

From: Mary Gioras
Sent: Thu, 8 Jul 2021 16:05:32 +1000
To: Marshall, Caroline
Cc: IR_Salomone, John;IR_Sutherland, Adam;Chand, Priya
Subject: PRIVILEGED AND CONFIDENTIAL: Crown Vic RC - McGN report DAB accounts
 – third party transfer [Allens-File-DMS.FID2039696]
Attachments: 2020.12.14 ANZ Return of Funds AUD5,000 CHAMINDA MANANDUWA
 ARACHCHI (part 1) - signed.pdf

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Hi Caroline,

- this transaction occurred in 14 Dec 2020

| FUNDS DEPOSITED INTO ACCOUNTS | | | | | | | ANZ MELBOURNE | |
|-------------------------------|--------------------|-----------|----------|----------|--------|-----------|---------------|----------|
| DATE | ACCOUNT | REFERENCE | AMOUNT | CURRENCY | STATUS | DATE | AMOUNT | CURRENCY |
| 14-Dec-20 | CHAMINDA MANANDUWA | 7420212 | 5,000.00 | AUD | ✓ | 14-Dec-20 | 5,000.00 | AUD |
| 14-Dec-20 | CHAMINDA MANANDUWA | 7420212 | 5,000.00 | AUD | ✓ | 14-Dec-20 | 5,000.00 | AUD |
| 14-Dec-20 | CHAMINDA MANANDUWA | 7420212 | 5,000.00 | AUD | ✓ | 14-Dec-20 | 5,000.00 | AUD |
| 14-Dec-20 | CHAMINDA MANANDUWA | 7420212 | 5,000.00 | AUD | ✓ | 14-Dec-20 | 5,000.00 | AUD |

- 4 Jan 2021 "Return of funds policy" outlines patron full name and patron number must accompany the transfer (this policy was issued after the patron transfer in question)

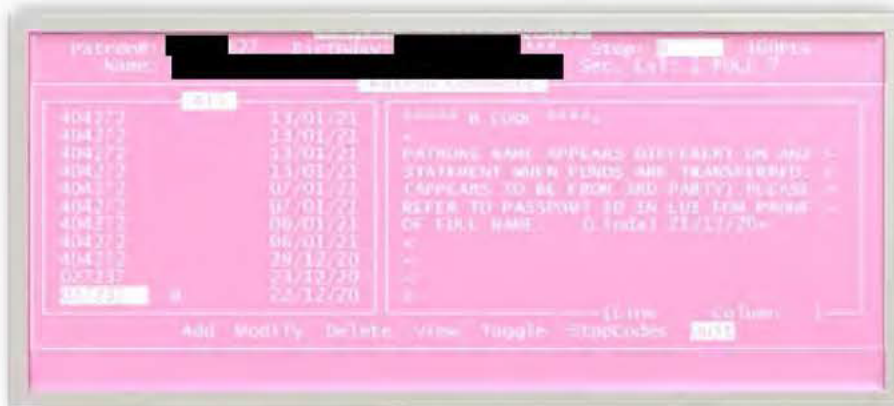


SUBJECT: Corporate Policy Statement
POLICY TITLE: Return of Funds
APPROVED BY: Stephen Hancock **REVIEWED:** 4th January 2021
VERSION: Version 1.0 **ISSUE DATE:** 4th January 2021

