

Royal Commission into the Casino Operator and Licence**STATEMENT OF JAN WILLIAMSON**

Name: JAN WILLIAMSON
Address: Crown Towers, Level 3, 8 Whiteman Street, SOUTH BANK VIC 3006
Occupation: Australian Legal Practitioner – General Manager – Legal
Date: 12 June 2021

1. I make this statement on behalf of Crown Resorts Limited and Crown Melbourne Limited (together **Crown**) in response to the Royal Commission's Request for Statement – RFS-Crown-014-Legal Proceedings (**Request for Statement**).
2. This statement has been prepared on the basis of my own knowledge and enquiries I have made of various employees within the Crown Resorts Group and its insurance broker.
3. My education and qualifications are Bachelor of Economics and a Bachelor of Laws from Monash University.
4. I commenced employment with Crown Melbourne Limited (**CML**) on 29 October 2001 as a Senior Legal Counsel in the CML Legal Department. There were two other lawyers within the department, including the head of the department and a law clerk.
5. Prior to my employment at Crown I had been employed in private practice.

1. **Provide the details of any legal proceedings in which a Crown company:**
 - (a) **Is a party and details of the claims in those legal proceedings; and**
 - (b) **Employee, consultant, former employee, former consultant or similar has provided assistance to law enforcement bodies or agencies, or is, or may, appear as a witness**

Details of any legal proceedings in which a Crown company:**(a) Is a party and details of the claims in those legal proceedings**

6. As agreed with the Solicitors Assisting, the response to question 1(a) is limited to current legal proceedings excluding any public liability, workers' compensation, trade mark, small claims which might be commenced at VCAT and any proceedings issued under the *Fair Work Act* 2009 where the response might be voluminous and which is not required for the Commission's Terms of Reference. I have not included any matter the subject of an investigation by any regulatory authority or body which do not fall with the terms of paragraph 1(a). I am also not aware of any legal proceedings filed at Fair Work Australia by any employee or former employee regarding the China arrests. Details of the current legal proceedings are set out in **Annexure 1** (CRW.512.135.0022).

Provide the details of any legal proceedings which a Crown company:**(b) Employee, consultant, former employee, former consultant or similar has provided assistance to law enforcement bodies or agencies, or is, or may, appear as a witness**

7. In addition to the legal proceedings set out in **Annexure 1** (CRW.512.135.0022), Crown provides assistance to law enforcement bodies and agencies which include:
- (i) Australian Transaction Reports and Analysis Centre;
 - (ii) Australian Taxation Office;
 - (iii) Centrelink;
 - (iv) Australian Securities and Investment Commission;
 - (v) Australian Federal Police;
 - (vi) Victoria Police;
 - (vii) New South Wales Police; and
 - (viii) Western Australia Police.

Following receipt from the Commission of this Request for a Statement I made enquiries within Crown in Melbourne, Sydney and Perth to source information.

8. Crown receives many requests for assistance from, or to provide information to, law enforcement agencies (**LEA's**). In **Annexure 2** (CRW.512.135.0020), **Annexure**

3 (CRW.512.135.0021) and **Annexure 4** (CRW.512.135.0019) attached I set out the numbers of requests received by Crown Melbourne for the period 2015 to June 2021, Crown Sydney for the period 2021 noting Crown Sydney only opened on 28 December 2020 and Crown Perth for the period 2015 to June 2021. The numbers contained within those annexures have been obtained from Crown's records maintained by the Compliance Department in Melbourne, the Compliance Department in Sydney and the Legal and Compliance Department in Perth (**Crown Departments**). As I understand it the process is that LEA requests are sent by LEA's directly to the Crown Departments via a Request for Information form and those Crown Departments have the direct contact with the LEA requestor. Those Crown Departments then collate and provide the records and information requested directly to the LEA requestor.

