
TRANSCRIPT OF PROCEEDINGS

COMMISSIONER: HON. RAY FINKELSTEIN AO QC

**IN THE MATTER OF A ROYAL COMMISSION
INTO THE CASINO OPERATOR AND LICENCE**

MELBOURNE, VICTORIA

11.05 AM, WEDNESDAY, 23 JUNE 2021

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Counsel for Victorian Commission for Gambling and Liquor Regulation	MR PETER ROZEN QC MR JUSTIN BRERETON MS SARALA FITZGERALD
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Counsel for the State of Victoria	MR PETER GRAY QC MR GLYN AYRES MS GEORGIE COLEMAN MS HELEN TIPLADY

1 **HEARING IN CAMERA**

2

09:38 3

11:05 4 **COMMISSIONER:** Good morning, everyone. Sit down, please.
11:05 5 Ms O'Sullivan?

11:05 6

11:05 7 **MS O'SULLIVAN:** Yes, Commissioner, I believe Crown have
11:05 8 a few housekeeping matters.

11:05 9

11:05 10

11:05 11 **HOUSEKEEPING**

11:05 12

11:05 13

11:05 14 **MS BUTTON:** Commissioner, very briefly, the Commission
11:05 15 has made non-publication orders in respect of the
11:05 16 employee witnesses that goes to the identification. Can
11:05 17 I advise the Commission and anyone else who may be
11:06 18 observing that by virtue of the nature of the positions
11:06 19 that some of these individuals occupy, reference to their
11:06 20 position may itself be revealing of their identity,
11:06 21 either one-for-one or by process of fairly close
11:06 22 deduction. I've discussed this matter with
11:06 23 Counsel Assisting, and I think the only practical
11:06 24 implication is that it will mean those observing need to
11:06 25 be mindful of that, and that when we review the
11:06 26 transcript prior to its being made public, that matter
11:06 27 will need to be borne in mind.

11:06 28

11:06 29 **COMMISSIONER:** Okay.

11:06 30

11:06 31 **MS BUTTON:** The only other matter of housekeeping I wish
11:06 32 to raise is the inclusion of Benestar Group Pty Ltd in
11:06 33 those who may receive information, I understand that ---

11:06 34

11:06 35 **COMMISSIONER:** I've made an order to that effect.

11:06 36

11:06 37 **MS BUTTON:** Thank you, Commissioner.

11:06 38

11:06 39 **COMMISSIONER:** On the first point, I understand how the
11:06 40 problem can manifest if somebody has a job description,
11:06 41 there is one or two people only who occupy that position.
11:06 42 If somebody occupies a position that has 10 or 12 or 15
11:07 43 different people, then the issue can't arise, can it?

11:07 44

11:07 45 **MS BUTTON:** I accept that entirely. Witness Employee 10
11:07 46 is the only person occupying that position, just by way
11:07 47 of example, and Employee 15 is one of four occupying that

11:07 1 position. So it wouldn't take too much to work out in
11:07 2 respect of that employee, for example.
11:07 3
11:07 4 COMMISSIONER: Yes, I get it. To be fair, I doubt the
11:07 5 particular position they hold is going to make much
11:07 6 difference one way or another to understanding the
11:07 7 evidence and so on.
11:07 8
11:07 9 MS BUTTON: Yes, although I understand it might be
11:07 10 expected that questions might be asked about what that
11:07 11 role entails, for example.
11:07 12
11:07 13 COMMISSIONER: Correct.
11:07 14
11:07 15 MS BUTTON: We'll deal with that as we go.
11:07 16
11:07 17 COMMISSIONER: Thanks.
11:07 18
11:07 19 MS BUTTON: Commissioner, it is intended that we will follow
11:07 20 the same process as was undertaken in respect of the
11:07 21 previous batch of employees.
11:07 22
11:07 23 COMMISSIONER: Yes.
11:07 24
11:07 25
11:08 26 **EMPLOYEE 8, CALLED**
11:08 27
11:08 28
11:08 29 MS BUTTON: Do you have in front of you, witness,
11:08 30 a document with NTA052 at the top?
11:08 31
11:08 32 WITNESS: Yes.
11:08 33
11:08 34 MS BUTTON: Can you confirm that that document has your
11:08 35 correct name?
11:08 36
11:08 37 WITNESS: Yes, correct.
11:08 38
11:08 39 MS BUTTON: Does it have your business address?
11:08 40
11:08 41 WITNESS: Yes, correct.
11:08 42
11:08 43 MS BUTTON: Now, once the witness has been affirmed
11:08 44 I will tender that as a confidential exhibit.
11:08 45
11:08 46
11:08 47 **WITNESS AFFIRMED**

11:08 1
11:08 2
11:08 3 MS BUTTON: Commissioner, if I could tender that document
11:08 4 as a confidential exhibit. Do you have a copy,
11:08 5 Commissioner?
11:08 6
11:08 7 COMMISSIONER: No, I don't. I will have in a few
11:09 8 seconds.
11:09 9
11:09 10 I think the only way this will work, and to distinguish
11:09 11 from the earlier group of witnesses is if I describe the
11:09 12 document as witness named in document NTA052, that will
11:09 13 be Exhibit 245.
11:09 14
11:09 15 MS BUTTON: Thank you, Commissioner. If it is of any
11:09 16 assistance, I think the procedure that was adopted
11:09 17 previously was to describe them as witness identification
11:09 18 document, for example, I was NTA034.
11:09 19
11:09 20 COMMISSIONER: Similar. Okay.
11:09 21
22
23 **EXHIBIT #RCPH0245 - WITNESS IDENTIFICATION**
24 **DOCUMENT NTA052 (CONFIDENTIAL)**
25
26
27 **EXAMINATION-IN-CHIEF BY MS BUTTON**
28
29
11:10 30 MS BUTTON: Thank you.
11:10 31
11:10 32 You began your employment with Crown in [REDACTED] is
11:10 33 that correct?
11:10 34
11:10 35 A. Yes, correct.
11:10 36
11:10 37 Q. What role did you have an Crown when you first
11:10 38 started your employment?
11:10 39
11:10 40 A. I work as a front office attendant at Crown Towers
11:10 41 Melbourne.
11:10 42
11:10 43 Q. Crown Towers is the hotel?
11:10 44
11:10 45 A. Yeah, Crown Towers Hotel Melbourne.
11:10 46
11:10 47 Q. Have you had any other roles in the time you've been

11:10 1 employed by Crown, you've been a front office attendant
11:10 2 the whole time?

11:10 3

11:10 4 A. Yes.

11:10 5

11:10 6 Q. Have you been there the whole time?

11:10 7

11:10 8 A. Whole time, yes.

11:10 9

11:10 10 MS BUTTON: Thank you. Counsel Assisting will ask you
11:10 11 some questions.

11:10 12

11:10 13 A. Thank you.

11:10 14

11:10 15

11:10 16 **CROSS-EXAMINATION BY MS O'SULLIVAN**

11:10 17

11:10 18

11:10 19 MS O'SULLIVAN: My name is Ms O'Sullivan and I'm one of
11:10 20 the Counsel Assisting the Commission. I won't be
11:10 21 referring to you by your name, I mean no disrespect. I
11:10 22 may occasionally refer to you as "witness"; again, I mean
11:10 23 no disrespect by that, it is simply to protect your
11:10 24 anonymity, but at times it will sound a little bit
11:11 25 awkward.

11:11 26

11:11 27 Witness, you've just told the Commission that you first
11:11 28 started working at Crown in [REDACTED] and that was as
11:11 29 a front office attendant. Over the years have you worked
11:11 30 full-time or part-time?

11:11 31

11:11 32 A. I work as a full-time for nearly one year, [REDACTED]
11:11 33 [REDACTED] I move back to part-time position.

11:11 34

11:11 35 Q. Right. And, talking about the present, how many
11:11 36 hours per week do you work on average?

11:11 37

11:11 38 A. For this current year I'm working as 16 hours per
11:11 39 week, [REDACTED]

11:11 40

11:11 41 Q. I see. Can you just briefly describe to the
11:11 42 Commissioner what it is you do?

11:11 43

11:11 44 A. What is my role of duty?

11:11 45

11:11 46 Q. Yes.

11:11 47

11:11 1 A. Yes, Commissioner. Normally we --- as a front
11:11 2 office attendant, or we call a front office receptionist,
11:11 3 so we do mostly check-out and check-in for all the guests
11:12 4 at the Crown Towers Melbourne hotel. And also we
11:12 5 settling accounts for the guests, and if the guests
11:12 6 enquiring about the questions, so we have to answer the
11:12 7 question as well too. But the main important job is to
11:12 8 do check-out and check-in process for the guests, and
11:12 9 issue the room keys for guests too.

11:12 10

11:12 11 Q. Do you deal with both international and Australian
11:12 12 guests?

11:12 13

11:12 14 A. Yes. We do both international and Australian guests
11:12 15 too.

11:12 16

11:12 17 Q. And can I just ask you about the check-in process.
11:12 18 In respect of the check-in process, do guests have to
11:12 19 provide you with any identification?

11:12 20

11:12 21 A. Yes, of course, yes. They have to provide either
11:12 22 Australian passport or driving licence if they are
11:12 23 locals. Or if they are international guests you have to
11:12 24 provide passport as well.

11:12 25

11:12 26 Q. Who do you report to?

11:12 27

11:12 28 A. I have to report to my front office manager and also
11:12 29 I have front desk manager as well too.

11:12 30

11:13 31 Q. I see. Are you involved in invoicing or billing the
11:13 32 hotel guests?

11:13 33

11:13 34 A. I beg your pardon?

11:13 35

11:13 36 Q. Are you involving in invoicing or billing the hotel
11:13 37 guests?

11:13 38

11:13 39 A. Yes, we have to billing the hotel guests and
11:13 40 advising the hotel guests doing that.

11:13 41

11:13 42 Q. I see. So I want to ask you just about how
11:13 43 invoicing works for the hotel guests. For example, if
11:13 44 I'm a guest who stays for, for example, two nights at the
11:13 45 hotel, can you describe to the Commissioner how the
11:13 46 invoicing works? For example, when it occurs and take us
11:13 47 through step-by-step how that works?

- 11:13 1
11:13 2 A. If the guest stay two nights at the hotel, so on the
11:13 3 billing screen, the bill will be appears, the guest name,
11:13 4 date of arrival, date of departure, and then the rate
11:13 5 code of the booking and also the room type and also for
11:14 6 the room rate as well. So all the bill will be all
11:14 7 caught on one page. Before the guest settle the account
11:14 8 they have to check everything detail, and then if the
11:14 9 guest stay for two nights, so let's say the rate is \$300
11:14 10 per night, so the bill will be occur day by day.
11:14 11
11:14 12 Q. Does the billing usually occur at the end of the
11:14 13 guest's stay?
11:14 14
11:14 15 A. Yes, correct.
11:14 16
11:14 17 Q. Is it ever the case that the billing might occur
11:14 18 during the guest's stay as opposed to checkout?
11:14 19
11:14 20 A. Normally we accept --- the guest supposed to settle
11:14 21 the account on checkout. But if the guest want to
11:14 22 shorten the stay or extend the stay, we can do in the
11:14 23 system as well too.
11:14 24
11:14 25 Q. I see. And I presume there are a range of payment
11:14 26 types that are accepted at the hotel; is that right?
11:14 27
11:14 28 A. Yes.
11:14 29
11:14 30 Q. I'm not sure whether you said earlier, in terms of
11:14 31 the Crown hotel that you work at, is that Crown Towers?
11:14 32
11:15 33 A. Crown Towers Melbourne, yes.
11:15 34
11:15 35 Q. Have you always worked at Crown Towers only, or have
11:15 36 you also worked at some of the other Crown hotels?
11:15 37
11:15 38 A. Normally I work at Crown Towers Melbourne most of
11:15 39 the time.
11:15 40
11:15 41 Q. Okay, but you have worked at some of the other
11:15 42 hotels?
11:15 43
11:15 44 A. If they need staff we have to shuffle around, but
11:15 45 our station is at the Crown Towers Melbourne.
11:15 46
11:15 47 Q. So you have worked on the odd occasion at Crown

11:15 1 Metropol; is that right?
11:15 2
11:15 3 A. Certainly. If they need staff, we will move
11:15 4 a little bit only.
11:15 5
11:15 6 Q. I see. In terms of the payment types that are
11:15 7 accepted at Crown Towers, I presume there is a whole
11:15 8 range of payment types that are accepted, is that right?
11:15 9
11:15 10 A. Correct.
11:15 11
11:15 12 Q. Including cash?
11:15 13
11:15 14 A. Correct.
11:15 15
11:15 16 Q. Cheque?
11:15 17
11:15 18 A. Sorry?
11:15 19
11:15 20 Q. Do you accept cheque?
11:15 21
11:15 22 A. No, we don't accept cheque.
11:15 23
11:15 24 Q. Credit card?
11:15 25
11:15 26 A. We accept credit card, yes.
11:15 27
11:15 28 Q. Debit card?
11:15 29
11:15 30 A. Yes, correct.
11:15 31
11:15 32 Q. Any other payment types accepted?
11:15 33
11:15 34 A. Chips. If the guest is a casino guest, we accept
11:16 35 their chips as cash. So we consider as cash. So we
11:16 36 accept their casino chips as well too.
11:16 37
11:16 38 Q. Right. So when you accept chips as payment, how
11:16 39 does that work? Do the chips get walked over to the
11:16 40 cage? Can you tell us how that works?
11:16 41
11:16 42 A. Yes, so if they want to settle the account by chips,
11:16 43 we have to post --- let's say the chip amount is \$200, so
11:16 44 we post \$200 in their room billing account, and then we
11:16 45 transfer it as cash. So at the end of the process, so we
11:16 46 have exchange with our manager, so the chips is exchanged
11:16 47 as a cash.

- 11:16 1
11:16 2 Q. On the invoice will it show that the guest paid by
11:16 3 chips, or when they pay by chips will the invoice state
11:17 4 that it was a cash payment?
11:17 5
11:17 6 A. For the invoice --- yeah, it is cash payment but at
11:17 7 the end of the day we have to swap with the supervisor
11:17 8 float or manager float. So we will swap to make the
11:17 9 balance of our accounts so we have to swap it.
11:17 10
11:17 11 Q. I see. For example, I was looking at a whole series
11:17 12 of Crown hotels invoices last night, and a lot of them
11:17 13 showed a cash payment. Is it the case that when I see
11:17 14 cash payment in truth that could be either cash payment
11:17 15 using physical dollars, currency, or it might have
11:17 16 actually been payment by chips?
11:17 17
11:17 18 A. It might be, it might be, yes.
11:17 19
11:17 20 Q. It is the case, is it not, that a typical hotel
11:17 21 invoice gives a breakdown of the charges?
11:17 22
11:17 23 A. Sorry, I missed that.
11:17 24
11:18 25 Q. Does the typical Crown Towers hotel invoice give
11:18 26 a breakdown of all the charges that the hotel guest has
11:18 27 incurred during their stay?
11:18 28
11:18 29 A. Yes. We will --- all the invoice will clearly
11:18 30 stated upon checkout, they will check everything detail.
11:18 31 So maybe accommodation is different, restaurant bill is
11:18 32 different, room service is different, yes, they will
11:18 33 break down all the charges.
11:18 34
11:18 35 Q. Yes, so for example, there will be a separate line
11:18 36 item, will there not, for the room fees?
11:18 37
11:18 38 A. Yes, so the room fees will be --- the bill will be
11:18 39 appear as accommodation charges.
11:18 40
11:18 41 Q. And will mini bar be ---
11:18 42
11:18 43 A. Mini bar will appear as mini bar charges.
11:18 44
11:18 45 Q. And room service?
11:18 46
11:18 47 A. Room service will appear as in-room dining charges.

- 11:18 1
11:18 2 Q. If I eat at a cafe or restaurant in the hotel ---
11:18 3 sorry, in the entire complex, can those charges --- can
11:18 4 those costs be charged to my hotel room?
11:18 5
11:18 6 A. Yes, they can. If they want --- if the guests want
11:19 7 to post it to their room, the restaurant can do for them.
11:19 8 Upon checkout they can settle the account.
11:19 9
11:19 10 Q. I see. If I get tickets to a concert or an event,
11:19 11 a show, that is occurring in the larger casino complex,
11:19 12 can I charge the cost of those hotel tickets to my hotel
11:19 13 room?
11:19 14
11:19 15 A. Sorry, I miss ---
11:19 16
11:19 17 Q. If I want to see an entertainment show, a singer or
11:19 18 a comedian or live music, and that is being staged in the
11:19 19 Crown complex as a whole, and I want to buy tickets, can
11:19 20 I charge the cost of those tickets to my hotel room?
11:19 21
11:19 22 A. Yes, they can appear as entertainment ticket price.
11:19 23
11:19 24 Q. Will that be noted separately on the hotel invoice?
11:19 25
11:19 26 A. They will appear on the hotel invoice too, yes.
11:19 27
11:19 28 Q. I see. If I, for example, go and buy an expensive
11:19 29 watch or a piece of jewellery at one of the boutiques in
11:19 30 the larger Crown complex, can I charge the cost of that
11:20 31 to my hotel room?
11:20 32
11:20 33 A. Yes, you can, yes.
11:20 34
11:20 35 Q. So I've described a series of different types of
11:20 36 charges that might appear on a hotel bill. Are there any
11:20 37 others that you can tell us about that might appear on
11:20 38 a hotel bill?
11:20 39
11:20 40 A. Yeah, maybe others --- their transferring charges,
11:20 41 airport pick-up fees, maybe their laundry charges, yes.
11:20 42
11:20 43 Q. And am I right to understand that there are also
11:20 44 what is called incidental charges on a hotel bill?
11:20 45
11:20 46 A. Yes, maybe. So they can post incidental charges.
11:20 47 Maybe if they want to buy Panadol from the pharmacy, so

11:20 1 we call as a miscellaneous or incidental charges, so they
11:20 2 can post as --- to the room too.
11:20 3
11:20 4 Q. Could you tell us what types of charges are
11:20 5 described as incidental?
11:20 6
11:20 7 A. Maybe if they want to buy flowers from the florist,
11:20 8 then concierge can order for them and they will post the
11:21 9 charges as miscellaneous charges. Or if they want to buy
11:21 10 pharmacy, medicine from the pharmacy, so they can post it
11:21 11 as miscellaneous charges too.
11:21 12
11:21 13 Q. And are there, does there appear on the hotel bills
11:21 14 codes for, as in numerical codes for the different types
11:21 15 of charges?
11:21 16
11:21 17 A. Yes, we have a different type of numerical codes
11:21 18 too.
11:21 19
11:21 20 Q. Do the numerical codes appear on --- sorry, I
11:21 21 withdraw that.
11:21 22
11:21 23 Am I right to understand that the hotel's software system
11:21 24 is called OPERA?
11:21 25
11:21 26 A. Yes, correct.
11:21 27
11:21 28 Q. Is it the case that within OPERA, different types of
11:21 29 charges that a hotel guest might incur are allocated
11:21 30 different numerical transaction codes; is that right?
11:21 31
11:21 32 A. Yes, correct.
11:21 33
11:22 34 Q. So, within OPERA, they have codes. Do those codes
11:22 35 appear on guest copy of the hotel invoice?
11:22 36
11:22 37 A. Yes, correct, ma'am.
11:22 38
11:22 39 Q. I see. Are there tens of codes or hundreds of
11:22 40 codes?
11:22 41
11:22 42 A. Yes, a lot of codes appear, yes. But we have the
11:22 43 code name of the code, and --- but for the guest point of
11:22 44 view --- let's say if the code for accommodation charges
11:22 45 is 025 or something like that, but the guest can see "052
11:22 46 Hotel Accommodation", like that.
11:22 47

- 11:22 1 Q. I see. I presume there is somewhere in the front
11:22 2 desk area a folder that has a document which lists all
11:22 3 the different codes; is that right?
11:22 4
- 11:22 5 A. But if you work familiar with your station already,
11:22 6 you don't need that paper anymore. In the system we can
11:22 7 check everything, detail, so we don't need the paper,
11:23 8 actually.
11:23 9
- 11:23 10 Q. But if you are new, say you are a new front office
11:23 11 attendant, and you don't know what code to charge
11:23 12 a particular item for a hotel guest, how do you find out
11:23 13 what code to use for the particular item that the hotel
11:23 14 guest has used?
11:23 15
- 11:23 16 A. If you are new for the role, you can post it as the
11:23 17 typing. Let's say if you type "accommodation", the code
11:23 18 will appear.
11:23 19
- 11:23 20 Q. What if it was something really unusual like "nail
11:23 21 scissors" ?
11:23 22
- 11:23 23 A. Sorry?
11:23 24
- 11:23 25 Q. What if it is something unusual, like a guest has
11:23 26 said that they couldn't bring their nail scissors because
11:23 27 they couldn't put it in their carry-on luggage, "Can you
11:23 28 get me a pair of nail scissors", and you charge that and
11:23 29 have a new staff member and they are thinking "I don't
11:23 30 know what code to use for the nail scissors" --- where
11:24 31 can the new staff member go to find where the appropriate
11:24 32 code is for that charge?
11:24 33
- 11:24 34 A. If they are new, not sure, check with supervisor or
11:24 35 manager. So they will guide you for the correct posting.
11:24 36
- 11:24 37 Q. I see. Within the OPERA system, is there somewhere
11:24 38 within the OPERA that has a list of the codes and their
11:24 39 corresponding description in words?
11:24 40
- 11:24 41 A. We have a lot of workstation in our drive too, so if
11:24 42 you are new for our role, so you can refer to it. So we
11:24 43 have the detail of the work instruction or the detail ---
11:24 44 if you are new for the learning of the OPERA, we will do
11:24 45 step-by-step guiding you before you start the role.
11:24 46
- 11:24 47 Q. Somewhere within OPERA there is a list of all the

11:24 1 codes ---
11:24 2
11:24 3 A. Yes. We have the trainee scripts as well, yeah.
11:24 4
11:24 5 Q. Okay. Thank you.
11:24 6
11:24 7 Are there some codes that are so familiar you could tell
11:25 8 me what they were off the top of your head? You've
11:25 9 worked there for [REDACTED] now. I presume there is some
11:25 10 codes that you use every single day that you work there
11:25 11 and you just know them off by heart; is that right?
11:25 12
11:25 13 A. Yes, correct.
11:25 14
11:25 15 Q. For example, the accommodation code, you know that
11:25 16 off by heart; is that right?
11:25 17
11:25 18 A. Yes, correct. And I know the correct code number is
11:25 19 --- if we post it as a mini bar we use as 6365, like
11:25 20 that. So there is a code. The correct code, yes.
11:25 21
11:25 22 Q. You might not know this question, but I am going to
11:25 23 ask you. Are you familiar with the transaction code
11:25 24 1908?
11:25 25
11:25 26 A. I'm sorry, I don't familiar.
11:25 27
11:25 28 Q. Are you familiar with transaction code 1909?
11:25 29
11:25 30 A. Sorry, I am not familiar.
11:25 31
11:25 32 Q. And last one, 1910?
11:25 33
11:25 34 A. 1910, I think is "paid out".
11:25 35
11:25 36 Q. "Paid out". Okay. I will come back to "paid out"
11:26 37 in a minute, but I want to ask you a series of questions
11:26 38 now. The next questions I am only going to be asking in
11:26 39 respect of international guests and I'm asking you about
11:26 40 the present day, so not what has happened in the past,
11:26 41 but the present day.
11:26 42
11:26 43 Can an international hotel guest obtain cash from the
11:26 44 front desk of Crown Towers and have that charged to their
11:26 45 room bill?
11:26 46
11:26 47 A. Can the international guest? Do we accept cash from

11:26 1 the international ---
11:26 2
11:26 3 Q. No.
11:26 4
11:26 5 A. Sorry about it, what is your question?
11:26 6
11:26 7 Q. Can an international guest obtain, get from you,
11:26 8 cash from the front desk at Crown Towers and have the
11:26 9 value of that charged to their room bill?
11:27 10
11:27 11 A. Yes. If they want to --- if guest want to get
11:27 12 advanced pay for, let's say "paid out", just now I
11:27 13 mention, but we have the maximum limit of paid out for
11:27 14 every guest, so maximum we do is only \$200 for the paid
11:27 15 out maximum, that they can bill back to their accounts.
11:27 16 If they want more than that, we can't allow.
11:27 17
11:27 18 Q. I see. And is that any different for an Australian
11:27 19 guest?
11:27 20
11:27 21 A. All guests.
11:27 22
11:27 23 Q. So all guests can come to the front desk and they
11:27 24 can get a maximum of \$200 and have \$200 charge to their
11:27 25 room bill; is that right?
11:27 26
11:27 27 A. Yes, correct.
11:27 28
11:27 29 Q. When they obtain the \$200, do they just ask for it
11:27 30 and it gets put on the system to be charged to their
11:27 31 checkout?
11:27 32
11:27 33 A. They can request for --- if they want cash, we can
11:27 34 do paid out as cash, and then we will post to the bill,
11:28 35 and then after the end of the checkout, they can settle
11:28 36 the account.
11:28 37
11:28 38 Q. I see. How is that described on the hotel bill?
11:28 39
11:28 40 A. So in their bill it is described as "paid out".
11:28 41
11:28 42 Q. And is that all it says "paid out", it says nothing
11:28 43 else?
11:28 44
11:28 45 A. Nothing else. So paid out --- the guest want to get
11:28 46 cash, that's all.
11:28 47

11:28 1 Q. Has that been the case for the entire time you've
11:28 2 worked at Crown Towers?
11:28 3
11:28 4 A. Mostly I'm work as Crown Towers front desk, yes.
11:28 5
11:28 6 Q. My question is, the ability of a guest to come to
11:28 7 the front desk at Crown Towers and obtain \$200 in cash,
11:28 8 has that been the case for the entire time you've worked
11:28 9 at Crown?
11:28 10
11:28 11 A. Not many guests they want cash, so sometimes we
11:29 12 hardly see, so nowadays they are using a lot of credit
11:29 13 card, so they don't need that kind of paid out anymore,
11:29 14 yeah.
11:29 15
11:29 16 Q. I see. So it is uncommon, is that right?
11:29 17
11:29 18 A. Yes, quite uncommon.
11:29 19
11:29 20 Q. Even though it is uncommon, is it the case that in
11:29 21 the past guests could --- when I say in the past, I'm
11:29 22 talking about from when you started working at Crown
11:29 23 Towers in [REDACTED] --- is it the case that guests could come
11:29 24 to the front desk and get \$200 paid out?
11:29 25
11:29 26 A. Yes, sometimes they come. If they want --- mostly
11:29 27 its international guest, they don't have the Australian
11:29 28 dollar with them, so they want to get a little bit for
11:29 29 here and there shopping. So we will do for them. But it
11:29 30 is before COVID period. Now we are dealing with all
11:29 31 local guests, so no more "paid out" anymore.
11:29 32
11:29 33 Q. Okay. I see. So no more "paid out" anymore because
11:29 34 of COVID; is that right?
11:29 35
11:30 36 A. Yes, so now it's all local guests we are dealing, so
11:30 37 they have their own credit card and they have money.
11:30 38
11:30 39 Q. I see. That \$200 limit, has that been different in
11:30 40 the past? Has there been a higher or lower limit in the
11:30 41 past?
11:30 42
11:30 43 A. Mostly we do is \$200 is maximum.
11:30 44
11:30 45 Q. You said mostly.
11:30 46
11:30 47 A. Yes.

