

## AUSTRAC Engagement Timeline

Tab	Date	
1.	27 March 2017	Letter received from AUSTRAC advising of AUSTRAC AML/CTF Program Compliance Assessment with a focus on Junkets ( <b>March Compliance Assessment</b> )
2.	29 March 2017	Introductory emails between Deb Tegoni & <b>Privileged</b> [following commencing of new CLO role]
3.	20 April 2017	Email from Scott Howell to AUSTRAC enclosing requested documentation (8 emails) for the March Compliance Assessment
4.	26 April 2017	Letter received from AUSTRAC confirming onsite March Compliance Assessment dates
5.	17 & 18 May 2017	AUSTRAC March Compliance Assessment at Crown Melbourne  <i>AUSTRAC Attendees:</i> <ul style="list-style-type: none"> <li>• <b>Privileged</b> Manager Compliance</li> <li>• <b>Privileged</b> Senior Compliance Officer, Compliance</li> <li>• <b>Privileged</b> Compliance Office, Compliance</li> <li>• <b>Privileged</b> Intelligence Analyst, Intelligence</li> </ul>
6.	18 May 2018	AUSTRAC tour of Crown Melbourne and of Suncity Room and other premium gaming areas
7.	1 June 2017	Email from <b>Privileged</b> (AUSTRAC) requesting copy of due diligence reports Crown relies on regarding Junket Operator, Cheok Wa Chau ( <b>CCW</b> )
8.	8 June 2017	Email from Scott Howell to <b>Privileged</b> (AUSTRAC) attaching requested reports for CCW (as requested on 1 June 2017)
9.	8 June 2017	Email from <b>Privileged</b> (AUSTRAC) advising that she has “perused the documentation prowers, and it is clears that Crown is aware that Mr Chau is both a foreign PEP and has a substantial criminal history” and requesting further documentation “evidencing Crown’s consideration of the appropriateness of continuing to provide designated services to Mr Chau, and an explanation as to how Crown considers its business relationship with Mr Chau to be consistent with its commitment to striving to achieve the objectives of the AML/CTF Act.”
10.	9 June 2017	Meeting with <b>Privileged</b> (AUSTRAC), Joshua Preston & Michelle Fielding
11.	20 June 2017	Email from <b>Privileged</b> (AUSTRAC) advising that at the meeting on 22 June “we would also be keen to discuss Crown’s IFTI reporting and the different scenarios in which a report is lodged. More specifically, we would like more information on how Crown is aware of which casino accounts to credit amounts transferred.  <i>I will provide you with more information on this on Thursday, however we are trying to gather more detailed information so we can appropriately work with Crown on its reporting obligations.”</i>
12.	21 June 2017	AUSTRAC Smarter Regulation Workshop (held in Melbourne) <ul style="list-style-type: none"> <li>• Joshua Preston – attended majority of day (excluding 12pm – 2.30pm to attend board meeting)</li> <li>• Michelle Fielding, Group General Manager Regulatory &amp; Compliance – attended all day</li> </ul>
13.	22 June 2017	Joshua Preston met with AUSTRAC, Sydney <b>Privileged</b> to discuss comments from <b>Privileged</b> in <b>Pr</b> email dated 8 June 2017 and specifically re

