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Details of Filing

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A handwritten signature in blue ink, reading "Warwick Soden".

Dated: 14/12/2017 11:05:17 AM AEDT

Registrar

Important Information

As required by the Court's Rules, this Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

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Form 17
Rule 8.05(1)(a)

AMENDED STATEMENT OF CLAIM

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: SYDNEY
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE
APPLICANT**

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124
RESPONDENT**

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Filed on behalf of the Applicant, the Chief Executive Officer of
the Australian Transaction Reports and Analysis Centre

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PARTIES

The Chief Executive Officer of AUSTRAC

1. The Applicant is the Chief Executive Officer (**CEO**) of the Australian Transaction Reports and Analysis Centre (**AUSTRAC**) an office established under s 211 of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (the **Act**).
2. The AUSTRAC CEO may apply for a civil penalty order by reason of s 176 of the Act.
3. The objects of the Act, among others, include to fulfil Australia's international obligations to combat money laundering and combat financing of terrorism.

Particulars

Section 3 of the Act.

4. The AUSTRAC CEO may, by writing, make rules prescribing matters required or permitted by any provision of the Act to be prescribed by the *Anti-Money Laundering and Counter-Terrorism Financing Rules*.

Particulars

Section 229 of the Act.

*The Anti-Money Laundering and Counter-Terrorism Financing Rules
Instrument 2007 (No. 1) (the Rules).*

Commonwealth Bank of Australia Limited

5. The Respondent, Commonwealth Bank of Australia Limited (**CommBank**):
 - a. is and was at all material times a company incorporated in Australia;
 - b. is and was at all material times a person within the meaning of s 5 of the Act;
 - c. is and was at all material times licensed to carry on banking business in Australia under the *Banking Act 1959*;
 - d. is and was at all material times an Authorised Deposit-Taking Institution (**ADI**), being a corporation which is authorised under the *Banking Act 1959* to take deposits from customers;
 - e. is a reporting entity within the meaning of s 5 of the Act; and
 - f. provides designated services to customers within the meaning of s 6 of the Act.

Particulars

CommBank provides, among others, the following designated services:

Item 1, Table 1 – in the capacity of account provider, opening an account, where the account provider is an ADI.

Item 2, Table 1 – in the capacity of account provider for a new or existing account, allowing a person to become a signatory to the account, where the account provider is an ADI.

Item 3, Table 1 – in the capacity of account provider for an account, allowing a transaction to be conducted in relation to the account, where the account provider is an ADI.

Item 29, Table 1 – in the capacity of an ordering institution, accepting an electronic funds transfer instruction from the payer.

Intelligent Deposit Machines

6. Intelligent Deposit Machines (**IDMs**) are Automatic Teller Machines (**ATMs**) that accept deposits, both cash and cheque, or a combination of both. In contrast to an ordinary ATM, any cash deposited through an IDM is automatically counted by the machine and is instantly credited to the nominated beneficiary account. Those funds are immediately available for transfer, including for international transfer.
7. CommBank introduced IDMs to the Australian market in May 2012.
8. CommBank IDMs are capable of counting a maximum of 200 notes per transaction and therefore can accept a maximum cash deposit per transaction of \$20,000. There is no daily transaction limit for cash deposits into a CommBank IDM.
9. As at 16 October 2015, CommBank had 507 IDMs in operation, out of a fleet of 3,466 CommBank branded ATM devices.
10. CommBank provides designated services under item 3, table 1 through IDMs.

AML/CTF PROGRAM - CONTRAVENTIONS OF S 82 OF THE ACT

11. A reporting entity must not commence to provide a designated service to a customer unless the reporting entity has adopted and maintains an anti-money laundering and counter-terrorism financing program (**AML/CTF program**), within the meaning of s 83 of the Act, that applies to the reporting entity.

Particulars

Sections 81(1) and 83 of the Act and rule 1.2.1 of the Rules.

12. An AML/CTF program includes a joint AML/CTF program.

Particulars

Section 83 of the Act.

13. A joint AML/CTF program is:

- (a) a written program that applies to each reporting entity that belongs to a particular designated business group (**DBG**);
- (b) divided into Part A (general) and Part B (customer identification).

Particulars

Section 85 of the Act.

14. Part A of a joint AML/CTF program is a part:

- (a) the primary purpose of which is to:

- (i) identify; and
- (ii) mitigate; and
- (iii) manage;

the risk each of those reporting entities within a DBG may reasonably face that the provision by the relevant reporting entity of designated services at or through a permanent establishment of the relevant reporting entity in Australia might (whether inadvertently or otherwise) involve or facilitate:

- (iv) money laundering; or
- (v) financing of terrorism (**ML/TF risk**).

Particulars

Section 85(2)(a) of the Act.

15. Part A of a joint AML/CTF program must comply with the Rules.

Particulars

Section 85(2)(c) of the Act.

16. For the period on and from 28 October 2010, CommBank has adopted and maintained a Part A joint AML/CTF program (the **Joint Program**), together with a number of other entities within the corporate group.

Particulars

The Joint Program is comprised of version 5.0, effective from 28 October 2010 to 25 June 2014, version 5.5 effective from 26 June 2014 to 31 December 2015 and version 6.0 effective from 1 January 2016.

17. If a reporting entity has adopted a joint AML/CTF program that applies to the reporting entity, the reporting entity must comply with a provision of its Part A program insofar as the provision was included in the program in order to comply with the requirements specified in the Rules made for the purposes of s 85(2)(c) of the Act.

Particulars

Section 82 of the Act.

Risk assessment contraventions

18. Section 2 of Part A of the Joint Program included provisions for ML/TF risk management.

Particulars

Paragraph 2.1 of Section 2 of Part A of versions 5, 5.5 and 6 provided for risk identification and assessment, including ongoing risk assessment and evaluation.

Paragraph 2.2 of Section 2 of Part A of versions 5 and 5.5 and paragraph 2.1.4 of version 6 provided for risk identification and assessment of new designated services, channels and technologies.

19. Section 2 was included in Part A of the Joint Program in order to comply with the requirements of Part 9.1 of the Rules.

Particulars

Table 3 in paragraph 3 of Section 1 of Part A of versions 5 and 5.5 and Table 1.3 in Section 1 of version 6.

Part 9.1 of the Rules was relevantly made for the purposes of s 85(2)(c) of the Act.

20. On and from ~~May 2012~~ 15 December 2011, CommBank did not comply with the provisions of Section 2 of Part A of its Joint Program with respect to designated services provided through IDMs.

Particulars

The project to develop and adopt IDMs commenced on or about 2009. The first IDMs were rolled out in May 2012.

The inherent ML/TF risks reasonably faced of providing designated services through IDMs was high given that unlimited cash can be deposited anonymously at IDMs and is immediately available for transfer, including international transfer. See section 2.1.2 of Part A of the Joint Program and the CommBank Group's ML/TF Risk Assessment Methodology.

The inherent ML/TF risks reasonably faced by providing designated services through IDMs are different and higher than the inherent ML/TF risks reasonably faced by providing designated services

through standard ATMs. See section 2.1.2 of Part A of the Joint Program and the CommBank Group's ML/TF Risk Assessment Methodology.

CommBank's failure to follow its procedures prior to the roll-out of IDMs

CommBank did not carry out an assessment of the ML/TF risks it reasonably faced with respect to designated services provided through the delivery channel of IDMs, prior to adopting this channel in May 2012 – rule 9.1.5(5)(b) of the Rules and paragraph 2.2 of versions 5 and 5.5 and paragraph 2.1.4 of version 6 of Part A of the Joint Program.

CommBank did not carry out an assessment of the ML/TF risks it reasonably faced with respect to designated services provided through the new and developing technology facilitated by IDMs, prior to adopting this technology in May 2012 – rule 9.1.5(5)(c) of the Rules and paragraph 2.2 of versions 5 and 5.5 and paragraph 2.1.4 of version 6 of Part A of the Joint Program.

Nor did CommBank introduce appropriate risk-based systems and controls to mitigate and manage the higher ML/TF risks it reasonably faced by providing designated services through IDMs prior to rolling out IDMs in May 2012 – rules 9.1.3 and 9.1.5(4) of the Rules and paragraphs 2.1.3 and 2.3 of versions 5 and 5.5 and paragraph 2.2 of version 6 of Part A of the Joint Program.

CommBank's procedures relating to the ongoing identification, mitigation and management of ML/TF risks

Section 2 of Part A of its Joint Program requires CommBank to conduct an assessment of ML/TF risks faced by members of the Group and to maintain a current assessment. The assessment of ML/TF risks faced by the Group were required to be kept up to date and changes in risks recognised and assessed. The assessments were required to be conducted in accordance with the applicable Group risk policy or standard in effect at the relevant time - paragraphs 2.1.1 and 2.1.3 of versions 5 and 5.5 and paragraphs 2.1 and 2.1.3 of version 6 of Part A of the Joint Program.

Section 2 of CommBank's Part A Joint Program provided that material risks identified by the Group will be subject to systems and controls to manage those risks on an ongoing basis. Resources will be applied to those risks that have the highest propensity to be used by criminals to facilitate the ML/TF activity through the use of the Group's designated services – paragraph 2.3.1 of versions 5 and 5.5 and paragraph 2.2.1 of version 6 of Part A of the Joint Program.

Section 2 of CommBank's Part A Joint Program required it to conduct periodic reviews, at a minimum of every two years and using the Group's ML/TF risk assessment methodology, of the overall inherent ML/TF risk faced by the Group and its members in order to identify new and significant changes in ML/TF risks and modify or

supplement Parts A and B of the Program accordingly where necessary - paragraph 2.1.3 of versions 5, 5.5 and 6 of Part A of the Joint Program.

Paragraph 2.1.3 of section 2 of Part A of the Joint Program (versions 5, 5.5 and 6) required CommBank to review the risk methodology, and the risk attributes utilised to ensure these remain appropriate. Periodic reviews (at a minimum every two years) were to include consideration of:

- analysis of alerts from the ongoing monitoring of customer transactions;
- industry guidance on typologies and emerging trends; and
 - AUSTRAC guidance and feedback (if any).

Paragraph 2.1.3 of section 2 of Part A of the Joint Program (versions 5, 5.5 and 6) provided that, in addition to periodic reviews, the CommBank Group was required to review the ML/TF risk assessments and risk methodology in response to changes in the Group's operating environment, including:

- legislative changes;
- significant changes in economic or political environment; and
 - significant instances of money laundering or terrorism financing using the Group's products or services.

Paragraph 2.1.3 of section 2 of Part A of the Joint Program (versions 5, 5.5 and 6) also provided that if there was a significant change to the ML/TF risk identified, the risk based systems and controls will be assessed and if necessary modified to ensure they remain appropriate in accordance with the Group risk policy or framework applicable at the time.

The changing and growing ML/TF risks of IDMs

The ML/TF risks of IDMs changed significantly throughout the period on and from May 2012 as cash deposits into IDMs grew exponentially.

The high and growing ML/TF risks were also evident by the significant instances of money laundering (including as particularised in paragraphs 37 to 1406 below), by CommBank's analysis of alerts from the ongoing monitoring of customer transactions, and from AUSTRAC's guidance of 18 December 2015 on the ML/TF risks posed by IDMs.

CommBank's failure to follow its procedures relating to the ongoing identification, mitigation and management of ML/TF risks

After IDMs were first rolled out in May 2012 there were at least 6 periods of time within which CommBank should have, but did not, follow the procedures set out in Section 2 of its Part A Joint Program to:

- firstly, identify and assess the ML/TF risks of IDMs and any new and significant changes to those ML/TF risks; and
- secondly, mitigate and manage those risks through risk based systems and controls, including by modifying those systems and controls as necessary.

The periods of time within which CommBank should have, but did not, follow those procedures included:

- May 2012 to February 2013;
- February 2013 to May 2014;
- May 2014 to July 2015;
- July 2015 to January 2016;
- January 2016 to October 2016; and
- October 2016 to July 2017.

The contravention is ongoing.

On other occasions as particularised below, CommBank did not comply with provisions of Section 2 of Part A of its Joint Program with respect to the ongoing identification, mitigation and management of ML/TF risks relating to the provision of designated services through IDMs.

~~At no time prior to July 2015 did CommBank take any steps to assess the ML/TF risk posed by the provision of designated services through IDMs—rule 9.1.5(3) of the Rules and paragraphs 2.1.2 and 2.1.3 of versions 5 and 5.5 and paragraphs 2.1.1 and 2.1.3 of version 6 of Part A of the Joint Program.~~

~~An assessment or re-assessment of the ML/TF risks should have been conducted at various points in time on and from May 2012, as particularised below, having regard to the provisions in section 2 of Part A of the Joint Program.~~

~~In the six months from June 2012 to November 2012 a total of \$89.1 million in cash was deposited through Commbank IDMs. In the six months from January 2015 to June 2015 a total of \$3.35 billion in cash was deposited through Commbank IDMs. CommBank did not update its ML/TF risk assessment in response to the exponential rise in cash deposits through IDMs on and from May 2012—rule 9.1.5(3) of the Rules and paragraphs 2.1.2 and 2.1.3 of versions 5 and 5.5 and paragraphs 2.1.1 and 2.1.3 of version 6 of Part A of the Joint Program.~~

~~About \$8.91 billion in cash was deposited through CommBank IDMs before it conducted any assessment of the ML/TF risks associated with the IDM channel.~~

~~CommBank did not review its ML/TF risk assessment in response to significant instances of money laundering through IDMs as relevantly~~

~~detailed in paragraphs 37 to 969 below—rule 9.1.5(3) of the Rules and paragraph 2.1.3 of versions 5, 5.5 and 6 of Part A of the Joint Program.~~

~~CommBank did not carry out any periodic review of its risk assessment or methodology with regard to the analysis of alerts from the ongoing monitoring of customer transactions—rule 9.1.5(3) of the Rules and paragraph 2.1.3 of Part A of the Joint Program.~~

~~CommBank did not carry out any periodic review of its risk assessment or methodology with regard to AUSTRAAC's guidance of 18 December 2015 on the ML/TF risks posed by IDMs—rule 9.1.5(3) of the Rules and paragraph 2.1.3 of Part A of the Joint Program.~~

~~In addition to the failure to assess ML/TF risks, at no stage has CommBank introduced appropriate risk-based systems and controls to mitigate and manage the higher ML/TF risks it reasonably faces by providing designated services through IDMs—rules 9.1.3 and 9.1.5(4) of the Rules and paragraphs 2.1.3 and 2.3 of versions 5 and 5.5 and paragraph 2.2 of version 6 of Part A of the Joint Program.~~

~~No such systems and controls were introduced following the July 2015 ML/TF risk assessment and the Intelligence Bulletin dated 24 July 2015.~~

~~CommBank's transaction monitoring and threshold transaction reporting did not reduce the residual risk of IDMs to low.~~

21. By reason of paragraphs 16, 18, 19 and 20, CommBank contravened section 82(1) of the Act on each occasion, on and from ~~May 2012~~ 15 December 2011, that it did not comply with a provision in Part A of its Joint Program.