11:30 1
11:30 2 Q. In the past have you paid out cash transactions with
11:30 3 guests that were higher than \$200?
11:30 4
11:30 5 A. This one I am not aware of. For our front office
11:30 6 attendant, our job is just \$200 maximum for them.
11:30 7
11:30 8 Q. Is it right that your authority only goes up to
11:30 9 \$200?
11:30 10
11:30 11 A. Yes, my authority is only \$200 is the maximum.
11:30 12
11:30 13 Q. What about other people who work at the hotel, such
11:30 14 as managers or front desk supervisors; do they have
11:30 15 a higher authority? Can they authorise guests to get
11:31 16 an amount in cash higher than \$200?
11:31 17
11:31 18 A. I'm sorry, I don't know about the role of the duty
11:31 19 --- so but for our side \$200 is the maximum.
11:31 20
11:31 21 Q. Fair enough. Now I'm going to ask you a question
11:31 22 about whether you've seen or observed something. So not
11:31 23 whether you did the transaction yourself, but whether you
11:31 24 have seen a transaction occurring at the front desk at
11:31 25 Crown Towers.
11:31 26
11:31 27 In the past, have you seen a transaction occur at the
11:31 28 front desk at Crown Towers whereby a guest was obtaining
11:31 29 cash, paid out, in an amount greater than \$200?
11:31 30
11:31 31 A. I haven't seen before.
11:31 32
11:31 33 Q. Okay.
11:31 34
11:31 35 Again I will ask a question about international hotel
11:31 36 guests. What I would like to know is, can
11:31 37 an international hotel guest obtain a chip purchase
11:32 38 voucher from the Crown Towers front desk and have that
11:32 39 charged on their room bill?
11:32 40
11:32 41 A. You mean voucher? Your question is international
11:32 42 guest using voucher, you mean?
11:32 43
11:32 44 Q. No, sorry. I'm not sure. We might be at cross
11:32 45 purposes. My question is about a chip purchase voucher.
11:32 46
11:32 47 A. Chips?

- 11:32 1
11:32 2 Q. Chips. Not as in the chips you might eat, but the
11:32 3 chips that you might play with at the casino.
11:32 4
11:32 5 A. No, we not selling chips at the counter.
11:32 6
11:32 7 Q. So my question is not about selling chips at the
11:32 8 counter, my question is whether an international guest
11:32 9 can obtain a chips purchase voucher. So a voucher where
11:32 10 they can then take it to the main cage and obtain chips
11:32 11 in exchange for the voucher.
11:32 12
11:32 13 A. We don't do that at front desk. We don't do that
11:32 14 service at front desk. This is mainly with casino floor.
11:33 15
11:33 16 Q. I see.
11:33 17
11:33 18 A. I think, yes.
11:33 19
11:33 20 Q. Mainly with the casino floor?
11:33 21
11:33 22 A. Yes.
11:33 23
11:33 24 Q. What about in the past? In the past has
11:33 25 an international guest been able to come to the Crown
11:33 26 Towers front desk and obtain a chip purchase voucher and
11:33 27 have it charged on their room bill?
11:33 28
11:33 29 A. I don't think so. If they are casino guest they
11:33 30 have to go to casino floor.
11:33 31
11:33 32 Q. I see. Is it any different for what is called
11:33 33 a chip exchange voucher?
11:33 34
11:33 35 A. This one I don't know.
11:33 36
11:33 37 Q. You are not familiar with a chip exchange voucher?
11:33 38
11:33 39 A. I have not encounter before.
11:33 40
11:33 41 Q. Can an international hotel guest make a payment at
11:33 42 the front desk of Crown Towers and obtain a receipt from
11:33 43 the hotel which they can then take to the main cage to
11:33 44 obtain chips or a chip exchange voucher or a chip
11:34 45 purchase voucher?
11:34 46
11:34 47 A. We are dealing with accommodation and other charges

11:34 1 to our account. So if it is concern with casino guest,
11:34 2 they directly deal with host, casino host, not to us.
11:34 3 Yeah, so I haven't aware of those things before.
11:34 4
11:34 5 Q. Have you ever observed an international guest at the
11:34 6 hotel front desk making a payment and then obtaining in
11:34 7 return a receipt which they can then take to the main
11:34 8 cage to obtain chips or a chip purchase voucher or a chip
11:34 9 exchange?
11:34 10
11:34 11 A. I don't think so.
11:34 12
11:34 13 Q. So you haven't observed that?
11:34 14
11:34 15 A. No, I haven't observed this one.
11:34 16
11:34 17 Q. Now I will read to you a process that we've heard
11:34 18 about occurring at Crown Towers.
11:34 19
11:35 20 For the other parties and for the transcript, I will be
11:35 21 reading from CRW.0000.0002.0151. I don't need that
11:35 22 brought up to the screen, operator.
11:35 23
11:35 24 Commissioner, that is at tab 1 of your folder right at
11:35 25 the back. Commissioner, it is the surveillance log
11:35 26 report at the back of your folder.
11:35 27
11:35 28 Witness, I will read something out to you and ask you
11:35 29 a question at the end. So you know what I'm going to
11:35 30 ask, I will ask whether the process I describe or any
11:35 31 part of it is familiar to you. So I am going to read
11:35 32 something out, and once I finish I am then going to say,
11:35 33 is that process or any part of it familiar to you. Do
11:35 34 you understand?
11:35 35
11:35 36 A. Thank you.
11:35 37
11:36 38 Q. A high action international patron stays at a hotel,
11:36 39 ie Crown Towers. The hosting or hotel staff charge
11:36 40 an incidental charge to the hotel invoice of the patron.
11:36 41 The patron then settles their hotel bill, including the
11:36 42 incidental charge using tap and go. This transfers money
11:36 43 from an international account to Crown to settle the
11:36 44 amount on the hotel room. The money for the incidental
11:36 45 charge is then made available to the patron potentially
11:36 46 at the cage for the purposes of gaming.
11:36 47

11:36 1 COMMISSIONER: Could you read it again slowly.
11:36 2
11:36 3 MS O'SULLIVAN: Sure. A high action international patron
11:36 4 stays at a hotel, ie Crown Towers. The hosting or hotel
11:36 5 staff charge an incidental charge to the hotel invoice of
11:37 6 the patron. The patron then settles their hotel bill,
11:37 7 including the incidental charge, using tap and go. This
11:37 8 transfers money from an international account to Crown to
11:37 9 settle the amount on the hotel room. The money for the
11:37 10 incidental charge is then made available to the patron
11:37 11 potentially at the cage for the purposes of gaming.
11:37 12
11:37 13 A. Yes, ma'am.
11:37 14
11:37 15 Q. So is the process that I have just described, or any
11:37 16 part of it, familiar to you?
11:37 17
11:37 18 A. So, concern with your scenario, we don't accept tap
11:37 19 and go payment. Normally if the guest want to posted the
11:37 20 charges to their bill, we posted the charges, but at the
11:37 21 end of the checkout they have to settle via their credit
11:37 22 card. So we don't have tap and go system.
11:37 23
11:38 24 Q. Okay. So you are not familiar with any tap and go.
11:38 25 Was any other part of what I described familiar to you?
11:38 26
11:38 27 A. Not familiar to me, yes.
11:38 28
11:38 29 Q. Now I will show you a written description of
11:38 30 a process and I will give you the chance to have a read
11:38 31 of it and then I will ask you the same question, which
11:38 32 is: is that process, or any part of it, familiar to you.
11:38 33
11:38 34 Operator, can we bring up document CRW.900.002.0001. I
11:38 35 want only page 50 and only paragraph 200(a) to (d).
11:39 36 Sorry, operator, if you can just hold on one moment.
11:39 37 We'll do this a different way. Again I will read it out.
11:39 38 If I need to read it twice, let me know. It is important
11:39 39 you understand ---
11:40 40
11:40 41 A. Thank you, ma'am.
11:40 42
11:40 43 Q. --- what I'm describing. I will describe a process
11:40 44 which has four points to it:
11:40 45
11:40 46 *(a) the customer makes a purchase with a debit or*
11:40 47 *credit card on the card terminal at Crown Towers*

- 11:40 1 *hotel;*
- 11:40 2
- 11:40 3 *(b) the hotel staff provide an invoice or voucher to*
- 11:40 4 *be taken by the customer to the cage, accompanied by*
- 11:40 5 *a gaming staff member who may carry the document;*
- 11:40 6
- 11:40 7 *(c) the customer or gaming staff member then*
- 11:40 8 *provided the invoice or voucher to the cage, which*
- 11:40 9 *led the cage to credit the customer's DAB account*
- 11:40 10 *with the value of the voucher;*
- 11:40 11
- 11:40 12 *(d) the customer is able to obtain from the cage*
- 11:40 13 *a credit into the DAB account, gaming chips, chip*
- 11:40 14 *purchase voucher or possibly cash out.*
- 11:40 15
- 11:40 16 Do you understand that or would you like me to read it
- 11:41 17 again?
- 11:41 18
- 11:41 19 A. If you don't mind.
- 11:41 20
- 11:41 21 Q. So:
- 11:41 22
- 11:41 23 *(a) the customer makes a purchase with a debit or*
- 11:41 24 *credit card on the card terminal at Crown Towers*
- 11:41 25 *Hotel.*
- 11:41 26
- 11:41 27 *..... the hotel staff provide an invoice or voucher*
- 11:41 28 *to be taken by the customer to the cage, accompanied*
- 11:41 29 *by a gaming staff member who may carry the document;*
- 11:41 30
- 11:41 31 *(c) the customer or gaming staff member then provide*
- 11:41 32 *the invoice or document to the cage which leads the*
- 11:41 33 *cage to credit the customer's DAB account with the*
- 11:41 34 *value of the voucher;*
- 11:41 35
- 11:41 36 *(d) the customer is then able to obtain from the*
- 11:41 37 *cage a credit into the DAB account, gaming chips,*
- 11:41 38 *a chip purchase voucher or possibly cash out.*
- 11:41 39
- 11:41 40 A. Yes.
- 11:41 41
- 11:41 42 Q. Is that process, or any part of it, familiar to you?
- 11:41 43
- 11:41 44 A. For that scenario, we normally don't deal directly
- 11:42 45 with the casino guest. So I told you already, they
- 11:42 46 cannot purchase anything from our counter. So if they
- 11:42 47 want, they directly talk with the casino host and then

11:42 1 casino host will do it. But normally we do for paid out
11:42 2 is \$200, the rest, they cannot post their bill. Yes. So
11:42 3 not concerned with chips or anything they want to buy,
11:42 4 they have to go to the casino floor, not with our front
11:42 5 desk.
11:42 6
11:42 7 Q. Thank you.
11:42 8
11:42 9 Operator, can I have this document brought up to the
11:42 10 screen, CRW.900.003.1952 page 1953.
11:42 11
11:42 12 Tab 5 of your folder, Commissioner.
11:42 13
11:42 14 Witness, I will get you to have a look at what is
11:42 15 appearing on the screen there. You can see there is,
11:43 16 I think we describe that as an EFTPOS terminal on the
11:43 17 screen which has the writing. It looks like it has been
11:43 18 labelled "M/CAGE ONLY"; can you see that?
11:43 19
11:43 20 A. Yes, correct.
11:43 21
11:43 22 Q. Is that familiar to you?
11:43 23
11:43 24 A. Yes, correct.
11:43 25
11:43 26 Q. Is that a photo of an EFTPOS terminal on the front
11:43 27 desk at Crown Towers?
11:43 28
11:43 29 A. Yes, correct.
11:43 30
11:43 31 Q. Is that a terminal that is presently on the desk?
11:43 32
11:43 33 A. Not anymore.
11:43 34
11:43 35 Q. When you say "not anymore", how long ago did it stop
11:43 36 being on the desk at Crown Towers?
11:43 37
11:43 38 A. Now they are changing the new system, so not with
11:43 39 NAB. This main cage anymore, we not using. So they
11:43 40 start changing around May this coming --- I mean last
11:44 41 May, so 2021 May, we have the changes of the payment
11:44 42 credit card system already.
11:44 43
11:44 44 Q. So, as of May 2021 ---
11:44 45
11:44 46 A. Around May, I believe.
11:44 47

11:44 1 Q. So, as of May 2021 this EFTPOS terminal is no longer
11:44 2 on the front desk, is that right?

11:44 3

11:44 4 A. Not anymore.

11:44 5

11:44 6 Q. Did you ever do a transaction on this EFTPOS
11:44 7 terminal?

11:44 8

11:44 9 A. Yes, you can see here, then this is --- we only use
11:44 10 for that time to do the main cage purchases, and the last
11:44 11 one:

11:44 12

11:44 13 FOAs should not be using this terminal at all.

11:44 14

11:44 15 So I'm the FOA team, so I'm not doing this terminal but I
11:44 16 know that they are using by supervisor and duty manager,
11:44 17 only they can allow to use this machine, not by front
11:44 18 office attendant.

11:44 19

11:44 20 Q. When was the last time you saw a front office duty
11:44 21 manager, for example, or anyone else make a transaction
11:45 22 on this EFTPOS machine?

11:45 23

11:45 24 A. It's a long time ago before the COVID period, maybe
11:45 25 2018, 2019, yes. Around that time we used this terminal.

11:45 26

11:45 27 Q. Is this a special terminal?

11:45 28

11:45 29 A. Yes.

11:45 30

11:45 31 Q. Why is it special?

11:45 32

11:45 33 A. This is only for DM and supervisor mode. I'm not
11:45 34 too familiar about this.

11:45 35

11:45 36 Q. So you recollect this was used in 2018; is that
11:45 37 right?

11:45 38

11:45 39 A. Yes, around for 2018 before the COVID period, yes.
11:45 40 So we used this terminal, yes.

11:45 41

11:45 42 Q. What about 2019, which was also prior to the COVID
11:45 43 period?

11:45 44

11:45 45 A. Yes, we used this terminal as well too, yes.

11:45 46

11:45 47 Q. I see. Am I right to understand that on your

11:45 1 observation you only saw this terminal stop being used
11:45 2 once COVID had hit; is that right?
11:45 3
11:45 4 A. Yes, ma'am.
11:45 5
11:45 6 Q. How frequently would this terminal be used?
11:46 7
11:46 8 A. This one I have no idea, because most of the person
11:46 9 who have to use this, only duty manager and supervisor.
11:46 10
11:46 11 Q. Yes.
11:46 12
11:46 13 A. So I'm not aware of your question.
11:46 14
11:46 15 Q. Do you know why? Why was it that only the
11:46 16 supervisors and duty managers were allowed to use that
11:46 17 terminal?
11:46 18
11:46 19 A. Because I haven't trained by this machine, so I
11:46 20 can't answer your question more detailed, I'm sorry about
11:46 21 that.
11:46 22
11:46 23 Q. You observed this machine being used by duty
11:46 24 managers and front office supervisors?
11:46 25
11:46 26 A. Yes, correct.
11:46 27
11:46 28 Q. In 2018/2019?
11:46 29
11:46 30 A. Roughly around that time.
11:46 31
11:46 32 Q. Can you recall how it was being used? Can you
11:46 33 describe to us what was occurring when this machine was
11:46 34 being used?
11:46 35
11:47 36 A. I'm sorry about that, I have no idea for training of
11:47 37 this one, so I don't know why they use this one. I can't
11:47 38 recall for this moment.
11:47 39
11:47 40 Q. When this machine was being used, was it being used
11:47 41 at checkout, or was it being used prior to a guest
11:47 42 checking out?
11:47 43
11:47 44 A. I think maybe they do checkout or during their stay
11:47 45 or their check-in, they use, I think, I think so, yeah.
11:47 46
11:47 47 Q. Did you observe this machine used at check-in?

11:47 1
11:47 2 A. Check-in and checkout as well too.
11:47 3
11:47 4 Q. Did you also observe it being used during ---
11:47 5
11:47 6 A. For stay as well.
11:47 7
11:47 8 Q. I see. Just asking about the times when you
11:47 9 observed this machine being used by hotel duty managers
11:47 10 and front desk supervisors, do you recall seeing what the
11:48 11 guest was given after the EFTPOS terminal had been used?
11:48 12
11:48 13 A. Sorry, I didn't recall at all.
11:48 14
11:48 15 Q. Operator, if we could bring up another document, it
11:48 16 is CRW.900.001.0026. Witness, have you ever seen
11:48 17 a document like this?
11:48 18
11:48 19 A. Yes, Ms O'Sullivan.
11:48 20
11:48 21 Q. Do you want the opportunity for the operator to
11:48 22 scroll down so you can --- or would you like the entire
11:49 23 page shown on the screen?
11:49 24
11:49 25 A. Yes, please.
11:49 26
11:49 27 Q. Can we go to the first page. Have you finished
11:49 28 reading the first page?
11:49 29
11:49 30 A. Yes, and also I would like to point out one thing,
11:49 31 there is a procedure in "scope", number 1, they are
11:49 32 saying it applies to all front office supervisors and
11:49 33 duty managers, so this is the one I want to point out.
11:49 34 Yes.
11:49 35
11:50 36 Q. Say when you have finished reading that and we'll go
11:50 37 to the last page.
11:50 38
11:50 39 A. Thank you. You can go to the last page. Thank you.
11:50 40
11:50 41 Q. Is the case that you've either seen this actual
11:50 42 document or a document similar to this in the past?
11:50 43
11:50 44 A. Yes, I've seen this document before but this is only
11:50 45 for supervisor and duty manager have to do.
11:50 46
11:50 47 Q. I see. So have you ever processed a transaction

11:50 1 pursuant to that policy?
11:50 2
11:50 3 A. No, I haven't done.
11:50 4
11:50 5 Q. Thank you. Just a couple of last questions. Can I
11:51 6 ask you, and you might not know the answer, are you
11:51 7 familiar with the acronym "KYC"?
11:51 8
11:51 9 A. Know Your Customer?
11:51 10
11:51 11 Q. Yes, okay. Can you tell us what do you know about
11:51 12 KYC?
11:51 13
11:51 14 A. Yes, so this is --- KYC means you need to know your
11:51 15 customer, so you need --- when the customer is check-in,
11:51 16 we need to identify who is she or he. We have to check
11:51 17 his driving licence, passport, and also check, if he is
11:51 18 international guest we have to check their international
11:51 19 passport. And also if they provide for credit card
11:51 20 detail, we have to check detail everything match with
11:51 21 driving licence name. Let's say if the guest provide
11:51 22 driving licence, we have to check the credit card holder
11:52 23 name is matched with the driving licence. That means
11:52 24 this is the part of the procedures of KYC.
11:52 25
11:52 26 Q. Is there a list of acceptable and unacceptable
11:52 27 identification that a guest can provide?
11:52 28
11:52 29 A. We don't have this thing for acceptable --
11:52 30 unacceptable things, but all the guests check in at the
11:52 31 hotel, we have to check everything detail. If the
11:52 32 reservation name need to match with their current driving
11:52 33 licence or their passport. If doesn't match, we not
11:52 34 allowed to check in the guest.
11:52 35
11:52 36 Q. Is someone allowed to check in but provide
11:52 37 an identification other than a driver's licence or
11:52 38 a passport?
11:52 39
11:52 40 A. International passport, yes, and proof of age card
11:52 41 if they have the photo ID. If they are Australian or ---
11:52 42 I mean if they are Australian citizen they have proof of
11:52 43 age card, we accept that as well too.
11:52 44
11:53 45 Q. So for Australians, you accept passport, driver's
11:53 46 licence or proof of age; is that right?
11:53 47

11:53 1 A. Correct, yes.
11:53 2
11:53 3 Q. Are there any other identifications you accept at
11:53 4 the front desk?
11:53 5
11:53 6 A. No.
11:53 7
11:53 8 Q. What about international guests?
11:53 9
11:53 10 A. Only passport.
11:53 11
11:53 12 Q. Are you familiar with the acronym "AML/CTF"?
11:53 13
11:53 14 A. Yes.
11:53 15
11:53 16 Q. Can you tell us what it means?
11:53 17
11:53 18 A. AML means, is it anti-money laundering. CTF is
11:53 19 counterfeit --- sorry, C-F?
11:53 20
11:53 21 Q. CTF?
11:53 22
11:53 23 A. Counter-terrorism financing. I'm not too sure about
11:53 24 it, but I know AML is anti-money laundering. The CTF is
11:53 25 I little bit forgot.
11:53 26
11:53 27 Q. I understand. Are you familiar with the acronym
11:53 28 "TTR"? Apologies, it sounds like a test.
11:53 29
11:54 30 A. Yeah. TTR? I'm sorry, I didn't familiar.
11:54 31
11:54 32 Q. That's fine. Are you familiar with the acronym
11:54 33 "SMR"?
11:54 34
11:54 35 A. Sorry about that, I didn't familiar.
11:54 36
11:54 37 Q. This is the last one, are you familiar with the
11:54 38 acronym "IFTI", sometimes also called an IF-TI?
11:54 39
11:54 40 A. Sorry about that, I didn't familiar.
11:54 41
11:54 42 Q. You worked at Crown Towers for about [REDACTED]
11:54 43 [REDACTED]
11:54 44
11:54 45 A. Yeah, nearly [REDACTED] yeah.
11:54 46
11:54 47 Q. Have you ever yourself observed or anyone else at

11:54 1 the front desk of Crown Towers make a written report
11:54 2 about a cash transaction of \$10,000 or more?
11:54 3
11:54 4 A. I don't think so.
11:54 5
11:54 6 Q. Again, in all of your time at Crown Towers, have you
11:55 7 ever personally, or have you ever observed someone else
11:55 8 at the front desk make a report called a suspicious
11:55 9 matter report?
11:55 10
11:55 11 A. Make a --- sorry, your question?
11:55 12
11:55 13 Q. Have you ever personally, or have you ever seen
11:55 14 anybody else at the Crown Towers front desk make a report
11:55 15 called a suspicious matter report?
11:55 16
11:55 17 A. Yes, if it is more than \$10,000, for that point of
11:55 18 view of the FOA, we have to inform the duty manager. So
11:55 19 we don't deal with more than \$10,000. If the guest is
11:55 20 holding more than \$10,000 we have to call the duty
11:55 21 manager or supervisor and they have to talk with the duty
11:55 22 manager and supervisor directly.
11:55 23
11:55 24 Q. Yes.
11:55 25
11:55 26 A. The other procedure is that TT is --- no more TT,
11:55 27 not by us.
11:55 28
11:55 29 Q. So just going back to you having --- you've got
11:55 30 a recollection obviously, or perhaps more than one, of
11:55 31 a guest coming with more than \$10,000 and you understand
11:56 32 at that point you have to go and get a duty manager.
11:56 33 What happens next? Does the duty manager take care of it
11:56 34 and you go and do something else, or do you stay involved
11:56 35 and watch what happens?
11:56 36
11:56 37 A. Yeah, normally if I report to duty manager, then
11:56 38 duty manager will deal with this guest directly and the
11:56 39 other procedure is they no more duty, not by us, so
11:56 40 I have to serve another guest too, so I will transfer the
11:56 41 guest to duty manager, and they will manage ---
11:56 42
11:56 43 Q. Sorry, you said more TT?
11:56 44
11:56 45 A. Duty manager will process more TT talk with the
11:56 46 guest. So I will do another thing, I don't need to get
11:56 47 involved.

11:56 1
11:56 2 Q. Have you been able to observe what happens kind of
11:56 3 in your peripheral vision in those instances?
11:56 4
11:56 5 A. Not, not I aware of.
11:56 6
11:56 7 Q. Going back to the question about what is called
11:56 8 a suspicious matter report, have you ever personally
11:57 9 prepared a report called a suspicious matter report?
11:57 10
11:57 11 A. No. No.
11:57 12
11:57 13 Q. Have you observed anyone else at the front desk of
11:57 14 Crown Towers prepare a report called a suspicious matter
11:57 15 report?
11:57 16
11:57 17 A. Yes, only duty manager. So if it is --- most of the
11:57 18 reporting is done by the duty manager. So they will deal
11:57 19 with this thing.
11:57 20
11:57 21 Q. Have you observed? I'm asking whether you have seen
11:57 22 it in the past, have you seen someone else, a duty
11:57 23 manager, at the front desk preparing a suspicious matter
11:57 24 report?
11:57 25
11:57 26 A. Yes.
11:57 27
11:57 28 Q. You have seen that?
11:57 29
11:57 30 A. Yes.
11:57 31
11:57 32 Q. On how many occasions, roughly?
11:57 33
11:57 34 A. I didn't record this one but --- so if they have to
11:57 35 do --- if the guest is a bit suspicious, we need to
11:57 36 inform the duty manager or supervisor and they will deal
11:57 37 with this, yes.
11:57 38
11:57 39 Q. So if you form a suspicion, you have to tell the
11:58 40 duty manager; is that right?
11:58 41
11:58 42 A. Yes, correct.
11:58 43
11:58 44 Q. What types of things might cause you to call a duty
11:58 45 manager because you think there is something suspicious
11:58 46 about the guest?
11:58 47

- 11:58 1 A. Let's say if the guest is settling for the bill ---
11:58 2 let's say for one scenario, if the guest is holding more
11:58 3 than \$10,000 cash in hand and he has a lot of cash in
11:58 4 hand and "I want to pay the bill by this many, can you
11:58 5 settle the account", then I say "Okay, you wait for
11:58 6 a while, I will call my duty manager", because it is
11:58 7 called a suspicious matter. So yes, it is one of the
11:58 8 scenario. Or maybe if the guest is drunk or if the guest
11:58 9 shouting at the counter, so this is another suspicious
11:58 10 thing, so we can't handle, so I have to call the duty
11:58 11 manager.
11:58 12
- 11:58 13 Q. I see. And in your role at Crown Towers have you
11:58 14 ever made a report called an international funds transfer
11:59 15 instruction?
11:59 16
- 11:59 17 A. No.
11:59 18
- 11:59 19 Q. Have you ever seen anybody else, a Crown employee,
11:59 20 at the Crown Towers front desk, make a report called
11:59 21 an international funds transfer instruction?
11:59 22
- 11:59 23 A. I don't know.
11:59 24
- 11:59 25 Q. Okay. Have you ever had any training in AML,
11:59 26 anti-money laundering?
11:59 27
- 11:59 28 A. We did the training online from the computer, that's
11:59 29 all. Because we are front office team, so we don't deal
11:59 30 directly with the casino guests. So we just have to do
11:59 31 the AML training in the computer. Mostly we have done
11:59 32 this training, for every six months we have to do. So we
11:59 33 have just refreshen up our mind.
11:59 34
- 11:59 35 Q. Is it every six months you specifically do the AML
12:00 36 training?
12:00 37
- 12:00 38 A. Yes.
12:00 39
- 12:00 40 Q. If you think about all of the questions I've asked
12:00 41 you today, has anyone from Crown or on behalf of Crown
12:00 42 asked you any questions similar to those that I've asked
12:00 43 you, in the past three months?
12:00 44
- 12:00 45 A. Nobody ask me.
12:00 46
- 12:00 47 Q. Okay. Are you aware about whether any of your other

12:00 1 colleagues at Crown Towers have been asked by someone
12:00 2 from Crown or someone on behalf of Crown questions
12:00 3 similar to those that I've been asking you today?

12:00 4
12:00 5 A. I don't think so, yeah.

12:00 6
12:00 7 Q. Are you aware this Commission is examining the
12:00 8 suitability of Crown to hold a casino licence?

12:00 9
12:00 10 A. Yes, Crown can hold for the casino licence. We
12:00 11 follow all the procedure. Because of our front desk
12:00 12 thing, we follow all the procedure.

12:00 13
12:00 14 Q. I see. Is there anything you think would be useful
12:00 15 for this Commission to know about Crown?

12:01 16
12:01 17 A. Yes, because our front desk, we have training for
12:01 18 all the awareness of suspicious person or suspicious
12:01 19 matters, like the AML, anti-money laundering, we train
12:01 20 all the things, and so we follow exact procedures of the
12:01 21 Crown. So yeah.