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		CCW due diligence measures undertaken and cash transactions at the Suncity desk
14.	26 June 2017	Letter from AUSTRAC – March Compliance Assessment findings: <ul style="list-style-type: none"> <li>• <i>Finding One – risk assessment</i></li> <li>• <i>Finding Two – transaction monitoring program</i></li> <li>• <i>Finding Three – further KYC and ECDD</i></li> <li>• <i>Finding Four – identification of politically exposed persons (PEPs) and Beneficial Owners</i></li> <li>• <i>Finding Five – discrepancies</i></li> <li>• <i>Finding Six – staff awareness training</i></li> <li>• <i>Finding Seven – additional KYC</i></li> <li>• <i>Finding Eight – reporting obligations</i></li> </ul>
15.	29 June 2017	AML/AUSTRAC Casinos Group Quarterly Meeting
16.	29 June 2017	Email from <b>Privileged</b> (AUSTRAC) referencing our meeting on 22 June where we discussed cash transactions at the Suncity Desk and requesting clarification on processes.  Discussion was also around the scenarios in which Crown would submit an IFTI-DRA. AUSTRAC requested further information understand how Crown identifies and tracks transactions that are deposited into Crown's account and then made available or provided to a player.
17.	30 June 2017	Email to <b>Privileged</b> (AUSTRAC) responding to <b>Pri</b> query on 29 June regarding IFTIs
18.	30 June 2017	Email from <b>Privileged</b> (AUSTRAC) with a further query regarding transfers to Crown's account from an international or domestic account
19.	6 July 2017	Email to <b>Privileged</b> (AUSTRAC) responding to <b>Pri</b> query on 29 June regarding the desk in the gaming room allocated to Suncity junket players and explaining nature of Suncity transactions and Crown's processes
20.	6 July 2017	Email to <b>Privileged</b> (AUSTRAC) responding to <b>Pri</b> 30 June 2017 email query regarding transfer of funds
21.	10 July 2017	Email from <b>Privileged</b> (AUSTRAC) acknowledging and thanking Crown for its 30 June response regarding IFTIs
22.	26 July 2017	Letter to AUSTRAC – response to March Compliance Assessment findings
23.	27 July 2017	Email from <b>Privileged</b> (AUSTRAC) thanking Crown for its 26 July letter and advising they will review and respond
24.	10 August 2017	Joshua Preston called <b>Privileged</b> (AUSTRAC) to advise of some IFTI reporting issues
25.	10 August 2017	Email from <b>Privileged</b> (AUSTRAC) thanking Crown for the call and requesting "a more detailed update of the issue and the impact it has had once you have been provided this information".  <b>Privi</b> also requested a meeting be arranged to discuss Crown's remediation following AUSTRAC's recent review of Crown, in addition to the results from the SMR review.
26.	11 August 2017	Email to <b>Privileged</b> (AUSTRAC) reporting that all of the IFTI's have now been uploaded as a result of the IT issue being resolved.
27.	14 – 15 August 2017	Emails between <b>Privileged</b> & Joshua Preston agreeing that the IFTIs matter will

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		be discussed further at the meeting on 29 August 2017
28.	25 August 2017	Letter from AUSTRAC – Review of Suspicious Matter Reports completed (Crown Melbourne)
29.	25 August 2017	Letter from AUSTRAC – Review of Suspicious Matter Reports completed (Crown Perth)
30.	29 August 2017	REDACTED - SECRET INFORMATION
31.	30 August 2017	AUSTRAC Smarter Regulation Workshop, Sydney
32.	14 September 2017	Letter sent to AUSTRAC regarding IFTI reporting issue
33.	14 September 2017	Email from <b>Privileged</b> (AUSTRAC) acknowledging receipt of 14 September letter
34.	14 September 2017	Email from <b>Privileged</b> (AUSTRAC) regarding the key commitments coming out of the Smarter Regulation Workshop on 30 August to re-design the AUSTRAC Compliance Report and inviting Crown to participate in the working group being established.
35.	21 September 2017	<p>Singapore CRA Australian Study Visit with AUSTRAC – Crown Melbourne Tour and review of some of the systems that are used in relation to AML/CTF and others to meet regulatory requirements</p> <p><i>Attendees:</i></p> <ul style="list-style-type: none"> <li>• <b>Privileged</b> Director, Inspection and Compliance Division – Singapore CRA</li> <li>• <b>Privileged</b> Senior Manager, Inspection and Compliance Division – Singapore CRA</li> <li>• <b>Privileged</b> Senior Manager, Inspection and Compliance Division – Singapore CRA</li> <li>• <b>Privileged</b> A/g Director, Compliance – AUSTRAC</li> <li>• <b>Privileged</b> Senior Compliance Officer, Compliance – AUSTRAC</li> <li>• <b>Privileged</b> Senior Compliance Officer, Compliance – AUSTRAC (possible)</li> <li>• <b>Privileged</b> Director, Liquor, Gambling &amp; Racing – Licensing NT</li> <li>• <b>Privileged</b> (possible)</li> </ul>
36.	26 September 2017	Letter from AUSTRAC advising closure of Crown Perth's Compliance Assessment
37.	26 September 2017	Email from <b>Privileged</b> AUSTRAC requesting relevant SMR numbers for their records – <i>Note we cannot find a formal response to this email.</i>
38.	9 October 2017	Introductory telephone conversation with Joshua Preston, <b>Privileged</b> <b>Privileged</b> (AUSTRAC)
39.	10 October 2017	Email from <b>Privileged</b> (AUSTRAC) attaching AUSTRAC's letter of response re IFTI Reporting
40.	19 October 2017	AML Community of Practice Workshop, Sydney (Louise Lane, previous Group General Manager - AML attended)
41.	19 October 2017	Meeting with Joshua Preston, <b>Privileged</b> (AUSTRAC) in Sydney
42.	20 October 2017	Letter from AUSTRAC regarding publicised allegations against Crown Melbourne by Mr Andrew Wilkie regarding manipulation of electronic gaming machines and illegal improper conduct at Crown Melbourne including alleged breaches of the AML/CTF Act