Transaction monitoring program contraventions

22. Part A of the Joint Program included a transaction monitoring program.

Particulars

Paragraph 2.3 of Section 7 of Part A of versions 5 and 5.5 and paragraph 6.4 of Section 6 of version 6 sets out the transaction monitoring program (the **transaction monitoring program**).

23. The transaction monitoring program was included in Part A of the Joint Program in order to comply with the requirements of rules 15.4, 15.5, 15.6 and 15.7 of the Rules.

Particulars

Section 7 of Part A of versions 5 and 5.5 and Section 6 of version 6 of the transaction monitoring program expressly provided that these sections establish or set out 'the Group's approach to meeting Ongoing Customer Due Diligence (OCDD) obligations under the Act' including transaction monitoring.

See also Section 1 of Part A of versions 5 and 5.5.

Rules 15.4, 15.5, 15.6 and 15.7 were made for the purposes of s 85(2)(c) of the Act.

CommBank undertakes transaction monitoring through its Financial Crimes Platform.

24. During the period 20 October 2012 to 27 September 2016 CommBank did not comply with the provisions of its transaction monitoring program with respect to 778,370 accounts (the **affected accounts**).

Particulars

Letter from CommBank to AUSTRAC dated 13 April 2017.

The affected accounts were not subject to account level transaction monitoring and in some instances were not subject to customer level transaction monitoring for varying periods.

The failure to comply with the transaction monitoring program with respect to the affected accounts was due to a 'systems error' identified by CommBank on 16 June 2014.

On or about 18 September 2014, CommBank updated its Financial Crimes Platform with a change to resolve the error on active affected accounts.

This update did not resolve the systems error on all active affected accounts until 30 November 2015.

The systems error affecting inactive accounts required a manual update to the Financial Crimes Platform.

CommBank did not resolve the systems error on all inactive affected accounts until 27 September 2016.

25. By reason of paragraphs 16, 22, 23, and 24, CommBank contravened section 82(1) from 20 October 2012 to 27 September 2016.

CONTRAVENTIONS OF S 43 OF THE ACT

27. If a reporting entity provides a designated service involving a threshold transaction, the reporting entity must give the AUSTRAC CEO a report (**TTR**) within 10 business days after the day on which the transaction takes place.

Particulars

Subsections 43(1) and (2) of the Act.

A threshold transaction is relevantly defined by s 5 as a transaction involving the transfer of physical currency, where the total amount of physical currency transferred is not less than \$10,000.

28. A report under s 43(2) must be in the approved form and contain such information relating to the transaction as is specified in the Rules.

Particulars

Subsection 43(3) of the Act.

The 53,506 contraventions of s 43(2) – cash deposits of \$10,000 or more through IDMs

29. On the dates identified in column C in Confidential Annexure B, CommBank provided designated services to customers within the meaning of item 3 of table 1 in s 6 of the Act by accepting cash deposits in the amount identified in column B through IDMs.
30. Each transaction identified in the Schedule involved a threshold transaction.
31. CommBank allocated the transaction number identified in column B to each threshold transaction identified in Confidential Annexure B.
32. By reason of the matters pleaded at paragraphs 29 and 30, CommBank was required to give the AUSTRAC CEO a report of each transaction identified in the Schedule within 10 business days after the date identified in column C.
33. CommBank lodged a report of each transaction identified in the Schedule on the date identified in column H.

Particulars

These reports included TTRs 586969730, 586981726, 586978268, 586951474, 586952754 and 586957334 involving cash transactions totalling \$63,700 to 5 customers in respect of whom CommBank assessed a potential link to terrorism or terrorism financing.

These reports included 60 TTRs involving cash transactions totalling \$629,200 in relation to customers involved in Syndicate No 1.

These reports included 178 TTRs involving cash transactions totalling \$1,780,030 in relation to customers involved in, or related to, Syndicate No 2.

These reports included 504 TTRs involving cash transactions totalling \$5,335,860 in relation to a single customer involved in Syndicate No 3. A further 10 TTRs involving cash transactions totalling \$100,000 relate to an account held in the name of Person 76, arrested and charged in connection with Syndicate No 3.

These reports included 888 TTRs involving cash transactions totalling \$9,462,095 in relation to customers involved in or connected to Syndicate No 4.

These reports included 16 late TTRs involving cash transactions totalling \$168,150 ~~5 late TTRs involving cash transactions totalling \$50,050~~ made by account holders connected to transactions effected by a money laundering syndicate in which Person 81, was involved. Person 81 was arrested on 19 January 2017 in relation to the laundering of millions of dollars knowingly dealing with proceeds of crime with intent to conceal and knowingly directing the activities of a criminal group.

34. Each report pleaded in paragraph 33 was allocated the number identified in column A.
35. By reason of the matters pleaded at paragraphs 32 and 33 above, CommBank did not give the AUSTRAC CEO a report of each transaction identified in Confidential Annexure B within 10 business days after the date identified in column C, in contravention of s 43(2) of the Act.
36. By reason of the matters pleaded at paragraph 35, CommBank contravened s 43(2) of the Act on 53,506 occasions.

CONTRAVENTIONS OF SECTIONS 41 AND 36 OF THE ACT

Money laundering through CommBank IDMs and accounts

37. Between 19 June 2014 and 22 February 2016, \$44,774,732 in cash was deposited through IDMs into CommBank accounts that are or have been the subject of criminal proceedings relating to money laundering offences by criminal syndicates.

Particulars

Yuen Hong Fung and Kha Weng Foong were charged with offences against the Act and the *Criminal Code Act 1995* (Cth) in relation to their involvement in **Syndicate No 1** (see from paragraph 40 below).

Kean Wai Wong, Person 31 and Person 32 were charged with offences against the *Criminal Code Act 1995* (Cth) in relation to their involvement in **Syndicate No 2** (see from paragraph 594 below).

Person 76, Person 77 and Jizhang Lu were charged with offences against the *Criminal Code Act 1995* (Cth) in relation to their involvement in **Syndicate No 3** (see from paragraph 771 below).

Person 78, Person 79, Yeuk Tung Kong, Wai Ki Vicky Fung, Man Chun Mak, Yiu Pong Tang, Hoi Tung Lau and Person 80 were charged with offences against the *Criminal Code Act 1995* (Cth) in relation to their involvement in **Syndicate No 4** (see from paragraph 792 below).

38. The \$44,774,732 in cash deposits processed through IDMs pleaded in paragraph 37 comprised 3,351 deposits under \$10,000, totalling \$26,828,462.

Particulars

See the pleadings at paragraphs 40 to 969.

39. It is an offence to conduct transactions, or cause transactions to be conducted, in a manner or form that has the sole or dominant purpose of ensuring, or attempting to ensure, that the transaction would not give rise to a TTR under s 43 of the Act.

Particulars

Section 142.

The conduct of transactions in this way is referred to as **structuring**.

Structuring involves patterns of cash transactions that are under \$10,000 each.

Syndicate No 1

40. Between 24 December 2014 and 24 August 2015, approximately \$20.59 million in cash was deposited through CommBank IDMs into 30 CommBank accounts, 29 of which were in fake names.
41. Between 15 December 2014 and 24 August 2015, approximately \$20.56 million was transferred by way of international money transfers (**IMTs**) from the above CommBank accounts to overseas accounts.

Particulars

Schedules A to Z and AA to AC.

The IDM deposits totalling \$20,596,325 comprised 2,525 IDM transactions, 2,462 of which were under \$10,000.

The IMTs totalling \$20,565,411 comprised 503 transactions to 13 offshore accounts.

CommBank charged \$22 for each IMT, totalling \$11,066 on these transactions.

Yuen Hong Fung and Kha Weng Foong were both arrested and charged with dealing in proceeds of crime and dealing with property reasonably suspected of being proceeds of crime contrary to section 400.3(1) and 400.9(1) of the *Criminal Code Act 1995* (Cth), and with conducting transactions so as to avoid reporting requirements relating to threshold transactions, contrary to section 142(1) of the Act in connection with these cash deposits and IMTs.

On 18 July 2017, Yuen Hong Fung was sentenced to 6 years and 4 months' imprisonment with a non-parole period of 4 years and 6 months, and Kha Weng Foong was sentenced to 5 years and 3 months' imprisonment with a non-parole period of 3 years and 5 months.

Overview of the money laundering from January 2015 to 1 July 2015 and CommBank's suspicions – Person 1 and the 15 fake name accounts

42. Between 1 January 2015 and 30 June 2015, 1,770 cash deposits totalling approximately \$14.33 million were made into 16 CommBank accounts, 15 of which were in fake names, through IDMs (the **16 suspicious accounts**).

Particulars

Person 1 – CommBank Account 1 (the **only real name account**).

Person 2 – CommBank Account 2.

Person 3 – CommBank Account 3.

Person 4 – CommBank Account 4.

Person 5 – CommBank Account 5.

Person 6 – CommBank Account 6.

Person 7 – CommBank Account 7.

Person 8 – CommBank Account 8.

Person 9 – CommBank Account 9.

Person 10 – CommBank Account 10.

Person 11 – CommBank Account 11.

Person 12 – CommBank Account 12.

Person 13 – CommBank Account 13.

Person 14 – CommBank Account 14.

Person 15 – CommBank Account 15.

Person 16 – CommBank Account 16.

SMR Report 543348622.

Email of 6 July 2015 from the Executive Manager of Intelligence in Group Security to other Group Security team members advising that the AFP had formally notified CommBank that a syndicate had opened 21 accounts in false names (including the 16 suspicious accounts). The email indicated that each of these accounts appeared to be the beneficiary of cash structuring via ATMs with the aggregated proceeds being sent to one of three parties in Hong Kong via IMTs.

Email of 27 August 2015 from the AFP to the Executive Manager of Intelligence in Group Security.

43. Between 1 January 2015 and 1 July 2015 approximately \$14.33 million was transferred from 15 of the 16 suspicious accounts to accounts in Hong Kong.

Particulars

Schedules A to O to the Statement of Claim.

\$5,943,286 transferred in 141 separate transfers to Offshore Account 1.

\$8,046,600 transferred in 176 separate transfers to Offshore Account 2.

\$53,436 transferred in 6 separate transfers to Offshore Account 3.

\$37,536 transferred in 7 separate transfers to Offshore Account 4.

\$143,770 transferred in 4 separate transfers to Offshore Account 5.

\$8,970 transferred in 1 transfer to Offshore Account 6.

\$1,600 transferred in 2 separate transfers to Offshore Account 7.

\$1,730 transferred in 2 separate transfers to Offshore Account 8.

\$29,140 transferred in 2 separate transfers to Offshore Account 9.

\$8,612 transferred in 1 transfer to Offshore Account 10.

\$500 transferred in 1 transfer to Offshore Account 11.

\$38,650 transferred in 3 separate transfers to Offshore Account 19.

44. By no later than 14 April 2015, CommBank had identified repeated and suspicious patterns of highly structured cash deposits into the 16 suspicious accounts followed by international money transfers to Offshore Account 1, during the period 21 January 2015 to 13 April 2015.

Particulars

SMR 543348622 lodged on 14 April 2015.

This SMR reported a total of \$4,255,696 cash deposits into the 16 suspicious accounts, of which \$3,980,395 was structured.

This SMR also reported \$4,126,363 had been transferred from the 16 suspicious accounts to Offshore Account 1 in Hong Kong during the period 21 January 2015 to 13 April 2015.

The SMR also reported that the majority of accounts had been opened electronically using a specific BSB and the customers verified through electronic methods using drivers licence card numbers in replacement of the actual licence number.

CommBank had earlier identified the same pattern of suspicious transactions on 26 February 2015 in relation to Person 2's account (CommBank Account 2) (SMR 531370027) and on 10 March 2015 in relation to Person 3's account (CommBank Account 3) (SMR 534323765).

45. From 14 April 2015 to 30 June 2015, approximately \$9.24 million in cash was deposited into 15 of the 16 suspicious accounts.

Particulars

Account statements for the 16 suspicious accounts.

\$199,880 deposited into CommBank Account 1.

\$699,610 deposited into CommBank Account 2.

\$503,120 deposited into CommBank Account 3.

\$628,670 deposited into CommBank Account 4.

\$451,240 deposited into CommBank Account 5.

\$351,700 deposited into CommBank Account 6.

\$720,900 deposited into CommBank Account 7.

\$796,715 deposited into CommBank Account 8.

\$897,560 deposited into CommBank Account 9.

\$69,550 deposited into CommBank Account 10.

\$891,965 deposited into CommBank Account 11.

\$947,700 deposited into CommBank Account 12.

\$530,500 deposited into CommBank Account 13.

\$1,008,215 deposited into CommBank Account 14.

\$544,970 deposited into CommBank Account 15.

46. From 14 April 2015 to 1 July 2015, approximately \$2.278 million was transferred from 11 of the 16 suspicious accounts to Offshore Account 1 in Hong Kong.

Particulars

Account statements for the 16 suspicious accounts.

\$2,278,336 transferred to Offshore Account 1 account in this period.

\$197,784 transferred from CommBank Account 1 including 2 IMTs totalling \$99,956 to Offshore Account 1.

\$697,020 transferred from CommBank Account 2 including 7 IMTs totalling \$349,360 to Offshore Account 1.

\$502,808 transferred from CommBank Account 3 including 7 IMTs totalling \$348,318 to Offshore Account 1.

\$628,342 transferred from CommBank Account 4 including 8 IMTs totalling \$396,192 to Offshore Account 1.

\$450,977 transferred from CommBank Account 5 including 3 IMTs totalling \$129,770 to Offshore Account 1.

\$299,588 transferred from CommBank Account 6 including 5 IMTs totalling \$248,632 to Offshore Account 1.

\$796,189 transferred from CommBank Account 8 including 2 IMTs totalling \$98,748 to Offshore Account 1.

\$897,105 transferred from CommBank Account 9 including 2 IMTs totalling \$49,656 to Offshore Account 1.

\$548,120 transferred from CommBank Account 13 including 4 IMTs totalling \$159,606 to Offshore Account 1.

\$994,385 transferred from CommBank Account 14 including 3 IMTs totalling \$149,918 to Offshore Account 1.

\$541,148 transferred from CommBank Account 15 including 5 IMTs totalling \$248,180 to Offshore Account 1.

47. From 14 April 2015 to 1 July 2015, approximately \$6.68 million was transferred from 15 of the 16 suspicious accounts to 7 other accounts in Hong Kong.

Particulars

Account statements for the 16 suspicious accounts.

\$197,784 transferred from CommBank Account 1 including 2 IMTs totalling \$97,828 to Offshore Account 2.