12:01 22
12:01 23 MS O'SULLIVAN: Thank you.

12:01 24
12:01 25 Commissioner, I don't have any further questions for this
12:01 26 witness.

12:01 27
12:01 28 COMMISSIONER: Thank you Ms O'Sullivan.

12:01 29
12:01 30

12:01 31 **RE-EXAMINATION BY MS BUTTON**

12:01 32
12:01 33

12:01 34 MS BUTTON: Thank you. Do you recall you were shown
12:01 35 a picture of a little EFTPOS terminal or a NAB terminal,
12:01 36 and you were asked questions about when you last saw it
12:01 37 being used? Do you recall that?

12:01 38
12:01 39 A. Yes.

12:01 40
12:01 41 Q. You said you thought you saw it being used in 2018
12:01 42 and possibly 2019?

12:01 43
12:01 44 A. Yeah, probably, maybe. Yes.

12:01 45
12:01 46 Q. You are not too sure about that?
12:01 47

12:01 1 A. I'm not too sure about the timing, because I'm the
12:01 2 one who using this machine.
12:01 3
12:02 4 Q. You are the one or you are not the one?
12:02 5
12:02 6 A. I'm not the one who using this machine.
12:02 7
12:02 8 Q. The people who were using the machine, do you know
12:02 9 what they were using it for? What charges they were
12:02 10 putting through that machine?
12:02 11
12:02 12 A. I have no idea about this.
12:02 13
12:02 14 MS BUTTON: Thank you.
12:02 15
12:02 16 May the witness be excused?
12:02 17
12:02 18 COMMISSIONER: Thank you very much. You can go now.
12:02 19
12:02 20 A. Thank you, Commissioner.
12:02 21
12:02 22
12:02 23 **THE WITNESS WITHDREW**
12:02 24
12:02 25
12:02 26 COMMISSIONER: The two documents about which you asked
12:02 27 questions. Tender?
12:02 28
12:02 29 MS O'SULLIVAN: Yes, I was thinking of tendering them at
12:02 30 the end.
12:02 31
12:02 32 COMMISSIONER: Okay, that's fine.
12:03 33
12:03 34 MS BUTTON: You can sit down. Thanks.
12:03 35
12:04 36 Are you ready to proceed?
12:04 37
12:04 38 COMMISSIONER: Yes.
12:04 39
12:04 40 MS BUTTON: Thank you.
41
42
43 **EMPLOYEE 9, CALLED**
44
45
12:04 46 MS BUTTON: Do you have in front of you a piece of paper
12:04 47 that has written on it "NTA069"?

12:04 1
12:04 2 WITNESS: Yes.
12:04 3
12:04 4 MS BUTTON: Can you confirm that piece of paper records
12:04 5 your name?
12:04 6
12:04 7 WITNESS: I confirm.
12:04 8
12:04 9 MS BUTTON: And can you confirm that it records also your
12:04 10 business address?
12:04 11
12:04 12 WITNESS: I confirm.
12:04 13
12:04 14 MS BUTTON: The associate will now affirm, give you
12:04 15 an affirmation.
12:04 16
12:04 17 WITNESS: Sure.
12:04 18
12:04 19
12:04 20 **WITNESS AFFIRMED**
12:04 21
12:04 22
12:04 23 MS BUTTON: I tender the document, Commissioner.
12:04 24
12:04 25 COMMISSIONER: Document identifying witness document
12:05 26 NTA069 will be Exhibit 246.
12:05 27
12:05 28
12:05 29 **EXHIBIT #RCPH0246 - WITNESS IDENTIFICATION**
12:05 30 **DOCUMENT NTA069 (CONFIDENTIAL)**
12:05 31
12:05 32
12:05 33 MS BUTTON: It will be a confidential exhibit?
12:05 34
12:05 35 COMMISSIONER: It will be confidential.
12:05 36
12:05 37
12:05 38
12:05 39 **EXAMINATION-IN-CHIEF BY MS BUTTON**
12:05 40
12:05 41
12:05 42 MS BUTTON: You started your employment with Crown
12:05 43 in [REDACTED] correct?
12:05 44
12:05 45 A. Correct.
12:05 46
12:05 47 Q. You started as a food and beverage attendant?

12:05 1
12:05 2 A. Correct.
12:05 3
12:05 4 Q. What part of the casino were you serving in that
12:05 5 role?
12:05 6
12:05 7 A. I was working at what they call [REDACTED]
12:05 8 venue of the Crown Towers casino. So that venue is
12:05 9 [REDACTED] venue. Yes.
12:05 10
12:05 11 Q. You moved at the end of [REDACTED] to take a graduate
12:05 12 trainee position in Crown Towers; is that correct?
12:05 13
12:05 14 A. That's correct.
12:05 15
12:05 16 Q. You started as a Front Office Supervisor in Crown
12:05 17 Towers in [REDACTED]?
12:05 18
12:05 19 A. Correct.
12:05 20
12:05 21 Q. Then you became a front office attendant at Crown
12:06 22 Towers from [REDACTED]; is that correct?
12:06 23
12:06 24 A. The date should be [REDACTED].
12:06 25
12:06 26 Q. Thank you. You are still in that position?
12:06 27
12:06 28 A. Correct.
12:06 29
12:06 30 Q. Thank you. Now Counsel Assisting will ask you some
12:06 31 questions.
12:06 32
12:06 33 A. Sure.
12:06 34
12:06 35
12:06 36 **CROSS- EXAMINATION BY MS O'SULLIVAN**
12:06 37
12:06 38
12:06 39 MS O'SULLIVAN: Thank you. My name is Ms O'Sullivan and
12:06 40 I'm one of the Counsel Assisting the Royal Commission.
12:06 41
12:06 42 I just want to check some of the questions you were asked
12:06 43 about your employment history at Crown.
12:06 44
12:06 45 A. Sure.
12:06 46
12:06 47 Q. Am I right to understand that you were a Front

12:06 1 office supervisor at Crown Towers?
12:06 2
12:06 3 A. Yes.
12:06 4
12:06 5 Q. That role started in [REDACTED] is that right?
12:06 6
12:06 7 A. [REDACTED] --- yes, correct.
12:06 8
12:06 9 Q. You were a front office supervisor from [REDACTED]
12:06 10 until [REDACTED] is that right?
12:06 11
12:06 12 A. Sorry, could you repeat that?
12:07 13
12:07 14 Q. The time that you were the front office supervisor
12:07 15 at Crown Towers was from [REDACTED]; is
12:07 16 that right?
12:07 17
12:07 18 A. Correct.
12:07 19
12:07 20 Q. Then from [REDACTED] onwards you have been a front office
12:07 21 attendant; is that right?
12:07 22
12:07 23 A. Correct.
12:07 24
12:07 25 Q. When you were a front office supervisor, you were
12:07 26 one of a number of front office supervisors; is that
12:07 27 right?
12:07 28
12:07 29 A. One of four.
12:07 30
12:07 31 Q. As a front office attendant you are one of very
12:07 32 many, I presume; is that right?
12:07 33
12:07 34 A. Yes. Off the top of my head, I think it is around
12:07 35 18 to 19 front office attendants.
12:07 36
12:07 37 Q. I'm just trying to understand what was the first
12:07 38 date you started to work at Crown Towers hotel reception.
12:07 39
12:07 40 A. Okay.
12:07 41
12:07 42 Q. What date was that?
12:07 43
12:07 44 A. That should be --- okay, so the graduate trainee
12:08 45 program, which Katherine indicated before, was one of the
12:08 46 roles that I've done. That involves a lot of departments
12:08 47 of the Crown Towers. So to the specific question you

12:08 1 asked, I would say I first started at Crown Towers front
12:08 2 office duty from the [REDACTED]

12:08 3

12:08 4 Q. I see. Okay.

12:08 5

12:08 6 A. Yep.

12:08 7

12:08 8 Q. What was the role that you held at Crown Towers
12:08 9 between [REDACTED] and [REDACTED]

12:08 10

12:08 11 A. Okay, so the period that you described includes the
12:08 12 graduate training plus the supervisor plus the front
12:08 13 office attendant. Because the nature of the graduate
12:08 14 training, I do rotations of shifts in different
12:08 15 departments, therefore the timeline can overlap. Yeah,
12:09 16 that's the answer.

12:09 17

12:09 18 Q. Okay. Thank you. Talking about your present role,
12:09 19 are you full-time or part-time?

12:09 20

12:09 21 A. Full-time.

12:09 22

12:09 23 Q. How many hours per week on average?

12:09 24

12:09 25 A. Thirty-eight.

12:09 26

12:09 27 Q. Can you just briefly describe to the Commissioner
12:09 28 what is the nature of your role?

12:09 29

12:09 30 A. Of course.

12:09 31

12:09 32 Q. What are your daily duties?

12:09 33

12:09 34 A. Yeah, of course. Commissioner, my daily duties
12:09 35 involves from check-in, checkouts of the guests that come
12:09 36 to stay at Crown Towers, and then I also answer phone
12:09 37 calls if guests have any inquiries, and also monitor the
12:09 38 inbox of --- the email inbox of Crown Towers. Guests can
12:09 39 email us with a billing inquiry or any general inquiries
12:09 40 during their stay or after their stay or even before they
12:10 41 come to Crown Towers.

12:10 42

12:10 43 We have also our own checklist as a front office
12:10 44 attendant. So that checklist have many tasks, for
12:10 45 example, checking how many people are arriving, and then
12:10 46 so that's the general duties of a front office attendant.

12:10 47

- 12:10 1 Q. So you respond to guests' queries about billing?
12:10 2
12:10 3 A. Yes, we do.
12:10 4
12:10 5 Q. And do you do guest checkouts?
12:10 6
12:10 7 A. Yes, I do.
12:10 8
12:10 9 Q. That involves preparing their accommodation or their
12:10 10 Crown Towers bill; is that right?
12:10 11
12:10 12 A. Correct.
12:10 13
12:10 14 Q. You accept payment and essentially checkout the
12:10 15 guest; is that right?
12:10 16
12:10 17 A. Correct.
12:10 18
12:10 19 Q. Am I right that the bill that the guest has is often
12:10 20 itemised with all the different types of charges they've
12:10 21 incurred during their stay?
12:10 22
12:11 23 A. That's correct.
12:11 24
12:11 25 Q. It is the case, is it not, that the different types
12:11 26 of charges have different codes in the OPERA system?
12:11 27
12:11 28 A. Could you maybe rephrase another way?
12:11 29
12:11 30 Q. I will go back a step.
12:11 31
12:11 32 A. Please.
12:11 33
12:11 34 Q. Is it the case that the Crown Towers hotel has
12:11 35 a software system called OPERA?
12:11 36
12:11 37 A. Correct.
12:11 38
12:11 39 Q. I presume it is used for both allocating guests to
12:11 40 rooms and also used for invoicing the guests in recording
12:11 41 all the charges they have incurred?
12:11 42
12:11 43 A. That's correct.
12:11 44
12:11 45 Q. And there are all different types of charges that
12:11 46 a guest might incur ; is that right?
12:11 47

12:11 1 A. Yes.
12:11 2
12:11 3 Q. That may be accommodation, room service, dry
12:11 4 cleaning, incidental; is that right?
12:11 5
12:11 6 A. That's right.
12:11 7
12:11 8 Q. The different types of charges, are they allocated
12:11 9 a code in the OPERA system, a transaction code?
12:11 10
12:11 11 A. Yes.
12:11 12
12:11 13 Q. Are the codes familiar to you?
12:11 14
12:11 15 A. Since you ask that question I was looking back,
12:12 16 thinking back of my day-to-day operation. I generally
12:12 17 look at the itemised description of the charge. Yes,
12:12 18 there is a code but we can't memorise the code because
12:12 19 there are too many.
12:12 20
12:12 21 Q. Yes.
12:12 22
12:12 23 A. Now I do understand the question you are asking.
12:12 24 Yes, there is a code, but we don't memorise the code, we
12:12 25 just look at the description of the charges, we explain
12:12 26 to the guest and then if they have any questions we
12:12 27 explain. Obviously sometimes a guest can have dispute of
12:12 28 what they have been charged. For example, if we charge
12:12 29 them mini bar water, for example, and they said they did
12:12 30 not consume water then we will investigate for them.
12:12 31
12:12 32 Q. I see.
12:12 33
12:12 34 A. Yep.
12:12 35
12:12 36 Q. I appreciate there is lots of codes and you can't
12:12 37 memorise them. I will ask whether you are familiar with
12:13 38 a couple of codes.
12:13 39
12:13 40 A. Sure.
12:13 41
12:13 42 Q. This is not a test.
12:13 43
12:13 44 A. Okay.
12:13 45
12:13 46 Q. So don't worry.
12:13 47

12:13 1 A. Okay.
12:13 2
12:13 3 Q. Are you familiar with code 1908?
12:13 4
12:13 5 A. I do not recall.
12:13 6
12:13 7 Q. Are you familiar with code 1909?
12:13 8
12:13 9 A. I do not recall.
12:13 10
12:13 11 Q. And what about 1910?
12:13 12
12:13 13 A. I do not recall.
12:13 14
12:13 15 Q. Now I'm going to ask you about how things operate in
12:13 16 the present day.
12:13 17
12:13 18 A. Sure.
12:13 19
12:13 20 Q. I know you've been working at the front desk for
12:13 21 some time, but I will ask you about the present day.
12:13 22
12:13 23 A. Sure.
12:13 24
12:13 25 Q. Is it the case that a hotel guest can come to the
12:13 26 front desk and obtain cash from the front desk and have
12:13 27 that amount charged though their bill?
12:13 28
12:13 29 A. You did mention present day, right?
12:14 30
12:14 31 Q. (Nods head).
12:14 32
12:14 33 A. We do not do that. Yes.
12:14 34
12:14 35 Q. Is it the case that you've done it in the past?
12:14 36
12:14 37 A. Yes.
12:14 38
12:14 39 Q. So I want you to describe to me --- I will start
12:14 40 with this. Why has it changed? You are not doing it
12:14 41 now, but you have in the past. Why has it changed?
12:14 42
12:14 43 A. Can I just --- I'm just trying to think of the
12:14 44 reason. One moment.
12:14 45
12:14 46 Q. Take your time.
12:15 47

12:15 1 A. My answer is we have been told that that is no longer the
12:15 2 procedure in place and we --- after the training that
12:15 3 I have done, anti-money laundering training, we do not
12:15 4 follow that procedure any more.

12:15 5

12:15 6 Q. Okay.

12:15 7

12:15 8 A. Yes.

12:15 9

12:15 10 Q. So you've referred to that procedure. Can you
12:15 11 describe to me what you mean by "that procedure"?

12:16 12

12:16 13 A. So before, I'd only done this a couple of times when
12:16 14 a guest would ask for cash --- we essentially call it
12:16 15 "cash out" --- and then I would, you know, either ask
12:16 16 management to see if we can do that. I can't recollect
12:16 17 the period, the exact period before that is still
12:16 18 allowed, but when was still allowed we would take the ---
12:16 19 they would put a charge on to their account and then we
12:16 20 would take cash out for the guest. That only happened to
12:17 21 me twice during the whole time that I've been working
12:17 22 there.

12:17 23

12:17 24 Q. Okay. So can I take you back to the very first
12:17 25 time.

12:17 26

12:17 27 A. Yes.

12:17 28

12:17 29 Q. You've only done it twice. The very first time it
12:17 30 happened. Can you describe for me step-by-step what
12:17 31 happens? I presume it starts with a guest presents at
12:17 32 the front desk and says "Can I have some cash?" Thinking
12:17 33 about the very first time it happened, tell me what
12:17 34 happened.

12:17 35

12:17 36 A. Okay, it was actually through --- so I was told by
12:17 37 another colleague of mine --- because we have the
12:17 38 different sections at front desk. Front desk, we have
12:17 39 concierge, and then a guest approached concierge to have
12:18 40 some cash out. I believe the amount was \$500. And the
12:18 41 guest was staying in-house, he didn't have access to ATM,
12:18 42 so he came to concierge and asking for cash out, and
12:18 43 asking us to place the charge on his account so he can
12:18 44 obtain cash instead of going to an ATM. And then the
12:18 45 concierge attendant approached me since the concierge
12:18 46 attendant do not have a till, essentially, and I happen
12:18 47 to have a till. You know, the concierge attendant can

12:18 1 have access to the till as well because we all have
12:19 2 access to the till, but for the convenience of the guest
12:19 3 at the time, and I just gave --- I saw the charge that is
12:19 4 already on the account and then I took cash out of my
12:19 5 till to give it to the guest.
12:19 6
12:19 7 Q. I see. So when you say that you saw the charge
12:19 8 already on the account ---
12:19 9
12:19 10 A. Yes.
12:19 11
12:19 12 Q. --- how had the charge already got on to the
12:19 13 account?
12:19 14
12:19 15 A. So when --- refer to what you said before, we can
12:19 16 only give cash out when there is a charge or when there
12:19 17 is a transaction occurred. So in that incidence, we have
12:19 18 a transaction called "paid out". So meaning if guest has
12:19 19 what we call a charge incurred in that transaction, we
12:19 20 give cash out and then we charged his card.
12:19 21
12:20 22 Q. Okay.
12:20 23
12:20 24 A. Yes. Similar process to when you go to Woolies and
12:20 25 ask them for cashout.
12:20 26
12:20 27 Q. So you were the one I presume who put \$500 into
12:20 28 an EFTPOS terminal; is that right?
12:20 29
12:20 30 A. Correct.
12:20 31
12:20 32 Q. Then the customer presented their card; is that
12:20 33 right?
12:20 34
12:20 35 A. Yes.
12:20 36
12:20 37 Q. And you got \$500 out of the till?
12:20 38
12:20 39 A. Correct.
12:20 40
12:20 41 Q. And you ensured that was on the system about that?
12:20 42
12:20 43 A. Correct.
12:20 44
12:20 45 Q. Was there a particular terminal EFTPOS terminal used
12:20 46 for that one?
12:20 47

12:20 1 A. Not a particular one. Generally all EFTPOS
12:20 2 terminals at front desk can have that function, to take
12:20 3 a card, to charge a card.
12:20 4

12:21 5 Q. The second time it occurred, was it a similar
12:21 6 process?
12:21 7

12:21 8 A. Yes.
12:21 9

12:21 10 Q. What was the amount; can you recall?
12:21 11

12:21 12 A. I can't recall the exact amount. I think it is
12:21 13 between \$500 to \$800 amount, yes.
12:21 14

12:21 15 Q. Have you ever had a guest come to the front desk and
12:21 16 ask to obtain --- to make a payment to the front desk and
12:21 17 obtain from the front desk a chip purchase voucher or
12:21 18 a chip exchange voucher?
12:21 19

12:21 20 A. No. Sorry, could you maybe rephrase that same
12:22 21 question in a different way so for me to understand
12:22 22 totally, and also to give you the answer that I think is
12:22 23 correct. If you can rephrase because you said a lot of
12:22 24 terms, chips and voucher and stuff, if you don't mind.
12:22 25

12:22 26 Q. I will ask it slightly differently. Can a guest
12:22 27 come to the front desk, at present ---
12:22 28

12:22 29 A. Yes.
12:22 30

12:22 31 Q. --- and make a payment and obtain from the front
12:22 32 desk either a chip purchase voucher or a receipt they can
12:22 33 take to the cage ---
12:22 34

12:22 35 A. No.
12:22 36

12:22 37 Q. --- to obtain a chip purchase voucher?
12:22 38

12:22 39 A. That never happened. Never.
12:22 40

12:22 41 Q. My question was about the present and I think your
12:22 42 answer is no.
12:22 43

12:22 44 A. Yes.
12:22 45

12:22 46 Q. To your knowledge, you haven't seen a transaction
12:23 47 like that occur in the past; is that right?

12:23 1
12:23 2 A. That's correct. I've never seen that happen. Nor
12:23 3 do I believe that a standard at Crown Towers front desk.
12:23 4 We have never done it in the past at present, no. Yes.
12:23 5
12:23 6 Q. Is your answer the same if I was to say "chip
12:23 7 exchange voucher" rather than "chip purchase voucher"?
12:23 8
12:23 9 A. My answer will be the same.
12:23 10
12:23 11 Q. Is your answer the same if I say just "chips"?
12:23 12
12:23 13 A. Okay, I do tell you one thing: with the chips, if
12:23 14 a guest come to front desk with actual gaming chip, that
12:23 15 I have done in the past, a gaming chip is essentially
12:23 16 cash to us. For example, when guests stay at a hotel
12:23 17 they need to pay a bond, what we call security deposit.
12:23 18 They can either use cash, credit card or chips. We take
12:24 19 chips as a bond for their room as well. So that is the
12:24 20 only thing we do at front desk in terms of chips
12:24 21 exchange.
12:24 22
12:24 23 Q. Okay. In that instance, a guest is paying with
12:24 24 chips ---
12:24 25
12:24 26 A. Yes.
12:24 27
12:24 28 Q. --- my question is more directed to a guest who has
12:24 29 no chips but wants chips.
12:24 30
12:24 31 A. Okay. That we can't do.
12:24 32
12:24 33 Q. If a guest ---
12:24 34
12:24 35 A. We don't have chips at front desk to give to the
12:24 36 guest.
12:24 37
12:24 38 Q. No, but what if the guest says "I want chips, I
12:24 39 don't have any, can I make a payment to you on my card
12:24 40 and you can add it to my hotel bill, and can you give me
12:24 41 a receipt and I will take it to the cage and exchange it
12:24 42 for chips?"
12:24 43
12:24 44 A. We don't do that.
12:24 45
12:24 46 Q. So you've never observed any transactions like that?
12:24 47

12:24 1 A. No.
12:24 2
12:25 3 Q. All right. Operator, can I ask that you bring up
12:25 4 this document, this one we've looked at before. Perhaps
12:25 5 if you might just show the photograph, CRW.900.003.1952
12:25 6 at 1953, and it is the very top photograph. If you
12:25 7 scroll down so we don't see the bullet points underneath.
12:25 8
12:25 9 Can you see that photograph?
12:25 10
12:25 11 A. Yes, I can.
12:25 12
12:25 13 Q. Is what depicted in that photograph familiar to you?
12:25 14
12:25 15 A. "Cage only"?
12:25 16
12:25 17 Q. Well, you will agree with me that is a picture of
12:25 18 an EFTPOS machine; that's right?
12:25 19
12:25 20 A. Correct. Yes.
12:25 21
12:26 22 Q. It does have a label on it saying "M/CAGE ONLY".
12:26 23 Simple question is: does that look familiar to you?
12:26 24
12:26 25 A. Does not. It's not the machine that I --- we have
12:26 26 at front desk.
12:26 27
12:26 28 Q. So you've never seen an EFTPOS machine with a label
12:26 29 like that on it?
12:26 30
12:26 31 A. I've never seen a machine with a label on it, no.
12:26 32
12:26 33 Q. So I presume, therefore, you've never processed
12:26 34 a transaction on a machine that looks like this?
12:26 35
12:26 36 A. Okay, just to understand your question, I've never
12:26 37 seen --- obviously I've seen plenty of EFTPOS machines at
12:26 38 front desk.
12:26 39
12:26 40 Q. As we all have.
12:26 41
12:26 42 A. But I've never seen a machine with a label saying
12:26 43 "M/CAGE ONLY" because I believe this should belong to the
12:27 44 cage only. Front desk is a separate department. We do
12:27 45 not have anything to do with the cage. Cage, to my
12:27 46 understanding, is the gaming floor, on the gaming floor,
12:27 47 and front desk do not have any association with the main

12:27 1 gaming floor, you know, terminal, EFTPOS machine. If
12:27 2 that ended up at front desk we would return it to them.
12:27 3 But I have never seen that in my, you know, working time
12:27 4 at Crown Towers front desk.

12:27 5
12:27 6 Q. Thank you.

12:27 7
12:27 8 A. Yes.

12:27 9
12:27 10 Q. Next I will read out to you, or describe a process.
12:27 11 When I get to the end, I will ask you a question.

12:27 12
12:27 13 A. Sure.

12:27 14
12:27 15 Q. So that you know upfront, I will tell you what the
12:27 16 question is. The question will be: is what I have
12:27 17 described, or any part of it, familiar to you. Do you
12:27 18 understand what I'm about to do?

12:27 19
12:27 20 A. Yes.

12:27 21
12:28 22 Q. So I will read a description to you ---

12:28 23
12:28 24 A. Yes.

12:28 25
12:28 26 Q. --- and when I get to the end I will ask you
12:28 27 a question.

12:28 28
12:28 29 A. Okay.

12:28 30
12:28 31 Q. And that question will be: is what I have described
12:28 32 or any part of it familiar to you.

12:28 33
12:28 34 A. Okay. Understood.

12:28 35
12:28 36 Q. I will start with the description. Again for the
12:28 37 transcript and for the benefit of the other parties, I'm
12:28 38 reading from CRW.0000.0002.0151 at 0164. I will begin
12:28 39 the description:

12:28 40
12:28 41 *A high action international patron stays at a hotel,*
12:28 42 *ie Crown Towers. The hosting or hotel staff charge*
12:28 43 *an incidental charge to the hotel invoice of the*
12:28 44 *patron. The patron then settles their hotel bill,*
12:28 45 *including the incidental charge using tap and go.*
12:28 46 *This transfers money from an international account*
12:28 47 *to Crown to settle the amount on the hotel room.*

12:28 1 *The money for the incidental charge is then made*
12:28 2 *available to the patron, potentially at the cage for*
12:29 3 *the purposes of gaming.*
12:29 4
12:29 5 So that ends the description. My question is: is what
12:29 6 I have described, or any part of it, familiar to you?
12:29 7
12:29 8 A. Only part of it. The part you asked at the very
12:29 9 beginning, we only see the charges of what is on the
12:29 10 OPERA account. For example, the mini bar and in-room
12:29 11 dining. The other charges that I saw, other than that,
12:29 12 nothing else you describe was familiar to me.
12:29 13
12:29 14 Q. Okay. So have you ever had a guest present at the
12:29 15 hotel desk in the company of a hosting staff, looking to
12:29 16 make a charge on their hotel bill and then obtain the
12:30 17 equivalent of the charge in monetary value at the cage?
12:30 18
12:30 19 A. No.
12:30 20
12:30 21 Q. Are you familiar with a process called "paid out"?
12:30 22
12:30 23 A. Yes.
12:30 24
12:30 25 Q. Can you tell us briefly what you understand the
12:30 26 "paid out" process is?
12:30 27
12:30 28 A. "Paid out" to us means cash given back to the guest.
12:30 29 So my role, the only time we do paid out, as I described
12:30 30 before, when guests can provide a cash bond. Normally it
12:30 31 is \$200 per night and then we cap it at generally five
12:30 32 nights, so cap at \$1,000 per night. And if guests at
12:31 33 checkout do not have any incidental charges, we check the
12:31 34 rooms, make sure it is still at the original condition,
12:31 35 and then we process a "paid out" to the guest. Basically
12:31 36 it is the money that they had given us at check-in, we
12:31 37 are just giving it back to them.
12:31 38
12:31 39 Q. So why is it called "paid out" and not "bond
12:31 40 refund"?
12:31 41
12:31 42 A. I think we might need to talk to OPERA to change the
12:31 43 code name. That's what I understood is --- I never
12:31 44 thought about that question before, the name. But to my
12:31 45 understanding is we are paying out money so paid out.
12:31 46 That's why I think the term to my knowledge. Yes, we can
12:31 47 change the bond refund --- okay, actually, good point.

