/2018		\$ 1,457,971.28
13/02/2018		\$ 1,964,243.50
13/02/2018		\$ 2,938,000.50
15/02/2018		\$ 9,975.00
1/03/2018		\$ 981,828.50
2/03/2018		\$ 1,976,277.08
5/03/2018		\$ 1,962,700.50
12/03/2018		\$ 199,992.50
13/03/2018		\$ 982,986.50
14/03/2018		\$ 69,978.00
14/03/2018		\$ 77,978.00
21/03/2018		\$ 1,987,866.50
26/03/2018		\$ 83,978.00
28/03/2018		\$ 606,306.50
28/03/2018		\$ 337,992.50
28/03/2018		\$ 655,041.15
4/04/2018		\$ 1,997,994.50
23/04/2018		\$ 2,001,593.78
24/04/2018		\$ 1,007,218.50
24/04/2018		\$ 999,992.50
26/04/2018		\$ 2,016,121.53
30/04/2018		\$ 2,030,448.50
8/05/2018		\$ 1,012,445.50
15/05/2018		\$ 1,014,911.50
16/05/2018		\$ 1,701,656.50
18/05/2018		\$ 2,041,016.50
24/05/2018		\$ 1,014,087.50
25/05/2018		\$ 3,050,819.50
10/07/2018		\$ 299,963.00
16/07/2018		\$ 299,963.00

18/07/2018		\$ 299,963.00
24/07/2018		\$ 979,769.50
25/07/2018		\$ 299,963.00
26/07/2018		\$ 299,963.00
1/08/2018		\$ 959,903.50
13/08/2018		\$ 974,650.50
23/08/2018		\$ 289,990.00
4/09/2018		\$ 999,992.50
17/09/2018		\$ 1,974,910.50
18/09/2018		\$ 1,499,992.50
20/09/2018		\$ 499,992.50
2/10/2018		\$ 999,992.50
17/10/2018		\$ 399,992.50
17/10/2018		\$ 599,992.50
19/10/2018		\$ 99,992.50
26/10/2018		\$ 781,473.50
29/10/2018		\$ 218,511.50
31/10/2018		\$ 394,313.50
1/11/2018		\$ 394,625.49
1/11/2018		\$ 799,992.50
5/11/2018		\$ 139,990.00
22/11/2018		\$ 973,133.50
28/11/2018		\$ 199,992.50
6/12/2018		\$ 978,657.50
7/12/2018		\$ 983,856.50
10/12/2018		\$ 99,990.00
11/12/2018		\$ 980,768.50
17/12/2018		\$ 983,276.50
28/12/2018		\$ 1,002,598.50
4/01/2019		\$ 1,023,324.50
15/01/2019		\$ 361,195.50
18/01/2019		\$ 603,189.50

23/01/2019		\$ 999,992.50
25/01/2019		\$ 1,999,992.50
29/01/2019		\$ 499,992.50
29/01/2019		\$ 999,992.50
31/01/2019		\$ 499,992.50
14/02/2019		\$ 999,992.50
15/02/2019		\$ 999,992.50
18/02/2019		\$ 499,992.50
20/02/2019		\$ 999,992.50
21/02/2019		\$ 999,992.50
22/02/2019		\$ 799,992.50
25/02/2019		\$ 1,999,992.50
26/02/2019		\$ 999,992.50
5/03/2019		\$ 1,021,025.50
6/03/2019		\$ 1,022,068.50
7/03/2019		\$ 1,027,952.50
17/05/2019		\$ 471,769.00
13/06/2019		\$ 203,531.00
17/06/2019		\$ 613,863.00
18/06/2019		\$ 409,826.00
18/06/2019		\$ 253,254.00
20/06/2019		\$ 1,031,768.00
27/06/2019		\$ 204,259.00
28/06/2019		\$ 204,238.00
9/07/2019		\$ 408,320.00
11/07/2019		\$ 613,612.00
16/07/2019		\$ 1,999,990.00
17/07/2019		\$ 199,990.00
18/07/2019		\$ 399,990.00
25/07/2019		\$ 199,990.00
29/07/2019		\$ 499,990.00