\$697,020 transferred from CommBank Account 2 including 7 IMTs totalling \$344,582 to Offshore Account 2, 1 IMT of \$2,478 to Offshore Account 4 and 1 IMT of \$600 to Offshore Account 3.

\$502,808 transferred from CommBank Account 3 including 4 IMTs totalling \$151,110 to Offshore Account 2, 1 IMT of \$1,450 to Offshore

Account 4, 1 IMT of \$600 to Offshore Account 3, 1 IMT of \$600 to Offshore Account 7 and 1 IMT of \$730 to Offshore Account 8.

\$628,342 transferred from CommBank Account 4 including 5 IMTs totalling \$201,142 to Offshore Account 2 and 2 IMTs totalling \$31,008 to Offshore Account 4.

\$450,977 transferred from CommBank Account 5 including 7 IMTs totalling \$300,257 to Offshore Account 2, 1 IMT of \$1,050 to Offshore Account 4 and 1 IMT of \$19,900 to Offshore Account 19.

\$299,588 transferred from CommBank Account 6 including 2 IMTs totalling \$50,956 to Offshore Account 2.

\$650,804 transferred from CommBank Account 7 including 13 IMTs totalling \$649,604 to Offshore Account 2, 1 IMT of \$600 to Offshore Account 4 and 1 IMT of \$600 to Offshore Account 7.

\$796,189 transferred from CommBank Account 8 including 14 IMTs totalling \$695,441 to Offshore Account 2, 1 IMT of \$1,000 to Offshore Account 7 and 1 IMT of \$1,000 to Offshore Account 3.

\$897,105 transferred from CommBank Account 9 comprising 17 IMTs totalling \$846,949 to Offshore Account 2 and 1 IMT of \$500 to Offshore Account 11.

\$67,497 transferred from CommBank Account 10 comprising 2 IMTs to Offshore Account 2.

\$891,129 transferred from CommBank Account 11 comprising 18 IMTs to Offshore Account 2 and 1 IMT of \$658 to Offshore Account 3.

\$947,276 transferred from CommBank Account 12 comprising 19 IMTs to Offshore Account 2.

\$548,120 transferred from CommBank Account 13 including 8 IMTs totalling \$388,514 to Offshore Account 2.

\$994,385 transferred from CommBank Account 14 including 16 IMTs totalling \$794,489 to Offshore Account 2 and 1 IMT of \$49,978 to Offshore Account 3.

\$541,148 transferred from CommBank Account 15 comprising 4 IMTs totalling \$143,770 to Offshore Account 5, 1 IMT of \$950 to Offshore Account 4 and 1 IMT of \$1,000 to Offshore Account 8.

48. On 18 May 2015, the Australian Federal Police (**AFP**) served a notice issued under s 49 of the Act (the **s 49 notice**) on CommBank seeking account opening and transaction documents in relation to the 16 suspicious accounts.

Particulars

The AFP advised that it was seeking further information in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts.

49. On 1 July 2015, the AFP spoke to CommBank about 18 international funds transfer instructions (**IFTIs**) it had accepted on 30 June 2015 for the transfer of funds from CommBank accounts to the holder of Offshore Accounts 1 and 2 in Hong Kong.

Particulars

1 July 2015 email from Executive Manager, Intelligence & Planning, Group Security, CommBank to AFP at 11.27am noting that IMTs had been sent to 3 different account titles in Hong Kong: the holder of Offshore Accounts 1 and 2, the holder of Offshore Accounts 7 and 8, and the holder of Offshore Accounts 3, 4, 5 and 19.

1 July 2015 email from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank, at 2.14pm advising that the Criminal Asset Confiscation Taskforce in Sydney had 'been looking at this syndicate for a month, and the transactions to [the holder of Offshore Account 1 and 2] in Hong Kong'.

1 July 2015 email from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank, at 2.58pm advising and providing details of 18 IFTIs on 30 June 2015 to the holder of Offshore Account 1 and 2 in Hong Kong. The Federal Agent raised the possibility of suspending and locking down the accounts to 'prevent money being transferred'.

The total value of funds transferred was \$897,709.

The \$897,709 came from structured cash deposits made between 29 and 30 June 2015.

13 of the 18 IFTIs were from accounts the subject of the s 49 notice:

Person 2 – CommBank Account 2 – 2 IFTIs (items 68 and 70 of Schedule B to the Statement of Claim).

Person 5 – CommBank Account 5 – 2 IFTIs (items 46 and 48 of Schedule E to the Statement of Claim).

Person 1 – CommBank Account 1 (item 26 of Schedule A to the Statement of Claim).

Person 3 – CommBank Account 3 (item 72 of Schedule C to the Statement of Claim).

Person 10 – CommBank Account 10 (item 12 of Schedule J to the Statement of Claim).

Person 11 – CommBank Account 11 (item 51 of Schedule K to the Statement of Claim).

Person 14 – CommBank Account 14 (item 64 of Schedule N to the Statement of Claim).

Person 4 – CommBank Account 4 (item 75 of Schedule D to the Statement of Claim).

Person 15 – CommBank Account 15 (item 28 of Schedule O to the Statement of Claim).

Person 9 – CommBank Account 9 (item 57 of Schedule I to the Statement of Claim).

Person 8 – CommBank Account 8 (item 61 of Schedule H to the Statement of Claim).

The remaining IFTIs were sent from the following CommBank accounts (the **3 additional suspicious accounts**):

Person 17 – CommBank Account 17 – 2 IFTIs (items 42 and 44 of Schedule P to the Statement of Claim).

Person 18 – CommBank Account 18 (item 39 of Schedule Q to the Statement of Claim).

Person 19 – CommBank Account 19 – 2 IFTIs (items 11 and 13 of Schedule R to the Statement of Claim).

50. By no later than 1 July 2015, CommBank had identified a suspicious pattern of activity on a number of CommBank accounts, including on 11 of the 16 suspicious accounts, where:
- a. the account holder was generally of Malaysian background in Australia on a holiday visa;
 - b. the account had recently been opened;
 - c. transactions involving blatant structuring at ATMs was occurring; and
 - d. funds would be sent offshore.

Particulars

Person 3; Person 12; Person 11; Person 5; Person 2; Person 1;
Person 6; Person 7; Person 8; Person 4; Person 15.

Email from CommBank Intelligence Analyst to Senior Analyst AML & Sanctions Operations of 30 June 2015 at 2.48pm.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

Both emails were forwarded to the AFP by the Executive Manager, Intelligence & Planning, Group Security, CommBank on 1 July 2015 at 4.14pm.

See also email between AML Team members dated 26 May 2015 at 1.24am with the subject line 'TM-179633A Malaysian National ML ring'.

51. By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to Offshore Accounts 7 and 8, to Offshore Account 3 and to Offshore Accounts 1 and 2.

Particulars

Email from Executive Manager, Intelligence & Planning, Group Security, CommBank to AFP of 1 July 2015 at 11.27am.

Email from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank, of 1 July 2015 at 2.14pm advising that the Criminal Asset Confiscation Taskforce in Sydney had been looking at this syndicate for a month and at the transactions to the holder of Offshore Accounts 1 and 2 in Hong Kong.

See also email dated 30 June 2015 from CommBank Intelligence Analyst to Executive Manager, Intelligence & Planning, Group Security, CommBank headed 'Urgent!!'.

52. On 1 July 2015, the AFP asked CommBank to stop withdrawals on the 16 suspicious accounts and the 3 additional suspicious accounts but to continue allowing deposits to be made so that the AFP would be in a position to restrain the deposits before they were transferred to Hong Kong.

Particulars

Email from Executive Manager, Intelligence & Planning, Group Security, CommBank to AFP of 1 July 2015 at 3.14pm.

Email from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank of 1 July 2015 at 4.08pm.

53. On 1 July 2015, CommBank issued letters to a number of customers terminating their accounts for intense blatant structuring and for sending funds offshore, including to persons purporting to be account holders of 11 of the 16 suspicious accounts who had sent IFTI debits to Offshore Bank 4 for the holder of Offshore Accounts 1 and 2.

Particulars

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

54. Syndicate No 1 laundered a further \$4.78 million from 30 June 2015 to 24 August 2015 using the same pattern identified by CommBank on 1 July 2015 and as pleaded at paragraph 50, but in 11 different fake name accounts opened online as pleaded at 422 to 593 below.

The contraventions of ss 41 and 36 in relation to the 16 suspicious accounts – money laundering in the period 1 January 2015 to 1 July 2015

Person 1

55. On or about 31 July 2014, CommBank provided a designated service to Person 1 by opening an account in the name of Person 1.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 1.

SMR 543348622 dated 14 April 2015.

Person 1's occupation was recorded as 'finance manager'.

56. Between 19 January 2015 and 30 June 2015, 66 cash deposits totalling \$526,830 were made into CommBank Account 1 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 1.

65 of these cash deposits were under \$10,000.

Schedule A to the Statement of Claim.

57. Between 19 January 2015 and 5 June 2015, a total of \$524,547 was transferred from CommBank Account 1 to 2 accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

10 IMTs totalling \$426,719 sent to Offshore Account 1.

2 IMTs totalling \$97,828 sent to Offshore Account 2.

CommBank statement for CommBank Account 1.

Schedule A to the Statement of Claim.

58. CommBank suspected that the cash deposits pleaded at paragraph 56 were structured contrary to s 142 of the Act.

Particulars

SMR 543348622 dated 14 April 2015.

SMR 558944629 dated 12 June 2015.

65 IDM deposits were under \$10,000.

59. By no later than 14 April 2015, CommBank was aware of highly suspicious activity on CommBank Account 1 in the name of Person 1.

Particulars

SMR 543348622 dated 14 April 2015.

CommBank suspected multiple cash deposits under \$10,000 made to CommBank Account 1 were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was indicative of money laundering and was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above.

The failures to report suspicious matters for the purposes of s 41

60. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 24, 25 and 26 of Schedule A to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

Two SMRs had been lodged with respect to this account for suspected money laundering and structuring to avoid reporting obligations – SMRs 543348622 dated 14 April 2015 and 558944629 dated 12 June 2015.

By 14 April 2015, CommBank suspected that highly suspicious patterns of activity on this account was indicative of money laundering and was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above - SMR 543348622 dated 14 April 2015.

The AFP had sought information from CommBank in relation to this account as early as 18 May 2015 - the s 49 notice of 18 May 2015 pleaded at paragraph 48.

Between 21 January 2015 and 5 June 2015, 6 automatic transaction monitoring alerts had triggered in relation to this account including, TM-169664A triggered on 21 January 2015, TM-169715A triggered on 21 January 2015, TM-185973A triggered on 29 March 2015, TM-188752A triggered on 8 April 2015, TM-198756A triggered on 28 May 2015 and TM-200183A triggered on 5 June 2015.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paras 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

61. By no later than 3 July 2015 CommBank suspected on reasonable grounds that Person 1 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML & Sanctions Operations Team, Group Security (**AML team**) at 5:22pm advising that the AFP has identified 21 customers, including Person 1, suspected of using false IDs, with potential links to money laundering.

On 3 July 2015 an alert was entered on Pegasus - HRC-2388124A – recording that the AFP had confirmed it was likely that this account opened using a false identity.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 1 (CommBank Account 1). The Executive General

Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID.

- 62. By reason of the matters pleaded in paragraphs 60 and 61, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 63. By reason of the matters pleaded in paragraphs 60 and 62, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
- 64. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at 60.

Particulars

CommBank did not report its suspicions with respect to transactions on and from 30 June 2015 as identified at items 24, 25 and 26 of Schedule A to the Statement of Claim.

\$49,880 in cash deposits and \$49,850 transferred to Hong Kong was not reported.

- 65. By reason of the matters pleaded in paragraphs 61 and 62, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
- 66. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 61.

Particulars

SMR 673791670 dated 27 July 2016.

- 67. By reason of the matters pleaded at paragraphs 60 to 66, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 68. On and from 21 January 2015, CommBank did not monitor Person 1 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 21 January 2015 and 5 June 2015, 9 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to

monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 21 January and 29 March 2015 transaction monitoring alerts TM-169664A, TM-169715A and TM-185973A triggered for large aggregate cash transactions and structured deposits across branches but were not reviewed by the AML team until 10 April 2015. On 8 April 2015 transaction monitoring alert TM-188752A triggered for large aggregate cash transactions and was reviewed by the AML team on 13 April 2015. SMR 543348622 was lodged on 14 April 2015, reporting a highly suspicious pattern of activity involving 15 other accounts and that was indicative of money laundering. In spite of this, the alert was closed and no customer due diligence carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48. No customer due diligence was carried out in response to this request.

On 28 May and 5 June 2015 transaction monitoring alerts TM-198756A and TM-200183A triggered for large aggregate cash transactions and high frequency deposits into HRC account but were not reviewed by the AML team until 12 June 2015. An SMR was lodged and the alerts were closed.

No transaction monitoring alerts were raised after the SMR on 12 June 2015 was lodged.

On 12 June 2015 the AML team recommended termination of the customer's account for high risk blatant structuring and remittance to Hong Kong and identified a number of customers conducting the same activity on newly opened accounts including Person 3, Person 12, Person 11 and Person 2. Termination was approved by the Business Unit, the Retail Banking Service (**RBS**) on 12 June 2015.

On 15 June 2015 CommBank sent a letter to the customer advising the account would be closed. CommBank gave the customer 30 days' notice of the closure, in spite of the known high risk involved with this account. Between 15 June 2015 and 30 June 2015, a further \$49,880 in cash was deposited into Person 1's account, and \$49,978 was transferred offshore.

No enhanced customer due diligence proportionate to the ML/TF risk was carried out until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager, Intelligence, Group Security to AFP dated 1 July 2015 at 5.55pm).

From 21 January 2015 to 30 June 2015 \$526,830 in cash was deposited into Person 1's account through CommBank IDMs and

\$524,675 was transferred to 2 accounts in Hong Kong, being Offshore Accounts 1 and 2.

As at 14 October 2016, the account was pending closure.

CommBank lodged 1 late TTR totalling \$10,000 with respect to this account.

69. On and from 14 April 2015, CommBank did not monitor Person 1 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act with respect to Person 1 and having submitted an SMR on 14 April 2015 with respect to Person 1, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 1.

Having formed a suspicion for the purposes of section 41 of the Act with respect to Person 1 and having submitted an SMR on 12 June 2015 with respect to Person 1, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 1.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 1 until 1 July 2015 when it put a stop on this account at the request of the AFP (email from Executive General Manager, Intelligence, in Group Security to the AFP dated 1 July 2015 at 5.55pm).

As at 14 October 2016, CommBank had not closed the account in response to the suspected money laundering.

From 14 April 2015 to 30 June 2015 Person 1 deposited \$199,880 in cash through CommBank IDMs and transferred \$197,912 to accounts in Hong Kong.