- 12:31 1 When I process a paid out, and then in the reference, we
12:32 2 put reference in OPERA as well when we process a paid out
12:32 3 transaction. In the reference I write "bond refund".
12:32 4 Yes.
12:32 5
- 12:32 6 Q. Is it the case that "paid out" is an umbrella
12:32 7 term ---
12:32 8
- 12:32 9 A. Yes.
12:32 10
- 12:32 11 Q. --- and "bond refund" is one type of "paid out"?
12:32 12
- 12:32 13 A. Yes. So the other term can be, let's say if
12:32 14 guest --- sorry, if a patron or guest stay at the hotel,
12:32 15 they pay cash for their room, not just the bond, they
12:32 16 paid cash for the room and the bond, let's say if they
12:32 17 originally staying for five nights, but they are
12:32 18 shortening their stay for whatever reason to two nights,
12:32 19 obviously we need to give them the money back for the
12:32 20 nights that they did not stay. So we do paid out and
12:33 21 write "cash refund" for the room, and then we do another
12:33 22 paid out cash refund for the bond. So everything is
12:33 23 itemised. For example, if you provide a different method
12:33 24 of payment, we can't just do paid out. We need --- if
12:33 25 guests paid cash, we refund as cash.
12:33 26
- 12:33 27 Q. So paid out can be used for a bond refund but also
12:33 28 an accommodation refund if the guest stays fewer nights
12:33 29 than they had original anticipated; is that right?
12:33 30
- 12:33 31 A. Yes, only if they paid cash for their room.
12:33 32
- 12:33 33 Q. I see. Is there anything else that might be done
12:33 34 under the heading "paid out"?
12:33 35
- 12:33 36 A. No.
12:33 37
- 12:33 38 Q. Am I right to understand that whenever you process
12:33 39 a paid out you put a description underneath the "paid
12:33 40 out" which explains what the paid out is in respect of?
12:33 41
- 12:34 42 A. Sorry, could you repeat that?
12:34 43
- 12:34 44 Q. When you process a paid out, is it the case that you
12:34 45 make an entry on the OPERA system or the bill which
12:34 46 indicates the nature of the paid out, whether that be
12:34 47 bond refund or accommodation refund or something else?

12:34 1
12:34 2 A. That is correct.
12:34 3
12:34 4 Q. I might ask you some questions about some invoices.
12:34 5
12:34 6 A. Sure.
12:34 7
12:34 8 Q. If I may.
12:34 9
12:34 10 Tab 7 of your folder, Commissioner.
12:34 11
12:34 12 Operator, can we bring up this document CRW.512.168.0004.
12:34 13
12:35 14 Witness, I don't expect you are familiar with the
12:35 15 invoice, other than you can observe it, it is a Crown
12:35 16 Towers invoice. But I want you to have a look at it.
12:35 17
12:35 18 If we can show the entire first page on the screen,
12:35 19 please, operator.
12:35 20
12:35 21 Can you see that clearly?
12:35 22
12:35 23 A. No, a little bit blurry. Better now. Yes, I can
12:35 24 see it now.
12:35 25
12:35 26 Q. So this guest stayed for a calendar month from 1 May
12:35 27 to 31 May 2019. If you look down the left-hand side, you
12:35 28 can see the dates on the left-hand side there; can you
12:35 29 see that?
12:35 30
12:35 31 A. Date on the left-hand side? Yes.
12:35 32
12:36 33 Q. Can you look down to the first date which starts
12:36 34 with 5 May?
12:36 35
12:36 36 A. Yes.
12:36 37
12:36 38 Q. You can see there is a reference to "paid out" in
12:36 39 the amount of \$1,000?
12:36 40
12:36 41 A. Yes.
12:36 42
12:36 43 Q. Underneath there is a description of the paid out,
12:36 44 which just says paid out to the guest.
12:36 45
12:36 46 A. Yes.
12:36 47

12:36 1 Q. What do you make of that? Because the description
12:36 2 underneath doesn't do anything other than repeat what is
12:36 3 above, which is that it's paid out. How do we know what
12:36 4 that \$1,000 --- how do we know anything about that
12:36 5 transaction?

12:36 6
12:36 7 A. That, to me, is a cash given to the guest.

12:36 8
12:36 9 Q. Okay.

12:36 10
12:37 11 A. And that's what I described before, the two
12:37 12 scenarios that I remember. That's --- yep. That's
12:37 13 a paid out, that's the cash given to the guest.

12:37 14
12:37 15 Q. The two scenarios that you described earlier,
12:37 16 I think in the first instance it was an amount of \$500.

12:37 17
12:37 18 A. Yes.

12:37 19
12:37 20 Q. In the second instance you couldn't recall, but you
12:37 21 thought it was somewhere between \$400 to \$800?

12:37 22
12:37 23 A. \$500 to \$800.

12:37 24
12:37 25 Q. Thank you. We're talking about the past because you
12:37 26 told us this no longer happens.

12:37 27
12:37 28 A. Correct.

12:37 29
12:37 30 Q. Was there any dollar limit to how much cash a guest
12:37 31 could obtain from the front desk?

12:37 32
12:37 33 A. The limit that I believe and recall before we
12:37 34 stopped doing it is \$1,000.

12:37 35
12:38 36 Q. Operator, can we move over to the second page.

12:38 37
12:38 38 For the second last entry, 30 May 2019, which is paid out
12:38 39 \$5,000, would you say that that is perhaps a paid out
12:38 40 that was made in breach of the limit?

12:38 41
12:38 42 A. No, it is not a breach of the limit because as
12:38 43 a front office attendant my limit is \$1,000.

12:38 44
12:38 45 Q. Is it?

12:38 46
12:38 47 A. Yes.

12:38 1
12:38 2 Q. What are the other limits, do you know of anyone's
12:38 3 limits?
12:38 4
12:38 5 A. I can't comment on that because limits are not set
12:38 6 by me so I don't ask the limit. And I only --- my
12:39 7 understanding is my limit is \$1,000 before, we could do
12:39 8 that. And during my two and three years working for
12:39 9 front desk I only done twice. So my understanding from
12:39 10 the first time I did it to now is we are not allowed to.
12:39 11 To me the limit is always \$1,000.
12:39 12
12:39 13 Q. I perhaps should have asked you this earlier, you
12:39 14 told us that this was permitted previously and it is no
12:39 15 longer permitted, and when I asked you what changed you
12:39 16 said you think that the process was stopped because of
12:39 17 something to do with money laundering; is that right?
12:40 18
12:40 19 A. No. I said the process was stopped after I did the
12:40 20 anti-money laundering training. Training.
12:40 21
12:40 22 Q. Okay.
12:40 23
12:40 24 A. At Crown Towers --- Crown as a whole, we do lots of
12:40 25 trainings to number one make sure we comply with the
12:40 26 rules and regulations at Crown. Also, for example, we
12:40 27 can do health and safety training as well to make sure we
12:40 28 know the right procedure when there is a health or safety
12:40 29 risks. So in that incidence I did the anti-money
12:40 30 laundering training and then understood we cannot, you
12:40 31 know, take a guest's credit card and then give them cash.
12:40 32
12:40 33 Q. So that is something you were told during the
12:40 34 training?
12:41 35
12:41 36 A. Yes. That was I think one of the points at the
12:41 37 training, yes.
12:41 38
12:41 39 Q. Was it face-to-face training or a training module
12:41 40 you did on a computer?
12:41 41
12:41 42 A. Both. So the training was delivered like
12:41 43 a PowerPoint, but the person was there with us. Yeah, to
12:41 44 do the training.
12:41 45
12:41 46 Q. And when did that occur, approximately?
12:41 47

- 12:41 1 A. I believe April 2020.
- 12:41 2
- 12:41 3 Q. April 2020?
- 12:41 4
- 12:41 5 A. Yes.
- 12:41 6
- 12:41 7 Q. So that was shortly after a series of --- was that
- 12:41 8 approximate to the time that the casino had to close
- 12:41 9 because of COVID?
- 12:42 10
- 12:42 11 A. Sorry, I'm just trying to think about the training
- 12:42 12 month. I remember the training we received was either
- 12:42 13 December last year 2020 because April 2020 we went into
- 12:42 14 lockdown. There was no --- so that was lockdown. So
- 12:42 15 when we came back to work from lockdown, that was when I
- 12:42 16 received that training.
- 12:42 17
- 12:42 18 Q. What specifically were you told in the training
- 12:42 19 about the process whereby the front desk were able to
- 12:42 20 process paid outs?
- 12:42 21
- 12:43 22 A. I'm trying to think back on the training I received.
- 12:43 23
- 12:43 24 Okay, so the part about paid-out was me drawing
- 12:43 25 conclusion from the training. I do not believe there is
- 12:43 26 a specific item in the training stating that, anything to
- 12:43 27 do with paid-out. And the part that I mentioned about
- 12:43 28 we're not allowed to do it anymore is my own conclusion
- 12:43 29 that from that training is --- because one of the things
- 12:43 30 I definitely remember from the training is look out for
- 12:44 31 any suspicious behaviour. You know, so to me, that will
- 12:44 32 be one of the suspicious behaviour, if a guests do not
- 12:44 33 pay us with cash, we cannot give them cash back. In that
- 12:44 34 case when I described a guest paid cash for the room and
- 12:44 35 bond, and we can refund cash and bond, but if they paid
- 12:44 36 credit card, we cannot give them cash. That is my own
- 12:44 37 conclusion drawing from the training I received.
- 12:44 38
- 12:44 39 Q. When you said earlier when I was asking you about
- 12:44 40 the ability of guests to obtain cash from the front desk,
- 12:44 41 and you said "That is not something we do anymore, we're
- 12:44 42 not allowed to", that is a conclusion you've drawn using
- 12:44 43 your own ---
- 12:44 44
- 12:44 45 A. Understanding.
- 12:44 46
- 12:44 47 Q. --- wits and judgment but you haven't been given

12:44 1 an instruction to that effect; is that right?
12:45 2
12:45 3 A. Not officially, no.
12:45 4
12:45 5 Q. What about unofficially?
12:45 6
12:45 7 A. Unofficially, yes, we stopped doing, for example,
12:45 8 what you just showed me, we don't do it anymore.
12:45 9
12:45 10 Q. Okay, but my question is about what instructions was
12:45 11 given to you. I'm asking whether you got an unofficial
12:45 12 instruction to stop providing cash to guests at the front
12:45 13 desk.
12:45 14
12:45 15 A. So my --- the answer is yes, we've been told not to
12:45 16 provide paid outs anymore.
12:45 17
12:45 18 Q. And who told you that?
12:45 19
12:45 20 A. Management.
12:45 21
12:45 22 Q. And when?
12:46 23
12:46 24 A. When. let me see.
12:46 25
12:46 26 Okay, so personally I haven't been informed officially or
12:46 27 been spoken to. Unofficially again is my own judgment
12:46 28 that it is something we don't do anymore.
12:46 29
12:46 30 Q. So you haven't been told to stop giving cash to
12:46 31 patrons at the front desk; is that right? You've
12:46 32 concluded that it is the wrong thing to do, but you
12:46 33 haven't been told not to do it; is that right?
12:46 34
12:46 35 A. Yes.
12:46 36
12:46 37 Q. So when you said "I've been told by management not
12:46 38 to do it", that is not correct?
12:46 39
12:47 40 A. So I have --- let me --- sorry, could you repeat
12:47 41 that question.
12:47 42
12:47 43 Q. When you told us that management told you not to do
12:47 44 it anymore, that was incorrect?
12:47 45
12:48 46 A. Okay, so when I said management told us not to
12:48 47 provide paid out anymore, was again the conclusion that I

12:48 1 drew from the training myself, yes.
12:48 2
12:48 3 COMMISSIONER: What about the other people who worked at
12:48 4 the desk? Did they reach the same conclusion as you or
12:48 5 did you discuss it amongst yourselves? Are you the only
12:48 6 person that doesn't pay cash out and the others do? It
12:48 7 is a bit confusing for me.
12:48 8
12:48 9 A. Yeah, understood. We, as a front office attendant,
12:48 10 Commissioner, we have been told to not to provide paid
12:49 11 out for the guest but the receipt showing we have done in
12:49 12 the past. When we do it, we always get approval from
12:49 13 management. So the official answer is, yes, we been told
12:49 14 not to do this because it is not a standard procedure but
12:49 15 unofficially we have, personally I have done in the past
12:49 16 twice and got approval from management.
12:49 17
12:49 18 COMMISSIONER: To do it?
12:49 19
12:49 20 A. To do it.
12:49 21
12:49 22 MS O'SULLIVAN: How far approximately is the Crown Towers
12:49 23 front desk from the nearest entrance to the casino floor?
12:49 24
12:49 25 A. How far?
12:49 26
12:49 27 Q. Yes.
12:49 28
12:49 29 A. I think it is around 200 metres? Yeah.
12:49 30
12:50 31 Q. Is that an estimate you are making just on the basis
12:50 32 of your knowledge of the layout ---
12:50 33
12:50 34 A. Correct. Yeah, my estimate.
12:50 35
12:50 36 Q. In your training, when you first work at front desk,
12:50 37 is the issue of how close the front desk is to the casino
12:50 38 floor an issue that is something that you are trained
12:50 39 about?
12:50 40
12:50 41 A. No.
12:50 42
12:50 43 Q. On your observation, do the front desk staff at
12:50 44 Crown Towers prepare reports such as threshold
12:51 45 transaction reports or suspicious matter reports?
12:51 46
12:51 47 A. Yes. So management will prepare those reports.

12:51 1 Personally I have never either initiated or spoken to
12:51 2 management about a suspicious report. Not my personal
12:51 3 experience, no. But I do know management can record if
12:51 4 they identified a suspicious behaviour. They can log
12:51 5 a report or write a report.
12:51 6
12:51 7 Q. Yes, okay. That's not quite what I'm asking though.
12:51 8 You told me about what management can do, and I'm asking
12:51 9 about something you have or haven't observed.
12:51 10
12:51 11 A. I haven't observed.
12:51 12
12:51 13 Q. Have you observed anybody at the Crown Towers front
12:52 14 desk prepare a suspicious matter report?
12:52 15
12:52 16 A. No.
12:52 17
12:52 18 Q. Have you ever observed anyone at the Crown Towers
12:52 19 front desk prepare a threshold transaction report?
12:52 20
12:52 21 A. Can I ask what is a threshold report if you have
12:52 22 any ---
12:52 23
12:52 24 Q. Yes, I will assist you there, but I will ask
12:52 25 an earlier question. Am I right to understand that you
12:52 26 don't know what a threshold transaction report is?
12:52 27
12:52 28 A. No.
12:52 29
12:52 30 Q. But you do know what a suspicious matter report is;
12:52 31 is that right?
12:52 32
12:52 33 A. Yes.
12:52 34
12:52 35 Q. Can you tell us what your understanding is of
12:52 36 a suspicious matter report?
12:52 37
12:52 38 A. My understanding is --- is this related to any
12:52 39 behaviour related to transaction ---
12:52 40
12:52 41 Q. Just tell us what you understand a suspicious matter
12:52 42 report is.
12:52 43
12:52 44 A. So if I would talk to management about a suspicious
12:53 45 behaviour if a guest came to front desk to pay his
12:53 46 account with a large amount of cash. So an amount over
12:53 47 \$10,000, then I will be talking to my management to ask,

12:53 1 to inform them the scenario first that was part of the
12:53 2 anti-money laundering, we're not allowed to take
12:53 3 a transaction with cash that is over \$10,000. And that
12:53 4 is deemed suspicious behaviour. And, number one, we
12:53 5 cannot accept that, and number two, we need to report it
12:53 6 to management.
12:53 7
12:53 8 Q. When you say "report to management", who do you
12:53 9 tell?
12:53 10
12:53 11 A. We tell our duty manager.
12:53 12
12:53 13 Q. I see.
12:53 14
12:53 15 A. Yeah.
12:53 16
12:54 17 Q. Has that ever happened to you? Has anyone ever come
12:54 18 to the desk trying to pay with \$10,000 worth of cash or
12:54 19 more?
12:54 20
12:54 21 A. No.
12:54 22
12:54 23 Q. Have you ever observed a customer --- a guest, I
12:54 24 should say, but be served by someone else where they were
12:54 25 looking to pay with more than \$10,000?
12:54 26
12:54 27 A. No. But I have people pay exactly \$10,000 once,
12:54 28 sorry, \$5,000, my apologies, not \$10,000.
12:54 29
12:54 30 Q. So you ever --- again, I'm just asking you about
12:54 31 what you've observed.
12:54 32
12:54 33 A. Yes.
12:54 34
12:54 35 Q. I don't want to know about training or anything
12:54 36 else.
12:54 37
12:54 38 A. Yes.
12:54 39
12:54 40 Q. I'm just asking you about what you have observed,
12:54 41 have you ever observed anyone at the front desk preparing
12:54 42 a threshold transaction report in respect of
12:54 43 a transaction involving \$10,000 of cash or more?
12:55 44
12:55 45 A. I have not observed, no.
12:55 46
12:55 47 Q. Have you ever observed anyone at the front desk

12:55 1 making a report called an international funds transfer
12:55 2 instruction?
12:55 3
12:55 4 A. No.
12:55 5
12:55 6 COMMISSIONER: Can I interrupt. It is seven minutes to
12:55 7 1. There is going to be a drill, which is the reason for
12:55 8 the 11 o'clock start, and they deferred it or changed it
12:55 9 over from this morning to 1 pm, and anybody who wants to
12:55 10 leave the building will have six minutes to do it. I'm
12:55 11 not sure what is going to happen then, but if you have
12:55 12 one question, you can do it and we can all get out of
12:55 13 here. Otherwise the witness will have to come back.
12:55 14
12:55 15 MS O'SULLIVAN: I've only got one more question.
12:55 16
12:55 17 COMMISSIONER: Ask one more question and I will tell
12:55 18 Ms Button she can't ask any!
12:56 19
12:56 20 MS O'SULLIVAN: Just reflecting on all the questions I've
12:56 21 asked you today, have you been asked any similar
12:56 22 questions by Crown or someone on behalf of Crown in the
12:56 23 last three to four months?
12:56 24
12:56 25 MS BUTTON: Can I object to the question. Counsel
12:56 26 Assisting has been asking this witness questions for
12:56 27 nearly an hour. If there is a specific matter she wishes
12:56 28 to put to him, but just to ask a bold up question that
12:56 29 covers everything traversed in the last hour I think is
12:56 30 unfair to the witness.
12:56 31
12:56 32 COMMISSIONER: We'll see what the witness says. He's
12:56 33 doing okay.
12:56 34
12:56 35 MS O'SULLIVAN: If you reflect on all the questions I've
12:56 36 asked you today and think about the general issues that
12:56 37 I've raised in my questioning, what I want to know is,
12:56 38 has anyone from Crown, or anyone on behalf of Crown,
12:56 39 asked you questions similar to the ones I've asked you
12:56 40 today?
12:56 41
12:56 42 A. No.
12:56 43
12:56 44 MS O'SULLIVAN: I have no more questions.
12:56 45
12:56 46 COMMISSIONER: Thank you. You want to take your chances?
12:56 47

12:56 1
12:56 2 **RE-EXAMINATION BY MS BUTTON**
12:56 3
12:56 4
12:56 5 MS BUTTON: I will be quick, Commissioner.
12:56 6
12:56 7 You were asked some questions by Counsel Assisting about
12:56 8 whether you have seen people at the front desk completing
12:56 9 IFTIs or suspicious matter reports; do you recall those
12:56 10 questions?
12:57 11
12:57 12 A. Yes.
12:57 13
12:57 14 Q. Do you sit there and watch everything those above
12:57 15 you, the duty managers and those higher up in the
12:57 16 hierarchy do?
12:57 17
12:57 18 A. No, I have my daily duties to perform. I can't just
12:57 19 watch people do stuff. They will not hire me if I do
12:57 20 that.
12:57 21
12:57 22 MS BUTTON: Thank you.
23
24
25 **THE WITNESS WITHDREW**
26
27
12:57 28 COMMISSIONER: Thank you. I will adjourn until 1.45. I
12:57 29 think whatever the drill is, it is going to only take 15
12:57 30 minutes or half an hour, something like that, so we will
12:57 31 be all right at 1.45.
12:57 32
12:57 33
12:57 34 **ADJOURNED** [12.57PM]
14:05 35
14:05 36
14:05 37 **RESUMED** [2.05PM]
14:05 38
14:05 39
14:05 40 COMMISSIONER: I hope nobody was too inconvenienced.
14:05 41
14:05 42 MS BUTTON: Thank you, Commissioner.
14:05 43
14:05 44 The next witness is Employee 18.
45
46
47 **EMPLOYEE 18, CALLED**

1
2
14:05 3 MS BUTTON: Do you have a sheet of paper in front of you
14:05 4 with "NTA030" at the top?
14:05 5
14:05 6 WITNESS: Yes.
14:05 7
14:05 8 MS BUTTON: Does that record your name as well?
14:05 9
14:05 10 WITNESS: Correct.
14:05 11
14:05 12 MS BUTTON: Does it record your business address?
14:05 13
14:05 14 WITNESS: Correct.
14:05 15
14:05 16 MS BUTTON: Can you confirm that you started your
14:05 17 employment with Crown in [REDACTED]
14:05 18
14:06 19 I'm getting ahead of myself. I think you will now be
14:06 20 sworn in.
14:06 21
14:06 22
14:06 23 **WITNESS AFFIRMED**
14:06 24
14:07 25
14:07 26 MS BUTTON: Commissioner, can I tender the identification
14:07 27 document as a confidential exhibit.
14:07 28
14:07 29 COMMISSIONER: Document NTA030 that identifies the
14:07 30 witness will be Exhibit 247, confidential.
14:07 31
32
33 **EXHIBIT #RCPH0247 - WITNESS IDENTIFICATION**
34 **DOCUMENT NTA030 (CONFIDENTIAL)**
35
36
37 **EXAMINATION-IN-CHIEF BY MS BUTTON**
38
39
14:07 40 MS BUTTON: Thank you, Commissioner.
14:07 41
14:07 42 Now, I was starting with your employment history. You
14:07 43 commenced with Crown in [REDACTED]
14:07 44
14:07 45 A. Correct.
14:07 46
14:07 47 Q. At that time you were a food and beverage attendant;

14:07 1 correct?
14:07 2
14:07 3 A. Correct.
14:07 4
14:07 5 Q. Then you moved in [REDACTED] to become
14:08 6 a receptionist at the Mahogany Room?
14:08 7
14:08 8 A. Correct.
14:08 9
14:08 10 Q. Then in [REDACTED], did you become a service
14:08 11 host in the Teak Room?
14:08 12
14:08 13 A. Yes.
14:08 14
14:08 15 Q. Then, finally, have you become a [REDACTED]
14:08 16 host in [REDACTED]
14:08 17
14:08 18 A. Yes.
14:08 19
14:08 20 Q. Is that the position that you still hold?
14:08 21
14:08 22 A. Yes, correct.
14:08 23
14:08 24 MS BUTTON: Thank you. Now Counsel Assisting will ask
14:08 25 you some questions.
14:08 26
14:08 27
14:08 28 **CROSS-EXAMINATION BY MS O'SULLIVAN**
14:08 29
14:08 30
14:08 31 MS O'SULLIVAN: Thank you. My name is Ms O'Sullivan, I'm
14:08 32 one of the Counsel Assisting the Royal Commission.
14:08 33
14:08 34 I understand that your English is good, you've
14:08 35 an interpreter here, we'll try as best we can to conduct
14:08 36 the interview in English and when you need assistance,
14:08 37 please of course take the opportunity to ask for the
14:08 38 matters to be translated.
14:08 39
14:08 40 A. Thank you.
14:08 41
14:08 42 Q. I didn't get a great note of your employment history
14:08 43 so I want to double-check. Your present role, which is
14:09 44 [REDACTED] host, you have held that since [REDACTED]
14:09 45 [REDACTED] is that right?
14:09 46
14:09 47 A. Correct.

