

# File note

Matter                    Crown | China Union Pay

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Date                    26 April 2021 26 April 2021

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Subject                **Meeting with Phillip Batsakis**  
**Monday, 26 April 2021 at 10:00 am – 12:25 pm**

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Present: Phillip Batsakis (**PB**); Christopher Carr (**CC**); Christopher Archibald (**CA**); Anna Dixon (**AD**); Jessica Elliott (**JE**); Harriet Craig

## General

- 1        PB is a Certified Practicing Accountant. He worked in Jason O'Connor (**Jason**)'s area and in Roland Theiler (**Roland**)'s team. He mostly reported to Jacinta Maguire (**Jacinta**). He assisted with significant player review and KYC by helping to automate the processes.

## China Union Pay

- 2        PB advised that Matt Sanders (**Matt**) put together the China Union Pay project. Matt's role wasn't recruited for so it fell in PB's area after Matt left.
- 3        PB sent six documents regarding the China Union Pay process to JE dated as early as November 2012. He noted that Matt was the "owner" of the project.
- 4        PB thinks that the China Union Pay process, whereby a customer was able to access funds by going to the hotel, tapping their card which was charged to their room, and receiving a voucher which they could exchange for chips at the cage, was already happening when he took over Matt's role. He recalls doing a post-implementation review for Jason. He thinks Matt set up the policy, left and then PB updated the policy.
- 5        PB doesn't recall whether there were restrictions on whether the voucher could be exchanged for chips or cash at the cage but he thinks the vouchers were either exchanged for chips which customers could either use or put in their DAB account and get cash out – he wasn't sure which.

## **CC showed PB document CRW.523.003.0331 – document entitled "VIP International Credit and debit card cash out review" dated 6 June 2013**

- 6        PB recalls doing a review of the usage and risks of the China Union Pay procedure. By "risks", he meant making sure that the person who presented the card is the card owner and ensuring the terminal used is more than 50m away from the cage. He recalls Debra Tegoni (**Debra**) telling him about the 50m requirement.
- 7        PB would have been surprised if one person's card enabled a different person to access funds at the cage, although he accepts that there probably wasn't any way to stop someone from getting chips through this process and then giving them to someone else. He expects that there was always a requirement that the person who presented the

receipt at the cage be the person whose name was on the card used at the hotel. CC noted that the documentation about this may have changed at some point. PB expects this requirement was there all along and doesn't recall any issue which caused the process to change. He noted that there were changes by Debra and Steve Hancock (**Steve**) to the policy but didn't think those changes related to what the Cage did.

- 8 CC asked PB about the different roles and responsibilities within the business. PB advised that he knew Kate Cannon (**Kate**) who was responsible for documenting policies from the Hotel side. He advised that Hotel had a process and VIP had a process. If VIP made a change (for example, putting in a limit or changing approvers) then the Hotel process would be checked to make sure it lined up. PB didn't know whether the Cage had its own process, but he assumed that there was a work instruction from the Cage.
- 9 CC asked whether it was PB's idea to get legal advice on the China Union Pay process. PB advised that the process was already approved by the time he got involved. He isn't familiar with the discussions that were had but recalls receiving a photocopy of an email marked "privileged" and "do not forward". He did have discussions with Debra, Jason and Jacinta about the process. He expects that Debra was reviewing proposed changes to the process the whole time he was involved. He advised that he has minutes of the meeting(s) between himself, Debra, Jason and Jacinta which occurred before June 2013.
- 10 **PB to provide minutes of the meeting(s) between PB, Debra, Jason and Jacinta.**
- 11 CC asked whether Debra said anything needed to be included in the China Union Pay process or if she gave any other advice. PB advised that it was before his involvement, but he knew there was advice. He understood that the process was only for international customers rather than domestic customers, and that the customers needed to be staying at the hotel and on a program. When asked whether Debra explained why these requirements were necessary, PB said that the advice predated him but was reinforced to him when he became involved.
- 12 When asked whether he recalls Roland having any involvement, PB recalled a discussion around merchant fees and also recalled Roland asking him for the value of customer withdrawals. He recalls Jason having more involvement than Roland. PB was a level below Roland but he mostly reported to Jacinta other than for a brief period. He may have reported to Roland when Jason went to China.
- 13 The six documents sent to JE were printed and distributed to the meeting.