70. By reason of the matters pleaded at paragraphs 68 and 69, CommBank contravened s 36(1) on and from 21 January 2015 with respect to Person 1.

Person 2

71. On or about 3 December 2014, CommBank provided a designated service to a person purporting to be Person 2 by opening an account in the name of Person 2.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 2.

Person 2 did not exist.

Person 2's occupation was recorded as 'pharmacy manager'.

72. Between 14 December 2014 and 30 June 2015, 176 cash deposits totalling \$1,341,160 were made into CommBank Account 2.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 2.

175 of these deposits were made through CommBank IDMs.

164 IDM deposits were under \$10,000.

1 cash deposit of \$9,000 made at a CommBank branch.

Schedule B to the Statement of Claim.

73. Between 19 January 2015 and 30 June 2015, a total of \$1,329,211 was transferred from CommBank Account 2 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

\$844,209.10 was transferred in 20 IMTs to Offshore Account 1.

\$481,924.81 was transferred in 10 IMTs to Offshore Account 2.

\$2,478 was transferred to Offshore Account 4.

\$600 was transferred to Offshore Account 3.

CommBank statement for CommBank Account 2.

Schedule B to the Statement of Claim.

74. CommBank suspected that the cash deposits pleaded at paragraph 72 were structured contrary to s 142 of the Act.

Particulars

164 IDM deposits were under \$10,000.

1 branch deposit was under \$10,000.

SMR 531370027 dated 26 February 2015.

SMR 543348622 dated 14 April 2015.

SMR 558859894 dated 11 June 2015.

75. By no later than 26 February 2015, CommBank was aware of suspicious activity on CommBank Account 2 in the name of Person 2.

Particulars

SMR 531370027 dated 26 February 2015 which reported structured cash deposits followed by international funds transfers to Hong Kong indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

76. By no later than 2 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 15 to 25 of Schedule B to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 26 February 2015 the AML Team had reviewed all transactions on this account between 3 December 2014 and 26 February 2015 and had identified structured cash deposits on this account followed by international funds transfers to Hong Kong indicative of money laundering and avoiding reporting obligations – SMR 531370027.

On 2 April 2015 transaction monitoring alert TM-185845A was reviewed by the AML Team which identified that the suspicious activity reported on 26 February 2015 was ongoing and noted 'two month review of the account found the similar activity, therefore no added value to report it within three months period'.

77. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 17 and 21 of Schedule B to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 14 April 2015, the AML Team had reviewed transactions on Person 2's account from 27 February 2015 to 13 April 2015 and had identified an ongoing pattern of intense structured cash deposits to avoid reporting obligations followed by suspicious offshore transfers in this period – see SMR 543348622 lodged on 14 April 2015 and transaction monitoring alert TM-188615A triggered on 7 April 2015 and reviewed by the AML Team on 13 April 2015.

By no later than 14 April 2015, CommBank suspected that this highly suspicious pattern of activity was indicative of money laundering and was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above: SMR 543348622.

Also, on 1 April 2015 transaction monitoring alert TM-187119A triggered on CommBank Account 4 in the name of Person 4 for structured withdrawals and was reviewed by the AML team on 8 April 2015 noting 'there is another entity...[Person 2]...who is conducting the exact same activity and was reported on 26 February 2015. Can you please add this person as a POI and complete a wider search on the beneficiary of these IMT's and see who else is sending funds here'.

78. By no later than 11 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 40 to 56 of Schedule B to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 11 June 2015 the AML Team reviewed 4 transaction monitoring alerts - TM-189793A triggered on 14 April 2015, TM-193797A triggered on 8 May 2015, TM-197483A triggered on 19 May 2015 and TM-199303A triggered on 1 June 2015. In reviewing these alerts, the AML Team reviewed transactions on this account from 26 February

2015 to 11 June 2015 and concluded that intense structured deposits followed by offshore transfers continued. The AML Team also concluded Person 2 was a high risk customer.

By no later than 18 May 2015 CommBank was aware of law enforcement interest in Person 2 when the AFP served the s 49 notice pleaded at paragraph 48 on CommBank requesting further information in relation to this account.

79. By no later than 22 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 57 to 66 of Schedule B to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 22 June 2015 the AML Team reviewed 2 transaction monitoring alerts – TM-203184A raised on 15 June 2015 and TM-203438A raised on 16 June 2015. The AML Team reviewed account activity since 11 June 2015 and identified ongoing suspicious cash activity but decided not to report the suspicion because the ‘customer was last reported to AUSTRAC on 11 June 2015...and a review since then found the activity continues however is not excessive. Await termination of customer under TERM-1139C’.

80. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 67 to 70 of Schedule B to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 1 July 2015, CommBank had raised and reviewed 12 automated transaction monitoring alerts with respect to this account and had lodged 3 SMRs, being SMRs 531370027 dated 26 February 2015, 543348622 dated 14 April 2015 and 558859894 dated 11 June 2015.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paras 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

81. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 2 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML Team at 5:22pm advising that the AFP has identified 21 customers,

including Person 2, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 2 (CommBank Account 2). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID.

- 82. By reason of the matters pleaded in paragraphs 76 to 81, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 83. By reason of the matters pleaded in paragraphs 76 and 82, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 2 April 2015, being 9 April 2015.
- 84. It was not until 14 April 2015 that the AUSTRAC CEO gave an SMR in relation to the matters pleaded at paragraph 76.

Particulars

SMRs 531370027 dated 26 February 2015 and 543348622 dated 14 April 2015.

The AML Team reviewed the account on 2 April 2015 and identified that the suspicious activity set out in SMR 531370027 was continuing. However, the AML team did not report its suspicions with respect to transactions in the period 26 February 2015 to 2 April 2015 until 14 April 2015.

\$235,150 in cash deposits and \$137,685 transferred to Hong Kong were reported late.

- 85. By reason of the matters pleaded in paragraphs 77 and 82, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
- 86. By reason of the matters pleaded in paragraphs 78 and 82, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 June 2015, being 16 June 2015.
- 87. By reason of the matters pleaded in paragraphs 79 and 82, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 22 June 2015, being 25 June 2015.

88. By reason of the matters pleaded in paragraphs 80 and 82, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
89. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 77 to 80.

Particulars

SMR 531370027 dated 26 February 2015, SMR 543348622 dated 14 April 2015 and SMR 558859894 dated 11 June 2015 in respect of Person 2 and the holder of Offshore Accounts 1 and 2.

See SMR 543348622 dated 14 April 2015. Having formed a suspicion about the overseas transfers, CommBank reported IMTs to Offshore Account 1, but did not report that IMTs were sent to Offshore Account 2 as identified at items 17 and 21 of Schedule B to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

Although CommBank formed the suspicion that there were continuing intense structured deposits followed by offshore transfers in the period up until 11 June 2015, SMR 558859894 dated 11 June 2015 only reported the transactions identified at items 38 and 39 of Schedule B. CommBank did not report its suspicions with respect to the transactions identified at items 40 to 56 of Schedule B. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

No SMRs were lodged by CommBank in relation to its suspicions about ongoing activity on this account after 11 June 2015 as set out at items 57 to 70 of Schedule B to the Statement of Claim.

\$649,610 in cash deposits and \$744,414 transferred to accounts in Hong Kong were never reported.

90. By reason of the matters pleaded in paragraphs 81 and 82, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
91. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 81.

Particulars

SMR 674002485 dated 27 July 2016.

92. By reason of the matters pleaded at paragraphs 76 to 91, CommBank contravened s 41(2)(a) of the Act on 6 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

93. On and from than 20 January 2015, CommBank did not monitor Person 2 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 20 January 2015 and 16 June 2015, 12 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 20 January, 30 January and 18 February 2015 transaction monitoring alerts TM-169570A, TM-170877A, TM-170932A and TM-175153A triggered for structured cash deposits and large aggregate cash transactions but were not reviewed by the AML team until 25 and 26 February 2015. SMR 531370027 was lodged, the alerts were closed and no customer due diligence carried out.

On 1 and 2 April 2015 the AML Team reviewed transaction monitoring alert TM-185845A triggered on 26 March 2015 for large aggregate cash transactions. The reviewer concluded that 'Bank records indicate customer was reported to AUSTRAC ... on 26 Feb 2015. Two months of review of the account found similar activity, therefore no added value to report it within three months period. Closed as not suspicious at this stage'. The alert was closed, no SMR was lodged and no customer due diligence carried out.

On 8 April 2015 the AML Team reviewed transaction monitoring alert TM-187119A triggered on 1 April 2015 on CommBank Account 4 in the name of Person 4 for structured withdrawals. The reviewer noted 'there is another entity...[Person 2]...who is conducting the exact same activity and was reported on 26 February 2015. Can you please add this person as a POI and complete a wider search on the beneficiary of these IMT's and see who else is sending funds here'.

On 13 April 2015 the AML Team reviewed transaction monitoring alert TM-188615A triggered on 7 April 2015 for structured cash deposits across branches. SMR 543348622 was lodged on 14 April 2015, reporting a highly suspicious pattern of activity involving 15 other accounts and that was indicative of money laundering. The alert was closed and no customer due diligence carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48. No customer due diligence was carried out in response to this request.

In the meantime, transaction monitoring alerts continued to be raised.

On 14 April 2015, 8 May 2015, 19 May 2015 and 1 June 2015 transaction monitoring alerts TM-189793A, TM-193797A, TM-197483A and TM-199303A triggered for structured withdrawals and large aggregate cash transactions but were not reviewed by the AML

team until 11 June 2015. On 11 June 2015 SMR 558859894 was lodged.

On 11 June 2015 the AML Team recommended the relationship with the customer be terminated for 'blatantly depositing (excessive) intensely structured cash deposits to recently opened account' followed by IMTs to the holder of Offshore Accounts 1 and 2, who was the previous beneficiary of other unrelated parties receiving structured cash deposits – TERM 1139C. This was approved by the business unit, RBS, on 12 June 2015.

On 15 and 16 June 2015 transaction monitoring alerts TM-203184A and TM-203438A triggered for large aggregate cash transactions and structured withdrawals but were not reviewed by the AML team until 22 June 2015. Upon review of TM-203184A, it was noted 'customer was last reported to AUSTRAC on 11 June 2015...a review since then found the activity continues however is not excessive. Await termination of customer under TERM-1139C'. The alerts were closed, no SMR was lodged and no consideration was given as to whether further customer due diligence was appropriate given the ongoing blatant structuring.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5.55pm).

As at 14 October 2016, the account was pending closure.

From 20 January 2015 to 30 June 2015 \$1,322,710 in cash was deposited into Person 2's account and \$1,319,779 was transferred to accounts in Hong Kong.

CommBank lodged 5 late TTRs totalling \$50,000 with respect to this account.

94. On and from 26 February 2015, CommBank did not monitor Person 2 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 and having submitted an SMR on 26 February 2015 with respect to Person 2, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 2.

Having formed a suspicion for the purposes of s 41 and having submitted an SMR on 14 April 2015 with respect to Person 2, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 2.

Having formed a suspicion for the purposes of s 41 and having submitted an SMR on 11 June 2015 with respect to Person 2, rule

15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 2.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 2 until 1 July 2015 when it put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5.55pm).

From 26 February 2015 to 30 June 2015 Person 2 deposited \$1,163,980 in cash and transferred \$1,161,178 to accounts in Hong Kong.

95. By reason of the matters pleaded at paragraphs 93 and 94, CommBank contravened s 36(1) on and from 20 January 2015 with respect to Person 2.

Person 3

96. On or about 3 December 2014, CommBank provided a designated service to a person purporting to be Person 3 by opening an account in the name of Person 3.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 3.

Person 3 did not exist.

Person 3's occupation was recorded as 'accountant'.

97. Between 15 December 2014 and 30 June 2015, 138 cash deposits totalling \$1,155,670 were made into CommBank Account 3.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 3.

132 of these cash deposits were made through CommBank IDMs.

127 IDM deposits were under \$10,000.

5 cash deposits were made at CommBank branches.

4 branch deposits were under \$10,000.

Schedule C to the Statement of Claim.

98. Between 15 December 2014 and 30 June 2015, a total of \$1,149,678 was transferred from CommBank Account 3 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 3.

22 IMTs totalling \$968,278.25 to Offshore Account 1.

4 IMTs totalling \$151,110 to Offshore Account 2.

3 IMTs totalling \$26,910 to Offshore Account 12.

IMT of \$1,450 to Offshore Account 4.

IMT of \$600 to Offshore Account 3.

IMT of \$730 to Offshore Account 8.

IMT of \$600 to Offshore Account 7.

Schedule C to the Statement of Claim.

99. CommBank suspected that the cash deposits pleaded at paragraph 97 were structured contrary to s 142 of the Act.

Particulars

SMR 534323765 dated 10 March 2015.

127 IDM deposits were under \$10,000.

4 branch deposits were under \$10,000.

100. By no later than 10 March 2015, CommBank was aware of suspicious activity on CommBank Account 3 in the name of Person 3.

Particulars

SMR 534323765 dated 10 March 2015 which reported multiple cash deposits at ATMs under the TTR requirements followed by offshore transfers, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

101. By no later than 10 March 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 9, 11, 13, 15, 18, 21, 23 and 25 of Schedule C to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 10 March 2015, the AML team had reviewed transactions on Person 3's account from 3 December 2014 to 10 March 2015 and had identified suspicious account activity in this period – see SMR 534323765 dated 10 March 2015.

102. By no later than 2 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 26 to 35 of Schedule C to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 534323765 dated 10 March 2015 and SMR 543348622 dated 14 April 2015.

On 26 March 2015 transaction monitoring alert TM-185843A triggered for large aggregate cash transactions and was reviewed by

the AML team on 1 and 2 April 2015. Upon review, it was noted 'a month review found the activity continues therefore no added value to report it within three months period'. No SMR was lodged at that time.

103. By no later than 10 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 48, 49 and 53 of Schedule C to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 10 June 2015, the AML team had reviewed transactions on Person 3's account from 10 March 2015 to 10 June 2015 and had identified multiple instances of cash deposits followed by larger outgoing IFTIs to an account in Hong Kong – see SMR 558527793 dated 10 June 2015.

By 14 April 2015 CommBank suspected multiple cash deposits under \$10,000 made to the Person 3's account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above.

By no later than 18 May 2015 CommBank was aware of law enforcement interest in Person 3 when the AFP served the s 49 notice pleaded at paragraph 48 on CommBank requesting further information in relation to this account.

104. By no later than 3 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 58 to 72 of Schedule C to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 534323765 dated 10 March 2015, SMR 543348622 dated 14 April 2015 and SMR 558527793 dated 10 June 2015.