14:09 1
14:09 2 Q. Immediately prior to that you were a service host in
14:09 3 the Teak Room; is that right?
14:09 4
14:09 5 A. Yes.
14:09 6
14:09 7 Q. What was the start date when you became a service
14:09 8 host in the Teak Room?
14:09 9
14:09 10 A. I can't remember the start date, which is [REDACTED]
14:09 11 [REDACTED]
14:09 12
14:09 13 Q. [REDACTED] is that right?
14:09 14
14:09 15 A. Yes.
14:09 16
14:09 17 Q. Thank you. Is one of the languages you speak
14:09 18 Cantonese or Mandarin?
14:09 19
14:09 20 A. I can speak both.
14:09 21
14:09 22 Q. You can speak both?
14:09 23
14:09 24 A. (Nods head).
14:09 25
14:09 26 Q. In your role as a [REDACTED] host, you deal
14:09 27 with guests from mainland China; is that right?
14:09 28
14:10 29 A. Mostly.
14:10 30
14:10 31 Q. When you were a service host in the Teak Room ---
14:10 32 sorry, perhaps you can tell us what was the nature of the
14:10 33 role as a service host?
14:10 34
14:10 35 A. The role's name was "Teak service host".
14:10 36
14:10 37 Q. And can you describe the role?
14:10 38
14:10 39 A. The role was to look after customers in Teak Room.
14:10 40
14:10 41 Q. Can you describe how you would look after the
14:10 42 customers?
14:10 43
14:10 44 A. We provide high-end service to VIP, and also to
14:10 45 conducting cash draw. And also, we are high-end focused,
14:11 46 high roller focused, in also Maple Room and Teak Room.
14:11 47 And we do event hosting in Teak Room and Maple Room as

14:11 1 well.
14:11 2
14:11 3 Q. So would you mostly be dealing with guests who are
14:11 4 also staying at one of the Crown hotels?
14:11 5
14:11 6 A. Not at all.
14:11 7
14:11 8 Q. Not at all?
14:11 9
14:11 10 A. Well, sometimes they --- what I said is sometimes
14:11 11 they might stay at Crown hotel, yes.
14:11 12
14:11 13 Q. So if you were to look ---
14:11 14
14:11 15 A. Just not related, it doesn't matter whether they
14:11 16 stay in the hotel or not, I mean.
14:11 17
14:11 18 Q. I see. When you were in the Teak Room you were
14:11 19 looking after guests, looking after guests of the casino,
14:11 20 and some of them might have been staying at the Crown
14:11 21 hotels and some of them might ---
14:11 22
14:11 23 A. Yes.
14:11 24
14:11 25 Q. --- have been local and some of them might have been
14:12 26 staying elsewhere?
14:12 27
14:12 28 A. Correct.
14:12 29
14:12 30 Q. In respect of your current role, which is [REDACTED]
14:12 31 [REDACTED] host ---
14:12 32
14:12 33 A. Yes.
14:12 34
14:12 35 Q. --- are you --- since the time you started in that
14:12 36 role, in [REDACTED] were you dealing with guests who
14:12 37 were staying at one of Crown hotels or locals or both?
14:12 38
14:12 39 A. I would say both.
14:12 40
14:12 41 Q. All right. I understand that customers who stay in
14:12 42 the hotel and in fact patrons who gamble at the casino,
14:12 43 that they have to obviously have some form of payment so
14:12 44 they can either pay for their accommodation or pay for
14:12 45 their gambling. I presume that in your time at Crown,
14:12 46 you have become familiar with the types of payment that
14:12 47 customers use: cash, bank transfer, credit card; is that

14:12 1 right?
14:12 2
14:12 3 A. Sorry, I don't get it. Like --- can you repeat?
14:13 4 Sorry.
14:13 5
14:13 6 Q. No, that's okay. Perhaps I might ask this: are you
14:13 7 familiar with a bank card called China UnionPay?
14:13 8
14:13 9 A. I've heard that.
14:13 10
14:13 11 Q. You've heard of that card?
14:13 12
14:13 13 A. Yes.
14:13 14
14:13 15 Q. Have you ever had any customers you've looked after
14:13 16 who had a China UnionPay card?
14:13 17
14:13 18 A. When they come into Crown?
14:13 19
14:13 20 Q. Yes.
14:13 21
14:13 22 A. During gamble? Like?
14:13 23
14:13 24 Q. Well, at any time they were at Crown and you were
14:13 25 having dealings with them.
14:13 26
14:13 27 A. Yes.
14:13 28
14:13 29 Q. Have you ever looked after a guest, and by that I
14:13 30 mean someone who was either staying at a hotel or
14:13 31 gambling at Crown, who wanted to go and make a payment at
14:13 32 the Crown Towers hotel front desk, make a payment in
14:13 33 order to be able to have that money put on to their hotel
14:14 34 bill and have the value of the money given to them at the
14:14 35 main cage?
14:14 36
14:14 37 A. I have no idea.
14:14 38
14:14 39 Q. You have no idea. Okay.
14:14 40
14:14 41 Have you ever accompanied, so thinking of all the
14:14 42 customers you have looked after, have you ever
14:14 43 accompanied those customers to the reception desk at
14:14 44 Crown Towers hotel?
14:14 45
14:14 46 A. Like?
14:14 47

14:14 1 Q. Have you walked them? Have you walked with them to
14:14 2 the Crown Towers reception desk?
14:14 3
14:14 4 A. Sometimes, yes.
14:14 5
14:14 6 Q. What was the purpose of accompanying them to the
14:14 7 Crown Towers hotel desk?
14:14 8
14:14 9 A. Oh, they just want to get a room.
14:14 10
14:14 11 Q. Just to obtain a room?
14:14 12
14:14 13 A. Yes.
14:14 14
14:14 15 Q. Okay. Have you accompanied them to the Crown hotel
14:14 16 towers desk for any other reason, other than assisting
14:14 17 them to get a room?
14:14 18
14:15 19 A. They might lose the room card, when they need
14:15 20 translations, or translator to explain what the situation
14:15 21 they are, then we will walk with them.
14:15 22
14:15 23 Q. I see. Have you ever been with a customer, so
14:15 24 accompanied a customer to the Crown Towers front desk and
14:15 25 been with them while they have conducted a transaction
14:15 26 with the front desk staff? Like a payment transaction?
14:15 27
14:15 28 A. I have no idea.
14:15 29
14:15 30 Q. Sorry? So you have on occasion, as I understand it,
14:15 31 accompanied a guest to the front desk of the Crown Towers
14:15 32 hotel so they can obtain a room; is that right?
14:15 33
14:15 34 A. Yes.
14:15 35
14:15 36 Q. Have you ever been with them, accompanied them to
14:15 37 the front desk of the Crown Towers hotel and stayed with
14:15 38 them while they conducted a transaction with the front
14:15 39 desk staff?
14:15 40
14:15 41 A. Usually I --- when we just take them to the
14:16 42 receptions at towers or Crown hotel then we just leave it
14:16 43 to the assistant over there. So we don't usually like
14:16 44 provide any further assistance to what they need.
14:16 45
14:16 46 Q. I see.
14:16 47

14:16 1 A. Yes.
14:16 2
14:16 3 Q. Have you ever been with a customer who has made
14:16 4 a payment at the front desk, at the Crown Towers hotel
14:16 5 who has then obtained paperwork that you've taken back
14:16 6 with that guest to the main cage?
14:16 7
14:16 8 A. No.
14:16 9
14:16 10 MS O'SULLIVAN: I have no further questions.
14:16 11
14:16 12 COMMISSIONER: Thank you. Thank you very much. That's
14:16 13 enough for you.
14:16 14
14:16 15 A. Thank you.
14:17 16
14:17 17
14:17 18 **THE WITNESS WITHDREW**
14:17 19
14:17 20
14:17 21 MS BUTTON: Commissioner, I think we are going to
14:17 22 Employee 15 next. I think Employee 15 had been given
14:18 23 a later time to arrive so we are switching to Employee
14:18 24 10.
14:18 25
14:19 26 COMMISSIONER: Okay.
14:19 27
14:19 28
14:19 29 **EMPLOYEE 10, CALLED**
14:19 30
14:19 31
14:19 32 MS BUTTON: Do you have in front of you a sheet with
14:19 33 "NTA055" at the top?
14:19 34
14:19 35 WITNESS: Yes.
14:19 36
14:20 37 MS BUTTON: Does that record your name and business
14:20 38 address?
14:20 39
14:20 40 WITNESS: Yes.
14:20 41
14:20 42 MS BUTTON: The associate will now administer the oath.
14:20 43
14:20 44
14:20 45 **WITNESS SWORN**
14:20 46
14:20 47

14:20 1 MS BUTTON: I tender the identification record as
14:20 2 a confidential exhibit, Commissioner.
14:20 3
14:20 4 COMMISSIONER: Yes, document NTA055 identifying the
14:20 5 witness will be Exhibit 248 confidential.
14:20 6
14:20 7
14:20 8 **EXHIBIT #RCPH0248 - WITNESS IDENTIFICATION**
14:20 9 **DOCUMENT NTA055 (CONFIDENTIAL)**
14:20 10
14:20 11
14:20 12 **EXAMINATION-IN-CHIEF BY MS BUTTON**
14:20 13
14:20 14
14:20 15 MS BUTTON: You started your employment in [REDACTED] with
14:20 16 Crown?
14:20 17
14:20 18 A. Correct.
14:20 19
14:20 20 Q. You held a number of roles in that time. I don't
14:20 21 propose to take you through each and every one of them
14:21 22 but broadly to step out your path in Crown, you started
14:21 23 in food and beverage in [REDACTED]?
14:21 24
14:21 25 A. Yes.
14:21 26
14:21 27 Q. Then you moved to become a bell attendant at Crown
14:21 28 Towers in [REDACTED]
14:21 29
14:21 30 A. Yes.
14:21 31
14:21 32 Q. Then you became [REDACTED] in [REDACTED] is
14:21 33 that right?
14:21 34
14:21 35 A. I was a concierge first and then a [REDACTED]
14:21 36 yes.
14:21 37
14:21 38 Q. When did you move into the concierge role?
14:21 39
14:21 40 A. I was a bell attendant for approximately a year or
14:21 41 less before I moved to concierge and then I was
14:21 42 a concierge for five years.
14:21 43
14:21 44 Q. Was it in [REDACTED] that you became [REDACTED]?
14:21 45
14:21 46 A. Correct.
14:21 47

14:21 1 Q. You moved to become a front office manager at Crown
14:21 2 Towers in [REDACTED]?

14:21 3

14:21 4 A. Yes.

14:21 5

14:21 6 Q. And became a reservations manager for sales, [REDACTED]

14:21 7 [REDACTED]

14:21 8

14:21 9 A. Correct.

14:21 10

14:21 11 Q. And a front office manager, [REDACTED]

14:21 12

14:21 13 A. Yes.

14:21 14

14:21 15 Q. You are presently the [REDACTED] for

14:22 16 [REDACTED]

14:22 17

14:22 18 A. Yes.

14:22 19

14:22 20 Q. Can you just explain where that role that you hold

14:22 21 now --- let me first ask you something else. You took

14:22 22 that role in [REDACTED]?

14:22 23

14:22 24 A. Correct.

14:22 25

14:22 26 Q. Can you explain who you report to and how your area

14:22 27 of responsibility for Crown Towers relates to the other

14:22 28 hotels that Crown has?

14:22 29

14:22 30 A. So I report to the Executive General Manager of

14:22 31 hotels. My role currently is [REDACTED] is

14:22 32 essentially [REDACTED]

14:22 33 [REDACTED]

14:22 34

14:22 35 Q. Are there people with equivalent roles to you for

14:22 36 the other two hotels at Crown?

14:22 37

14:22 38 A. Yes, there are [REDACTED]

14:22 39 [REDACTED]

14:22 40 [REDACTED]

14:22 41 [REDACTED]

14:22 42 [REDACTED]

14:22 43 Q. As far as Crown Towers is concerned, you are the

14:22 44 [REDACTED]

14:22 45

14:22 46 A. Correct.

14:22 47

14:22 1 MS BUTTON: Thank you. Counsel Assisting will ask you
14:23 2 some questions now.

14:23 3

14:23 4

14:23 5 **CROSS-EXAMINATION BY MS O'SULLIVAN**

14:23 6

14:23 7

14:23 8 MS O'SULLIVAN: Thank you. My name is Ms O'Sullivan, I'm
14:23 9 one of the Counsel Assisting the Royal Commission.

14:23 10

14:23 11 I want to understand more specifically your employment
14:23 12 history for a specific period. Am I right to understand
14:23 13 that if I start at [REDACTED] during that time you were a bell
14:23 14 attendant at Crown Towers and then you moved to concierge
14:23 15 and, within a year, [REDACTED] at Crown Towers?

14:23 16

14:23 17 A. I was a concierge for five years, that was the bulk
14:23 18 of my employment in one role, and then I moved to [REDACTED]
14:23 19 [REDACTED] where I was in that role for 18 months.

14:23 20

14:23 21 Q. The concierge role, was that at Crown Towers?

14:23 22

14:23 23 A. Correct.

14:23 24

14:23 25 Q. [REDACTED] role was also at Crown Towers?

14:23 26

14:23 27 A. Correct.

14:23 28

14:23 29 Q. Then the front office manager role which you started
14:23 30 in [REDACTED]

14:24 31

14:24 32 A. Correct. Yes.

14:24 33

14:24 34 Q. Was that also Crown Towers?

14:24 35

14:24 36 A. Yes.

14:24 37

14:24 38 Q. All right. At that time you were working full-time
14:24 39 or part-time or a combination of both?

14:24 40

14:24 41 A. Full-time.

14:24 42

14:24 43 Q. I presume you were dealing with both international
14:24 44 and local guests; is that right?

14:24 45

14:24 46 A. Correct.

14:24 47

14:24 1 Q. The Commission has heard some evidence about what
14:24 2 some people have called the CUP process, and if that's
14:24 3 not ringing any bells, I will describe it to you. But I
14:24 4 will start by saying, if I use the phrase "CUP process",
14:24 5 do you have any understanding of what that is?

14:24 6
14:24 7 A. Yes.

14:24 8
14:24 9 Q. Can you tell us what you understand that is?

14:24 10
14:24 11 A. The China UnionPay process.

14:24 12
14:24 13 Q. Yes.

14:24 14
14:24 15 A. To be clear, I've never referred to it as "CUP", I
14:24 16 just know the initials for China UnionPay, and that
14:25 17 process was a transaction that took place at the front
14:25 18 desk of Crown Towers, to take an advance of money on
14:25 19 a UnionPay credit card.

14:25 20
14:25 21 Q. On your observation, what was the purpose of the
14:25 22 advance on the China UnionPay card?

14:25 23
14:25 24 A. To be honest, at the time I wasn't aware of what the
14:25 25 end process was, I knew it to be a process that was
14:25 26 requested by relevant gaming staff to be actioned at the
14:25 27 front desk. Beyond where it went --- beyond the hotel I
14:25 28 wasn't aware of what that process was used for.

14:25 29
14:25 30 Q. So how did you come to be aware of the process?

14:25 31
14:25 32 A. When I became [REDACTED] any manager at Crown
14:25 33 Towers essentially covers shifts as a duty manager
14:25 34 function, and the duty managers were responsible for
14:26 35 transacting these charges through a terminal at the front
14:26 36 desk, so it was part of my training when I became [REDACTED]

14:26 37
14:26 38
14:26 39 Q. So you were trained in how to conduct the process on
14:26 40 the China UnionPay cards; is that right?

14:26 41
14:26 42 A. Correct.

14:26 43
14:26 44 Q. Were you someone who did conduct those transactions
14:26 45 from time to time when you were covering other people's
14:26 46 shifts and so on?

14:26 47

- 14:26 1 A. Yes.
- 14:26 2
- 14:26 3 Q. Can you describe to us a typical example of how that
- 14:26 4 process would work?
- 14:26 5
- 14:26 6 A. So an email would come from a level of gaming
- 14:26 7 management, or the host of a gaming patron, I should say,
- 14:26 8 and it came to our duty manager distribution, requesting
- 14:26 9 an amount to be approved for UnionPay processing. That
- 14:26 10 was then approved via email by the level determined, the
- 14:26 11 title level determined to approve that particular value,
- 14:27 12 and once that process had been approved, that email was
- 14:27 13 brought to the front desk by the host with the patron
- 14:27 14 with their patron card, their identification, and that
- 14:27 15 value, and the transaction was processed at a terminal on
- 14:27 16 the front desk, posted in our internal system called
- 14:27 17 OPERA, which is our hotel operating system, and the
- 14:27 18 receipt given to the patron for that transaction.
- 14:27 19
- 14:27 20 Q. To your knowledge, what was the purpose of giving
- 14:27 21 the guest a receipt?
- 14:27 22
- 14:27 23 A. We had processed a sum on their credit card, so it
- 14:27 24 was similar to any transaction we would do for anything
- 14:27 25 else. Once we processed it, we would give the customer
- 14:27 26 or patron a copy of that receipt.
- 14:27 27
- 14:27 28 Q. But insofar as they were paying for something, they
- 14:27 29 weren't paying for accommodation; is that right?
- 14:27 30
- 14:27 31 A. No.
- 14:27 32
- 14:27 33 Q. And they weren't paying for anything otherwise
- 14:28 34 incidental to the hotel stay; is that right?
- 14:28 35
- 14:28 36 A. Correct.
- 14:28 37
- 14:28 38 Q. What were they paying for?
- 14:28 39
- 14:28 40 A. I was not aware what they were specifically paying
- 14:28 41 for, no.
- 14:28 42
- 14:28 43 Q. Did you not wonder?
- 14:28 44
- 14:28 45 A. Not particularly, no. As I said, this process was
- 14:28 46 a part of my training. I knew it had something to do
- 14:28 47 with the casino, but we operate relatively in silos so I

14:28 1 knew it had something to do with the casino but I was not
14:28 2 aware of, nor did I ask to what end we actioned it for.

14:28 3

14:28 4 Q. What was the range of amounts? Confining it to the
14:28 5 ones where you actually conducted the transaction, what
14:28 6 were the range of amounts that were paid on the China
14:28 7 UnionPay cards?

14:28 8

14:28 9 A. I don't recall specifically the ones that I did
14:28 10 necessarily, but I was a part of the email chains of
14:28 11 everyone that we did, and they would range from \$10,000
14:29 12 to \$500,000 from my memory.

14:29 13

14:29 14 Q. So am I right to understand then that you were
14:29 15 essentially cc'd on each of the requests to use this
14:29 16 process; is that right?

14:29 17

14:29 18 A. Correct.

14:29 19

14:29 20 Q. Okay. How frequently would these requests come
14:29 21 through?

14:29 22

14:29 23 A. I don't know specifically. If I were to estimate,
14:29 24 three to five times per week.

14:29 25

14:29 26 Q. From your observation, was it only China UnionPay
14:29 27 cards that were used or were there other types of credit
14:30 28 or bank cards used?

14:30 29

14:30 30 A. The only one I recall is China UnionPay for that
14:30 31 particular transaction.

14:30 32

14:30 33 Q. Is it right the transactions had to be conducted on
14:30 34 a specific EFTPOS machine --

14:30 35

14:30 36 A. Correct.

14:30 37

14:30 38 Q. --- or, call it pinpad at the desk; is that right?

14:30 39

14:30 40 A. Yes.

14:30 41

14:30 42 Q. How was that pinpad identified, do you know, or that
14:30 43 EFTPOS machine, how was it identified?

14:30 44

14:30 45 A. It sat separately. Our --- my understanding is our
14:30 46 credit card terminals at the time didn't accept UnionPay
14:30 47 so we would use that terminal for transactions with any

14:30 1 kind of UnionPay card.
14:30 2
14:30 3 Q. I see.
14:30 4
14:30 5 A. Yes, so outside of just this process.
14:30 6
14:30 7 Q. Did it have any markings on it? How was it
14:30 8 identifiable?
14:30 9
14:30 10 A. It was an NAB terminal, and at the time I believed
14:30 11 we used ANZ for the other terminals.
14:30 12
14:31 13 Q. Can you help me understand how this worked in the
14:31 14 OPERA system because, for example, if someone is coming
14:31 15 and making a payment of say \$500,000 on their China
14:31 16 UnionPay card, and it's not in respect of their
14:31 17 accommodation or otherwise incidental to their hotel
14:31 18 stay, how did that work within the OPERA system?
14:31 19
14:31 20 A. My recollection was --- so there is a payment code
14:31 21 specific to UnionPay ---
14:31 22
14:31 23 Q. What was that?
14:31 24
14:31 25 A. I don't know the code number, I'm afraid. But there
14:31 26 was an individual code for China UnionPay is my memory,
14:31 27 and that would be offset by another charge to which I
14:32 28 don't recall what its description was, but there was
14:32 29 another kind of transaction that we would post it, to
14:32 30 offset it, and it would balance, the account would
14:32 31 balance at the end of the transaction. So if we were
14:32 32 posting \$140,000, it would be posted as \$140,000 credit
14:32 33 card transaction under the UnionPay code and there would
14:32 34 be a \$140,000 transaction --- actually, no. I think we
14:32 35 had to process it in smaller increments through the
14:32 36 credit card terminal. There was a limit to the amount
14:32 37 that credit card terminal could transact in, and so each
14:32 38 payment we would take from the terminal, we would need to
14:32 39 process in OPERA as an individual transaction. Does that
14:32 40 make sense?
14:32 41
14:32 42 Q. Yes, it does. When you say that it had to be in
14:32 43 smaller increments, what was it that caused it to be
14:33 44 necessary to do it in smaller increments?
14:33 45
14:33 46 A. I believe the terminal had a transaction limit was
14:33 47 my understanding.

14:33 1
14:33 2 Q. Is that the NAB terminal?
14:33 3
14:33 4 A. Yes.
14:33 5
14:33 6 Q. Do you remember what those increments were?
14:33 7
14:33 8 A. I think they were \$10,000 increments.
14:33 9
14:33 10 Q. So if someone came and wanted to do a \$500,000
14:33 11 payment, that is going to be time-intensive; is that
14:33 12 right?
14:33 13
14:33 14 A. Correct.
14:33 15
14:33 16 Q. What words would be used in the OPERA system to
14:33 17 describe the payment?
14:33 18
14:33 19 A. The term that it was requested to us was
14:33 20 a pre-approved bank transaction and I believe, from my
14:33 21 memory, that that was the terminology we would write in
14:33 22 OPERA.
14:33 23
14:33 24 Q. Okay. It is obvious in a sense because the way
14:34 25 you've described all of these things were pre-approved,
14:34 26 and they are all in a sense bank transactions. That
14:34 27 description, though, "pre-approved bank transaction",
14:34 28 it's not telling anyone who reads the system much about
14:34 29 what is being paid for; do you agree?
14:34 30
14:34 31 A. Correct.
14:34 32
14:34 33 Q. In fact, that description is it really is obscuring
14:34 34 what the money is being paid for; do you agree?
14:34 35
14:34 36 A. I agree that it is not clear, no, yes, correct.
14:34 37
14:34 38 Q. So I have asked you about the OPERA system and now
14:34 39 I'm asking more about what appears on the guest's hotel
14:34 40 bill. How was it described --- so I guess my first
14:34 41 question would be is, is whatever description it has on
14:34 42 the OPERA system going to be replicated on the bill or
14:34 43 might there be a different description for that
14:35 44 transaction on the bill?
14:35 45
14:35 46 A. The bill is a direct reflection of what is in OPERA.
14:35 47 We can't manipulate it to say otherwise. Whatever we

14:35 1 want in our system is what will print off on their bill.
14:35 2
14:35 3 Q. So as soon as you put in "pre-approved bank
14:35 4 transaction" into the OPERA system, that is what is going
14:35 5 to appear on the bill?
14:35 6
14:35 7 A. Correct.
14:35 8
14:35 9 Q. So my next question is, when you are entering the
14:35 10 nature of the transaction into OPERA, is it like a free
14:35 11 text, or as soon as you choose the transaction code or
14:35 12 payment code which you referred to earlier, does it
14:35 13 automatically pre-populate with this wording
14:35 14 "pre-approved bank transaction"?
14:35 15
14:35 16 A. There is a function that is not able to be changed,
14:35 17 which is the payment code, and it generates a description
14:35 18 of that payment code, and there is a free text area that
14:35 19 you can enter it. I believe that would be where we would
14:35 20 have put "pre-approved bank transaction".
14:35 21
14:35 22 Q. I see.
14:35 23
14:35 24 A. But I don't recall the code we used to offset that
14:36 25 charge. I don't recall what that code was or what it
14:36 26 said.
14:36 27
14:36 28 Q. Okay. Was the purpose of the offset to show that
14:36 29 this was kind of revenue neutral to the hotel; is that
14:36 30 right?
14:36 31
14:36 32 A. I would assume so. I don't have a strong
14:36 33 understanding of the financial settlement to be able to
14:36 34 answer that effectively.
14:36 35
14:36 36 Q. Okay. I understand.
14:36 37
14:36 38 In each of the transactions that you actually conducted,
14:36 39 for a guest using their China UnionPay card for these
14:36 40 amounts, were they always accompanied by a VIP host or
14:36 41 someone of that type of role?
14:36 42
14:36 43 A. They were always accompanied by some version of
14:36 44 a host, yes.
14:36 45
14:37 46 Q. Can you tell me precisely what is the paperwork that
14:37 47 the guest or their accompanying host was given once the

14:37 1 transaction had essentially gone through on EFTPOS
14:37 2 machine?
14:37 3
14:37 4 A. We would have given them a printout of the OPERA
14:37 5 receipt to show that the transaction had been completed.
14:37 6 I believe, from my memory, we would have attached the NAB
14:37 7 receipts to that so that they could see the transactions
14:37 8 that we had processed through NAB. So one would have
14:37 9 been generated from NAB machine and one from OPERA.
14:37 10
14:37 11 Q. The one from the NAB machine is the shiny paper, is
14:37 12 that right?
14:37 13
14:37 14 A. Yes.
14:37 15
14:37 16 Q. Then you staple them together and you give that to
14:37 17 the host?
14:37 18
14:37 19 A. Yes, and would have kept a copy of that for
14:38 20 ourselves.
14:38 21
14:38 22 Q. Then, on your observation, where were the guests and
14:38 23 hosts heading after the transaction had been completed at
14:38 24 the desk?
14:38 25
14:38 26 A. I don't know. They would just leave the desk. I
14:38 27 don't have any knowledge as to where they would have gone
14:38 28 after that.
14:38 29
14:38 30 Q. All right. Do you ever wonder why these
14:38 31 transactions --- sorry, did you ever wonder why these
14:38 32 payments were being made at the hotel desk
14:38 33 notwithstanding they weren't for any service that the
14:38 34 hotel was providing?
14:38 35
14:38 36 A. At the time, no, I did not wonder.
14:38 37
14:38 38 Q. Subsequently, have you wondered?
14:38 39
14:38 40 A. As a result of this inquiry I have wondered, yes.
14:38 41
14:38 42 Q. Have you asked anyone?
14:38 43
14:38 44 A. No.
14:38 45
14:38 46 Q. Have you learnt subsequently what these guests were
14:39 47 paying for?

14:39 1
14:39 2 A. I have since come to learn, correctly or
14:39 3 incorrectly, my understanding is that they were --- it
14:39 4 was a version of credit or something for the purposes of
14:39 5 gaming, I believe is my understanding since. That is not
14:39 6 as a result of information I've learnt from Crown, that
14:39 7 is as a result of information I've learnt from reading
14:39 8 information on the inquiry.
14:39 9
14:39 10 Q. I see, so that is just information you've obtained
14:39 11 in the public domain; is that right?
14:39 12
14:39 13 A. Yeah, correct.
14:39 14
14:39 15 Q. Is that consistent or inconsistent with the things
14:39 16 that you observed when these transactions were being
14:39 17 conducted at the front desk?
14:39 18
14:39 19 A. It is consistent, yes.
14:39 20
14:39 21 Q. It is consistent?
14:39 22
14:39 23 A. Yes.
14:39 24
14:39 25 Q. To your knowledge, are these types of transactions
14:40 26 being conducted currently?
14:40 27
14:40 28 A. They are not being currently.
14:40 29
14:40 30 Q. They are not being conducted currently.
14:40 31
14:40 32 A. No.
14:40 33
14:40 34 Q. I want to ask you another question. I guess the
14:40 35 premise is, lots of things are not being conducted
14:40 36 currently because of COVID. So what I really want to do
14:40 37 is eliminate COVID ---
14:40 38
14:40 39 A. Yes.
14:40 40
14:40 41 Q. --- from the circumstance. As best you can, I want
14:40 42 you to put your head back to the time immediately prior
14:40 43 to COVID hitting Australia and the consequent closure of
14:40 44 the casino and no doubt parts of the hotel, if not the
14:40 45 whole hotel. Were these transactions being conducted
14:40 46 immediately prior to COVID hitting Australia and the
14:40 47 associated restrictions and shutdowns that COVID

14:40 1 entailed?
14:40 2
14:40 3 A. They were not.
14:40 4
14:40 5 Q. Do you have any recollection as to when these types
14:41 6 of transactions stopped being transacted?
14:41 7
14:41 8 A. Yes.
14:41 9
14:41 10 Q. When was that?
14:41 11
14:41 12 A. November 2016.
14:41 13
14:41 14 Q. Why were these transactions stopped then?
14:41 15
14:41 16 A. I don't have any information as to why. I do know
14:41 17 they recently followed the arrests in China.
14:41 18
14:41 19 Q. Did you just observe that the emails stopped coming
14:41 20 in, or was there something else that you observed around
14:41 21 that time that led you to understand that the
14:41 22 transactions were going to be conducted anymore?
14:41 23
14:41 24 A. I was made aware that that was no longer a process
14:41 25 that we were going to facilitate at the hotel.
14:41 26
14:41 27 Q. Who told you that?
14:41 28
14:41 29 A. I don't recall.
14:41 30
14:41 31 Q. When you were told that, was that when you were
14:41 32 front office manager?
14:41 33
14:41 34 A. It would be around the time I started, yes, I
14:41 35 assume. I started somewhere in [REDACTED] I think you have
14:42 36 my history. They are around the same time. I started my
14:42 37 role, I think, in [REDACTED] from memory.
14:42 38
14:42 39 Q. Can I ask: was it just the transactions conducted on
14:42 40 the CUP cards that were going to stop, or was it these
14:42 41 transactions generally on any type of credit or debit or
14:42 42 bank card that were going to be stopped?
14:42 43
14:42 44 A. The process that stopped was the large transactions
14:42 45 through the NAB terminal. We still accept UnionPay as
14:42 46 a payment type for hotel services rendered, but that
14:42 47 large bank transaction process stopped.