**CC referred to three of the documents provided by PB, all entitled "VIP International Credit Access Facility" – one dated 14 June 2012 and the other two dated 23 July 2012**

- 14 CC noted that the documents state that they were prepared by Matt Sanders and Stephen Hancock and asked when PB took over the process. PB remembers taking a document from Matt and updating it but he thought that was the policy rather than these documents.
- 15 CC noted PB's earlier comment that the process could only be used for international customers and noted that the documents refer to international patrons. He asked whether anyone else involved would have known about this requirement or whether it would have come from Debra. PB assumes it came from Debra.

**CC referred to the process map provided by PB**



- 16 CC noted that the first process is one where someone has a charge on their credit card but isn't actually charged. He asked whether this allowed a customer to gamble at Crown with security over their card. PB advised that that sounds right but he that he doesn't think ever happened.

**CC referred to the document provided by PB entitled "VIP International Credit Access Facility" dated 14 June 2012**

- 17 CC noted that the executive summary talks about Crown extending a credit line but not accessing the card until they see whether the customer comes good. PB advised that he wasn't familiar with the process, but said it sounds like the process involved in charging for a room key.
- 18 CC asked whether, from an accounting perspective, if Crown charges a customer's credit card for a purchase and receives money from the merchant, Crown is giving the person credit. He then asked whether Crown would be giving credit if it charged a debit card. PB didn't think so. CC asked whether PB was familiar with the process for debit card transactions through the EFTPOS machines. PB assumes the charge goes through the back end and, at a certain point in time, the bank will settle with Crown. He is aware that there's a reconciliation somewhere and Crown receives credit.
- 19 PB doesn't think the process described in the 14 June 2012 executive summary of using a credit card as security ever happened.

**Mahogany Cage**

**CC referred to the document provided by PB entitled "VIP International Credit Access Facility" dated 23 July 2012**

- 20 CC noted the third sentence in the executive summary that: "[t]he credit card transactions will be processed via an on-line credit card terminal which will be installed in the Mahogany Cage". PB assumes this didn't happen due to the 50m requirement. He also assumes that the proposal had disappeared by the time the China Union Pay process came to him. He would be very surprised if the process ever happened at the Cage.

**Start date**

- 21 CC asked whether the China Union Pay transactions started before PB was involved in the process. PB wasn't sure but will check the dates.
- 22 PB to check the dates to confirm whether China Union Pay transactions happened before he was involved in the process.

**Cash**

- 23 PB doesn't recall whether the China Union Pay transactions involved paying out cash at the Cage rather than giving chips. He noted that the transaction spreadsheet is generated by Hotels, so it only shows what was charged to the card and not what happened afterwards.

**Transaction reports**

- 24 PB recalls an email, possibly in October 2016 around the time of the China arrests, where he asked Finance to send a weekly report showing the China Union Pay



transactions to PB, Debra and AML. He couldn't find a reply, or any reports being provided afterwards. When asked why he would have wanted a weekly report to be sent to AML, PB couldn't recall but expects Debra or Jason may have asked for it.

- 25 PB to check the date of the email and what prompted him to request weekly report to go to AML.
- 26 When asked whether he had requested that anyone to run a report post-October 2016, PB recalled Roland asking for the numbers but wasn't sure whether they were pulled from the file or a new report was run. He thinks this was when Michael Johnston (**Michael**) was preparing for the Bergin Inquiry. Roland didn't say why Michael was interested in the issue. PB advised that Roland asking for a report was nothing out of the ordinary and that PB was asked for a lot of reports by people preparing for the Bergin Inquiry.

### Approval

- 27 CC noted that PB had an approval role in the China Union Pay process and asked what was involved in order for PB to approve a particular person. PB couldn't recall but thinks it was just a matter of making sure the person was on a program. He doesn't recall getting many applications for approval, he expects that most went to other people because of the amounts involved. PB advised that he does approve credit (up to \$300k) and that, at that time, he would receive a handful of credit applications per week. Roland was the main credit person, then Jacinta and then PB if it was within his credit limit.