29/07/2019		\$ 999,990.00
30/07/2019		\$ 499,990.00
31/07/2019		\$ 999,990.00
2/08/2019		\$ 185,878.00
6/08/2019		\$ 414,068.00
7/08/2019		\$ 199,990.00
19/08/2019		\$ 617,400.00
22/08/2019		\$ 313,303.36
4/09/2019		\$ 999,990.00
3/10/2019		\$ 499,990.00
4/10/2019		\$ 549,990.00
10/10/2019		\$ 199,990.00
17/10/2019		\$ 1,199,990.00
21/10/2019		\$ 1,199,990.00
29/10/2019		\$ 1,099,990.00
6/11/2019		\$ 99,990.00
7/11/2019		\$ 608,385.00
8/11/2019		\$ 499,990.00
11/11/2019		\$ 399,990.00
12/11/2019		\$ 399,990.00



## APPENDIX F - DOMESTIC TRANSFERS BY THIRD PARTIES

Initialism identified some transactions which appear to be made by domestic (Australian) third parties (individuals and companies) unrelated to Crown's customer. The payments appear to have been made in the name of the unrelated third party and contain either the Crown customer's name or a Crown customer number as part of the payment text.

Whilst inconclusive on its own, the use of domestic third parties evidenced by the Riverbank and Southbank bank accounts, in Initialism's opinion, align to the indicia of cuckoo smurfing activity for the purposes of money laundering.

### Riverbank – ANZ Account

10/10/2013		\$ 20,000.00
11/10/2013		\$ 10,000.00
11/10/2013		\$ 10,000.00
14/10/2013		\$ 19,500.00
17/10/2013		\$ 10,000.00
20/11/2013		\$ 24,366.00
17/12/2013		\$ 10,000.00
18/12/2013		\$ 50,000.00
19/12/2013		\$ 38,000.00
20/12/2013		\$ 25,000.00
5/03/2014		\$ 100,000.00
6/03/2014		\$ 40,000.00

### Riverbank – CBA Account

None identified

### Southbank – CBA account

21/11/2013		\$ 1,393,242.75
18/03/2014		\$ 250,000.00
3/04/2014		\$ 250,342.90
20/05/2014		\$ 20,000.00
21/05/2014		\$ 20,000.00
17/06/2014		\$ 20,000.00
17/06/2014		\$ 300,000.00
20/06/2014		\$ 200,000.00
23/06/2014		\$ 300,000.00
25/06/2014		\$ 140,102.00
1/07/2014		\$ 60,000.00
15/06/2015		\$ 20,000.00
12/07/2016		\$ 50,000.00

## APPENDIX G – INCONSISTENT PAYMENT DESCRIPTORS

Additionally, during the review, Initialism identified a number of instances where payments into the Riverbank and Southbank bank accounts were accompanied by payment descriptions that conflicted with the underlying purpose of the payment to Crown.

### Riverbank – ANZ Account

14/08/2013		\$ 35,000.00
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### Riverbank – CBA Account

12/11/2015		353,805.26
31/12/2015		350,000.00
20/02/2018		5,000.00
23/12/2016		40,309.00
29/11/2016		5,978.00
9/10/2017		70,963.00
2/08/2018		3,000,000.00
3/07/2019		2,000.00

### Southbank – CBA account

12/11/2014		\$ 148,971.35
31/08/2016		\$ 148,099.00
12/10/2016		\$ 139,968.00
14/10/2016		\$ 244,968.00
2/12/2016		\$ 19,971.00
3/08/2017		\$ 76,978.00
19/09/2017		\$ 46,356.00
20/12/2017		\$ 199,963.00
20/12/2017		\$ 99,963.00
29/12/2017		\$ 100,000.00
2/01/2018		\$ 100,000.00
3/01/2018		\$ 234,963.00
3/01/2018		\$ 239,963.00
3/01/2018		\$ 241,446.00
3/01/2018		\$ 241,963.00

4/01/2018		\$ 70,000.00
28/02/2018		\$ 244,963.00
2/03/2018		\$ 239,963.00
8/03/2018		\$ 270,963.00
8/03/2018		\$ 268,963.00
9/03/2018		\$ 100,000.00
14/03/2018		\$ 109,832.00
19/03/2018		\$ 239,963.00
19/03/2018		\$ 254,963.00
20/03/2018		\$ 34,105.00
19/08/2019		\$ 85,000.00