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43.	26 October 2017	Letter to AUSTRAC responding to their 26 September 2017 letter regarding AML/CTF Compliance Assessment – Crown Melbourne Findings
44.	26 October 2017	Email from <b>Privileged</b> (AUSTRAC) acknowledging receipt of above letter
45.	26 October 2017	Letter to AUSTRAC responding to their 20 October letter regarding publicised allegations against Crown Melbourne
46.	26 October 2017	Email from <b>Privileged</b> (AUSTRAC) acknowledging receipt of above letter
47.	9 November 2017	Letter from AUSTRAC regarding Freedom of Information Request: Third Party Consultation – Crown Melbourne
48.	9 November 2017	Letter from AUSTRAC regarding Freedom of Information Request: Third Party Consultation – Crown Perth
49.	13 November 2017	Email from <b>Privileged</b> (AUSTRAC) introducing Crown to <b>Privileged</b> Manager Fintel Alliance Operations Hub and Kate Gunning, Acting Senior Intelligence Analyst, Fintel Alliance Operations Hub (AUSTRAC <b>Privileged</b> )
50.	13 November 2017	Letter from AUSTRAC regarding Compliance Assessment – Crown Melbourne on 28 & 29 November 2017 ( <b>EGM Compliance Assessment</b> ).  Objective of the EGM Compliance Assessment is to review the policies, programs and processes that Crown Melbourne has implemented to meet certain obligations under the AML/CTF Act and will be limited to electronic gaming machines.
51.	16 November 2017	AUSTRAC & Fintel Presentation and Crown Melbourne Tour
52.	20 November 2017	Letter to AUSTRAC regarding March Compliance Assessment – Crown Melbourne on Electronic Gaming Machines and attaching various documents as requested by AUSTRAC
53.	21 November 2017	Email to <b>Privileged</b> (AUSTRAC) attached a draft agenda ahead of AUSTRAC's visit on 28 & 29 November regarding the March Compliance Assessment
54.	23 November 2017	Email from <b>Privileged</b> (AUSTRAC) attaching draft agenda for EGM Compliance Assessment on 28 & 29 November
55.	28 November 2017	Email from <b>Privileged</b> attaching outstanding items for Crown to submit to AUSTRAC following March Compliance Assessment
56.	5 December 2017	Letter from Louise Lane to AUSTRAC responding to the above outstanding items to be submitted to AUSTRAC
57.	6 December 2017	Email from <b>Privileged</b> (AUSTRAC) acknowledging response of 5 December letter
58.	11 December 2017	Email from <b>Privileged</b> (AUSTRAC) attaching post March Compliance Assessment question
59.	11 December 2017	Letter from AUSTRAC re decision of FOI Request – Crown Perth
60.	11 December 2017	Letter from AUSTRAC re decision of FOI Request – Crown Melbourne
61.	12 December 2017	Meeting with <b>Privileged</b> (AUSTRAC) (Perth)
62.	20 December 2017	Email from <b>Privileged</b> Intelligence Capability (AUSTRAC) attaching letter from AUSTRAC thanking Crown Melbourne for their contribution to AUSTRAC's Financial Intelligence Analyst Course
63.	19 January 2018	Email from <b>Privileged</b> (AUSTRAC) attaching further additional post March