### Sales staff

- 28 PB was involved with most, if not all, sales staff. This was in two main ways. The first was special customer deals whereby sales staff would send through a proposed deal or incentive and PB would run the model, check whether the proposal was within budget, get approval from management and then let the sales, operations and cage staff know. The second related to reporting – PB had one person working under him who would send scorecards which showed how Crown was tracking against the target. These scorecards would be run daily and then weekly.
- 29 PB noted that bonuses were based on the scorecards and were based on the sales staff's own region and the proportion of the market they were from. Therefore, if three sales staff all worked in Singapore, they would receive the same percentage.
- 30 CC asked whether PB remembers being aware of any issues with the sales staff in China in terms of customers having difficulty getting access to funds held in China. PB advised that he had heard of the issue but didn't know what the restrictions were. He wasn't sure whether he was aware of the difficulty when he started in his role or if he became aware subsequently. When asked whether he remembers thinking of the China Union Pay process as a solution for people otherwise having difficulty getting funds out of China, PB advised that he wasn't sure whether the process was specific to Chinese customers or whether it could be used by anyone. He noted that a lot of customers are from China so it would have been helpful for them. His role was more operational than strategic – his role was to make sure the policy was in line with the Hotel work instructions. He viewed his role as complying with legal requirements and advised that if there were any changes they would be approved by Legal.

### Addition of debit cards to the policy



**CC showed PB document CRW.523.002.0331 again – document entitled “VIP International Credit and debit card cash out review” dated 6 June 2013**

- 31 CC noted the first sentence of the “Background” section: “Since August 2012, Crown Melbourne has permitted international patrons to obtain access to their funds via cash outs on credit and debit cards”. He contrasted this with the documents entitled “VIP International Credit Access Facility” which only refer to credit cards. PB doesn’t recall the policy changing from just credit cards to credit and debit cards. He doesn’t remember being aware of the change and doesn’t recall Debra saying anything about credit cards or debit cards having significance.
- 32 PB to check when the China Union Pay policy changed from credit cards only to credit and debit cards. Specifically, how debit cards were added to the process between the 23 July 2012 document and when PB did the review in June 2013.

**Legal advice**

**CC showed PB document CRW.523.002.0121 – Email from Debra Tegoni to David Stoddart containing legal advice**

- 33 PB advised that this may be the document he recalled seeing which says that it is not to be forwarded. He doesn’t recall reading the advice. He noted a reference in the advice to the 50m requirement. When asked whether he learned about that requirement from this advice or from other conversations, PB advised that thinks he learned about it from the document entitled “VIP International Credit and debit card cash out review” dated 6 June 2013.
- 34 CC took PB to the fourth dot point: “Further, s68(2) of the Act prohibits Crown from providing money or chips as part of transaction involving a credit or debit card unless exempted under S68(8) when the chips are provided **on credit** (there is no mention of a debit card in this section) is provided to an International resident when participating in a Premium program agreement or a junket at the casino”. He asked whether PB recalled Debra talking about this issue or anyone saying there’s prohibition on debit cards being used for chips and an exemption for credit but not for debit. PB couldn’t recall any such conversations. On reading the advice, he thought it was saying that Crown can’t provide chips on credit or debit unless it’s on credit but agreed that it’s not expressed in a way he can easily understand.

**Banks**

- 35 PB advised that Travis Costin, Treasurer, had relationships with Crown’s bankers. He recalls that at some point Crown changed either from CBA to NAB or vice versa. CC suggested that it may have been a change from NAB to CBA, but that Crown kept one NAB terminal to use for China Union Pay. PB noted that that rang a bell. He recalls a discussion with Debra about keeping the NAB terminal because of NAB’s terms and conditions and think Roland may have been involved.

**End of China Union Pay**

- 36 CC asked whether PB remembered the China Union Pay process coming to a halt after the China arrests. PB advised that, shortly after the arrests, either Roland or Jacinta passed on the message to stop the process. He wasn’t told why but can guess that it was because Crown didn’t want to do anything China-related that would potentially risk the people in China or a headline.



## Perth

- 37 PB was involved with Perth but advised that the China Union Pay process wasn't implemented in Perth. He advised Jason asked him about introducing it but it was around the time of the China arrests so didn't eventuate. They had been in the process of developing work instructions.
- 38 When asked whether the regulator in Perth had oversight of a greater number of policies than the Victorian regulator, PB advised that the Casino Manual in Western Australia was a thicker book than the Victorian one.
- 39 CC asked whether there was a hesitance to roll out the China Union Pay process in Perth because of the regulator. PB advised that this ring a bell but that he remembers being asked to roll it out in Perth. He assumed that the overseas sales team was pushing for it.