By 29 June 2015, 11 automatic transaction monitoring alerts had triggered on this account including TM-169698A triggered on 21 January 2015, TM-175152A triggered on 18 February 2015, TM-177056A triggered on 2 March 2015, TM-185843A triggered on 26 March 2015, TM-188748A triggered on 8 April 2015, TM-189041A triggered on 9 April 2015, TM-189622A triggered on 13 April 2015, TM-198869A triggered on 29 May 2015, TM-202323A triggered on 11 June 2015, TM-202551A triggered on 12 June 2015, TM-206047A triggered on 29 June 2015.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paras 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to
CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

On 3 July 2015 the AML Team reviewed two further transaction monitoring alerts – TM-202323A triggered on 11 June 2015 for large aggregate cash transactions and TM-202551A triggered on 12 June 2015 for structured withdrawals. The AML Team reviewed the account on and from 10 June 2015, being the date of the last SMR, and concluded that the same suspicious activity continued 'however it is not excessive' so no SMR was lodged.

Another transaction monitoring alert that had been raised on the account on 29 June (TM-206047A) was not reviewed by the AML Team on 3 July 2015 – but was reviewed on 23 and 31 July 2015. The AML Team concluded that a review of the account since the last SMR of 10 June 2015 'indicates the activity continues as per previous report. However, it is felt that activity at this time is not warranted.

TERM case has been initiated refer TERM-1123C, appears termination currently in progress'.

105. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 3 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 3, suspected of using false IDs, with potential links to money laundering.

On 3 July 2015 an alert was entered on Pegasus - HRC-2388124A – recording that the AFP had confirmed it was likely that this account opened using a false identity.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 3 (CommBank Account 3). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank

wrote to Person 3 on 15 June 2015 terminating the customer's account on this basis.

106. By reason of the matters pleaded in paragraphs 101 to 105, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
107. By reason of the matters pleaded in paragraph 101, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 10 March 2015, being 13 March 2015.
108. By reason of the matters pleaded in paragraphs 102 and 106, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 2 April 2015, being 9 April 2015.
109. It was not until 14 April 2015 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 102.

Particulars

SMRs 534323765 dated 10 March 2015 and 543348622 dated 14 April 2015.

\$246,525 in cash deposits and \$246,420 transferred to accounts in Hong Kong reported late.

110. By reason of the matters pleaded in paragraphs 103 and 106, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 10 June 2015, being 15 June 2015.
111. By reason of the matters pleaded in paragraphs 104, 105 and 106, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO SMRs by no later than 3 business days after 3 July 2015, being 8 July 2015.
112. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 101, 103 and 104.

Particulars

See SMR 534323765 dated 10 March 2015. Having formed a suspicion about overseas transfers, CommBank reported \$151,608 of IMTs, but did not identify the payee with respect to the transfers identified at items 2, 9, 11, 13, 15, 18, 21, 23 and 25 of Schedule C to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

See SMR 558527793 dated 10 June 2015. Having formed a suspicion about overseas transfers, CommBank reported IMTs to Offshore Account 1, but did not report that IMTs were also sent to Offshore Account 2 and Offshore Account 4 as identified at items 48, 49 and 53 of Schedule C to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

No SMRs were lodged by CommBank in relation to its suspicions about ongoing activity on this account after 10 June 2015 as set out at items 58 to 72 of Schedule C to the Statement of Claim.

\$251,400 in cash deposits and \$504,912.15 transferred to accounts in Hong Kong not reported.

113. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 105.

Particulars

SMR 674010076 dated 27 July 2016.

114. By reason of the matters pleaded at paragraphs 101 to 113, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

115. On and from 21 January 2015, CommBank did not monitor Person 3 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 21 January 2015 and 29 June 2015, 11 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 21 January, 18 February and 2 March 2015 transaction monitoring alerts TM-169698A, TM-175152A and TM-177056A triggered for structured deposits and large aggregate cash transactions but were not reviewed by the AML team until 10 March 2015. SMR 534323765 was lodged on 10 March 2015, the alerts were closed and no customer due diligence carried out.

On 26 March 2015 transaction monitoring alert TM-185843A triggered for large aggregate cash transactions and was reviewed by the AML team on 1 and 2 April 2015, which noted 'a month review found the activity continues therefore no added value to report it within three months period'. The alert was closed, no SMR was lodged and no customer due diligence carried out.

On 8 April 2015 transaction monitoring alert TM-188748A triggered for large aggregate cash transactions and was reviewed by the AML team on 10 and 13 April 2015, which noted 'a month review found the activity continues therefore no added value to report the similar activity within three months time'. The alert was closed, no SMR was lodged and no customer due diligence carried out.

Another transaction monitoring alert was reviewed by a different member of the AML Team on 13 April 2015 – being TM-189041A triggered on 9 April 2015 for structured withdrawals. SMR 543348622 was lodged on 14 April 2015, reporting a highly suspicious pattern of

activity involving 15 other accounts that was indicative of money laundering. In spite of this conclusion, the alert was closed and no due diligence carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48. No customer due diligence was carried out in response to this request.

Transaction monitoring alerts continued to be raised. On 13 April and 29 May 2015 transaction monitoring alerts TM-189622A and TM-198869A triggered for structured deposits across branches and large aggregate cash transactions but were not reviewed by the AML team until 9 and 10 June 2015 in spite of the known high risks. SMR 558527793 was lodged 10 June 2015.

On 9 June 2015 the AML Team recommend the account be terminated for 'blatantly depositing (excessive) intensely structured cash deposits to recently opened account'. On 11 June 2015 termination was approved.

On 11 and 12 June 2015 transaction monitoring alerts TM-202323A and TM-202551A triggered for large aggregate cash transactions and structured withdrawals but were not reviewed by the AML team until 1 and 3 July 2015, in spite of the known high ML/TF risks. Upon review of TM-202323A, it was noted that a review since the last SMR found 'the activity however is not excessive'. The alerts were closed and no SMR was lodged.

On 29 June 2015 transaction monitoring alert TM-206047A triggered for large aggregate cash transactions but was not reviewed by the AML team until 23 and 31 July 2015, noting that the activity continues as per the last SMR, but as termination has been initiated no SMR was required. The alert was closed and no SMR was lodged.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5.55pm).

From 21 January 2015 to 30 June 2015 \$1,121,795 in cash was deposited into Person 3's account and \$1,121,099 was transferred to accounts overseas.

The account was not closed until 4 August 2016.

CommBank lodged 4 late TTRs totalling \$40,000 with respect to this account.

116. On and from 10 March 2015, CommBank did not monitor Person 3 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 10 March 2015 with respect to Person 3, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 3.

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 3, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 3.

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 10 June 2015 with respect to Person 3, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 3.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 3 until 1 July 2015 when it put a stop on this account at the request of the AFP (email from Executive General Manager, Group Security to AFP dated 1 July 2015 at 5.55pm).

From 10 March 2015 to 30 June 2015, Person 3 deposited \$949,395 in cash and transferred \$948,840 to accounts overseas.

117. By reason of the matters pleaded at paragraphs 115 and 116, CommBank contravened s 36(1) on and from 21 January 2015 with respect to Person 3.

Person 4

118. On or about 3 December 2014, CommBank provided a designated service to a person purporting to be Person 4 by opening an account in the name of Person 4.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 4.

Person 4 did not exist.

Person 4's occupation was recorded as 'accountant'.

119. Between 16 December 2014 and 30 June 2015, 151 cash deposits totalling \$1,238,010 were made into CommBank Account 4.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 4.

146 of these cash deposits were made through CommBank IDMs.

144 IDM deposits were under \$10,000.

5 cash deposits under \$10,000 were made at CommBank branches.

Schedule D to the Statement of Claim.

120. Between 16 December 2014 and 30 June 2015, a total of \$1,237,248 was transferred from CommBank Account 4 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 4.

23 IMTs totalling \$957,921 were sent to Offshore Account 1.

5 IMTs totalling \$201,142 were sent to Offshore Account 2.

2 IMTs totalling \$31,008 were sent to Offshore Account 4.

2 IMTs were sent to Offshore Account 10.

1 IMT was sent to Offshore Account 11.

1 IMT was sent to Offshore Account 19

Schedule D to the Statement of Claim.

121. CommBank suspected that the cash deposits pleaded at paragraph 119 were structured contrary to s 142 of the Act.

Particulars

SMRs 542244433 dated 9 April 2015, 543348622 dated 14 April 2015, 559799568 dated 16 June 2015 and 570449930 dated 24 July 2015.

144 IDM deposits were under \$10,000.

5 branch deposits were under \$10,000.

122. By no later than 9 April 2015, CommBank was aware of suspicious activity on CommBank Account 4 in the name of Person 4.

Particulars

SMR 542244433 dated 9 April 2015 which reported intensely structured cash deposits followed by rapid IFTI debits to Hong Kong indicative of money laundering and avoiding reporting obligations.

The transactions were described as highly suspicious.

Shortly after, on 14 April 2015, CommBank suspected multiple cash deposits under \$10,000 made to CommBank Account 4 were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above - SMR 543348622 dated 14 April 2015.

The failures to report suspicious matters for the purposes of s 41

123. By no later than 9 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 4, 8, 27, 38 to 41 of Schedule

D to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 9 April 2015, the AML Team had reviewed transactions on Person 4's account on and from 3 December 2014 and had identified a large number of intensely structured cash deposits followed by IFTI debits to Hong Kong in this period – see SMR 542244433 dated 9 April 2015.

124. By no later than 29 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 42 and 43 of Schedule D to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 29 April 2015, the AML Team reviewed TM-189795A triggered on 14 April 2015. The AML Team reviewed transactions on Person 4's account from 9 April 2015 to 29 April 2015, and concluded that although the activity continued unchanged, 'no further action [was] required'.

By 14 April 2015, CommBank suspected that highly suspicious patterns of activity on this account were connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above – see TM-187119A triggered on 1 April 2015 and considered on 8 and 9 April 2015, at which time the AML Team noted there was another entity, Person 2 'who is conducting the exact same activity and was reported on 26 Feb-5...Can you please add this person as a POI and complete a wider search on the beneficiary of these IMT's and see who else is sending funds here. Lets try get a big picture. Also appears they may be colluding as they both opened their accounts on the same day 3 Dec-14.' See also SMR 543348622 dated 14 April 2015.

125. By no later than 16 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 53, 54 and 58 of Schedule D to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 16 June 2015, the AML Team had reviewed transactions on Person 4's account from 9 April 2015 to 13 June 2015 and had identified further suspicious cash deposits followed by IFTIs to Hong Kong – see SMR 559799568 dated 16 June 2015.

By no later than 18 May 2015, CommBank was aware that the AFP was investigating transactions on this account - the s 49 notice of 18 May 2015 pleaded at paragraph 48.

On 15 June 2015 CommBank decided to terminate its relationship with Person 4 for excessive blatant structuring followed by IMTs to

the holder of Offshore Accounts 1 and 2, having identified other customers conducting the same activity and sending funds to the same beneficiary – TERM 1168C.

On 16 June 2015 CommBank sent a letter to the customer advising the account would be closed with 30 days' notice.

126. By no later than 24 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 68, 70, 72 and 75 of Schedule D to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 24 July 2015, the AML Team had reviewed transactions on Person 4's account from 16 June 2015 to 23 July 2015 and had identified further structured cash deposits followed by IFTIs to Hong Kong – SMR 570449930 dated 24 July 2015.

SMRs 542244433 dated 9 April 2015, 543348622 dated 14 April 2015, 559799568 dated 16 June 2015 and 570449930 dated 24 July 2015.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paras 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

By 24 July 2015, 11 automatic alerts had triggered in relation to this account – TM-169700A, TM-185512A, TM-186783A, TM-187119A, TM-188652A, TM-189795A, TM-197253A and TM-198870A, TM-202325A, TM-202552A and TM-206049A.

127. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 4 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 4, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 4 (CommBank Account 4). The Executive General

Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 4 on 16 June 2015 terminating the customer on this basis.

128. By reason of the matters pleaded in paragraphs 123 to 127, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
129. By reason of the matters pleaded in paragraphs 123 and 128, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 9 April 2015, being 14 April 2015.
130. By reason of the matters pleaded in paragraphs 124 and 128, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 29 April 2015, being 4 May 2015.
131. It was not until 16 June 2015 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 124.

Particulars

SMR 559799568 dated 16 June 2015.

The AML Team reviewed the account on 29 April 2015 and identified that the suspicious activity identified in SMR 542244433 was continuing. However, the AML Team did not report its suspicions with respect to transactions in the period 9 April 2015 to 29 April 2015 until 16 June 2015.

\$49,900 in cash deposits and \$49,870 transferred to accounts in Hong Kong were reported late.

132. By reason of the matters pleaded in paragraphs 125 and 128, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 16 June 2015, being 19 June 2015.
133. By reason of the matters pleaded in paragraphs 126 and 128, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 24 July 2015, being 29 July 2015.
134. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 123, 125 or 126.

Particulars

SMRs 542244433 dated 9 April 2015, 543348622 dated 14 April 2015, 559799568 dated 16 June 2015 and 570449930 dated 24 July 2015.

CommBank did not report its suspicions with respect to transactions on 7 and 8 April 2015 in SMR 542244433 dated 9 April 2015 as identified at items 38 to 41 of Schedule D to the Statement of Claim. Further, this SMR reported suspicions with respect to IMTs, but did not identify the payees with respect to the transfers as identified at items 2, 4, 8 and 27 of Schedule D to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

Having formed a suspicion about overseas transfers on this account by no later than 16 June 2015 when it lodged SMR 559799568, CommBank reported IMTs to Offshore Account 1, but did not report its suspicions about the IMTs that were sent to Offshore Account 2 and Offshore Account 4 as identified at items 53, 54 and 58 of Schedule D to the Statement of Claim. The SMR did not contain the information specified in also rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

In SMR 570449930 dated 24 July 2015 CommBank reported its suspicions about IMTs, but did not correctly identify the payee with respect to the transfers identified at items 68, 70, 72 and 75 of Schedule D to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

\$79,750 in cash deposits and \$311,860 transferred to accounts in Hong Kong not reported.

135. By reason of the matters pleaded in paragraphs 127 and 128, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
136. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 127.

Particulars

SMR 674010006 dated 27 July 2016.

137. By reason of the matters pleaded at paragraphs 123 to 136, CommBank contravened s 41(2)(a) of the Act on 5 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

138. On and from 21 January 2015, CommBank did not monitor Person 4 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 21 January 2015 and 29 June 2015, 11 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank

failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 2 January 2015 CommBank withdrew a debit/credit card that had been issued to Person 4 on this account with the reason being 'bm x fraud no supporting documents received' – APP- 354599A.

Previously, the customer had been called on 11 December 2014 to request 'sup' documents but he did not respond. A stop had been put on the account on 11 December 2014.

On 21 January, 24 March and 30 March 2015 transaction monitoring alerts TM-169700A, TM-185512A and TM-186783A triggered for structured cash deposits, large aggregate cash deposit and cash deposits across branches but were not reviewed by the AML team until 7 and 8 April 2015.