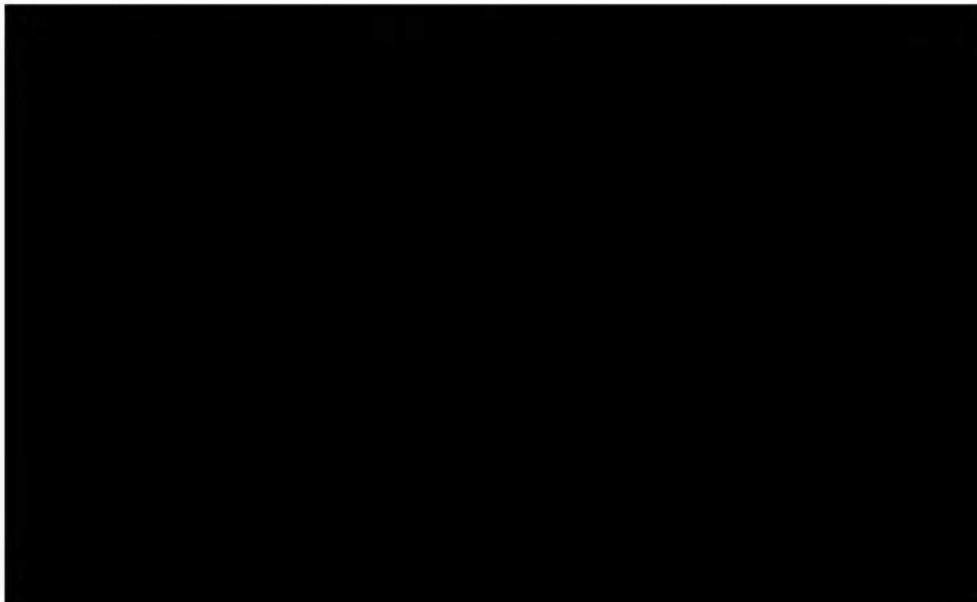
1. Statement of Purpose

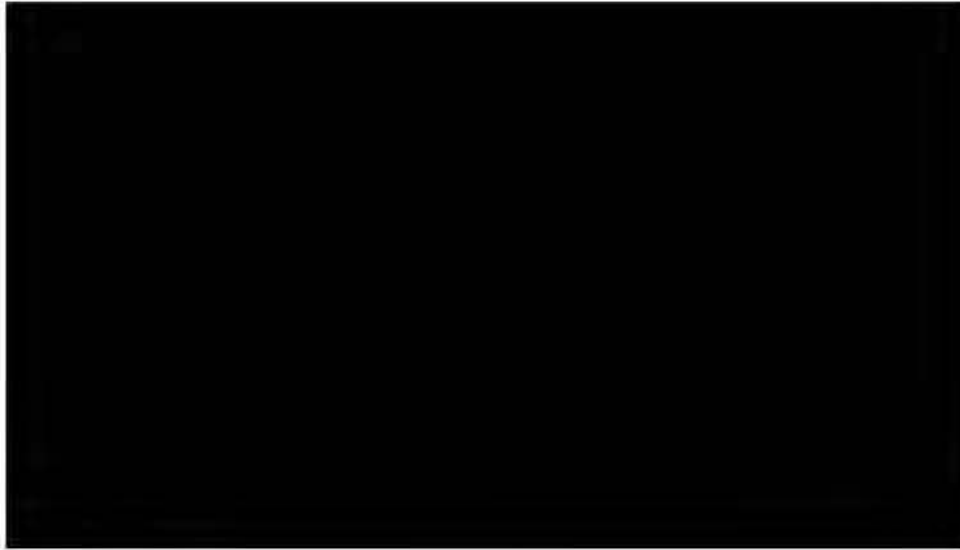
- 1.1 The objective of this policy (**Return of Funds Policy**) is to set out the Crown Designated Business Groups (**Crown**) policy in relation to returning funds deposited or transferred into the Crown bank accounts used by patrons to deposit funds for gaming purposes (**Bank Accounts**) where such transfers are made other than in accordance with Crown's policies, procedures and directions.
- 1.2 This Policy should be read in conjunction with Crown's Third Party Transfers and Money Remitters Policy (**Third Party Policy**).
- 1.3 In December 2020, Crown circulated to patrons within its Platinum and Black membership levels a notification regarding the manner in which transfers must be made into Crown's Bank Accounts (**Bank Transfer Notification**). The Bank Transfer Notification informed patrons that:
 - (a) Crown no longer accepts cash deposits paid into its Bank Accounts;
 - (b) Crown no longer accepts payments from third parties into its Bank Accounts;
 - (c) all payments into Crown's Bank Accounts must be from a patron's personal bank account;
 - (d) transfers into Crown's Bank Accounts must state the patron's full name and Crown Rewards number;
 - (e) international transfers into Crown's Bank Accounts must be supported with a receipt stating the branch address of the bank or financial entity from which the funds are being sent. If the receipt does not have the branch address, the customer must provide appropriate documentation with these details;
 - (f) any other description or narration contained in transfers into Crown's Bank Accounts must state that the purpose of the transfer is for gaming or gambling, or to repay a debt;
 - (g) descriptions or narrations contained in transfers into Crown's Bank Accounts must not be misleading as to the purpose of the transaction, for example but not limited to 'Investment', 'Property Purchase' or 'School Fees';
 - (h) if a receipt is not provided, either by email to [REDACTED] or upon arrival at Crown, the transferred funds will not be credited to the patron's account.
- 1.4 Crown's Bank Account information which includes the process on how to transfer funds will also be provided to patrons on request. This can be provided by email (if the patron does not have the details of the Bank Accounts) or in hard copy by the Cage staff if the patron is onsite.

- The transfer in question was actually returned to the patron 14 Dec 2020 and debited from the account on the 21 Dec 2020.
- Cage identified there was an issue with the patron name on the transfer as they believed it was transferred from a 3rd party (refer syco comment)



- Cage subsequently received the ID from patron which confirmed that was his actual full name. It also confirmed that due to his name being so long, the ANZ narrative restrictions could not capture the entire name on the transfer (16 character limit).





MARY GIORAS

GROUP CREDIT MANAGER

CROWN RESORTS | MELBOURNE | PERTH | SYDNEY | LONDON

8 Whiteman Street, Southbank VIC 3006

t: [REDACTED] w: www.crownresorts.com.au

From: Marshall, Caroline <[REDACTED]>
Sent: Thursday, 8 July 2021 3:26 PM
To: Mary Gioras <[REDACTED]>
Cc: John Salomone <[REDACTED]>; Adam Sutherland <[REDACTED]>; Chand, Priya <[REDACTED]>
Subject: PRIVILEGED AND CONFIDENTIAL: Crown Vic RC – McGN report DAB accounts – third party transfer [Allens-File-DMS.FID2039696]

Hi Mary,

Thanks again for your assistance with this. As discussed, to assist Counsel with their preparation for McGN's evidence on Friday, we would also be grateful if you could please look into our request below.

Request 1: DAB accounts – third party transfer

Paragraph 6.3.13 of the McGN report notes that McGN have identified one instance of a third party transfer into a DAB account which McGN cannot reconcile, "*The analysis of bank and DAB/SK account data undertaken by McGrathNicol and described in section 5.6 found one potential instance of third party funds being deposited to a DAB/SK account after 21 October 2020 and none subsequent to 4 January 2021. We do not have sufficient information to reconcile our finding to Deloitte's.*"

McGN provides the following information regarding this transaction: "*The "no match" instance had a very complex string of letters and numbers in the narrative field and thus it cannot be certain that this isn't matched to another account, further data such as internal data linking the bank transaction specifically to the DAB account it was credited against would be required to confirm this"* (para 5.6.3(c)(ii))

Based on this information, we have circled in red below the transaction that we think McGN is referring to, from the transactions identified in Appendix B8 "*Third party transfer risk dataset: post 21 October 2020.*"



We would be grateful if you could please look into whether this transaction can be reconciled, or confirm if it is indeed a payment from a third party.

Many thanks

Caroline

Caroline Marshall
Managing Associate, Allens

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