## VIP International credit and debit card cash out policy

**AD showed PB document CRW.523.002.0028 – Email from Phillip Batsakis to Debra Tegoni, copied to Jason O'Connor, attaching the VIP International credit and debit card cash out policy**

- 40 AD noted that the policy doesn't seem to have a requirement that the customer be internationally domiciled and asked whether its absence from the policy meant it wasn't a requirement at the time. PB had always known it to be a formal requirement and was surprised it wasn't in the policy.
- 41 AD noted item 6, "MR Cage will deposit the approved funds (excluding card transaction fee) into patrons DAB account for use as required by patron" and asked whether this meant a patron could immediately withdraw the money as cash. PB noted that a DAB account is the customer's own account and agreed that there is nothing to prevent the customer from immediately withdrawing the funds.
- 42 PB isn't sure but assumes he signed off on the policy.

**AD showed PB document CRW.523.002.0036 – Email from Phillip Batsakis to Debra Tegoni, copied to Jason O'Connor, attaching the updated VIP International credit and debit card cash out policy**

- 43 PB assumes he would have played a role in designing the updated policy.
- 44 AD noted that the updated policy contains the requirement that the patron be internationally domiciled (which was missing from the earlier version) and asked whether PB recalls realising that this needed to be incorporated when he was designing the policy. PB expects so and said he would have tracked his changes. He will look to find older versions.
- 45 **PB to provide older versions of the document entitled "VIP International credit and debit card cash out policy"**
- 46 AD asked whether there's anything explicit which requires the funds to be deposited into the DAB account of the patron who made the payment at the hotel. PB reads point 6: "MR Cage will deposit the approved funds ... into patrons DAB account for use as required by patron" as referring to the specific patron that made the payment rather than just any patron.



### Cards with no name

**AD showed PB document CRW.523.002.0039 – Email from Phillip Batsakis to Debra Tegoni regarding cards with no names**

- 47 AD noted that the email chain refers to cards with no names and noted that PB emailed Debra with links indicating that it's legitimate that banks issue cards with no names. She asked whether PB remembers the policy evolving regarding cards with no names. PB advised that, if it was a blank card, Crown would ask the customer to bring up their bank account on their phone so that they could see the card number to ensure the card was linked with the person. As long as Crown could link the card to the person then the cards were accepted. He remembers Debra saying that Crown could accept these cards.
- 48 AD noted that the feature didn't seem to make its way into a formal policy document and asked whether it was approved on a case-by-case basis. PB assumed that an operations person would say that they have a card with no name and take a screenshot of the bank account conformation on the customer's phone. He's not sure whether it was ever put into a document.

### Risk

- 49 CC asked PB about Crown's AML program. PB wasn't aware that it involved allocating risk levels to people, but he did the AML training course each year and saw the Joint AML policy about 6 months ago.
- 50 CC asked about the interaction of someone being "high" risk and the China Union Pay program. PB knew Hotel would connect the person to the card but didn't think there was any discussion about not giving the facility to a person because of their AML risk. He assumed that Debra would have been the person to incorporate the necessary AML requirements into the policy when it was developed. He doesn't recall discussing the policy with Scott Howell (AML). He has heard of Jimmy Rousis but hasn't had dealings with him.

### Vouchers

**CC showed PB unnumbered document entitled "Main Cage Purchase Request form"**

- 51 PB advised that the document doesn't look familiar. He would guess it's the voucher issued by Hotel, but he would have expected a more official-looking voucher.

### Cash out

**CC showed PB document CRW.523.002.0023 – document entitled "VIP International Credit and Debit Card Cash Out Policy" dated September 2014 prepared by Phillip Batsakis**

- 52 CC noted that the document is called "debit and credit cash out policy" and asked whether it was PB's perception that the China Union Pay program was essentially allowing people to get cash out. PB advised that it was about customers getting funds from their cards, whether that was by way of cash or chips. He doesn't remember thinking much about the title but expects that he just picked up and updated the existing document. He thinks the title later changed to "main cage purchase".



- 53 CC noted that one purpose of China Union Pay process was to allow people to gamble at Crown and asked whether another purpose was to allow people to get cash out. PB said yes and recalled getting cash (including large amounts up to \$500k) out to buy things being discussed. He doesn't recall who those discussions were with but expects it was Jason, Jacinta, Roland and possible Debra. He remembers thinking it was a lot of money to hand over in cash but doesn't recall anything triggering him to raise alarms.