By that time, transaction monitoring alert TM-187119A had triggered on 1 April 2015 for structured withdrawals and was reviewed by the AML team on 8 and 9 April 2015, which identified commonalities between activity on this account and that of Person 2 and recommended a wider search on the common beneficiary, being the holder of Offshore Accounts 1 and 2. In the interim, SMR 542244433 was lodged on 9 April 2015 in relation to Person 4.

On 7 April 2015 a further transaction monitoring alert was triggered for large aggregate cash deposits (TM-188652A) and was reviewed by the AML team on 9 and 13 April 2015.

Following review of transaction monitoring alerts TM-169700A, TM-185512A, TM-186783A and TM-188652A, SMR 543348622 was lodged on 14 April 2015, reporting a highly suspicious pattern of activity involving 15 other accounts that was indicative of money laundering. In spite of this conclusion, after lodging the SMR, the alerts were closed and no customer due diligence carried out.

On 14 April 2015 transaction monitoring alert TM-189795A triggered for structured withdrawals but was not reviewed by the AML team until 29 and 30 April 2015. In spite of the known high ML/TF risks, the AML team determined that as the customer had previously been reported on 9 April 2015 and as the activity remains unchanged, no further action was required. The alert was closed, no SMR was lodged and no customer due diligence carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48. No customer due diligence was carried out in response to this request.

Transaction monitoring alerts continued to be raised.

On 18 May 2015 transaction monitoring alert TM-197253A triggered for structured deposits across branches but was not reviewed by the AML team until 13 June 2015, in spite of the known high ML/TF risks. Also on 13 and 16 June 2015, the AML Team reviewed transaction monitoring alerts TM-198870A, TM-202325A and TM-202552A triggered on 29 May 2015, 11 June 2015 and 12 June 2015 for large aggregate cash transactions and structured withdrawals. On 16 June 2015 SMR 559799568 was lodged.

On 13 June 2015 the AML Team recommended the relationship with the customer be terminated for 'blatantly depositing (excessive) intensely structured cash deposits' or 'high risk blatant intense structuring activity to avoid TTR obligations (an offence)', with the source of cash funds unknown, followed by the remittance of funds to Hong Kong, noting that the holder of Offshore Accounts 1 and 2 was the previous beneficiary of other unrelated parties receiving structured cash deposits - TERM-1168C.

On 15 June 2015 the termination of the customer's account was approved by the business unit, RBS.

On 16 June 2015 CommBank sent a letter to the customer advising the account would be closed. In spite of the known high risks, the customer was given 30 days' notice of closure. Between 16 June 2015 and 30 June 2015, a further \$150,000 in cash was deposited into Person 4's account and a further \$149,934 was transferred offshore.

On 29 June 2015 transaction monitoring alert TM-206049A triggered for large aggregate cash transactions but was not reviewed by the AML team until 23 and 24 July 2015. On 24 July 2015 SMR 570449930 was lodged. The alert was closed.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence Group Security to AFP dated 1 July 2015 at 5.55pm).

From 21 January 2015 to 30 June 2015 \$1,211,110 in cash was deposited into Person 4's account and \$1,219,666 was transferred to accounts in Hong Kong.

As at 14 October 2016, the account was pending closure.

CommBank lodged 4 late TTRs totalling \$41,440 with respect to this account.

139. On and from 9 April 2015, CommBank did not monitor Person 4 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 9 April 2015 with respect to Person

4 rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 4.

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 4, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 4.

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 16 June 2015 with respect to Person 4, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 4.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 4 until 1 July 2015 when it put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence Group Security to AFP dated 1 July 2015 at 5.55pm).

From 9 April 2015 to 30 June 2015 Person 4 deposited \$678,570 in cash and transferred \$678,212 to accounts in Hong Kong.

140. By reason of the matters pleaded at paragraphs 138 and 139, CommBank contravened s 36(1) on and from 21 January 2015 with respect to Person 4.

Person 5

141. On or about 9 January 2015, CommBank provided a designated service to a person purporting to be Person 5 by opening an account in the name of Person 5.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 5.

Person 5 did not exist.

Person 5's occupation was recorded as 'unemployed'.

142. Between 19 January 2015 and 30 June 2015, 108 cash deposits totalling \$873,910 were made into CommBank Account 5.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 5.

106 of these cash deposits were made through CommBank IDMs.

101 IDM deposits were under \$10,000.

2 deposits made at CommBank branches were under \$10,000.

Schedule E to the Statement of Claim.

143. Between 20 January 2015 and 30 June 2015, a total of \$864,417 was transferred from CommBank Account 5 to 4 accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 5.

13 IMTs totalling \$533,885 were sent to Offshore Account 1.

7 IMTs totalling \$300,437 were sent to Offshore Account 2.

1 IMT totalling \$1,050 was sent to Offshore Account 4.

2 IMTs totalling \$29,224 were sent to Offshore Account 19.

Schedule E to the Statement of Claim.

144. CommBank suspected that the cash deposits pleaded at paragraph 142 were structured contrary to s 142 of the Act.

Particulars

101 IDM deposits were under \$10,000.

2 branch deposits were under \$10,000.

SMR 558873248 dated 11 June 2015.

The structured cash deposits were made into CommBank Account 5 through CommBank IDMs, except for two cash deposits of \$9,000 made at CommBank branches.

145. By no later than 14 April 2015, CommBank was aware of unusual patterns of transactions on CommBank Account 5 in the name of Person 5.

Particulars

SMR 543348622 dated 14 April 2015 which reported CommBank suspected multiple cash deposits under \$10,000 made to CommBank Account 5 were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

146. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 2 of Schedule E to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 14 April 2015, the AML team had reviewed transactions on Person 5's account from 9 January 2015 to 13 April 2015 and had identified an ongoing pattern of intense structured cash deposits to avoid reporting obligations followed by suspicious

offshore transfers in this period – see SMR 543348622 dated 14 April 2015.

By no later than 14 April 2015, CommBank suspected that this highly suspicious pattern of activity was indicative of money laundering and was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above: SMR 543348622.

147. By no later than 11 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 29, 30, 34 and 36 of Schedule E to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 11 June 2015, the AML Team had reviewed transactions on Person 5's account from 14 April 2015 to 11 June 2015 and had identified further intensely structured deposits followed by multiple IFTI debits – see SMR 558873248 dated 11 June 2015.

By 18 May 2015, CommBank was aware that the AFP was investigating transactions on this account - the s 49 notice dated 18 May 2015 pleaded at paragraph 48 above.

148. By no later than 29 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 39 to 48 of Schedule E to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 22 and 29 July 2015 the AML team reviewed 3 transaction monitoring alerts – TM-205977A and TM-206046A triggered on 29 June 2015 and TM-206537A triggered on 1 July 2015. In reviewing these alerts, the AML team concluded that although Person 5's account had triggered on wire debits to Hong Kong funded by intensely structured cash, 'no further action required at this point'.

By 29 July 2015, 11 automatic transaction monitoring alerts had been triggered on this account - TM-187149A; TM-188539A; TM-189199A; TM-197481A; TM-199562A; TM-200177A; TM-202424A; TM-202538A; TM-205977A; TM-206046A and TM-206537A.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paras 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

149. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 5 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 5, suspected of using false IDs, with potential links to money laundering.

On 3 July 2015 an alert was entered on Pegasus - HRC-2388124A – recording that the AFP had confirmed it was likely that this account opened using a false identity.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 5 (CommBank Account 5). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 5 on 15 June 2015 terminating the customer's account on this basis.

150. By reason of the matters pleaded in paragraphs 146 to 149, s 41(1)(f)(iii) and/or s41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
151. By reason of the matters pleaded in paragraphs 146 and 150, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
152. By reason of the matters pleaded in paragraphs 147 and 150, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 June 2015, being 16 June 2015.
153. By reason of the matters pleaded in paragraphs 148 and 150, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 29 July 2015, being 3 August 2015.
154. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 146 to 148.

Particulars

See SMR 543348622 dated 14 April 2015. Having formed a suspicion about the overseas transfers, CommBank reported IMTs to Offshore Account 1, but did not report that an IMT was also sent to Offshore Account 19 as identified at item 2 of Schedule E to the Statement of

Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

See SMR 558873248 dated 11 June 2015. Having formed a suspicion about the overseas transfers, CommBank reported IMTs to Offshore Account 1, but did not report that IMTs were also sent to Offshore Account 2, Offshore Account 4 and Offshore Account 19 as identified at items 29, 30, 34 and 36 of Schedule E to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

CommBank did not report its suspicions with respect to transactions on and from 11 June 2015 as set out at items 39 to 48 of Schedule E to the Statement of Claim.

\$249,390 in cash deposits and \$330,531 transferred to accounts in Hong Kong not reported.

155. By reason of the matters pleaded in paragraphs 149 and 150, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business dates after 3 July 2015, being 8 July 2015.
156. CommBank did not give the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraph 149 until 27 July 2016.

Particulars

SMR 673956214 dated 27 July 2016.

157. By reason of the matters pleaded at paragraphs 146 to 156, CommBank contravened s 41(2)(a) of the Act on 4 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

158. On and from 29 January 2015, CommBank did not monitor Person 5 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

No transaction monitoring alerts were raised before 1 April 2015 although, between 29 January 2015 and 31 March 2015, 30 cash deposits under \$10,000 totalling \$249,250 were made into this account.

Between 1 April 2015 and 1 July 2015, 9 automated transaction monitoring alerts were raised on this account. CommBank failed to review all of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 1, 7 and 10 April 2015 transaction monitoring alerts TM-187149A, TM-188539A and TM-189199A triggered for large withdrawals from

HRC account, high frequency deposits into HRC account and structured withdrawals and were reviewed by the AML team on 13 April 2015. SMR 543348622 was lodged on 14 April 2015, reporting a highly suspicious pattern of activity involving 15 other accounts that was indicative of money laundering. In spite of this conclusion, after lodging the SMR, the alerts were closed and no customer due diligence carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48. No customer due diligence was carried out in response to this request.

Transaction monitoring alerts TM-197481A triggered on 19 May 2015 for large aggregate cash transactions and TM-199562A triggered on 2 June 2015 for large aggregate cash transactions were not reviewed by the AML team until 11 June 2015, in spite of the known high ML/TF risks. An SMR was lodged and the alert was closed. The AML team initiated termination of the customer's account.

On 11 June 2015 the AML Team recommended termination for 'blatantly depositing (excessive) intensely structured cash deposits' followed by multiple IFTIs to Offshore Account 2. Email from Senior Analyst, AML Sanctions & Compliance to GS AML at 3:58pm.

On 12 June 2015 the termination of the customer was approved by the business unit, RBS.

On 15 June 2015 CommBank sent a letter to the customer advising the account would be closed. The customer was given 30 days' notice of closure, in spite of the known high risks. Structured deposits and offshore transfers through this account continued until 30 June 2015. From 15 June 2015 to 30 June 2015, \$199,390 in cash under \$10,000 was deposited and \$199,481 transferred to Offshore Account 2.

A week after the termination letter was sent, on 22 June 2015, the AML team reviewed another transaction monitoring alert - TM-200177A triggered on 5 June 2015 for high frequency deposits into HRC account. The AML Team concluded that 'this customer was last reported to AUSTRAC on 11 June 2015...and a review since then found very little activity. Await termination of customer'. The alert was closed and no due customer diligence carried out, in spite of the known high risks. In spite of the AML Team's view that there was little activity on the account, on and from 11 June 2015 \$249,390 in cash under \$10,000 was deposited into this account and \$249,279 sent offshore.

On 29 June and 1 July 2015 transaction monitoring alerts TM-205977A, TM-206046A and TM-206537A triggered for high frequency deposits into HRC account, large aggregate cash transactions and

large withdrawals from HRC account but were not reviewed by the AML team until 22 and 29 July 2015. The alerts were closed.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 29 January 2015 to 30 June 2015 \$864,560 in cash was deposited into Person 5's account and \$855,272 was transferred to accounts in Hong Kong.

The account was not closed until 4 August 2016.

CommBank lodged 5 late TTRs totalling \$70,950 with respect to this account.

159. On and from 14 April 2015, CommBank did not monitor Person 5 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 5 rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 5.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 11 June 2015 with respect to Person 5, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 5.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 5 until 1 July 2015 when it put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 30 June 2015 Person 5 deposited \$451,240 in cash and transferred \$451,157 to accounts in Hong Kong.

160. By reason of the matters pleaded at paragraphs 158 and 159, CommBank contravened s 36(1) on and from 29 January 2015 with respect to Person 5.

Person 6

161. On or about 20 January 2015, CommBank provided a designated service to a person purporting to be Person 6 by opening an account in the name of Person 6.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 6.

Person 6 did not exist.

Person 6's occupation was recorded as 'unemployed'.

162. Between 4 February 2015 and 21 June 2015, 103 cash deposits totalling \$849,820 were made into CommBank Account 6.

Particulars

Item 3, table 1, s 6 of the Act.

102 of these cash deposits were made through CommBank IDMs.

99 IDM deposits were under \$10,000.

1 deposit at a CommBank branch was under \$10,000.

CommBank statement for CommBank Account 6.

Schedule F to the Statement of Claim.

163. Between 4 February 2015 and 11 June 2015, a total of \$787,509 was transferred from CommBank Account 6 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

16 IMTs totalling \$736,553 sent to Offshore Account 1.

2 IMTs totalling \$50,956 sent to Offshore Account 2.

CommBank statement for CommBank Account 6.

Schedule F to the Statement of Claim.

164. Between 21 June 2015 and 30 June 2015, a total of \$20,000 was withdrawn from CommBank Account 6 through CommBank ATMs.

Particulars

10 ATM withdrawals of \$2,000.

Items 43 to 52, Schedule F to the Statement of Claim.

CommBank statement for CommBank Account 6.

165. CommBank suspected that the cash deposits pleaded at paragraph 162 were structured contrary to s 142 of the Act.

Particulars

SMR 543348622 dated 14 April 2015.

99 of these IDM deposits were under \$10,000.

1 branch deposit was under \$10,000.

166. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 6 in the name of Person 6.

Particulars

SMR 543348622 dated 14 April 2015 reported multiple intensely structured deposits at ATMs under the TTR requirements followed by transfers to Hong Kong, indicative of money laundering and avoiding

reporting obligations. CommBank suspected that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above.

The failures to report suspicious matters for the purposes of s 41

167. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 25 and 26 of Schedule F to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 14 April 2015, the AML Team had reviewed transactions on Person 6's account from 20 January 2015 to 13 April 2015 and had identified an ongoing pattern of intense structured cash deposits to avoid reporting obligations followed by suspicious offshore transfers in this period – see SMR 543348622 dated 14 April 2015.

