

## Crown Submission.

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**From:** REDACTED  
**To:** Contact (RCCOL) <contact@rccol.vic.gov.au>  
**Date:** Mon, 12 Apr 2021 22:14:36 +1000  
**Attachments:** Crown assessment.pdf (48.72 kB); Submission- cover-sheet\_4 Edited.pdf (705.18 kB)

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Hi Team

Please see the attached documents (Cover sheet + assessment)

Being an Ex-Employee of Crown (part of the AML compliance team) i have to take steps to protect my identity, as i do fear that they might take some action against me for speaking out. As having worked there and I know from a first hand basis that speaking out against them does not end well for those individuals. This is all incase they somehow get a hold of this email and documents attached to them.

This inbox is not monitored on a regular basis. if you do wish to reach out please use the phone number listed in the cover sheet

As such I'm submitting the information contained in the docs anonymously, The contact number i have put down is monitored on a regular basis in case you do wish to reach out.

hopefully the information i have provided will help with your investigations

Please don't be fooled by the way the AML team at Crown presents themselves. They have been known to edit email dates and files occasionally go "Missing" when it is detrimental to them. Take things they say with a grain of salt as they are known to go back on their word.

Kind regards

REDACTED

A. Whether Crown Melbourne is a suitable person to continue to hold the casino licence under the Casino Control Act 1991.

- As an Ex-Employee of the Crown Resorts group I worked under their Anti Money Laundering (AML) Compliance team, I can attest that they are not fit to hold a casino licence. When I was there during the period of REDACTED they did not seem to care at all about AML or the consequences of having ZERO (and I mean ZERO) controls around AML. Their main form of getting alerts for any transaction that was unusual or adverse was through the dealers and cage staff on the floor (this is not an exaggeration). When I joined I saw many flaws in their way of actioning AML and how they received alerts. When I asked how things were going to change along with proposed solutions, the response from the General Manager was "AUSTRAC knows nothing about the gaming industry, even if they audit us they will fail to understand the scope of our work". This remark stuck with me as it really set the tone for the entirety of my time there while struggling to make a difference in the AML space.

Their general consensus between the GM and the senior manager was that the customers / "high rollers" come first, and that them bringing in money was key for the success of Crown.

Furthermore the general team structure was absolute horrendous. With only two individuals to manage the ENTIRETY of Crown Perth, and REDACTED to manage ALL of Crown Melbourne with ZERO support from the GM or Senior manager when needing direction in how to action things or where to escalate things I found unusual.

Crown overall does not have a designated system to capture all the transactions going through, their systems only capture slot machines at an accurate level, with the data for table games being an estimated value when I had to review their accounts. Furthermore Table games in the high roller rooms are not even recorded at an accurate level rather an estimated of what the customer has played. Their own system to record customer transactions are not even adequate enough to capture the data accurately. If I do recall correctly I was told that a certain table game was not even recorded that even if the customer used their loyalty card no transaction would be recorded (it was the prime table used by criminals to launder their money

Even when screening for names, majority of the customers had adverse media around them yet they decided to keep them pening how big of a spender they were at Crown.

D. Whether it is in the public interest for Crown Melbourne to continue to hold the casino licence in Victoria.

I do not believe that Crown Melbourne should continue to hold the casino licence with their current attitude to AML. They have allowed known criminals to walk through their casino floors untouched or alerted by security all so they can make money and assist criminals in laundering their funds - they have assisted criminals transfers their monies out of the Crown account directly into a real estate company's account with no SMR being conducted until a news report was done when a cage staff spoke out to the media.

They run ECDD reports some of the “high roller” clients and most of them come back with multiple allegations of them being linked to Chinese Triads with no action being taken due to them bringing in millions of dollars into the casino. Customers are also never exited from Crown; they are only “banned” from the venue with the customers being able to appeal for their status to be unbanned (ie pay their way back). A certain individual who has been banned from Australia was only banned from Crown casino the day that Australia announced that he would be banned from the country, however Crown allowed his Junket Programs to still run for some time. The Majority of the Junket programs running in Crown are runned by individuals and companies with known ties to the Triad and criminals. Yet Crown refuses to shut down those programs all because they are bringing in the “big bucks” as i have been told.

F. Whether Crown Resorts is a Suitable Associate of Crown Melbourne.

-Crown resorts is definitely an associate of Crown Melbourne as the Hotel staff does send the AML Team unusual activity reports (although no action is usually taken).

H. Whether any other existing associates of Crown Melbourne are not Suitable Associates of Crown Melbourne.

I. If you consider that any other existing associates of Crown Melbourne are not Suitable Associates of Crown Melbourne, what action (if any) would be required for those persons to become Suitable Associates of Crown Melbourne.

- The entire AML team in Crown Melbourne needs to go in particular the GM and Senior Manager in general due to their nonchalant attitude towards AML and how they think the regulator is a joke (this was put down in writing in email – however It would not surprise me if the email cannot be found as they are known to edit emails to help their case). They have even created “documents’ to show that they are planning on creating a case manager with proper systems in place however in my time there they never wanted to act on them as they said they would never be regulated and probably only start editing or pushing forward the plans if the regulator does come in, the documents they have are for show and should not be taken seriously in how they are able to show that they are “changing”.

A new AML team needs to be put in place with proper individuals that take AML matters seriously.

J. Whether you consider changes to relevant Victorian legislation, including the Casino Control Act and the Victorian Commission for Gambling and Liquor Regulation Act 2011, as well as the Crown Melbourne Contracts, are necessary for the State to address your findings and implement your recommendations.

K .Whether there are any other matters necessary to satisfactorily resolve the matters set out in paragraphs A to J, above.