### **Regal Crown**

- 54 CA noted that some documents deal with the China Union Pay policy in combination with other ways clients might be able to remit funds to Crown. He noted that one such idea was with Regal Crown and asked whether PB had anything to do with that project. PB recalled that Roland was speaking with Gordon McIntosh. PB thinks the Regal Crown proposal was uncompetitive in terms of rates. CA asked whether there was a risk because the funds were not just held in escrow but were owned by Regal Crown for a period of time. PB said there was some issue with the proposal which meant it didn't progress further than an idea on a blackboard.
- 55 CA asked what PB's impression was when he arrived in 2012/2014 of Crown's appetite to find ways of making it easier for clients to remit funds. PB advised that Crown was exploring options to help get funds across. This was a common thing at other casinos. He didn't think it was a particularly aggressive environment to look for other options. CA asked about the extent to which CPH suggestions or contributions were being injected and whether that contributed to the risk appetite with which the China Union Pay policy was adopted. PB advised that, at his level, he didn't feel or see that pressure and that the people at the top would have those discussions and feed information to him. He noted though that the project was built up before he started to Matt might know more about the pressures.
- 56 CA asked whether, when it came to adding constraints such as limits on the amount of funds or the extent to which pre-approval was needed, there was any resistance to those constraints being added. PB advised that it was the other way around – they were working to make things tighter. He noted that they would get approval if there was anything unusual such as cards with no names.

### **Value of transactions**

#### ***CA showed PB a spreadsheet showing the value of China Union Pay transactions***

- 57 PB noted that Hotel, in particular, Kate Cannon, would run these reports. He was familiar with the spreadsheet. CA noted the revenue of \$160m which PB was surprised by. In his mind, it was always \$80m but he has seen reference to \$160m. When he saw this, he went back to Hotel and asked about void transactions, duplicates and the like but doesn't recall receiving a response. He did a random check of some of the larger amounts and confirmed that the commons in SYCO verified the entries. Ultimately he was satisfied that \$160m was correct.
- 58 CA asked whether this was the spreadsheet PB prepared when Michael Johnston was giving evidence. PB advised that it would have been the source report which he got numbers from for Michael. CA asked whether PB gave Michael the figure of \$160m and PB advised that, from memory, he was asked for the last three financial years so the figure would have been different.





- 59 CA noted the transaction code "1908" in the second column and asked what it refers to. PB assumed it was the terminal where the transaction was conducted. He understood the report to come from Hotel's accounting system.
- 60 PB expects that a report which shows the individual entries is only generated by Hotel. He assumed the Corporate Finance team would only see a total amount come through the general ledger.
- 61 CA asked how Crown kept track of the extent of funds obtained from the China Union Pay method, and PB noted that Jason and his team approved the transaction so they would have seen them coming in. PB only asked Finance to run a report when he was asked.
- 62 CA asked why the information wasn't accessible by Gaming and PB advised that he assumes it is because it was processed on the terminal. He didn't think there was a code at the Cage but said that Steve Hancock would know.
- 63 CA noted that he asked Kate Cannon to pull together a report and that she was using a different transaction code and the numbers came out slightly differently which made him check what the source of the report was. He noted that we might need to reconcile the source of the difference.

#### **Further documents**

- 64 CA noted that it feels like Counsel doesn't have all of the documents yet and asked whether, apart from records on his drive, PB knows where there might be hard copy files of things to do with the China Union Pay process. PB advised that he had a folder which he gave to Rob Meade a few weeks ago. PB advised that he would update the policy, pass it by Legal and make sure it was aligned with Hotel's. CA asked whether PB's file would have been the repository of the things that were going on and PB responded "yes". PB also noted that Jacinta Maguire came him a folder when she left in January which PB gave to Rob.
- 65 PB also noted that the Cage and Hotel might have documentation.
- 66 CA advised that he's after the actual documents regarding the carrying out of the process and what that involves – for example, transactional receipts or invoices at the hotel and chip exchange vouchers handed over to the Cage. PB thinks this broadly captures the hard copy documents that would be related to the transactions and assumes that they were put in a packet with the customer's other documents.
- 67 PB didn't recall any document gathering or inquiries to do with China Union Pay at the time of the Bergin Inquiry.
- 68 CA asked whether, when the policy ceased after the China arrests, anyone collected the files and put them in archiving. PB didn't recall any document gathering.