By 14 April 2015, CommBank suspected that highly suspicious patterns of activity on this account was indicative of money laundering and was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above – SMR 543348622 dated 14 April 2015.

168. By no later than 13 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 26, 29, 31, 33, 35 and 37 of Schedule F to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 13 June 2015, the AML Team had reviewed transactions on Person 6's account from 14 April 2015 to 12 June 2015 and had identified further cash deposits followed by multiple IFTIs to a Hong Kong account in this period.

By 18 May 2015, CommBank was aware that the AFP was investigating transactions on this account - the AFP served a section 49 notice on CommBank on 18 May 2015 as pleaded at paragraph 48 above.

169. By no later than 15 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 42 of Schedule F to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 15 July 2015 the AML Team reviewed TM-289311A triggered on 30 June 2015. In reviewing this alert, the AML Team noted that Person 6 was previously reported to AUSTRAC on 13 June 2015,

and that a transaction review revealed the activity ceased on 30 June 2015. The AML Team concluded that there was no 'add value to re report same activity within three month period of last report'.

By 15 July 2015, 6 automated transaction monitoring alerts and 2 manual STR alerts were raised on this account – TM-184199A, TM-186642A, TM-189040A, TM-198534A, TM-199860A STR, TM-202321A, TM-204511A and TM-289311A STR.

On 15 June 2015 CommBank decided to terminate its relationship with Person 6 for excessive blatant structuring of cash deposits followed by IMTs to Offshore Account 2 – TERM-1159C.

On 16 June 2015 CommBank sent a letter to the customer advising the account would be closed with 30 days' notice.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paras 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

170. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 6 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 6, suspected of using false IDs, with potential links to money laundering.

On 3 July 2015 an alert was entered on Pegasus - HRC-2388124A – recording that the AFP had confirmed it was likely that this account opened using a false identity.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 6 (CommBank Account 6). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA

& Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank sent a letter to Person 6 on 16 June 2015 terminating the customer's account on this basis.

171. By reason of the matters pleaded in paragraphs 167 to 170, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
172. By reason of the matters pleaded in paragraphs 167 and 171, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
173. By reason of the matters pleaded in paragraphs 168 and 171, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 13 June 2015, being 17 June 2015.
174. By reason of the matters pleaded in paragraphs 169 and 171, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 15 July 2015, being 20 July 2015.
175. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 167 to 169.

Particulars

SMRs 543348622 dated 14 April 2015 and 559053648 dated 13 June 2015.

Having identified suspicious patterns of transactions up until 13 April 2015, CommBank did not report its suspicions with respect to cash deposits and an IMT on 13 April 2015 as identified at items 25 and 26 of Schedule F to the Statement of Claim.

See SMR 559053648 dated 13 June 2015. Having formed a suspicion about the overseas transfers, CommBank reported IMTs to Offshore Account 2, but did not report that IMTs were also sent to Offshore Account 1 account during the relevant period as identified at items 26, 29, 31, 33, 35 and 37 of Schedule F to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

Having reviewed the account on 15 July 2015, CommBank did not report its suspicions with respect to the transactions identified at item 42 of Schedule F to the Statement of Claim.

\$100,000 in cash deposits and \$298,610 transferred to accounts in Hong Kong were not reported.

176. By reason of the matters pleaded in paragraphs 170 and 171, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
177. CommBank did not give the AUSTRAC CEO an SMR in relation to the matter pleaded at paragraph 170 until 27 July 2016.

Particulars

SMR 674010077 dated 27 July 2016.

178. By reason of the matters pleaded at paragraphs 167 to 177, CommBank contravened s 41(2)(a) of the Act on 4 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

179. On and from 17 March 2015, CommBank did not monitor Person 6 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 17 March 2015 and 30 June 2015, 6 automated transaction monitoring alerts and 2 manual STR alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 17 March, 30 March and 9 April 2015 transaction monitoring alerts TM-184199A, TM-186642A and TM-189040A triggered for large aggregate cash transactions and structured withdrawals but were not reviewed by the AML team until 13 April 2015. SMR 543348622 was lodged on 14 April 2015, reporting a highly suspicious pattern of activity involving 15 other accounts that was indicative of money laundering. In spite of this conclusion, after lodging the SMR, the alerts were closed and no customer due diligence carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request.

The next transaction monitoring alert was not raised until 27 May 2015 - TM-198534A triggered for large aggregate cash transactions, notwithstanding that between 12 April 2015 and 27 May 2015 \$238,890 in cash under \$10,000 was deposited into this account.

TM-198534A was not reviewed by the AML team until 12 and 13 June 2015, in spite of the known high ML/TF risks. An SMR was submitted and the alert was closed.

On 12 June 2015 the AML team recommend the account be terminated for 'excessive blatant structuring of cash deposits to avoid the threshold transactions reporting requirements, cash deposits are followed by IMTs' (TERM-1159C). On 15 June 2015 termination was approved by the Business Unit, RBS.

Two further transaction monitoring alerts were also reviewed by the AML Team on 15 June 2015 - manual alert STR TM-199860A was raised on 5 June 2015 by CommBank staff at the Surry Hills branch reporting 'several large deposits 6 in total deposited into machine all under \$10,000'; and TM-202321A triggered on 11 June 2015 for large aggregate cash transactions. The AML team decided no further action was required, given that the customer had been reported to AUSTRAC on 13 June 2015 and as termination action had commenced. The alert was closed.

On 16 June 2015 CommBank sent a letter to the customer advising the account would be closed. The customer was given 30 days' notice of closure in spite of the known high risks. Structured deposits and offshore transfers through this account continued until 30 June 2015. Between 16 June 2015 and 30 June 2015, \$50,000 in cash under \$10,000 was deposited into this account and \$20,000 in cash withdrawn at ATMs.

On 22 June 2015 transaction monitoring alert TM-204511A triggered for large aggregate cash transactions but was not reviewed by the AML team until 1 and 3 July 2015, which identified that the activity had continued. No SMR was lodged and the alert was closed.

On 29 June 2015 manual alert STR TM-289311A was raised by CommBank staff in the Security Online Fraud Group, which identified that the account had received many ATM cash deposits under the \$10K limit and funds were then transferred overseas by IMT. The STR was not reviewed by the AML team until 4 and 15 July 2015, which determined since the activity ceased on 30 June 2015 there was no value added by reporting the activity within three months of the last report. The alert was closed and no SMR was lodged.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 17 March 2015 to 21 June 2015 \$799,270 in cash was deposited into Person 6's account and \$737,008 was transferred to accounts in Hong Kong. A further \$20,000 was withdrawn in cash from 21 June 2015 to 30 June 2015.

As at 14 October 2016, the account was pending closure.

CommBank lodged 3 late TTRs totalling \$34,360 with respect to this account.

180. On and from 14 April 2015, CommBank did not monitor Person 6 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 6,

rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 6.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 13 June 2015 with respect to Person 6, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 6.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 6 until 1 July 2015 when it put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 21 June 2015 Person 6 deposited \$351,700 in cash, transferred \$299,588 to accounts in Hong Kong and withdrew \$20,000 in cash.

181. By reason of the matters pleaded at paragraphs 179 and 180, CommBank contravened s 36(1) on and from 17 March 2015 with respect to Person 6.

Person 7

182. On or about 20 January 2015, CommBank provided a designated service to a person purporting to be Person 7 by opening an account in the name of Person 7.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 7

Person 7 did not exist.

Person 7's occupation was recorded as 'unemployed'.

183. Between 27 February 2015 and 21 June 2015, 127 cash deposits totalling \$1,012,400 were made into CommBank Account 7.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 7.

124 of these cash deposits were made through CommBank IDMs.

121 IDM deposits were under \$10,000.

3 of these cash deposits were made at CommBank branches.

3 branch deposits were under \$10,000.

Schedule G to the Statement of Claim.

184. Between 28 February 2015 and 18 June 2015, a total of \$961,148 was transferred from CommBank Account 7 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 7.

Schedule G to the Statement of Claim.

185. Between 21 June 2015 and 30 June 2015, \$20,000 in cash was withdrawn through CommBank ATMs from CommBank Account 7.

Particulars

10 withdrawals of \$2,000 totalling \$20,000.

Items 48 to 56, Schedule G to the Statement of Claim.

CommBank statement for CommBank Account 7.

186. CommBank suspected that the cash deposits pleaded at paragraph 183 were structured contrary to s 142 of the Act.

Particulars

SMR 543348622 dated 14 April 2015.

121 IDM deposits were under \$10,000.

3 branch deposits were under \$10,000.

187. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 7 in the name of Person 7.

Particulars

SMR 543348622 dated 14 April 2015 reported that CommBank suspected multiple cash deposits under \$10,000 made to this account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

188. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 4, 6, 8, 9, 11 and 14 of Schedule G to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 14 April 2015, the AML Team had reviewed transactions on Person 7's account from 20 January 2015 to 13 April 2015 and had identified an ongoing pattern of intense structured cash deposits to avoid reporting obligations followed by suspicious offshore transfers in this period – see SMR 543348622 lodged on 14 April 2015.

By 14 April 2015 CommBank suspected multiple cash deposits under \$10,000 made to Person 7's account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was indicative of money laundering and connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above.

189. By no later than 28 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 16 to 21 of Schedule G to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 28 April 2015 the AML team reviewed transaction monitoring alert TM-190711A triggered on 20 April 2015 and identified that the suspicious activity reported on 14 April 2015 was ongoing, but it was decided that the activity was not excessive and less than two weeks since the last report, so no SMR was lodged at the time.

190. By no later than 3 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 41 to 47 of Schedule G to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 1 and 3 July 2015 the AML Team reviewed TM-204629A triggered on 27 June 2015. In reviewing this alert, the AML Team reviewed transactions on this account from 15 June 2015 to 1 July 2015 and concluded that 'activity has continued', but concluded that a 'further report at this time not felt warranted'.

By 3 July 2015, 8 automated alerts had triggered in relation to this account – TM-183115A, TM-185814A, TM-188651A, TM-190711A, TM-193701A, TM-199439A, TM-199918A and TM-204629A.

By 18 May 2015 CommBank was aware that the AFP was investigating transactions on this account - the s 49 notice of 18 May 2015 pleaded at paragraph 48.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paras 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

191. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 7 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 7, suspected of using false IDs, with potential links to money laundering.

On 3 July 2015 an alert was entered on Pegasus - HRC-2388124A – recording that the AFP had confirmed it was likely that this account opened using a false identity.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 7 (CommBank Account 7). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank had sent a letter to Person 7 on 16 June 2015 terminating the customer's account on this basis.

192. By reason of the matters pleaded in paragraphs 188 to 191, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
193. By reason of the matters pleaded in paragraphs 188 and 192, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
194. By reason of the matters pleaded in paragraphs 189 and 192, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 28 April 2015, being 1 May 2015.
195. It was not until 15 June 2015 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 189.

Particulars

Having reviewed the account on 28 April 2015 and identified that the suspicious activity identified in SMR 543348622 lodged on 14 April 2015 continued, the AML team did not report their suspicions with respect to that ongoing activity until 15 June 2015.

\$149,000 in cash and \$149,934 transferred to accounts in Hong Kong were reported late.

196. By reason of the matters pleaded in paragraphs 190 and 192, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 28 April 2015, being 1 May 2015.
197. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 188 or 190.

Particulars

SMRs 543348622 dated 14 April 2015 and 559687605 dated 15 June 2015.

See SMR 543348622 dated 14 April 2015. CommBank reported suspicions with respect to \$310,345 of IMTs as identified at items 2, 4, 6, 8, 9, 11 and 14 of Schedule G to the Statement of Claim, but did not correctly identify the payee. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

CommBank did not report its suspicions with respect to transactions on and from 16 June 2015 as identified at items 41 to 47 of Schedule G to the Statement of Claim.

\$101,950 in cash deposits and \$361,522 transferred to accounts in Hong Kong were not reported.

198. By reason of the matters pleaded in paragraphs 191 and 192, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015 being 8 July 2015.
199. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 191.

Particulars

SMR 674014226 dated 27 July 2016.

200. By reason of the matters pleaded at paragraphs 188 to 199, CommBank contravened s 41(2)(a) of the Act on 4 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

201. On and from 12 March 2015, CommBank did not monitor Person 7 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 12 March 2015 and 22 June 2015, 8 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 12 March, 26 March and 7 April 2015 transaction monitoring alerts TM-183115A, TM-185814A and TM-188651A triggered for large aggregate cash transactions and were reviewed by the AML team on 13 April 2015. SMR 543348622 was lodged on 14 April 2015, reporting a highly suspicious pattern of activity involving 15 other accounts that was indicative of money laundering. In spite of this conclusion, after lodging the SMR, the alerts were closed and no customer due diligence carried out.

On 20 April 2015 transaction monitoring alert TM-190711A triggered for large aggregate cash transactions and was reviewed by the AML team on 28 April 2015. The AML team determined that even though the activity continued, it was not excessive and less than two weeks since last report. The alert was closed, no SMR was lodged and no customer due diligence carried out, in spite of the known high risks.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request.

On 7 May, 1 June and 4 June 2015 transaction monitoring alerts TM-193701A, TM-199439A and TM-199918A triggered for large aggregate cash transactions and structured withdrawals but were not reviewed by the AML team until 12 and 15 June 2015, in spite of the known high ML/TF risks. SMR 559687605 was lodged on 15 June 2015 and the alerts were closed.

On 12 June 2015 the AML team recommend the account be terminated for 'excessive blatant structuring of cash deposits to avoid the threshold transactions reporting requirements, cash deposits are followed by IMTs' (TERM-1163C). On 15 June 2015 termination was approved by the Business Unit, RBS.

After deciding to close the account, a further transaction monitoring alert was raised on 22 June 2015 (TM-204629A triggered for high frequency deposits into HRC account). This was not reviewed by the AML team until 1 and 3 July 2015. The AML team determined that the activity had continued but no further report was warranted. The alert was closed and no SMR submitted.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 12 March 2015 to 21 June 2015 \$1,012,400 in cash was deposited into Person 7's account and \$943,172 was transferred to accounts in Hong Kong. A further \$20,000 was withdrawn in cash from 21 June 2015 to 30 June 2015.

As at 14 October 2016, the account was pending closure.

CommBank lodged 3 late TTRs totalling \$30,000 with respect to this account.

202. On and from 14 April 2015, CommBank did not monitor Person 7 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 7, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 7.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 15 June 2015 with respect to Person 7, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 7.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 7 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 21 June 2015 Person 7 deposited \$700,900 in cash, transferred \$650,804 to accounts in Hong Kong and withdrew \$20,000 in cash.

203. By reason of the matters pleaded at paragraphs 201 and 202, CommBank contravened s 36(1) on and from 20 January 2015 with respect to Person 7.