9. LEA requests may ask Crown to provide gaming records or other information or intelligence regarding an incident which may or may not have occurred at Crown. Those requests might concern a one-off isolated matter and after Crown has provided the information, Crown may not hear further about the matter from a LEA. On other occasions, the request may be the start of an investigation which then ultimately result in charges being laid against an offender and then becomes a LEA legal proceeding. In most instances Crown employees may be required to provide statements and give evidence concerning chain of evidence verification, explanation of Crown records and the circumstances of the subject matter of the legal proceeding. It is not until a matter is listed for a hearing or trial and Crown is informed of this by a LEA that Crown employees or former employees may be called to give evidence. Dependent upon the nature of the matter the employees from various Crown Departments may be called to give evidence including the Compliance Department (for record verification and explanation of Crown's gaming records), the Security and Surveillance Departments (for footage verification) and hotel employees if an incident occurred within one of Crown's Hotels, the gaming department and food and beverage departments.
10. In the time available I have only been able to provide the details of LEA legal proceedings for the year 2021 for Crown Sydney (noting Crown Sydney only opened on 28 December 2020) and for the period 2015 through to 2021 for Crown Melbourne and Crown Perth. This information has been sourced from the records of the Crown Departments and is set out in

Annexure 5 (CRW.512.135.0003) I have endeavoured to provide the details to the Commission as requested to answer 1(b) and I note that Annexure 5 may not be an exhaustive list. However, the records of the Crown Departments on occasion were not complete nor did they have sufficient detail to enable me to provide full details to complete Annexure 5. The Crown records rely upon the information provided by LEA's and often LEA's do not provide that detail. Also, the total number of matters for Crown Perth is significantly greater than the number for Crown Melbourne. Many of the matters for Crown Perth refer to summary type offences, such as trespass, which a LEA prosecutes through the courts. The Crown employee attendance at court, if required for these matters, relates to the production and verification of footage. In Melbourne, summary offence type matters are often dealt with by way of the issuance of an Infringement Notice by a LEA and do not progress to a court hearing unless the Infringement Notice is challenged by the offender, hence those types of minor matters do not fall within the terms of paragraph 1(b).

11. As at the date of this Statement, there are nine matters in 2021 for which Crown employees may be required to give evidence and those matters are set out in **Annexure 6** (CRW.512.135.0001) Crown does not keep records of and it is not within its knowledge as to whether any consultant may have provided assistance and/or evidence to a LEA.
12. Although not specifically within the definition of a 'Crown Company' as defined in the Request for Statement, Solicitors Assisting the Commission have indicated that the matter of the China arrests is covered by the Commission's Terms of Reference and should be included in this statement. I have therefore provided information regarding the China arrests and the legal proceedings arising from the arrests and detention of Crown staff in China on 13 October 2016. **Annexure 7** (CRW.512.135.0024) records the name of each Crown employee arrested, the detail of the offences as charged, the subsequent conviction, sentence and fine imposed by the Shanghai Baoshan District Court.

<p>1. A list of claims or potential claims notified to a Crown company insurer in the last 5 years</p>

13. I refer to **Annexure 8** (CRW.512.135.0072) (provided by Crown's broker) which sets out all

claims or potential claims notified to Crown's insurers excluding any property damage and business interruption claims, public liability claims and workers compensation claims.

Annexure 8 has been provided by Crown's insurance broker to Crown on the following basis:

"This is a confidential document, and we ask that you advise the Royal Commission to at all times maintain its confidentiality. The report reflects the notifications and claims submissions made by Crown and does not represent AIG's acceptance or determination of either the validity of those notifications or submissions, such that it does not portray if each notification and/or claim submission will be accepted by AIG and/or relevant year of account."

Annexure 8 (CRW.512.135.0072) has been so marked.

I also note that **Annexure 8** (CRW.512.135.0072) contains highly sensitive commercial information regarding Crown's insurance policies which, if published, could amount to a breach under the general terms upon which the insurance is provided to Crown, as well as the terms of the individual policies.

Signed: _____

Date: 1 _____