14:42 1
14:42 2 Q. Yes. And on your observation --- so it stopped in
14:42 3 respect of the CUP cards. Did it continue with any other
14:42 4 types of cards?
14:42 5
14:42 6 A. No.
14:42 7
14:42 8 Q. Not to your observation?
14:42 9
14:42 10 A. No. Yes, correct.
14:42 11
14:43 12 Q. Is it the case that this process was available to
14:43 13 guests of Crown Promenade and Crown Metropol, provided
14:43 14 that they conducted the transaction at Crown Towers?
14:43 15
14:43 16 A. I don't have a recollection of guests from Promenade
14:43 17 and Metropol attending Crown Towers to conduct this, no.
14:43 18
14:43 19 Q. But would it be right to say that you weren't aware
14:43 20 of anything which said that this is only for guests of
14:43 21 Crown Towers?
14:43 22
14:43 23 A. Correct. I believe --- you're testing my memory,
14:43 24 but I believe guests had to have a hotel reservation. I
14:43 25 don't believe someone could just walk in and not have
14:43 26 a hotel reservation. I recall them to be associated with
14:43 27 guests that were staying in the hotel.
14:43 28
14:43 29 Q. But that could be Metropol or Crown Promenade as
14:44 30 well, was that right?
14:44 31
14:44 32 A. I don't recall any guests from Crown Promenade or
14:44 33 Metropol, no.
14:44 34
14:44 35 Q. Was it equally available to Australian guests as it
14:44 36 was international guests?
14:44 37
14:44 38 A. From my memory they were all international guests.
14:44 39 We don't have a lot of oversight of the types of patrons
14:44 40 that they are, but the hosts that were with them, to my
14:44 41 knowledge, were international hosts, not local hosts.
14:44 42
14:44 43 Q. Okay, but when you were conducting the transactions
14:44 44 you weren't --- someone else might have, but you weren't
14:44 45 checking that they were international patrons; is that
14:44 46 right?
14:44 47

- 14:44 1 A. Correct. They would give a passport. They had to
14:44 2 give a passport. So they always had a passport, and from
14:44 3 my memory it was always an international passport.
14:44 4
- 14:45 5 Q. To your knowledge, someone couldn't just walk in
14:45 6 from outside or via the casino floor and come in and make
14:45 7 use of this process, it had to be someone who was a guest
14:45 8 at one of the hotels?
14:45 9
- 14:45 10 A. Yes. And it specifically had to be a gaming --- the
14:45 11 approval path for these transactions were specifically
14:45 12 gaming representatives. So
- 14:45 13
- 14:45 14 Q. Do you know why the guests weren't going to the cage
14:45 15 to perform that transaction as opposed to doing it at the
14:45 16 hotel front desk?
14:45 17
- 14:45 18 A. I don't know why, no.
14:45 19
- 14:45 20 Q. When you were conducting the transactions, which I
14:45 21 understand you did although on occasion you were at the
14:46 22 front desk covering someone's shift, or when you were
14:46 23 observing it ---
14:46 24
- 14:46 25 A. (Nods head).
14:46 26
- 14:46 27 Q. --- other people do it, sorry, other staff members
14:46 28 performing the transactions, did you ever wonder where
14:46 29 the guests got such large sums of money?
14:46 30
- 14:46 31 A. I never wondered that, no.
14:46 32
- 14:46 33 Q. Was it any part of the process to ask the guest
14:46 34 about where the money had come from?
14:46 35
- 14:46 36 A. Not as a hotel function, no. We did not have any
14:46 37 interaction with the person other than retrieving their
14:46 38 passport.
14:46 39
- 14:46 40 Q. On any occasion that you processed one of these
14:46 41 transactions of the type we have been discussing, did you
14:46 42 have any concerns about whether the money wholly or
14:46 43 partly was the proceeds of crime?
14:46 44
- 14:46 45 A. No, I did not have any concerns.
14:46 46
- 14:46 47 Q. Did you have any concerns about whether the process

14:47 1 might facilitate any money laundering?
14:47 2
14:47 3 A. I did not have any concerns about that, no.
14:47 4
14:47 5 Q. You might not have thought about it at the time, but
14:47 6 I will ask you to think about it now. Do you think it
14:47 7 would be the case that for the guests involved, the
14:47 8 guests who were making these payments pursuant to the
14:47 9 process we've been describing, that on their credit card
14:47 10 bill, or on the bill that they get, it would be described
14:47 11 as a payment to Crown Towers hotel; is that what you
14:47 12 assumed would have been the case?
14:47 13
14:47 14 A. Yes.
14:47 15
14:47 16 Q. Do you agree with me that the reader of that bill
14:47 17 would assume it is a payment made to the hotel for
14:47 18 a service that the hotel had provided to the customer?
14:47 19
14:47 20 A. In the absence of the receipt, which dictated
14:48 21 otherwise, potentially, yes.
14:48 22
14:48 23 Q. How did it dictate otherwise?
14:48 24
14:48 25 A. Well, the receipt had no hotel services rendered on
14:48 26 the receipt, so it had a transaction for a pre-approved
14:48 27 bank transaction. So it had no accommodation association
14:48 28 or incidental association.
14:48 29
14:48 30 Q. I see. So this is the receipt they are given
14:48 31 immediately after ---
14:48 32
14:48 33 A. Yes.
14:48 34
14:48 35 Q. My question is slightly different. I'm really
14:48 36 looking at it from the perspective of someone who is
14:48 37 looking at the guest's credit card bill ---
14:48 38
14:48 39 A. Yes.
14:48 40
14:48 41 Q. --- and they see large payments to Crown Towers
14:48 42 Melbourne. Do you agree with me that their natural
14:48 43 assumption is the payment is made for services that the
14:48 44 hotel has provided?
14:48 45
14:48 46 A. Yes.
14:48 47

14:48 1 Q. And, in fact, the hotel wasn't providing any
14:49 2 service, or certainly no services to the value of that
14:49 3 amount of money to the guests and, therefore, it was, in
14:49 4 a sense --- certainly what would have been on their
14:49 5 corresponding bill would have been misleading; do you
14:49 6 agree?

14:49 7
14:49 8 A. Yes.
14:49 9

14:49 10 Q. So, from the perspective of the credit provider,
14:49 11 which is China UnionPay, you agree with me that in
14:49 12 a sense they were being misled as to the nature of the
14:49 13 transaction?

14:49 14
14:49 15 A. Yes.
14:49 16

14:49 17 Q. Do you agree that, for example, if any particular
14:49 18 law enforcement agency might be looking at the
14:49 19 transaction and looking at a particular guest's China
14:50 20 UnionPay credit card bill, they would also be misled as
14:50 21 to the nature of the transaction?

14:50 22
14:50 23 A. Yes.
14:50 24

14:50 25 Q. Did you have any awareness at the time that these
14:50 26 transactions were being conducted that there were limits
14:50 27 on the amount of money that Chinese nationals could take
14:50 28 out of China?

14:50 29
14:50 30 A. I was not aware, no.
14:50 31

14:50 32 Q. I want to ask a few more questions about the
14:50 33 practice of the front reception desk at Crown Towers.

14:50 34
14:50 35 A. Yes.
14:50 36

14:50 37 Q. I understand that all staff, and tell me if I'm
14:51 38 wrong --- is it the case that all Crown staff get some
14:51 39 training on what is called AML, anti-money laundering?

14:51 40
14:51 41 A. Correct, yes.
14:51 42

14:51 43 Q. The next question is about reporting. And I might
14:51 44 start by asking you this, and it's not a test, but are
14:51 45 you familiar with what a TTR is?

14:51 46
14:51 47 A. No.

14:51 1
14:51 2 Q. Are you familiar with what an SMR is?
14:51 3
14:51 4 A. No.
14:51 5
14:51 6 Q. Again, not a test, are you familiar with what
14:51 7 an IFTI is? It is sometimes called an "IF-TI"; are you
14:51 8 familiar with what an IFTI is?
14:51 9
14:51 10 A. No.
14:51 11
14:51 12 Q. I will help you out, I'm not going to keep you in
14:51 13 the dark. A TTR is a threshold transaction report
14:51 14 which --- it can be complicated --- but reporting
14:51 15 entities who are providing designated services report
14:52 16 transactions involving cash of \$10,000 or more.
14:52 17
14:52 18 A. (Nods head).
14:52 19
14:52 20 Q. Just for your background, a suspicious matter report
14:52 21 is a report that a reporting entity might provide to
14:52 22 AUSTRAC in respect of a suspicion that is formed about
14:52 23 a particular transaction. And international funds
14:52 24 transfer instruction is reporting about international
14:52 25 transfer funds instructions.
14:52 26
14:52 27 Is it your understanding that the front desk at Crown
14:52 28 Towers hotel, is it any part of their role or practice
14:52 29 that they make such reports when circumstances require?
14:52 30
14:52 31 A. They do not make those reports, no.
14:52 32
14:52 33 Q. You've never made one of those reports yourself?
14:52 34
14:52 35 A. No.
14:52 36
14:52 37 Q. And you've never observed anyone else or colleagues
14:52 38 making such reports?
14:52 39
14:52 40 A. We have a process to direct to the cage any
14:53 41 transactions over \$9,000, so those transactions --- those
14:53 42 reports would then be completed by the cage employees.
14:53 43
14:53 44 Q. I see. I'm just going to take advantage of your
14:53 45 extensive time at Crown. I will ask you a couple of
14:53 46 questions about COVID-19 and how it affected the hotel.
14:53 47

14:53 1 Did the hotel close either totally or partially in
14:53 2 response to the outbreak of COVID-19 in Australia?
14:53 3
14:53 4 A. Crown Towers hotel did not close. Crown Metropol
14:53 5 and Crown Promenade did close.
14:53 6
14:53 7 Q. So Promenade and Metropol did close and Crown Towers
14:53 8 stayed open?
14:53 9
14:53 10 A. Yes.
14:53 11
14:53 12 Q. On a reduced staffing and reduced occupancy basis, I
14:53 13 imagine; is that right?
14:53 14
14:53 15 A. Yes, we had very limited staffing and there were
14:53 16 very few guests at the hotel during that time.
14:54 17
14:54 18 Q. I want to ask you some questions about a couple of
14:54 19 sample invoices that have been provided to the
14:54 20 Commission.
14:54 21
14:54 22 Operator, can we go to CRW.512.168.0004. This will come
14:54 23 up on your screen. This is a three-page invoice. Tell
14:54 24 me if you can't read it when it is full page and we can
14:54 25 get it enlarged for you.
14:54 26
14:54 27 Operator, can we go to the second page.
14:54 28
14:54 29 You can see there at the bottom if you look at the date,
14:55 30 30 May 2019, paid out there with asterisk for \$5,000 and
14:55 31 an entry for visa for \$5,000.
14:55 32
14:55 33 A. Yes.
14:55 34
14:55 35 Q. What is that about, do you know?
14:55 36
14:55 37 A. That appears to be a paid out of cash to the value
14:55 38 of \$5,000 which was then settled by credit card.
14:55 39
14:55 40 Q. So what is a "paid out"?
14:55 41
14:55 42 A. Paid out is a transaction of cash which is given out
14:55 43 to a guest, essentially.
14:55 44
14:55 45 Q. So it's acting as a bit of an ATM for a guest is
14:55 46 that right?
14:55 47

- 14:55 1 A. In some versions, yes. It can also be if a guest
14:55 2 paid a cash deposit for their bond or accommodation and
14:55 3 they were owed money --- we take a deposit for
14:55 4 incidentals, and if they did not use that deposit it
14:55 5 would be returned to them in cash. As well as that is
14:55 6 the other scenario we would use it. This particular
14:55 7 transaction appears to be a paid out of cash solely as
14:56 8 cash.
14:56 9
- 14:56 10 Q. Is it the case that "paid out" can be an umbrella
14:56 11 term ---
14:56 12
- 14:56 13 A. (Nods head).
14:56 14
- 14:56 15 Q. --- and there are different categories of what might
14:56 16 be a paid out; is that right?
14:56 17
- 14:56 18 A. Correct.
14:56 19
- 14:56 20 Q. One of them is a bond refund?
14:56 21
- 14:56 22 A. Correct.
14:56 23
- 14:56 24 Q. One of them might be a refund if someone stays fewer
14:56 25 days in their hotel stay than they had originally booked
14:56 26 for?
14:56 27
- 14:56 28 A. Correct.
14:56 29
- 14:56 30 Q. A third category is just provision of cash?
14:56 31
- 14:56 32 A. Correct.
14:56 33
- 14:56 34 Q. Are there any other categories of paid out?
14:56 35
- 14:56 36 A. The concierge team would also do a paid out if they
14:56 37 were going to purchase an item on behalf of a guest, and
14:56 38 that would appear on the guest bill as a transaction from
14:56 39 concierge, but elsewhere there would be a paid out
14:56 40 conducted for the purpose of them getting cash ---
14:56 41 retrieve cash to go and make that purchase on behalf of
14:56 42 the guest.
14:56 43
- 14:56 44 Q. What, if any, relationship is there between these
14:56 45 types of paid out and the practice we've described,
14:57 46 before whereas Crown was accepting payment on the CUP
14:57 47 cards for patrons who were then given receipts to ---

14:57 1
14:57 2 A. Sorry, could you repeat that?
14:57 3
14:57 4 Q. Yes. What is the relationship between these types
14:57 5 of paid outs --- well, this type of paid out and the type
14:57 6 you've described us and the process we were talking about
14:57 7 a few moments ago which was the CUP process?
14:57 8
14:57 9 A. From a hotel perspective, we never dealt in cash for
14:57 10 those transactions for CUP, we only dealt in the credit
14:57 11 transaction and the posting in OPERA. We never had any
14:57 12 cash component to that at all, nor at the time any
14:57 13 knowledge that that was the process, that they were
14:57 14 receiving cash for those transactions. This process is
14:57 15 solely within the hotel space, that is a cash
14:57 16 transaction.
14:57 17
14:57 18 Q. Thank you.
14:57 19
14:57 20 Can we move to CRW.512.168.0031. This is another sample
14:58 21 invoice that we were provided with. Can we turn to the
14:58 22 third page of this document. Can I draw your attention
14:58 23 to --- there are entries for 1 August 2019. One of them
14:58 24 said "Paid out forex processed at main cage". Is it the
14:58 25 case that "forex" refers to foreign exchange?
14:58 26
14:58 27 A. Correct.
14:58 28
14:58 29 Q. And it has here "processed at main cage".
14:58 30
14:58 31 A. Yes.
14:58 32
14:58 33 Q. What is your understanding of this particular type
14:58 34 of transaction?
14:58 35
14:58 36 A. So the front desk can take exchanges of foreign
14:58 37 exchange up to the value of \$500. Anything over that
14:58 38 would be processed at the main cage to transfer foreign
14:59 39 exchange in Australian dollars.
14:59 40
14:59 41 Q. I will confess I don't understand.
14:59 42
14:59 43 A. That's okay.
14:59 44
14:59 45 Q. Does this entry here on this invoice suggest that
14:59 46 this particular hotel guest was given AU\$3,250?
14:59 47

14:59 1 A. Yes. Based on the description it would indicate
14:59 2 that that person had --- my understanding of this would
14:59 3 be that that person had made a foreign exchange for that
14:59 4 amount. So whether we sourced --- potentially sourced
14:59 5 foreign exchange from the main cage for this person, I
14:59 6 would expect, because otherwise it wouldn't be a paid
14:59 7 out. So it wouldn't be this kind of transaction. So it
14:59 8 looks unusual to me to be honest because a paid out would
15:00 9 indicate that cash is being given to the guest but the
15:00 10 description would ascertain that that cash would have
15:00 11 been foreign exchange cash. It would have been
15:00 12 an alternate currency.

15:00 13
15:00 14 Q. So you think that a different currency but to the
15:00 15 value of \$3,250 was provided to this customer?

15:00 16
15:00 17 A. Yes.

15:00 18
15:00 19 Q. But the hotel front desk doesn't have physical
15:00 20 currency or physical notes in all currencies, is that
15:00 21 right?

15:00 22
15:00 23 A. Correct.

15:00 24
15:00 25 Q. But the main cage does?

15:00 26
15:00 27 A. I believe so, yes.

15:00 28
15:00 29 Q. Can I go to CRW.512.168.0040. The first thing I
15:00 30 want to draw your attention to on this one is that this
15:00 31 is an invoice which has both an arrival and a departure
15:00 32 date, which are the same day.

15:00 33
15:01 34 A. Yes.

15:01 35
15:01 36 Q. Does that mean that this was a day stay?

15:01 37
15:01 38 A. No. This is not for a room stay. So if you refer
15:01 39 to the top right corner where it says "Room No.", that is
15:01 40 called a PM account number. It essentially mirrors
15:01 41 a room number --- how do I explain this. So a PM account
15:01 42 is essentially not a room account but is a way of
15:01 43 transacting without having to stay in accommodation. So
15:01 44 if someone weren't staying in the hotel at the time, we
15:01 45 could check this in for the purposes of making
15:01 46 a transaction and settling it through OPERA but it is not
15:01 47 associated with a room that is in-house.

15:01 1
15:01 2 Q. So does Room 9010 just not exist?
15:01 3
15:01 4 A. No, anything that starts with a 9 does not exist.
15:01 5
15:02 6 Q. So this invoice was created in order to give this
15:02 7 guest cash, \$5,000 worth of cash; is that right?
15:02 8
15:02 9 A. Yes.
15:02 10
15:02 11 Q. So this invoice is reflective of the hotel just
15:02 12 operating as a, I guess, you might say merchant, or even
15:02 13 bank?
15:02 14
15:02 15 A. That assumption could be made, yes.
15:02 16
15:02 17 Q. If we look at the customer here, his credit card
15:02 18 bill is going to show that he made a payment of
15:03 19 \$5,000 --- in fact \$5,075 to Crown Towers hotel; that's
15:03 20 what it will show, correct?
15:03 21
15:03 22 A. Yes.
15:03 23
15:03 24 Q. In fact he didn't make any such payment, he just got
15:03 25 cash out?
15:03 26
15:03 27 A. Yes.
15:03 28
15:03 29 Q. Can we turn to this document, CRW.512.168.0042.
15:03 30 This is another invoice where the arrival and departure
15:03 31 date are the same. It says room 9009. I presume that is
15:03 32 a room that doesn't exist; is that right?
15:03 33
15:03 34 A. Correct.
15:03 35
15:03 36 Q. That's one of the codes that is put in when
15:03 37 a transaction is being conducted with somebody who is not
15:03 38 a hotel guest; is that right?
15:03 39
15:03 40 A. Yes.
15:03 41
15:04 42 Q. This one is a little perplexing to me because there
15:04 43 is a customer name, but it appears as though there is
15:04 44 a paid out to someone who is not a previous customer.
15:04 45 Are you able to help me make sense of this invoice?
15:04 46
15:04 47 A. So this --- that person's name in the invoice, can I

15:04 1 say that out loud, that person's name that is there?
15:04 2
15:04 3 Q. Why don't we say there is Mr [REDACTED] and then there is
15:04 4 person [REDACTED]. Let's do it that way.
15:04 5
15:04 6 A. So Mr [REDACTED] purchased an electronic --- what I would
15:04 7 assume is a laptop or iPad of some description for [REDACTED],
15:04 8 and then in order to pay for that, we facilitated giving
15:04 9 cash out and charging it to [REDACTED] credit card and giving
15:04 10 that to [REDACTED].
15:04 11
15:05 12 Q. Again, I don't understand. I presume the hotel
15:05 13 doesn't sell iPads?
15:05 14
15:05 15 A. No.
15:05 16
15:05 17 Q. And the hotel doesn't sell electronics?
15:05 18
15:05 19 A. To give you some context, [REDACTED] is the hotel's biggest
15:05 20 single VIP. He's very, very regular at our hotel.
15:05 21
15:05 22 Q. Right.
15:05 23
15:05 24 A. And so I would assume on this occasion he had
15:05 25 purchased something for somebody else and that person
15:05 26 wanted to pay by credit card for it, and so we
15:05 27 facilitated that charge. So this transaction has nothing
15:05 28 to do with the hotel other than the fact that we have
15:05 29 taken cash to give to [REDACTED] and charged it to the other
15:05 30 person.
15:05 31
15:05 32 Q. Mr [REDACTED]?
15:05 33
15:05 34 A. (Nods head).
15:05 35
15:06 36 Q. Where it says "American Express" and then there is
15:06 37 the credit, am I to read this as Mr [REDACTED] made that payment?
15:06 38
15:06 39 A. Yes, correct.
15:06 40
15:06 41 Q. How is this type of transaction --- you might not
15:06 42 know, but how is this type of transaction kind of
15:06 43 accounted for in the books and accounts of Crown Towers?
15:06 44
15:06 45 A. To be honest, I don't know. I don't know.
15:06 46
15:06 47 COMMISSIONER: I wouldn't mind asking a similar question

15:06 1 ---
15:06 2
15:06 3 A. Of course.
15:06 4
15:06 5 COMMISSIONER: --- same question, but one that doesn't
15:06 6 involve at least potentially the transaction of goods.
15:07 7 But if I go back to the CU transactions, I take it that
15:07 8 because it goes through the computer system, the amount
15:07 9 of money which comes in through the credit card is
15:07 10 treated as revenue of the hotel?
15:07 11
15:07 12 A. Not necessarily. There are posting --- my
15:07 13 understanding, and again I don't have a financial
15:07 14 background for our areas, but there are posting codes
15:07 15 which do not associate with hotel revenue. A paid out is
15:07 16 one of them, because there is no revenue component, it is
15:07 17 in cash, whereas if that transaction was a hotel
15:07 18 accommodation, or a concierge flowers, that would
15:07 19 associate with revenue for the hotel. The credit --- my
15:07 20 understanding, the credit part of it is consolidated to
15:07 21 make sure it balances that --- for everything we've taken
15:08 22 a transaction for, it balances.
15:08 23
15:08 24 COMMISSIONER: I understand the balancing point.
15:08 25
15:08 26 A. Yes.
15:08 27
15:08 28 COMMISSIONER: I'm trying to work out how the balancing
15:08 29 is achieved in the books of the hotel. One way to do it
15:08 30 is have the amount of money that is coming in through the
15:08 31 credit card received as revenue, and then expensed in
15:08 32 some way.
15:08 33
15:08 34 A. Yes.
15:08 35
15:08 36 COMMISSIONER: I'm trying to work out how the books work.
15:08 37 I'm particularly interested in how it is expensed because
15:08 38 if it comes in as revenue, I get that \$100,000 comes in,
15:08 39 then you have to --- and it might look like it is revenue
15:08 40 to the hotel, but it's not, I'm trying to work out how
15:08 41 you expense it. In other words, what do the books show?
15:08 42 Or how do the books describe the expense so that it can
15:08 43 be offset against the revenue or the income?
15:08 44
15:08 45 A. I have no knowledge of that, I'm afraid.
15:09 46
15:09 47 COMMISSIONER: I thought in your role you must be on top

15:09 1 of the recordkeeping of the hotel; you are in charge of
15:09 2 the hotel.
15:09 3
15:09 4 A. The financial record --- we have a hotel finance
15:09 5 team who manage the reconciliation of these transactions.
15:09 6 It's not part of my role.
15:09 7
15:09 8 COMMISSIONER: So you don't know whether the incoming
15:09 9 money is treated as revenue or whether it bypasses the
15:09 10 hotel books completely?
15:09 11
15:09 12 A. I have no knowledge of that, I'm afraid.
15:09 13
15:09 14 COMMISSIONER: Okay, thanks.
15:09 15
15:09 16 MS O'SULLIVAN: Operator, can we please call up this
15:09 17 document, CRW.900.003.1952, page 1953, which is the
15:09 18 second page. Thank you. You can see there that there is
15:09 19 a picture of I guess we'll call it an EFTPOS machine. Is
15:09 20 what that photo depicts familiar to you?
15:10 21
15:10 22 A. To be honest, no. No, not specifically.
15:10 23
15:10 24 COMMISSIONER: When you say "not specifically", can I ask
15:10 25 you what you mean by that?
15:10 26
15:10 27 A. It would indicate to me the terminal that was used
15:10 28 for those China UnionPay transactions but I recall it to
15:10 29 look different to that so I don't know where that machine
15:10 30 is from.
15:10 31
15:10 32 MS O'SULLIVAN: The one you do recall, was it similarly
15:10 33 labelled "M/CAGE ONLY"?
15:10 34
15:10 35 A. I don't recall that, no. I recall it as a NAB
15:10 36 device.
15:10 37
15:11 38 Q. When was the last time you were working at the hotel
15:11 39 and had the opportunity to observe what was located at
15:11 40 the front desk of the Crown Towers hotel?
15:11 41
15:11 42 A. Yesterday.
15:11 43
15:11 44 Q. Is there any terminal that looks like this on the
15:11 45 desk at the moment?
15:11 46
15:11 47 A. No.

15:11 1
15:11 2 MS O'SULLIVAN: I have no further questions.
15:11 3
15:11 4 COMMISSIONER: Thanks, Ms O'Sullivan.
15:11 5
15:11 6
15:11 7 **RE-EXAMINATION BY MS BUTTON**
15:11 8
15:11 9
15:11 10 MS BUTTON: Sticking with the terminal, I think you gave
15:11 11 evidence you didn't recognise a NAB terminal with
15:11 12 a sticker like that on it?
15:11 13
15:11 14 A. Yes.
15:11 15
15:11 16 Q. It's the case, is it not, that the China UnionPay
15:11 17 payments you were familiar with were made on a NAB
15:11 18 terminal?
15:11 19
15:11 20 A. Yes.
15:11 21
15:11 22 Q. Are you able to say when that terminal, the NAB
15:11 23 terminal was removed from the Crown Towers front desk?
15:11 24
15:11 25 A. Maybe three years ago? Approximately.
15:11 26
15:12 27 Q. So that takes us to 2018. Is that the rough period
15:12 28 that you are thinking of?
15:12 29
15:12 30 A. Yeah. I can't specifically recall, to be honest. I
15:12 31 know it was associated with an upgrade that we did on our
15:12 32 terminals where UnionPay was then accepted on the main
15:12 33 hotel terminals, and thus the additional terminal was
15:12 34 removed.
15:12 35
15:12 36 Q. You've explained earlier that the process whereby
15:12 37 charges were put on a customer's China UnionPay and they
15:12 38 came with the host and they got the receipt that they
15:12 39 took off for some purpose connected with gaming for. You
15:12 40 gave evidence that process stopped in 2016. You recall
15:12 41 that?
15:12 42
15:12 43 A. Yes.
15:12 44
15:12 45 Q. What, if anything, was this NAB terminal used for
15:12 46 between then and the point at which it was removed?
15:12 47

- 15:12 1 A. For processing UnionPay transactions for the purpose
15:12 2 of hotel services for ---
15:12 3
- 15:12 4 Q. Actual hotel ---
15:12 5
- 15:13 6 A. Actual hotel services. Accommodation, incidentals,
15:13 7 food and beverage.
15:13 8
- 15:13 9 Q. Can I ask you a few questions to clarify what we've
15:13 10 been talking about in relation to paid outs, and you've
15:13 11 been taken to some invoices with various paid outs. Does
15:13 12 Crown Towers facilitate paid outs of cash to customers
15:13 13 now?
15:13 14
- 15:13 15 A. No.
15:13 16
- 15:13 17 Q. In the past, was it any customer who could get
15:13 18 a payout for cash or only a subset of customers?
15:13 19
- 15:13 20 A. Only a subset of customers.
15:13 21
- 15:13 22 Q. Did somebody have to approve the making of the
15:13 23 payment out for the particular customer?
15:13 24
- 15:13 25 A. There was an approval of the people that could
15:13 26 receive these paid outs in general, but each transaction
15:13 27 themselves was not necessarily approved by someone unless
15:13 28 it went over \$1,000.
15:13 29
- 15:13 30 Q. What was the defining characteristic of the group
15:13 31 who could, in the past, receive these paid outs versus
15:14 32 the rest who couldn't?
15:14 33
- 15:14 34 A. Hotel VIPs.
15:14 35
- 15:14 36 Q. When you say a "hotel VIP ", is that the same group
15:14 37 as the casino would have, or do you have your own VIPs?
15:14 38
- 15:14 39 A. We have our own VIPs. They are often not associated
15:14 40 with the casino.
15:14 41
- 15:14 42 Q. CRW.512.168.0004. This is one of the invoices you
15:14 43 were taken to. Was this customer one of your hotel VIPs?
15:14 44
- 15:14 45 A. Correct.
15:14 46
- 15:14 47 Q. To your knowledge, was he also associated with the

15:14 1 gaming operations of Crown?