#### **Risk of failing in defence**

***CC showed PB document CRW.523.001.0030 – Email from Debra Tegoni to Jason O'Connor, Jacinta Maguire and Phillip Batsakis dated 11 September 2015 forwarding an email dated 17 October 2014 containing legal advice from Debra Tegoni***

- 69 CC noted Debra's comment that "[w]e would argue that subsection 68(8) allows us to provide credit to a person to a person who is not ordinarily resident in Australia on a



premium player arrangement or as a Junket and so is effectively an exception to the above prohibition. Technically, however and as discussed, a credit card transaction is where credit is provided by the bank” and asked whether PB recalls this discussion with him or whether it was just a discussion between Debra and Jason. PB didn’t recall.

- 70 CC took PB to the second last paragraph: “Obviously we may fail in any defence in this manner but the way in which we agreed to undertake these transactions are designed to mitigate the risks. This is predominantly why we agreed to limit CUP card transactions to international patrons staying at the hotel etc”. CC asked whether PB remembers Debra mentioning that Crown may fail in showing that the transactions are legal. PB didn’t recall this but said he was aware that the 50m requirement and the requirement that patrons are international patrons were important from a legal perspective.
- 71 CC took PB to the third paragraph: “This was the provision I was talking about that we would have to defend in circumstances where the transitions were questioned” and asked whether PB remembers having a sense that this was all a bit questionable. PB remembers wondering why the email was marked “legally privileged and do not forward”. He hadn’t seen that before but didn’t take it to mean that this was a dodgy practice. He doesn’t recall having a discussion with Debra and thinking this was a risky practice, he just remembers thinking that “if we do A, B and C then it’s ok” so he made sure Crown did A, B and C.
- 72 CC asked whether, at the time, PB took “we may fail in our defence” to mean that there’s a risk the practice was unlawful. PB accepted that, reading it now, it sounds like, if Crown was questioned, they would have to defend it. He accepted that “may fail” doesn’t sounds great. However, he noted that, if it was too risky, “the powers” would have made a call not to pursue it. From PB’s perspective, if the process had been approved then he made sure it complied with the relevant requirements.

## Perth

### CC showed PB document CRW.523.002.0046 – Email from Jason O’Connor to Debra Tegoni regarding implementing China Union Pay in Perth

- 73 CC noted the top email which reads: “We spoke with Josh last week about using credit cards (China Union pay) at Perth. Today is a follow up to that and a chance for him to speak with you about perceived challenges. One issue is what the VCGLR might do if contacted by the Perth regulator, which Josh feels is likely to happen”. CC asked whether this concerned reached PB. PB advised that he recalls Jason asking him to implement China Union Pay at Perth but noted that the decision may have changed afterwards.
- 74 CC noted that this email was in 2014 but that he thought PB said Jason asked him to implement China Union Pay at Perth in 2016. He asked whether there was a concern back in 2014. PB said it rings a bell but that he can’t remember where his knowledge of it came from. He assumes it came from Debra but can’t recall whether Jacinta, Jason or someone else told him about it.
- 75 CA asked what might have been the concern, and PB advised that it sounds like China Union Pay would have to be approved in Perth but not in Victoria. He assumes Debra made the decision that Crown didn’t need approval by the Victorian regulator.
- 76 PB doesn’t know whether he spoke with Debra about her concerns or whether there was a suggestion of a genuine risk of illegitimacy of Crown’s practices or just an



embarrassment that the Victorian regulator would be finding out about things from the Perth regulator.

#### **Patron to patron transfers**

- 77 CC asked whether PB had heard about a process by which a patron overseas transferred from their account in China to a second patron in China and the recipient made money available in Australia either by putting it in the first patron's Australian account or making a payment to Crown. PB hadn't heard of this but suggested that the service team may know because they speak to customers. He advised that the service team report up to their direct manager – Michael Chen or Jason, if they have concerns and they would take it to AML or Debra. PB wouldn't have heard about it unless there was a policy change because of it.
- 78 AD asked whether all policies PB was involved in would have been looked at by Debra before they were implemented. PB expects he would have gone to Debra with any changes.