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		Compliance Assessment question
64.	22 January 2018	Email from <b>Privileged</b> (AUSTRAC) querying Crown's Internal Sources Management Committee and whether any reports had been received to date from concerning staff collusion with patrons to avoid AML/CTF reporting obligations or breaches alleged by Mr Andrew Wilkie, and requesting a contact so as to verify the same with Stoptline, Crown's independent whistleblower company
65.	25 January 2017	Email from Louise Lane responding to Gavin Raper's email of 22 January 2017
66.	21 February 2017	Philippine Casino Regulator Visit and tour of Crown Melbourne
67.	20 April 2018	On or about 20 April Joshua Preston contacted <b>Privileged</b> regarding the identification of approx \$5.6m in cash in the Suncity Room.
68.	3 May 2018	Email from <b>Privileged</b> Fintel Alliance (AUSTRAC) regarding the process of joining the Fintel Alliance Operational Coordinator Group and providing a short presentation regarding the alliance and how it works
69.	May 2018	<p>In May 2018, AUSTRAC made enquiries in relation to the circumstances in which the \$5.6m was located in the Suncity Room.</p> <p>On 4 May 2018, an information request was received from Victoria Police in respect of the \$5.6m, to which Crown responded</p> <p>In May 2018, Crown Melbourne implemented additional controls in relation to the Suncity Room, namely that the cash transactions that the junket could undertake each day were limited to a maximum aggregate amount of A\$300,000 (with all such transactions being required to take place at the Crown Melbourne Cage), the Suncity Room was to be moved to an alternate location ("Pit 38") where enhanced access controls were in place to ensure all persons entering the Suncity Room were identified and recorded in Crown's systems, and no cash counting machines were permitted in the Suncity Room.</p> <p>Crown engaged with AUSTRAC and Victoria Police in relation to this incident and engaged with AUSTRAC about the proposed controls to be implemented.</p>
70.	15 May 2018	REDACTED - SECRET INFORMATION
71.	15 May 2018	Email from <b>Privileged</b> (AUSTRAC) attaching letter and EGM Compliance Assessment Report, along with AUSTRAC's Closure letter for March Compliance Assessment
72.	18 May 2018	REDACTED - SECRET INFORMATION
73.	23 May 2018	REDACTED - SECRET INFORMATION
74.	23 May 2018	Email from <b>Privileged</b> agreeing to Crown's request for extension until COB Friday, 25 May 2018
75.	25 May 2018	REDACTED - SECRET INFORMATION
76.	28 May 2018	Email from <b>Privileged</b> (AUSTRAC) acknowledging receipt of 15 May letter

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77.	1 June 2018	Meeting with <b>Privileged</b> (AUSTRAC) – Fintel Alliance
78.	15 June 2018	Letter to AUSTRAC regarding Compliance Assessment Report <b>regarding electronic gaming machines</b> including Crown's comments and responses to AUSTRAC's recommendations <b>[[#M, is this for the March Compliance Assessment of the EGM Compliance Assessment?]]</b>
79.	15 June 2018	Email from <b>Privileged</b> (AUSTRAC) acknowledging receipt of 15 June 2018 letter
80.	26 June 2018	AUSTRAC RegTech Showcase
81.	19 July 2018	Letter from AUSTRAC – advising Compliance assessment <b>regarding electronic gaming machines</b> now closed <b>[[#M, is this for the March Compliance Assessment of the EGM Compliance Assessment?]]</b>
82.	6 August 2018	Telephone call with and email to <b>Privileged</b> (AUSTRAC) regarding draft questions and answers referencing AUSTRAC in advance of the release of Crown's Full Year Results
83.	16 August 2018	Meeting with <b>Privileged</b> from AUSTRAC, with Ken Barton, Barry Felstead and Joshua Preston
84.	27 September 2018	AML RegTech Association Breakfast
85.	12 October 2018	Letter from AUSTRAC regarding launch of an information paper titled ' <i>AUSTRAC's approach to regulation</i> '. The paper provides reporting entities and other stakeholders with useful insights into how AUSTRAC views and fulfils its regulatory role under the <i>Anti-Money Laundering and Counter-Terrorism Financing Act 2006</i> (Cth).
86.	17 October 2018 TBC	Presentation to AUSTRAC on junkets operators and tour of Crown Melbourne
87.	22 November 2018	Meeting with <b>Privileged</b> (AUSTRAC), with Joshua Preston and Louise Lane
88.	2 May 2019	AUSTRAC Presentation and Crown Melbourne Tour
89.	28 May 2019	Email to <b>Privileged</b> (AUSTRAC) following an earlier phone call regarding the Fintel Alliance update
90.	14 June 2019	Meeting with AUSTRAC to discuss internal control statements
91.	25 June 2019	Letter to AUSTRAC regarding proposed changes to Crown's ICSs following feedback from Initialism
92.	27 June 2019	Email from <b>Privileged</b> acknowledging receipt of 25 June letter
93.	28 June 2019	Letter from AUSTRAC relating to s25 Review Recommendation where Crown is seeking input from AUSTRAC in reviewing the ICSs
94.	29 July 2019	Email to AUSTRAC forwarding a copy of Crown's Statement regarding media allegations.
95.	29 July 2019	Email from <b>Privileged</b> (AUSTRAC) acknowledging receipt of 29 June email
96.	31 July 2019	Email to <b>Privileged</b> (AUSTRAC) attached a copy of Crown's ASX/Media Release regarding the 60 Minutes Program and related Nine/Fairfax media
97.	16 August 2019	Email to AUSTRAC confirming Crown's response and supporting documents regarding Enhanced Risk Assessment Process – Risk Assessment of Junket Operators was hand delivered to AUSTRAC