15:14 2

15:14 3 A. He does not gamble.

15:14 4

15:14 5 Q. So this customer does not gamble, to your knowledge?

15:14 6

15:14 7 A. He does not, correct.

15:14 8

15:14 9 Q. Are you able to say, I don't know if you caught the
15:14 10 names of the other customers whose invoices you were
15:14 11 shown, but do you know whether any of them were gaming
15:14 12 customers to your knowledge as well?

15:14 13

15:14 14 A. To my knowledge, they are not gaming customers, no.

15:14 15

15:15 16 MS BUTTON: Thank you.

15:15 17

15:15 18

15:15 19 **FURTHER CROSS-EXAMINATION BY MS O'SULLIVAN**

15:15 20

15:15 21

15:15 22 MS O'SULLIVAN: How do you know they are not gaming
15:15 23 customers?

15:15 24

15:15 25 A. This person onscreen, I've known him my whole time
15:15 26 that I've been at Crown. I just know him not to gamble.
15:15 27 He never has. He doesn't like it.

15:15 28

15:15 29 Q. So you have never observed him gamble?

15:15 30

15:15 31 A. I wouldn't observe anybody gamble, I don't spend any
15:15 32 time on the gambling floor, but as I said, I know this
15:15 33 person well and I know that he does not like gambling.

15:15 34

15:15 35 MS O'SULLIVAN: Thank you.

15:15 36

15:15 37 COMMISSIONER: Thank you very much. You are free to go
15:15 38 now.

15:15 39

15:15 40 A. Thank you.

15:15 41

15:15 42

15:15 43 **THE WITNESS WITHDREW**

15:16 44

15:16 45

15:16 46 **EMPLOYEE 15, CALLED**

15:16 47

15:16 1
15:16 2 MS BUTTON: Do you have in front of you a piece of paper
15:16 3 with "NTA060" at the top?
15:16 4
15:16 5 WITNESS: Yes.
15:16 6
15:17 7 MS BUTTON: Can you confirm that that records your name?
15:17 8
15:17 9 WITNESS: Yes, it does.
15:17 10
15:17 11 MS BUTTON: Does it also record your business address?
15:17 12
15:17 13 WITNESS: Yes.
15:17 14
15:17 15 MS BUTTON: The associate will now give the affirmation
15:17 16 to you.
15:17 17
15:17 18
15:17 19 **WITNESS AFFIRMED**
15:17 20
15:17 21
15:17 22 COMMISSIONER: Document identifying witness NTA060 will
15:17 23 be Exhibit 249, confidential.
24
25
26 **EXHIBIT #RCPH0249 - WITNESS IDENTIFICATION**
27 **DOCUMENT NTA060 (CONFIDENTIAL)**
28
29
30 **EXAMINATION-IN-CHIEF BY MS BUTTON**
31
32
15:17 33 MS BUTTON: Thank you, Commissioner.
15:17 34
15:17 35 You commenced your employment in [REDACTED] with Crown;
15:17 36 is that right?
15:17 37
15:17 38 A. That is correct.
15:17 39
15:17 40 Q. Your first role was as a dealer?
15:17 41
15:17 42 A. Yes.
15:17 43
15:17 44 Q. You held that role for 2.5 years?
15:17 45
15:17 46 A. Correct.
15:17 47

- 15:17 1 Q. Then you moved to a role as a host, platinum, for
15:18 2 gaming machines local patrons, is that right?
15:18 3
- 15:18 4 A. That is correct.
15:18 5
- 15:18 6 Q. How long did you have the role for?
15:18 7
- 15:18 8 A. Approximately 2.5, just under 3 years.
15:18 9
- 15:18 10 Q. So the current role you have is as a [REDACTED]
15:18 11 host, table games, in the Maple, Teak and Monte Carlo
15:18 12 rooms; is that right?
15:18 13
- 15:18 14 A. Based in there, yes.
15:18 15
- 15:18 16 Q. When did you assume that position?
15:18 17
- 15:18 18 A. I believe it was approximately [REDACTED] to the best of
15:18 19 my knowledge.
15:18 20
- 15:18 21 Q. You've been stood down in that role for some periods
15:18 22 during COVID; is that right?
15:18 23
- 15:18 24 A. Correct.
15:18 25
- 15:18 26 Q. You were stood up, if that's the expression, earlier
15:18 27 this year; is that right?
15:18 28
- 15:18 29 A. Yes.
15:18 30
- 15:18 31 Q. What duties have you been performing since you
15:18 32 returned to work earlier this year?
15:18 33
- 15:18 34 A. Since I returned, off the top of my head I came back
15:19 35 as crowd control at one point, and then I did call centre
15:19 36 where we were calling to conduct surveys if our customers
15:19 37 were happy with the restriction in place and if they felt
15:19 38 comfortable coming back. I also did a click kind of
15:19 39 a head counting job at the entry of Crown to monitor head
15:19 40 counts during the COVID period. Then we moved on to
15:19 41 assisting with QR check-ins to help patrons smoothly gain
15:19 42 entry by registering for their visit. And then I went on
15:19 43 personal leave and I believe my colleagues also assumed
15:19 44 some other roles.
15:19 45
- 15:19 46 MS BUTTON: Thank you. Counsel Assisting will ask you
15:19 47 some questions now.

15:20 1

15:20 2

15:20 3 **CROSS-EXAMINATION BY MS O'SULLIVAN**

15:20 4

15:20 5

15:20 6 MS O'SULLIVAN: Thank you, my name is Ms O'Sullivan and

15:20 7 I'm one of the Counsel Assisting the Royal Commission.

15:20 8

15:20 9 I took a note of the potted history of your time at

15:20 10 Crown, and I see that you have been both a [REDACTED]

15:20 11 [REDACTED] host and also a [REDACTED] host; is that right?

15:20 12

15:20 13 A. That's correct.

15:20 14

15:20 15 Q. Can I ask, in your various hosting roles have you

15:20 16 bought with both local and international clients?

15:20 17

15:20 18 A. I have never dealt with international clients

15:20 19 directly. Always local.

15:20 20

15:20 21 Q. Since you started to work in Crown in [REDACTED]

15:20 22 have you worked full-time, part-time or a bit of both?

15:20 23

15:20 24 A. I was a part-time worker when I was a dealer, and

15:20 25 when I assumed hosting roles, that was when I moved to

15:21 26 full-time.

15:21 27

15:21 28 Q. You moved to your first hosting role in about, if I

15:21 29 quickly do my maths, [REDACTED] is that right?

15:21 30

15:21 31 A. To the best of my knowledge, approximately then,

15:21 32 yes.

15:21 33

15:21 34 Q. Can you remember when specifically --- we know it is

15:21 35 roughly the [REDACTED], do you remember, you might not

15:21 36 remember, do you remember what month?

15:21 37

15:21 38 A. I want to say confidently about [REDACTED] I believe

15:21 39 it was the [REDACTED]

15:21 40

15:21 41 Q. So [REDACTED] is when you first moved to a hosting

15:21 42 role; is that right?

15:21 43

15:21 44 A. To the best of my knowledge, yes, I can say that

15:21 45 confidently.

15:21 46

15:21 47 Q. What makes you so confident?

15:21 1
15:21 2 A. I believe that was because we have up and down
15:22 3 periods, and we obviously celebrate festivities. So
15:22 4 I believe the reason why that dates resonates to me is
15:22 5 because we have [REDACTED]
15:22 6 [REDACTED] that is a Chinese festival, and I believe also
15:22 7 it was [REDACTED]
15:22 8
15:22 9 Q. You answered some questions about the types of roles
15:22 10 that you have been performing for Crown in 2021. So you
15:22 11 have been working for Crown in the past four months or
15:22 12 so; is that right?
15:22 13
15:22 14 A. I took one to two months of personal leave, but from
15:22 15 around the start of the year until April, around
15:22 16 those months I was working, yes.
15:22 17
15:23 18 Q. So from about January to April you were working; is
15:23 19 that right?
15:23 20
15:23 21 A. Yes.
15:23 22
15:23 23 Q. Do you remember --- so some time in April you took
15:23 24 personal leave; is that right?
15:23 25
15:23 26 A. Yes.
15:23 27
15:23 28 Q. Can you remember when in April your personal leave
15:23 29 started?
15:23 30
15:23 31 A. The exact date I cannot remember.
15:23 32
15:23 33 Q. Mid, late, early?
15:23 34
15:23 35 A. I honestly cannot answer confidently. Probably the
15:23 36 start to the mid, between the first two weeks possibly.
15:23 37
15:23 38 Q. In terms of you taking personal leave, did you
15:23 39 remain in Melbourne?
15:23 40
15:23 41 A. Yes.
15:23 42
15:23 43 Q. You've been in good health this year?
15:23 44
15:23 45 A. Would you like to elaborate, physically or mentally,
15:23 46 or if you want details regarding the personal leave?
15:23 47

15:23 1 Q. I withdraw the question. So I want to ask you some
15:23 2 questions about a particular training session that you
15:24 3 attended at Crown. It is the case, is it not, that when
15:24 4 you are employed at Crown you do periodic training; is
15:24 5 that right?
15:24 6
15:24 7 A. That's correct.
15:24 8
15:24 9 Q. Some of the training is face-to-face; is that right?
15:24 10
15:24 11 A. Yes.
15:24 12
15:24 13 Q. Some of the training is online?
15:24 14
15:24 15 A. Yes.
15:24 16
15:24 17 Q. When you do the face-to-face training, do you do it
15:24 18 on Crown premises?
15:24 19
15:24 20 A. Yes.
15:24 21
15:24 22 Q. Is there a specific part of Crown where everyone
15:24 23 goes to do their training?
15:24 24
15:24 25 A. I believe it is called Crown College, the training
15:24 26 rooms.
15:24 27
15:24 28 Q. It's not one-on-one training, is it, it is group
15:24 29 training; is that right?
15:24 30
15:24 31 A. Generally speaking, yes.
15:24 32
15:24 33 Q. Insofar as you do training with others, are they
15:24 34 just kind of a random selection of people at Crown, so
15:24 35 you might be doing training with someone who is involved
15:24 36 in food and beverage, someone who is a dealer, someone
15:24 37 who does securities, someone who does cleaning; would
15:24 38 that be right?
15:24 39
15:24 40 A. It depends on the actual course we're doing.
15:25 41 Sometimes it could be just our team, sometimes it is
15:25 42 a pool of people.
15:25 43
15:25 44 Q. More specifically, it is right, isn't it, to say
15:25 45 that in [REDACTED] this year, and specifically on [REDACTED]
15:25 46 this year, you did some training or learning with Crown;
15:25 47 is that right?

15:25 1
15:25 2 A. I believe so.
15:25 3
15:25 4 Q. In particular you did something which is called [REDACTED]
15:25 5 [REDACTED] is that right?
15:25 6
15:25 7 A. Yes.
15:25 8
15:25 9 Q. What is [REDACTED]
15:25 10
15:25 11 A. [REDACTED]
15:25 12 [REDACTED] I originally enrolled in it because I wanted
15:25 13 to upskill so that I could potentially earn a promotion
15:25 14 or something like that.
15:25 15
15:25 16 Q. I see. And is [REDACTED]
15:25 17 [REDACTED] is that the one that comes after
15:25 18 [REDACTED]
15:25 19
15:26 20 A. Yes.
15:26 21
15:26 22 Q. You had already been through [REDACTED]
15:26 23 [REDACTED]
15:26 24
15:26 25 A. Yes.
15:26 26
15:26 27 Q. Are you aware that some comments that you made
15:26 28 during that training session were reported up to Crown
15:26 29 management?
15:26 30
15:26 31 A. Yes.
15:26 32
15:26 33 Q. I want to ask you about the comments that you made.
15:26 34 Sorry, I withdraw that. I want to ask you about some
15:26 35 comments that are reported that you made.
15:26 36
15:26 37 It has been reported that you spoke about money
15:26 38 laundering at that training program; that is accurate?
15:26 39
15:26 40 A. Not specifically.
15:26 41
15:26 42 Q. Did you speak about money laundering generally?
15:26 43
15:26 44 A. My exact comments, I guess, can be interpreted in
15:26 45 different ways, but it wasn't really the nature of why I
15:27 46 commented.
15:27 47

15:27 1 Q. Well, why don't we start from the beginning. Can
15:27 2 you tell us what you recall saying at that learning
15:27 3 development program training session?

15:27 4
15:27 5 A. The context of the conversation, but I don't
15:27 6 remember the exact conversation. It began with, I think
15:27 7 the trainer mentioned something like the international
15:27 8 team and obviously the issues that they've faced. It
15:27 9 wasn't into detail of what those were, but I originally
15:27 10 stated that I thought that it was better --- I felt like
15:27 11 the way we kind of, as a local host, I think the company
15:27 12 neglected the local market, and I just said I think that
15:28 13 it's better now that our company has more of a focus on
15:28 14 the local market than the international market.

15:28 15
15:28 16 Q. I presume that is your view?

15:28 17
15:28 18 A. Yes.

15:28 19
15:28 20 Q. Why do you think it is better that the company has
15:28 21 more of a focus on the local market rather than the
15:28 22 international market?

15:28 23
15:28 24 A. I think the local market for Crown is the most
15:28 25 sustainable market, as it is the market that is closest
15:28 26 to us, and I think that's why we should put more focus on
15:28 27 them.

15:28 28
15:28 29 Q. And how do you define the local market?

15:28 30
15:28 31 A. I define the local market as Melbourne, regional,
15:28 32 maybe as well, just Victoria.

15:28 33
15:28 34 Q. I see. Is it your view that there are problems with
15:28 35 the international market or problems with Central Bank
15:28 36 pursuing the international market?

15:28 37
15:28 38 A. I think there are certain problems.

15:28 39
15:28 40 Q. Can you tell us what you think those problems are?

15:28 41
15:28 42 A. Right off the back I think geography is a problem,
15:29 43 because obviously they are further away. I also think,
15:29 44 coming from a Chinese background, there is also cultural
15:29 45 issues there as well.

15:29 46
15:29 47 Q. And what are those issues?

15:29 1
15:29 2 A. I know from my parents that gambling is prohibited
15:29 3 in mainland China, so I think that if we try and get
15:29 4 international patrons, it is not really the most
15:29 5 sustainable market because gambling is prohibited in
15:29 6 China and we should focus more on the local.
15:29 7
15:29 8 Q. I see. Are your concerns just about sustainability
15:29 9 or are they about sustainability and other things?
15:29 10
15:29 11 A. It was mainly about sustainability, yes.
15:29 12
15:29 13 Q. So you were at the training session in [REDACTED] and the
15:29 14 person who is conducting the training, is that right,
15:29 15 starts to raise issues facing the international team; is
15:29 16 that right?
15:29 17
15:29 18 A. No, so she was saying how I think a lot of our
15:30 19 business relied on the international team, and I just
15:30 20 felt like our business should rely on more of the local
15:30 21 team for the reasons that I stated prior.
15:30 22
15:30 23 Q. It's been reported that you said "we're all Crown
15:30 24 here so I can talk about this"; is that something you
15:30 25 recall saying?
15:30 26
15:30 27 A. I think the context of that was we are all employees
15:30 28 and I think to some extent we have witnessed it. That is
15:30 29 pretty much what I meant.
15:30 30
15:30 31 Q. When you say "witnessed it", what do you mean?
15:30 32
15:30 33 A. Just the high action gaming from the international
15:30 34 player.
15:30 35
15:30 36 Q. I see. I asked you before whether or not you raised
15:30 37 money laundering.
15:30 38
15:30 39 A. I also want to say I do feel like we could speak
15:31 40 about it because I think within my contract there are
15:31 41 certain privacy procedures. So we don't really disclose
15:31 42 anything to the public.
15:31 43
15:31 44 Q. So you are prevented by the terms of your employment
15:31 45 to talk publicly about Crown matters; is that right?
15:31 46
15:31 47 A. I'm not sure if there is any policies that really

15:31 1 enforce it, but even back from when I was a dealer, we
15:31 2 were told to keep things obviously confidential for the
15:31 3 protection of our customers and also to provide customer
15:31 4 service on that point.

15:31 5

15:31 6 Q. Do you feel a general inhibition on speaking
15:31 7 generally about things that occur at Crown?

15:31 8

15:31 9 A. Not really, but I don't also like to talk about work
15:31 10 outside of work as well.

15:31 11

15:31 12 Q. You are not alone there.

15:32 13

15:32 14 In terms of the confidentiality, is it your understanding
15:32 15 that that is limited to confidential matters about
15:32 16 particular patrons or is the restriction more general
15:32 17 than that?

15:32 18

15:32 19 A. I'm not certain on that. I just maintain a general
15:32 20 view. But I don't really disclose things where I can not
15:32 21 disclose them.

15:32 22

15:32 23 Q. I see. But at the training session you felt less
15:32 24 inhibited; is that right?

15:32 25

15:32 26 A. At the training session I made the comments because
15:32 27 I feel like we were in a training session regarding
15:32 28 becoming managers, and my honest opinion was just I feel
15:32 29 like as someone who was pursuing a management role I did
15:32 30 think that it was important for Crown that we focus on
15:32 31 sustainable markets and that's why I made those comments.
15:33 32 It wasn't really about privacy or anything like that. It
15:33 33 was just about, I think we should turn our focus to the
15:33 34 local market, rather than the domestic and international
15:33 35 market.

15:33 36

15:33 37 Q. I see. It's been reported that one of the things
15:33 38 you said was "Crown staff are aware that international
15:33 39 patrons were engaged in money laundering activities"; do
15:33 40 you recall saying that or something to that effect?

15:33 41

15:33 42 A. I don't recall saying something like that, to be
15:33 43 honest, yeah.

15:33 44

15:33 45 Q. Do you recall saying anything about money
15:33 46 laundering?

15:33 47

- 15:33 1 A. No, not specifically, no.
15:33 2
- 15:33 3 Q. What about generally?
15:33 4
- 15:33 5 A. Generally speaking my sole, I think, issue is in
15:34 6 that is I know, from obviously coming from a Chinese
15:34 7 background, that I've been informed that we have laws in
15:34 8 China that prohibit large amounts of money being
15:34 9 transferred out of the country. And I think for
15:34 10 a customer to be counted as international they would
15:34 11 obviously have residence not obviously in Australia.
15:34 12 Obviously I don't work in international so I don't know
15:34 13 the exact rules that qualify a player to be
15:34 14 international, but I do believe most likely they don't
15:34 15 reside in Australia. So my only kind of external opinion
15:34 16 concern was I thought it was strange that they were able
15:34 17 to bet large amounts of money, but we do have obviously
15:35 18 rules that prohibit the transfer of money out of the
15:35 19 country.
15:35 20
- 15:35 21 Q. When you say "we", you mean the Chinese?
15:35 22
- 15:35 23 A. Yes.
15:35 24
- 15:35 25 Q. So you are aware, are you not, that China has
15:35 26 restrictions on the amount of currency that can be taken
15:35 27 out of China; is that right?
15:35 28
- 15:35 29 A. That's correct.
15:35 30
- 15:35 31 Q. You also have knowledge that there are Chinese
15:35 32 gamblers at Crown who bet large amounts of money; is that
15:35 33 right?
15:35 34
- 15:35 35 A. To the best of my knowledge I believe I have seen it
15:35 36 when I was a dealer, or partially when I was working in
15:35 37 Mahogany.
15:35 38
- 15:35 39 Q. Specifically it was Chinese nationals; is that
15:35 40 right?
15:35 41
- 15:35 42 A. Yes.
15:35 43
- 15:35 44 Q. Did you wonder, "What's going on here? They are not
15:35 45 allowed to take currency out of China, how is it that
15:35 46 they have these large amounts of money to gamble here?"
15:36 47 Is that what is going through your head?

15:36 1
15:36 2 A. Somewhat.
15:36 3
15:36 4 Q. What else was going through your head?
15:36 5
15:36 6 A. It's just like --- working in an interesting
15:36 7 environment, it is something that we saw, and because we
15:36 8 don't facilitate any of the money exchange, we thought
15:36 9 the correct procedures would have been made, and we just
15:36 10 saw it and it was something that we wondered.
15:36 11
15:36 12 Q. Every time you say "we", I will have to ask you who
15:36 13 you mean by "we". So it will take a long time or you can
15:36 14 say "I".
15:36 15
15:36 16 A. I apologise. I wondered it.
15:36 17
15:36 18 Q. Okay. It's been reported you made comments about
15:36 19 money laundering but you don't think you did. Sorry, I
15:36 20 take that back. It has been reported you made comments
15:36 21 about money laundering in the training session on
15:37 22 [REDACTED] but you don't think you did. Am I right that
15:37 23 you think you might have made comments about the evasion
15:37 24 of currency movement restrictions in China; is that the
15:37 25 nature of the comments you made?
15:37 26
15:37 27 A. The nature of my comments that I made was, I just
15:37 28 thought that it was a bit strange that patrons were from
15:37 29 international, but they were able to gamble here with
15:37 30 large quantities of money, yet we do obviously have the
15:37 31 rules where you can't transfer, I believe it is 50,000
15:37 32 out of the country per year, and that is pretty much it.
15:37 33 I may have --- I don't think I made remarks specifically
15:37 34 about money laundering, but if that is how it was
15:37 35 understood then I'm not sure.
15:37 36
15:37 37 Q. Well, do you deny that you made comments about money
15:37 38 laundering?
15:37 39
15:37 40 A. I honestly cannot remember. It was a couple
15:38 41 of months ago.
15:38 42
15:38 43 Q. So it is possible?
15:38 44
15:38 45 A. I don't remember the exact conversation so I don't
15:38 46 know.
15:38 47

- 15:38 1 Q. I see.
15:38 2
15:38 3 We'll come back to the comments you are reported to have
15:38 4 made in a minute. Just speaking generally about the
15:38 5 notion that there are restrictions on the amount of
15:38 6 currency that Chinese nationals can take out of China and
15:38 7 at the same time there are Chinese nationals gambling in
15:38 8 Crown very large amounts of money, are you concerned
15:38 9 about that? Are you concerned that Crown is facilitating
15:38 10 players circumventing the Chinese currency restrictions?
15:38 11
15:38 12 MS BUTTON: Can I ask my learned friend to put a time
15:39 13 period on that.
15:39 14
15:39 15 MS O'SULLIVAN: Right now.
15:39 16
15:39 17 A. Am I concerned about?
15:39 18
15:39 19 Q. Does it concern you --- are you concerned about the
15:39 20 fact that there are restrictions on the amount of
15:39 21 currency that Chinese nationals can take out of China,
15:39 22 and juxtapose that with the fact that, on your
15:39 23 observation, there are Chinese nationals gambling large
15:39 24 amounts of money at Crown?
15:39 25
15:39 26 A. As all of my positions have been local, it really
15:39 27 didn't concern me because I never facilitated any
15:39 28 operations from international, so I'm not 100 per cent
15:39 29 certain on how they were able to play. I just saw it and
15:39 30 thought there might be an issue there, there might not
15:39 31 be, and that's really as far as what I thought about the
15:39 32 whole situation.
15:40 33
15:40 34 Q. So you thought that there might be an issue. What
15:40 35 would the issue be and who is it an issue for?
15:40 36
15:40 37 A. I thought there possibly was an issue, and if there
15:40 38 was an issue it would potentially be international's or
15:40 39 Crown's, but obviously I wasn't there when the customer
15:40 40 came and started playing at Crown, so I can't really
15:40 41 comment on how concerned I am about the situation. I
15:40 42 always worked in local.
15:40 43
15:40 44 Q. Okay. What do you mean by there might be an issue?
15:40 45 What do you mean by that?
15:40 46
15:40 47 A. Like I said before, the 50,000 per person per year,

- 15:40 1 yet they are playing more than that. That's probably the
15:40 2 issue of which I would identify.
15:40 3
- 15:41 4 Q. Okay, but do you see that as a legal issue,
15:41 5 an ethical issue, a different type of issue? What is the
15:41 6 nature of the issue that you think is there?
15:41 7
- 15:41 8 A. The only nature of the issue that I think is there
15:41 9 is that my local customers they have access to their
15:41 10 funds here. They come in and play and I don't know the
15:41 11 operations of international and how their customers, as
15:41 12 in I don't know how international customers buy in for
15:41 13 chips. That's probably the issue there.
15:41 14
- 15:41 15 Q. Okay, that's not what I asked you. You said that
15:41 16 there is an issue, you think there is an issue, and I'm
15:41 17 asking you what is the nature of the issue. So I don't
15:41 18 want to know about what you have and haven't seen. I'm
15:41 19 just asking you about what you see is the issue. What is
15:41 20 the nature of the issue? Legal issue, ethical issue,
15:41 21 public relations issue, some other type of issue? What
15:42 22 is the issue that you've identified?
15:42 23
- 15:42 24 A. Probably legal issue, because legally, to my
15:42 25 knowledge, they can't bring large amounts of money over
15:42 26 and they have large amounts of money over here.
15:42 27
- 15:42 28 Q. Earlier you said it is an issue for the
15:42 29 international patrons and Crown. So is it the case you
15:42 30 think there is potentially a legal issue both for
15:42 31 international patrons and a legal issue for Crown,
15:42 32 whereby there are these currency restrictions and yet
15:42 33 you've got Chinese nationals playing at Crown in large
15:42 34 amounts of money? So that is a legal issue for Crown, is
15:42 35 that right?
15:42 36
- 15:42 37 A. Potentially, yes.
15:42 38
- 15:42 39 Q. Is it more than just a legal issue, or is legal
15:42 40 issue the only nature of issue that you've identified?
15:43 41
- 15:43 42 A. I've been thinking about it. It's just a legal
15:43 43 issue.
15:43 44
- 15:43 45 Q. When you say you think it is a legal issue, by that
15:43 46 do you mean you think that potentially Crown is breaking
15:43 47 the law?

