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29 June 2021

Mr Craig Philips
Ms Abigail Gill
The Solicitors Assisting the Royal Commission
Into the Casino Operation Licence
Level 25, 567 Collins Street
Melbourne VIC 3000

Dear Mr Philips and Ms Gill

Royal Commission into the Casino Operator and Licence

We refer to:

- the letter from the Commissioner to the directors of Crown Melbourne Limited (**Crown**) dated 10 March 2021, including a Schedule that requested that Crown identify (among other things) all actual or potential breaches of certain specified laws going back to 1 January 2010 (**RFI-002**);
- our letters dated 24 March 2021, 21 April 2021, 19 May 2021, 18 June 2021 and 24 June 2021 responding to RFI-002;
- the Notice to Produce with the reference number NTP-061 concerning the response to RFI-002.

The purpose of this letter is to bring to your attention an issue that Crown considers may be a contravention of section 74(1A) of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (the **AML/CTF Act**).

Section 74(1A) of the AML/CTF Act prohibits a person (other than an affiliate of a remittance network provider) from providing a registrable designated remittance service unless registered on the remittance sector register. Crown is not registered on the remittance sector register.

During evidence provided by Employee 10 on 23 June 2021, Counsel Assisting asked Employee 10 a number of questions about a Crown Towers invoice issued to Mr Peter Gavalas (CRW.512.168.0042) (the **Gavalas Invoice**).

Having since considered the Gavalas Invoice and the transactions that it records, Crown considers that in facilitating these transactions it may have provided a registrable designated remittance service in contravention of section 74(1A) of the AML/CTF Act.

Crown is currently urgently considering the next steps in relation to this matter. Crown is investigating the extent to which other similar transactions have also been facilitated at its hotels and whether Crown has been 'carrying on a business of giving effect to remittance arrangements'. If it has not, it will not have provided a registrable designated remittance service.

Our Ref MTMM:120999183
PXHM 515101934v1 120999183 29.6.2021

The Solicitors Assisting the Royal Commission
Into the Casino Operator and Licence

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This letter is provided in accordance with a requirement to do so under the *Inquiries Act 2014*, in response to NTP-061.

Yours sincerely



Matthew McCarthy
Managing Associate
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Peter Haig
Partner
Allens



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