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98.	21 August 2019	Email from <b>Privileged</b> (AUSTRAC) acknowledging receipt of letter and supporting documents dated 16 August and querying an SMR reference
99.	26 August 2019	Email from <b>Privileged</b> (AUSTRAC) regarding AUSTRAC undertaking a money laundering and terrorism financing (ML/TF) risk assessment into junket tour operations in Australia, of which Crown Casino (Melbourne and Perth) is a key facilitator and indicating AUSTRAC would be very interested in meeting with Crown Casino to learn from our insights into the criminal threats, vulnerabilities to exploitation and consequences of criminality arising from Crown's dealings with junket tour operators/representatives.
100.	29 August 2019	Meeting with AUSTRAC and Crown Melbourne tour  <i>Attendees:</i> <ul style="list-style-type: none"> <li>• <b>Privileged</b></li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> </ul>
101.	12 September 2019	Email from <b>Privileged</b> (AUSTRAC) attachment a s167 Notice ( <i>regarding Politically Exposed Persons and High Risk Customers</i> ) and Letter of Service ( <i>###, is this for the Junket Risk Assessment of the most recent Compliance Assessment for Crown Melbourne?</i> )
102.	12 September 2019	Email to AUSTRAC acknowledging receipt of s167 Notice and letter
103.	19 September 2019	Email to <b>Privileged</b> (AUSTRAC) regarding the queries raised on IFTIs and confirming a substantive response would be provided shortly
104.	24 September 2019	Meeting with AUSTRAC to discuss junket risk assessment as per email dated 29 <i>{26?}25</i> August 2019
105.	25 September 2019	Presentation and Tour of Crown Perth with <b>Privileged</b> (AUSTRAC)
106.	4 October 2019	Email to AUSTRAC requesting an extension for Crown's response to s167 Notice
107.	4 October 2019	Letter from AUSTRAC attaching a variation to s167 Notice and confirming the extension of the due date from 8 October to 14 October 2019
108.	15 October 2019	REDACTED - SECRET INFORMATION
109.	18 October 2019	Letter to AUSTRAC regarding International Funds Transfer Instructions
110.	30 October 2019	Letter from AUSTRAC attaching s167 Notice, Letter of Service and Appendices ( <i>## is this for the current Compliance Assessment?</i> ) ( <i>regarding Politically Exposed Persons and High Risk Customers</i> )
111.	30 October 2019	Email to AUSTRAC acknowledging receipt of s16 Notice
112.	20 November 2019	Coffee Meeting with <b>Privileged</b> (AUSTRAC) to introduce Nick Stokes (Crown's GGM – AML)
113.	21 November 2019	Letter from AUSTRAC attaching a Variation of s167 Notice and letter
114.	22 November 2019	Email to AUSTRAC attaching Crown's Response to Part A of s167 Notice – relating to PEPs
115.	6 December 2019	Email to AUSTRAC attaching Crown's Response to Part B of s167 Notice – relating to PEPs and High Risk Customers
116.	6 December 2019	Email from <b>Privileged</b> (AUSTRAC) acknowledging receipt of 6 December email

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		from Crown
117.	23 January 2020	Letter from AUSTRAC and annexures regarding further clarification to the responses provided by Crown to AUSTRAC on 14 October and 6 December 2019
118.	23 January 2020	Email to AUSTRAC confirming receipt of their 23 January email
119.	13 May 2020	Letter sent to <b>Privileged</b> (AUSTRAC) regarding Junket Tour Operations in Australia – money laundering and terrorism financing risk assessment
120.	14 May 2020	Email from <b>Privileged</b> acknowledging receipt of 13 May letter
121.	17 August 2020	Telephone call with and email from <b>Privilege</b> (AUSTRAC) regarding AUSTRAC is in the process of developing a new money laundering and terrorism financing (ML/TF) risk assessment. This risk assessment will focus on Australia's casino sector, excluding junket tour operators.