15:43 1
15:43 2 A. I cannot confirm that.
15:43 3
15:43 4 Q. Well, I'm not asking you a legal question. I'm not
15:43 5 asking you to express a view about whether or not there
15:43 6 is any breach of the law. I'm asking you about
15:43 7 the nature of your concern. And am I right that the
15:43 8 nature of your concern in part, because it is not only
15:43 9 about Crown but it's about international patrons --- is
15:43 10 that you are concerned that Crown might be breaking the
15:43 11 law?
15:43 12
15:43 13 MS BUTTON: Can I ask that a time period be put on when
15:43 14 any view that might have been held that Crown was breaking the
15:43 15 law, and at what time the breaking of the law may have
15:43 16 been occurring. It's unclear.
15:43 17
15:43 18 MS O'SULLIVAN: The witness has already given an answer
15:43 19 that he had identified an issue, and so that answer is
15:44 20 that answer, and now I'm literally just asking follow-up
15:44 21 questions as to the nature of the issue that he
15:44 22 identified.
15:44 23
15:44 24 COMMISSIONER: Please go ahead.
15:44 25
15:44 26 A. I just think that because I don't know the full
15:44 27 extent of how the funds were brought in by the customer,
15:44 28 there could be an issue, but there also couldn't be. I
15:44 29 just don't know. Maybe potentially the customers just
15:44 30 did have a business over here, and it was just a thought
15:44 31 that I had.
15:44 32
15:44 33 Q. Yes. Was it part of the issue that you identified
15:44 34 that --- well, were you also concerned that Crown might
15:44 35 be facilitating other people breaking the law?
15:44 36
15:44 37 A. That thought never came to my head because I just
15:44 38 saw the customer gambling. I never thought about anyone
15:44 39 else or anything like that.
15:45 40
15:45 41 Q. So one of the things that you are reported to have
15:45 42 said at the training session on [REDACTED] is that "we knew
15:45 43 there was money laundering happening". Can you recall
15:45 44 saying something either in those words or to that effect
15:45 45 at the training session on [REDACTED]?
15:45 46
15:45 47 A. I don't think I ever said we knew that money

15:45 1 laundering was happening, I think I said we knew there
15:45 2 might be an issue there just because of my understanding
15:45 3 of the bringing currency over and we have customers
15:45 4 betting high bets. I just thought, in a snapshot thought
15:45 5 there might be something going on there.
15:45 6

15:46 7 Q. I see. When you use the term "we" ---
15:46 8

15:46 9 A. I'm really sorry. I meant I myself.
15:46 10

15:46 11 Q. Okay, right. So you didn't say "I knew there was
15:46 12 money laundering", you said "I knew that there might have
15:46 13 been an issue and the issue was about the currency
15:46 14 restrictions in China"; is that right?
15:46 15

15:46 16 A. Yes.
15:46 17

15:46 18 Q. All right.
15:46 19

15:46 20 One of the other things it's reported that you said at
15:46 21 the session on [REDACTED] is that "hosting staff were given
15:46 22 instruction from "higher ups" to identify, implement or
15:46 23 create new methods of circumventing government laws.
15:46 24

15:46 25 Q. Do you recall saying that at the session on [REDACTED]
15:46 26 [REDACTED]
15:46 27

15:46 28 A. Those words exactly, no, I never said those words
15:46 29 exactly.
15:46 30

15:46 31 Q. So can you recall --- can you tell us what it was
15:47 32 you did say?
15:47 33

15:47 34 A. I cannot answer the question confidently.
15:47 35

15:47 36 Q. Okay.
15:47 37

15:47 38 A. Because I don't remember the full conversation.
15:47 39

15:47 40 Q. I see. Let's forget about the conversation for now
15:47 41 and just talk about --- I will ask you some questions
15:47 42 more specifically.
15:47 43

15:47 44 Were you personally ever given an instruction from anyone
15:47 45 at Crown to identify, implement or create new methods of
15:47 46 circumventing government laws or something to that
15:47 47 affect?

15:47 1
15:47 2 A. Something to that effect, yes.
15:47 3
15:47 4 Q. Okay. So, tell us about that instruction you were
15:47 5 given. Let's start with when approximately you were
15:47 6 given that instruction?
15:47 7
15:47 8 A. The only thing that I can't remember where it came
15:48 9 from was that obviously with the anti-money laundering
15:48 10 laws that we have where if a customer who doesn't have
15:48 11 identification to buy-in for, I believe the threshold is
15:48 12 \$10,000 in cash, I think we --- I don't know --- I can't
15:48 13 honestly remember any directive but we told --- I told
15:48 14 the customer that they can play less than that because it
15:48 15 is their right to. They just can't buy-in over 10,000.
15:48 16
15:48 17 Q. I see.
15:48 18
15:48 19 So you recall telling a customer that they can buy-in at
15:48 20 less than \$10,000; is that right?
15:48 21
15:48 22 A. Yes.
15:48 23
15:48 24 Q. What was the context? Was that a customer who
15:49 25 didn't want to identify themselves?
15:49 26
15:49 27 A. Yes.
15:49 28
15:49 29 Q. And how did you know that the customer didn't want
15:49 30 to identify themselves?
15:49 31
15:49 32 A. Because depending on the customers, obviously we
15:49 33 have different ones, and some of them do prefer to play
15:49 34 anonymously.
15:49 35
15:49 36 Q. So you advised the customer that if they wanted to
15:49 37 play anonymously they had to have buy-ins under the
15:49 38 \$10,000 threshold; is that right?
15:49 39
15:49 40 A. Yes.
15:49 41
15:49 42 Q. And is that because you were aware that once you hit
15:49 43 the \$10,000 threshold with cash the customer had to
15:49 44 provide some identification?
15:49 45
15:49 46 A. Yes.
15:49 47

15:49 1 Q. And on how many occasions do you recall making those
15:49 2 types of comments to customers?
15:49 3
15:49 4 A. I can't answer that confidently. I don't know. I
15:49 5 never kept track.
15:49 6
15:49 7 Q. But would it have been something you did only ever
15:49 8 once or something you did hundreds of times?
15:49 9
15:49 10 A. Oh, it was not hundreds of times, no.
15:49 11
15:49 12 Q. Was it --- do you know the term "score" means 20?
15:50 13 Was it scores of times?
15:50 14
15:50 15 A. I think less than.
15:50 16
15:50 17 Q. Somewhere between 1 and 50 times then?
15:50 18
15:50 19 A. Approximately 10 times.
15:50 20
15:50 21 Q. Okay, so ten times. Over what time period?
15:50 22
15:50 23 A. Last two years, maybe.
15:50 24
15:50 25 Q. And did you have any suspicion about those customers
15:50 26 who wanted to play anonymously?
15:50 27
15:50 28 A. No.
15:50 29
15:50 30 Q. So that is something that you told the customer but
15:50 31 I originally started asking you about instructions that
15:50 32 you were given. And I put to you that --- Well, I asked
15:51 33 you whether you had been given an instruction from
15:51 34 someone at Crown to identify, implement or create new
15:51 35 methods of circumventing government laws and, I think ---
15:51 36 I will be corrected if I'm wrong, I think your answer was
15:51 37 not quite that ---
15:51 38
15:51 39 A. Yes.
15:51 40
15:51 41 Q. --- but something similar. Now I don't want to
15:51 42 know necessarily about what you told the customer, but I
15:51 43 want to know about what someone else at Crown told you.
15:51 44 What can you tell me about what someone else at Crown
15:51 45 told you about identifying or implementing or creating
15:51 46 new methods of circumventing government laws?
15:51 47

15:51 1 A. I said "no" to that because no one from
15:51 2 Crown actually said, "is there any way we can
15:51 3 circumvent", I'm assuming means somewhat like bypassing
15:51 4 the law?

15:51 5
15:51 6 Q. Yeah, get around.

15:51 7
15:51 8 A. So no one actually ever gave directions like that
15:51 9 but obviously we don't facilitate the cash changes
15:52 10 because we're there to provide customer service as our
15:52 11 role. So we are never there to obviously, how do I say
15:52 12 it, approve cash changes or just witness cash changes.
15:52 13 We are there to provide customer support. So sometimes
15:52 14 we'll be there just to assist, to provide customer
15:52 15 service. And if a manager obviously who is responsible
15:52 16 for doing the cash change will count out the money and
15:52 17 find out that it is over the threshold, then the manager
15:52 18 sometimes would ask us to basically say, like, "is there
15:52 19 anything that we can do" or something like that for the
15:52 20 customer; more or less from a customer service point of
15:52 21 view.

15:52 22
15:52 23 Q. Okay. So I don't really understand. What were you
15:53 24 being told?

15:53 25
15:53 26 A. So I was told, basically --- I mean, a lot of things
15:53 27 that happened we didn't really think --- I was basically
15:53 28 told like is there anything we can say to the customer
15:53 29 that can basically provide service and I think sometimes
15:53 30 unfortunately the actual person is who responsible, the
15:53 31 operations managers, would ask us if there is anything we
15:53 32 can do. Like, for example, can we let them play under
15:53 33 the threshold.

15:53 34
15:53 35 COMMISSIONER: Is it just --- so I follow this, your job
15:54 36 as host, you are there to help the customer?

15:54 37
15:54 38 A. Yes.

15:54 39
15:54 40 COMMISSIONER: Help him with whatever the customer's
15:54 41 needs might be?

15:54 42
15:54 43 A. Yes.

15:54 44
15:54 45 COMMISSIONER: That's the job?

15:54 46
15:54 47 A. Yes.

15:54 1
15:54 2 COMMISSIONER: And if the customer brings in \$15,000
15:54 3 worth of cash, you could help him by saying, "Don't spend
15:54 4 \$15,000 all in one go, spend \$7,000 ---
15:54 5
15:54 6 A. Yep.
15:54 7
15:54 8 COMMISSIONER: --- because that way you and I won't get
15:54 9 in trouble and I'm helping you". So you are giving the
15:54 10 customer helpful advice.
15:54 11
15:54 12 A. Not that I won't get in trouble just you can ---
15:54 13
15:54 14 COMMISSIONER: You can avoid it being a reportable
15:54 15 transaction.
15:54 16
15:54 17 A. No, you can just come and play, basically, instead
15:54 18 of not being able to play.
15:54 19
15:54 20 COMMISSIONER: What is stopping him playing?
15:54 21
15:54 22 A. So if the customer is doing a transaction of over
15:54 23 \$10,000 we cannot take his cash and give him chips
15:55 24 because it is over the threshold amount.
15:55 25
15:55 26 MS O'SULLIVAN: Do you mean when you are at the table?
15:55 27
15:55 28 A. Yes, table or at the buy-in booth.
15:55 29
15:55 30 Q. So that customer has to go to the cage to do the
15:55 31 transaction; is that right?
15:55 32
15:55 33 A. No. Customers can buy-in on the tables.
15:55 34
15:55 35 Q. Yes, but are you telling us that they can't buy-in
15:55 36 at the table at \$10,000 or more?
15:55 37
15:55 38 A. They just can't buy-in for that amount or more if
15:55 39 like at one time if they don't have the proper
15:55 40 identification.
15:55 41
15:55 42 Q. And what is the proper identification?
15:55 43
15:55 44 A. I believe if they aren't a member and they buy-in
15:55 45 for over 10,000 they need to provide a ID and address.
15:55 46
15:55 47 Q. What kind of ID?

15:56 1
15:56 2 A. Photo ID.
15:56 3
15:56 4 Q. Any kind of photo ID?
15:56 5
15:56 6 A. I believe it's called Category A photo ID and it has
15:56 7 to be in English.
15:56 8
15:56 9 Q. You've told us that no one specifically gave
15:56 10 a direction to you to tell customers that they can,
15:56 11 provided they buy-in or play at less than \$10,000 they
15:56 12 won't have to show identification. So no one told you
15:56 13 specifically that; is that right?
15:56 14
15:56 15 A. I can't honestly recall a specific conversation, but
15:57 16 I can confidently say at least once a operation manager
15:57 17 could have said, "Well, they can play under 10,000".
15:57 18
15:57 19 Q. I see. So you were informed that it was an option;
15:57 20 is that right?
15:57 21
15:57 22 A. Yes.
15:57 23
15:57 24 Q. What about any other instructions from someone at
15:57 25 Crown at getting around government laws? Have you ever
15:57 26 received any other type of instruction like that?
15:57 27
15:57 28 A. I can't recall, honestly.
15:57 29
15:57 30 Q. Okay.
15:57 31
15:57 32 I'm going to show you --- I will bring up a document on
15:57 33 the screen and show you what has been reported you said
15:57 34 at the [REDACTED] 2021 training session.
15:57 35
15:58 36 A. (Nods head).
15:58 37
15:58 38 Q. Operator, can we bring up this document,
15:58 39 CRW.0000.0002.0151, page 0164. I will give you
15:58 40 an opportunity to have a read of that before I ask you
15:58 41 some questions. Take whatever time you need to read
15:58 42 that.
15:59 43
15:59 44 A. Okay.
15:59 45
15:59 46 Q. I want to draw your attention in particular to the
15:59 47 paragraph which starts "one method of money laundering".

15:59 1 Do you want another opportunity to read that paragraph?
15:59 2
15:59 3 A. Can I hear the question first.
15:59 4
15:59 5 Q. Yes. It will be do you recall saying something to
15:59 6 that effect at the training session?
15:59 7
16:00 8 A. Yes.
16:00 9
16:00 10 Q. How did you come to know the things that are set out
16:00 11 there in that paragraph?
16:00 12
16:00 13 A. I --- just through potentially office banter and
16:00 14 rumours.
16:00 15
16:00 16 Q. Office banter did you say?
16:00 17
16:00 18 A. Just like office talk, I'm not certain.
16:00 19
16:00 20 Q. And this refers to, in a sense, the exchange or the
16:01 21 offsetting of amounts between patrons' bank accounts.
16:01 22
16:01 23 A. Yes.
16:01 24
16:01 25 Q. Did you ever have a patron disclose to you that they
16:01 26 were engaging in these types of transactions?
16:01 27
16:01 28 A. No.
16:01 29
16:01 30 Q. And were you otherwise aware that there were patrons
16:01 31 engaging in these types of transactions other than what
16:01 32 you heard through office banter?
16:01 33
16:01 34 A. I made that comment not, basically, referring to any
16:01 35 particular patron and I can't even confirm that Crown was
16:01 36 doing it, but I just made that comment through logic that
16:01 37 I guess it was possible.
16:01 38
16:01 39 Q. Yes, but aren't you saying you heard office banter
16:01 40 that this was not just possible, but actually occurring?
16:01 41
16:01 42 A. To be honest, when I made that remark I may have
16:02 43 exaggerated it a little bit, but, no, I can't confirm if
16:02 44 anyone in the office was actually doing it.
16:02 45
16:02 46 Q. No, I'm not asking you whether anyone in the office
16:02 47 was doing it, I'm asking you about the office banter that

16:02 1 you heard, and I'm making a distinction between office
16:02 2 banter which says "this is possible" and office banter
16:02 3 which says "this is occurring"?

16:02 4
16:02 5 A. I think it was office banter that "this was
16:02 6 possible".

16:02 7
16:02 8 Q. I see. Now I draw your attention --- hold on one
16:02 9 moment.

16:02 10
16:02 11 I will now ask you some questions about the paragraph
16:02 12 immediately underneath which starts with the words
16:02 13 "a second method" so I will give you another chance to
16:02 14 have a read of that. Do you recall saying that at the
16:03 15 training session on [REDACTED]?

16:03 16
16:03 17 A. I do recall saying something approximate to that.

16:03 18
16:03 19 Q. Okay. So, insofar as it was approximate to that, is
16:03 20 there anything in particular, reading the words there, is
16:03 21 there anything in particular which you say, "no, I didn't
16:03 22 say that, I used a different word"? Is this wrong in any
16:03 23 material respect or is it

16:04 24
16:04 25 A. I think once again the comment here is more
16:04 26 definitive but it is something that possibly could have
16:04 27 happened but I can't be sure.

16:04 28
16:04 29 Q. Yes, but anything can possibly happen so we're not
16:04 30 interested in things that can possibly happen, right?

16:04 31
16:04 32 A. Yes.

16:04 33
16:04 34 Q. Let's go back to the question. I've asked you
16:04 35 whether you recall saying this and you said "yes, I said
16:04 36 something" or words to that effect.

16:04 37
16:04 38 A. Yes.

16:04 39
16:04 40 Q. And you've also told me that this is expressed in
16:04 41 a more definitive way than you said it. So that is
16:04 42 helpful to know as well. So it is more definitive than
16:04 43 the way you said it, but it is approximately what you
16:04 44 said. Is there anything specific about it that you
16:04 45 think, "No, I didn't say that". I want to know whether
16:04 46 it is wrong in any material way?

16:04 47

16:04 1 A. It's something that I said but I believe when I said
16:04 2 it, it was probably wrong.
16:05 3
16:05 4 Q. So at this session you made a comment that you
16:05 5 thought was wrong.
16:05 6
16:05 7 A. Yes.
16:05 8
16:05 9 Q. Why did you do that?
16:05 10
16:05 11 A. Because I have never actually like witnessed or can
16:05 12 confirm like I have seen this happen. Once again it is
16:05 13 something that I thought possibly could happen.
16:05 14
16:05 15 Q. Yeah, okay. Are you worried now that you are going
16:05 16 to get in trouble?
16:05 17
16:05 18 A. I just feel like I said something that possibly
16:05 19 could have happened in the training session but now it's
16:05 20 being depicted like I said something that did happen.
16:05 21
16:05 22 Q. So what you are telling me is that you never
16:05 23 personally observed --- let's call it a "method", because
16:05 24 that is how it is described there.
16:05 25
16:06 26 A. Yes.
16:06 27
16:06 28 Q. You never personally observed this method occurring;
16:06 29 is that right?
16:06 30
16:06 31 A. No, I never witnessed it.
16:06 32
16:06 33 Q. You never witnessed it. But you were, am I
16:06 34 right --- you thought it was occurring; is that right?
16:06 35
16:06 36 A. I thought that it was possible that it could occur.
16:06 37
16:06 38 COMMISSIONER: Is that because somebody told you this was
16:06 39 what was happening?
16:06 40
16:06 41 A. No, we actually in local also charge bills to
16:06 42 incidental charges through hotels, that's why I thought
16:06 43 it was possible.
16:06 44
16:06 45 COMMISSIONER: Somebody actually told you that this was
16:06 46 happening, didn't they?
16:06 47

16:06 1 A. I think someone --- I don't know who and I can't
16:06 2 honestly recall this conversation but I just knew it was
16:06 3 possible because we in local also used to charge external
16:06 4 charges to incidental ---
16:07 5
16:07 6 COMMISSIONER: It is a very detailed description of
16:07 7 a method of getting money from overseas to Australia.
16:07 8
16:07 9 A. Yep.
16:07 10
16:07 11 COMMISSIONER: And you didn't make it up?
16:07 12
16:07 13 A. No, I just heard a rumour.
16:07 14
16:07 15 COMMISSIONER: You heard a rumour. So people who work
16:07 16 alongside you, maybe an international host, told you that
16:07 17 this is what was happening? They must have?
16:07 18
16:07 19 A. I'm not sure.
16:07 20
16:07 21 COMMISSIONER: You didn't have a dream about this in the
16:07 22 middle of the night?
16:07 23
16:07 24 A. No. No.
16:07 25
16:07 26 COMMISSIONER: So the only other source, unless you saw
16:07 27 it yourself ---
16:07 28
16:07 29 A. I didn't see it.
16:07 30
16:07 31 COMMISSIONER: I know you said that. If you didn't see
16:07 32 it yourself, somebody told you?
16:07 33
16:07 34 A. Yep. Possibly.
16:07 35
16:07 36 COMMISSIONER: There is no other explanation is there?
16:07 37
16:07 38 A. Um I think someone may have told me then.
16:08 39
16:08 40 MS O'SULLIVAN: Is it possible that more than one person
16:08 41 told you that?
16:08 42
16:08 43 A. I cannot remember. I just don't know.
16:08 44
16:08 45 Q. Is it likely that the person who told you that is
16:08 46 someone who would have first-hand knowledge of it? Do
16:08 47 you know what I mean by "first-hand knowledge"?

16:08 1
16:08 2 A. I don't know. I know what you mean, but I don't
16:08 3 know.
16:08 4
16:08 5 Q. Can I ask you this: in every workplace there is
16:08 6 a wide variety of people; do you agree? And some are
16:08 7 really credible; do you agree?
16:08 8
16:08 9 A. Yep.
16:08 10
16:08 11 Q. And at the other end of the spectrum there are
16:08 12 a whole lot of people who are a bit kooky or totally not
16:08 13 credible; do you agree?
16:08 14
16:08 15 A. Yes.
16:08 16
16:08 17 Q. And every time one of the people in your workplace
16:08 18 tell you something you assess that through the lense of
16:08 19 whether or not you assess them to have credibility; do
16:08 20 you agree?
16:08 21
16:08 22 A. Yes.
16:08 23
16:08 24 Q. It is right, isn't it, that you wouldn't have
16:09 25 mentioned this in the training session unless the person
16:09 26 who had told you was someone who you thought was
16:09 27 credible?
16:09 28
16:09 29 A. I don't think I based like the credibility of the
16:09 30 knowledge. I just kind of said it.
16:09 31
16:09 32 Q. Weren't you raising this because your conscience was
16:09 33 dictating that you raise it.
16:09 34
16:09 35 A. I'm not sure what that means.
16:09 36
16:09 37 Q. Did you feel compelled to raise this because you
16:09 38 thought it was the right thing to do to raise this in
16:09 39 a Crown forum?
16:09 40
16:09 41 A. I don't think so. I raised it under the context as
16:10 42 I worked for local and I just felt like --- I just felt,
16:10 43 like, local was a more sustainable way of running the
16:10 44 casino, that's all.
16:10 45
16:10 46 Q. Is it not the case that you also thought that local
16:10 47 was more sustainable because there was less chances of

16:10 1 there being breaches of the law?
16:10 2
16:10 3 A. Yes.
16:10 4
16:10 5 Q. If you look at the sentence immediately below the
16:10 6 paragraph that we've just been talking about, I'm talking
16:10 7 about the sentence which commences with your name there,
16:10 8 there it is reported that you've said that you stated:
16:10 9
16:10 10 *That the rules regarding the above were a lot looser*
16:10 11 *prior to 'China happening' and 'China changed*
16:10 12 *everything'*
16:10 13
16:10 14 A. Yes.
16:10 15
16:11 16 Q. Why did you say that?
16:11 17
16:11 18 A. Because I think things changed when the incident
16:11 19 happened in China where there were I --- I think there
16:11 20 were staff working on behalf of China that got detained
16:11 21 and their operations stopped.
16:11 22
16:11 23 Q. How did you know that things changed?
16:11 24
16:11 25 A. How did I know that things changed I think we
16:11 26 were told of the news and ---
16:11 27
16:11 28 Q. No, no, not that people in China were arrested, how
16:11 29 did you know that the rules about what you've talked
16:11 30 about in the two paragraphs above ---
16:11 31
16:11 32 A. Yep.
16:11 33
16:11 34 Q. --- how did you know that things had changed?
16:11 35
16:11 36 A. Because I believe it was when I was working in
16:11 37 gaming machines and before I think we --- I worked in
16:12 38 gaming machines and I say "we" as a team of local gaming
16:12 39 machines, we kind of didn't have high expectations on how
16:12 40 our department operated. But I do remember we had, like,
16:12 41 I think someone spoke to us, one of our managers just
16:12 42 informed us, of the issue and obviously that our
16:12 43 contribution to the company would be more important.
16:12 44
16:12 45 Q. Do you recall being called in to speak to someone at
16:12 46 Crown about the comments you'd made on [REDACTED] ?
16:12 47

16:12 1 A. Yes.
16:12 2
16:12 3 Q. And you had a conversation with someone at Crown on
16:12 4 or about ██████████ 2021; is that right?
16:13 5
16:13 6 A. Approximately, if --- yep.
16:13 7
16:13 8 Q. And who did you have that conversation with?
16:13 9
16:13 10 A. It was a conversation with my manager at the time,
16:13 11 not my direct manager but my direct manager's manager and
16:13 12 a lady named Jan and I think a gentlemen named Rob.
16:13 13
16:13 14 Q. Yep.
16:13 15
16:13 16 MS BUTTON: Commissioner, I'm sorry to interrupt my
16:13 17 learned friend. If my learned friend is going to the
16:13 18 notes of an interview with in-house counsel, I know we
16:13 19 are in private session I think similar to the way the
16:13 20 Commission proceeded when Mr Borsky raised a similar
16:13 21 issue, it may --- I'm making it clear that I don't have
16:13 22 instructions to waive privilege over that note or the
16:13 23 contents of ---
16:13 24
16:14 25 COMMISSIONER: Would that be privileged?
16:14 26
16:14 27 MS BUTTON: Well ---
16:14 28
16:14 29 COMMISSIONER: Dealing with staff about what staff said?
16:14 30 Prima facie it doesn't sound privileged?
16:14 31
16:14 32 MS BUTTON: The interview may have been conducted with
16:14 33 a view to advising on meets and bounds of an issue and
16:14 34 what to do about it. I'm not affirmatively making
16:14 35 a claim, I'm trying to preserve a position ---
16:14 36
16:14 37 COMMISSIONER: I'm happy for that basis.
16:14 38
16:14 39 MS BUTTON: --- lest it be said I have not raised the
16:14 40 matter.
16:14 41
16:14 42 COMMISSIONER: You've raised it. I'm just expressing
16:14 43 doubt but we'll raise it at a point when we need to.
16:14 44
16:14 45 MS BUTTON: Yes.
16:14 46
16:14 47 MS O'SULLIVAN: I'm not aware there is a privilege claim

16:14 1 in respect of this document.
16:14 2
16:14 3 COMMISSIONER: I thought not.
16:14 4
16:14 5 MS O'SULLIVAN: Commonly where those claims are made
16:14 6 there is a heading that says, "wholly privileged" and
16:14 7 everything is in yellow.
16:14 8
16:14 9 COMMISSIONER: I think Ms Button is just being cautious,
16:14 10 just in case, because of the identity of the people
16:14 11 conducting the interview.
16:14 12
16:14 13 MS O'SULLIVAN: Yes.
16:15 14
16:15 15 So there were four people at the discussion; is that
16:15 16 right?
16:15 17
16:15 18 A. Yes.
16:15 19
16:15 20 Q. And do you recall the name of your direct manager's
16:15 21 manager?
16:15 22
16:15 23 A. [REDACTED].
16:15 24
16:15 25 Q. And do you recall [REDACTED] surname?
16:15 26
16:15 27 A. I believe it is [REDACTED]?
16:15 28
16:15 29 Q. Is that [REDACTED]?
16:15 30
16:15 31 A. I'm not sure how to spell it. Sorry.
16:15 32
16:15 33 Q. You mentioned someone called Jan.
16:15 34
16:15 35 A. Yes.
16:15 36
16:15 37 Q. Do you recall Jan's surname?
16:15 38
16:15 39 A. I think it is Wilkinson.
16:15 40
16:15 41 Q. Is it possible that it was someone called Jan
16:15 42 Williamson?
16:15 43
16:15 44 A. Yes, possibly.
16:15 45
16:15 46 Q. And the other person who was present was someone
16:15 47 you've identified as Rob. Can you recall Rob's surname?

16:15 1
16:15 2 A. I don't know his surname.
16:15 3
16:15 4 Q. Is it possible that it is Meade?
16:15 5
16:15 6 A. I honestly don't know his surname. It was never
16:16 7 told to me.
16:16 8
16:16 9 Q. Were you asked in that discussion to keep the
16:16 10 contents of what you told those people confidential?
16:16 11
16:16 12 A. I believe so, yes.
16:16 13
16:16 14 MS O'SULLIVAN: I have no further questions for this
16:16 15 witness.
16:16 16
16:16 17 COMMISSIONER: Thank you, Ms O'Sullivan. Nothing?
16:16 18
16:16 19 MS BUTTON: Nothing.
16:16 20
16:16 21 COMMISSIONER: Thank you very much. You are free to go.
16:16 22
16:16 23 A. Thank you, Commissioner.
16:17 24
16:17 25
16:17 26 **THE WITNESS WITHDREW**
16:17 27
16:17 28
16:17 29 COMMISSIONER: Logistics. I think we might have two
16:17 30 witnesses to go but we might only do one. I have a note
16:17 31 from my associate saying one has to be done tonight.
16:17 32
16:17 33 MS O'SULLIVAN: I'm instructed one of the witnesses has
16:17 34 a family reason why that witness would prefer to give
16:17 35 that evidence today not tomorrow. We are proposing to
16:17 36 call that witness next. Well, Ms Button is proposing to
16:17 37 call that witness next.
16:17 38
16:17 39 MS BUTTON: Commissioner, would you let me raise
16:17 40 something with my learned friend?
16:17 41
16:17 42 COMMISSIONER: Yes, I thought we might have a five-minute
16:17 43 break in any event. And then we can sort it out.
16:17 44
16:17 45
16:17 46 **ADJOURNED** [4.17 PM]
16:17 47

1
2 **ADJOURNED AT 4.29 PM UNTIL THURSDAY, 24 JUNE 2021 AT**
3 **9.30 AM**

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