Person 8

204. On or about 20 January 2015, CommBank provided a designated service to a person purporting to be Person 8 by opening an account in the name of Person 8.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 8.

Person 8 did not exist.

Person 8's occupation was recorded as 'unemployed'.

205. Between 4 February 2015 and 30 June 2015, 170 cash deposits totalling \$1,291,255 were made into CommBank Account 8.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 8.

164 of these cash deposits were made through CommBank IDMs.

154 IDM deposits were under \$10,000.

1 deposit made at a CommBank branch was under \$10,000.

Schedule H to the Statement of Claim.

206. Between 4 February 2015 and 30 June 2015, a total of \$1,290,255 was transferred from CommBank Account 8 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 8.

8 IMTs totalling \$317,136 sent to Offshore Account 1.

17 IMTs totalling \$821,883 sent to Offshore Account 2.

1 IMT of \$1,000 sent to Offshore Account 7.

1 IMT of \$1,000 sent to Offshore Account 3.

Schedule H to the Statement of Claim.

207. CommBank suspected that the cash deposits pleaded at paragraph 205 were structured contrary to s 142 of the Act.

Particulars

SMR 543348622 dated 14 April 2015.

154 IDM deposits were under \$10,000.

1 branch deposit was under \$10,000.

208. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 8 in the name of Person 8.

Particulars

SMR 543348622 dated 14 April 2015 reported that CommBank suspected multiple cash deposits under \$10,000 made to the Person 8's account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

209. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 6, 8, 10, 12 and 21 of Schedule H to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 14 April 2015, the AML Team had reviewed transactions on Person 8's account from 27 February 2015 to 13 April 2015 and had identified an ongoing pattern of intense structured cash deposits to avoid reporting obligations followed by suspicious offshore transfers in this period – see SMR 543348622 dated 14 April 2015.

By 14 April 2015, CommBank suspected that highly suspicious patterns of activity on this account was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above – SMR 543348622.

210. By no later than 30 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 26 of Schedule H to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 28 and 30 April 2015 transaction monitoring alerts TM-189672A and TM-189688A were reviewed by the AML Team which identified that the suspicious activity reported on 14 April 2015 was ongoing and noted 'as it is not excessive and last report was only two weeks ago will close as not suspicious at this stage'.

211. By no later than 7 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 28, 30, 32, 33, 34, 36, 38, 40, 42, 43, 45, 46 and 47 of Schedule H to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 6 and 7 June 2015, transaction monitoring alerts TM-197104A, TM-197464A, TM-198070A, TM-198945A, TM-199302A and TM-199494A were reviewed by the AML Team. The AML Team reviewed account activity since the last report on 14 April 2015 and identified that the activity continued, however 'it is not excessive and as we reported only six weeks ago no value add in re reporting at this stage.'

By 18 May 2015 CommBank was aware that the AFP was investigating transactions on this account - the s 49 notice of 18 May 2015 pleaded at paragraph 48.

212. By no later than 15 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 27, 29, 31, 35, 37, 39, 41, 44 and 49 of Schedule H to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 15 June 2015, the AML Team had reviewed transactions on Person 8's account from 14 April 2015 to 12 June

2015 and had identified further cash deposits followed by IFTIs to Hong Kong during this period – SMR 559687799 dated 15 June 2015.

On 12 June 2015 CommBank decided to terminate its relationship with Person 8 for excessive blatant structuring of cash deposits to avoid the threshold transactions reporting requirements, followed by IMTs – TERM-1166C.

213. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 51 to 64 of Schedule H to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 1 July 2015, 16 automated transaction monitoring alerts were raised on this account – TM-176048A, TM-185700A, TM-187008A, TM-187014A, TM-189672A, TM-189688A, TM-197104A, TM-197464A, TM-198070A, TM-198945A, TM-199302A, TM-199494A, TM-200175A, TM-203080A, TM-203476A and TM-204983A.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paras 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

On 1 and 3 July 2015 transactions monitoring alert TM-204983A was reviewed by the AML Team. The AML Team reviewed account activity since the last report on 15 June 2015 and identified that the activity continued, but was 'not excessive'.

214. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 8 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 8, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 8 (CommBank Account 8). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank had sent a letter to Person 8 on 16 June 2015 terminating the customer's account on this basis.

- 215. By reason of the matters pleaded in paragraphs 209 to 214, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 216. By reason of the matters pleaded in paragraphs 209 and 215, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
- 217. By reason of the matters pleaded in paragraphs 210 and 215, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 30 April 2015, being 5 May 2015.
- 218. By reason of the matters pleaded in paragraphs 211 and 215, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 7 June 2015, being 11 June 2015.
- 219. By reason of the matters pleaded in paragraphs 212 and 215, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 15 June 2015, being 18 June 2015.
- 220. By reason of the matters pleaded in paragraphs 213 and 215, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
- 221. It was not until 15 June 2015 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraphs 210 and 211.

Particulars

SMR 559687799 dated 15 June 2015.

\$499,515 in cash deposits and \$98,748 transferred offshore reported late.

- 222. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 209, 212 and 213.

Particulars

See SMR 543348622 dated 14 April 2015. Having formed a suspicion about overseas transfers, CommBank reported IMTs to Offshore Account 1, but did not report that IMTs were also sent to Offshore Account 2 as identified at items 6, 8, 10, 12 and 21 of Schedule H to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

See SMR 559687799 dated 15 June 2015. Having formed a suspicion about overseas transfers, CommBank reported IMTs to Offshore Account 1, but did not report that IMTs were also sent to Offshore Account 2 during the period as identified at items 27, 29, 31, 35, 37, 39, 41, 44 and 49 of Schedule H to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

CommBank did not report its suspicions with respect to transactions on and from 13 June 2015 as set out at items 51 to 64 of Schedule H to the Statement of Claim.

\$198,400 in cash deposits and \$923,191 transferred to accounts in Hong Kong not reported.

223. By reason of the matters pleaded in paragraphs 214 and 215, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
224. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 214.

Particulars

SMR 674012732 dated 27 July 2016.

225. By reason of the matters pleaded at paragraphs 209 to 224, CommBank contravened s 41(2)(a) of the Act on 6 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

226. On and from 24 February 2015, CommBank did not monitor Person 8 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 24 February 2015 and 24 June 2015, 16 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 24 February, 25 March and 31 March 2015 transaction monitoring alerts TM-176048A, TM-185700A, TM-187008A and TM-187014A triggered for large aggregate cash transactions, large withdrawals from HRC accounts and high frequency deposits into HRC account but were not reviewed by the AML team until 13 April 2015. SMR 543348622 was lodged on 14 April 2015, reporting a highly suspicious pattern of activity involving 15 other accounts that was indicative of money laundering. In spite of this conclusion, after

lodging the SMR, the alerts were closed and no customer due diligence carried out.

On 13 April 2015 transaction monitoring alerts TM-189672A and TM-189688A triggered for large withdrawals from HRC accounts and high frequency deposits into HRC accounts but were not reviewed by the AML team until 28 and 30 April 2015. Upon review of TM-189672A, the AML team noted 'the activity continues however it is not excessive and last report was only two weeks ago'. In spite of the known high ML/TF risks, the alerts were closed, no SMR was lodged and no customer due diligence carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request with a view to identifying, mitigating and managing the ML/TF risks.

On 18 May, 19 May, 25 May, 29 May and 1 June 2015 transaction monitoring alerts TM-197104A, TM-197464A, TM-198070A, TM-198945A, TM-199302A and TM-199494A triggered for large aggregate cash transactions, high frequency deposits into HRC accounts, large withdrawals from HRC accounts and structured withdrawals but were not reviewed by the AML team until 6 and 7 June 2015, in spite of the known high ML/TF risks. Upon review of TM-197104A it was noted 'the activity continues however it is not excessive and as we reported only six weeks ago no value add in re reporting at this stage'. Between 14 April 2015 and 7 June 2015, \$489,515 in structured cash was deposited into this account and \$498,397 was sent offshore. The alerts were closed, no SMR was lodged and no customer due diligence carried out.

On 12 and 15 June 2015 the AML Team reviewed another transaction monitoring alert - TM-200175A triggered on 5 June 2015 for large withdrawals from HRC accounts. An SMR was lodged and the alert closed.

On 12 June 2015 the AML team recommended the relationship with the customer be terminated. On 15 June 2015 the termination was approved by the business unit, RBS.

On 15 and 16 June 2015 transaction monitoring alerts TM-203080A and TM-203476A triggered for high frequency deposits into HRC account and large withdrawals from HRC accounts and were reviewed by the AML team on 22 and 24 June 2015. Upon review of TM-203080A it was noted that the activity was ongoing but not excessive and termination had been initiated. The alerts were closed and no SMR was lodged.

On 24 June 2015 transaction monitoring alert TM-204983A triggered for high frequency deposits into HRC account and was reviewed by

the AML team on 1 and 3 July 2015, which found the activity was ongoing but not excessive. The alert was closed and no SMR was lodged.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 24 February 2015 to 30 June 2015 \$1,271,275 in cash was deposited into Person 8's account and \$1,270,528 was transferred to accounts in Hong Kong.

The account was not closed until 4 August 2016.

CommBank lodged 10 late TTRs totalling \$100,000 with respect to this account.

227. On and from 14 April 2015, CommBank did not monitor Person 8 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 and having submitted an SMR on 14 April 2015 with respect to Person 8, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 8.

Having formed a suspicion for the purposes of s 41 and having submitted an SMR on 15 June 2015 with respect to Person 8, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 8.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 8 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 30 June 2015 Person 8 deposited \$796,715 in cash and transferred \$796,189 to accounts in Hong Kong.

228. By reason of the matters pleaded at paragraphs 226 and 227, CommBank contravened s 36(1) on and from 24 February 2015 with respect to Person 8.

Person 9

229. On or about 9 February 2015, CommBank provided a designated service to a person purporting to be Person 9 by opening an account in the name of Person 9.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 9.

Person 9 did not exist.

Person 9's occupation was recorded as 'unemployed'.

230. Between 26 March 2015 and 30 June 2015, 151 cash deposits totalling \$1,246,960 were made into CommBank Account 9.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 9.

149 of these cash deposits were through CommBank IDMs and were under \$10,000.

2 of these cash deposits were made at CommBank branches and were under \$10,000.

Schedule I to the Statement of Claim.

231. Between 26 March 2015 and 30 June 2015, a total of \$1,246,306 was transferred from CommBank Account 9 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

19 IMTs totalling \$946,585 sent to Offshore Account 2.

8 IMTs totalling \$298,973 sent to Offshore Account 1.

1 IMT of \$500 sent to Offshore Account 11.

CommBank statement for CommBank Account 9.

Schedule I to the Statement of Claim.

232. CommBank suspected that the cash deposits pleaded at paragraph 230 were structured contrary to s 142 of the Act.

Particulars

SMR 543348622 dated 14 April 2015.

149 IDM deposits were under \$10,000.

2 branch deposits were under \$10,000.

233. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 9 in the name of Person 9.

Particulars

SMR 543348622 dated 14 April 2015 reported CommBank suspected multiple cash deposits under \$10,000 made to this account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations.

Internal AML Team email of 13 April 2015 headed 'Refer to analytics, no trigger on structured cash deposit' – including for this account – 41 deposits totalling \$347,600 on 30, 31 Mar and 8, 9, 10, 12 and 13 Apr 2015 – and onforwarded within the AML Team on same day with message 'I'm aware that about 1 million CBA profiles are not being picked up by FCP/Pegasus. I just wanted to run these CIF profile (incl this customer) by your team to see whether they are part of it or if we have a wider issue'.

The failures to report suspicious matters for the purposes of s 41

234. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 4, 5, 8, 10, 11, 13, 14 and 17 of Schedule I to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 14 April 2015 the AML team had reviewed transactions on Person 9's account from 9 February 2015 to 13 April 2015 and had identified an ongoing pattern of structured cash deposits to avoid reporting obligations followed by suspicious offshore transfers in this period and was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above – see SMR 543348622 dated 14 April 2015.

235. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 18 to 60 of Schedule I to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 1 July 2015 CommBank had lodged an SMR, being SMR 543348622 dated 14 April 2015.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paragraphs 44 and 48 to 53 above.

By 18 May 2015 CommBank was aware that the AFP was investigating transactions on this account - the s 49 notice of 18 May 2015 pleaded at paragraph 48.

No automatic alerts were triggered in relation to this account.

236. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 9 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 9, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 9 (CommBank Account 9). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank had sent a letter to Person 9 on 3 July 2015 terminating the customer on this basis.

- 237. By reason of the matters pleaded in paragraphs 234 to 236, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 238. By reason of the matters pleaded in paragraphs 234 and 237, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
- 239. By reason of the matters pleaded in paragraphs 235 and 237, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
- 240. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 234 and 235.

Particulars

See SMR 543348622 dated 14 April 2015. Having formed a suspicion about overseas transfers, CommBank reported IMTs to Offshore Account 1, but did not report that Offshore Account 2 and Offshore Account 11 payees with respect to the transfers identified at items 2, 4, 5, 8, 10, 11, 13, 14 and 17 of Schedule I to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

CommBank did not report its suspicions with respect to transactions on and from 16 April 2015 as set out at items 18 to 60 of Schedule I to the Statement of Claim.

\$897,560 in cash deposits and \$996,989 transferred to accounts in Hong Kong not reported.

241. By reason of the matters pleaded at paragraphs 236 and 237, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
242. CommBank did not give the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 236 until 27 July 2016.

Particulars

SMR 674012734 dated 27 July 2016.

243. By reason of the matters pleaded at 234 to 242, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

244. On and from 31 March 2015, CommBank did not monitor Person 9 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

The account was opened on 9 February 2015. No automated transaction monitoring alerts were raised on this account, although on and from 31 March 2015, 149 cash deposits under \$10,000 totalling \$1,245,160 were made into CommBank Account 9.

SMR 543348622 was lodged 14 April 2015, reporting that the highly suspicious pattern of activity on this account was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above and was indicative of money laundering and avoiding reporting obligations. However, after lodging this SMR, no customer due diligence was carried out.

By 13 April 2015, CommBank was aware that this account was not being subject to transaction monitoring and yet no steps were taken to rectify this – AML Team email dated 13 April 2015 and headed ‘Refer to analytics, no trigger on structured cash deposit’. On and from 13 April 2015, \$996,710 in structured cash was deposited into this account and \$895,121 sent offshore.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request.

On 1 July 2015 CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

The account was not closed until 4 August 2016.

From 31 March 2015 to 30 June 2015 \$1,245,160 in cash was deposited into Person 9's account and \$1,195,087 was transferred to accounts in Hong Kong.

CommBank lodged 2 late TTRs totalling \$20,000 with respect to this account.

245. On and from 14 April 2015, CommBank did not monitor Person 9 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 9, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 9.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 9 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 30 June 2015 Person 9 deposited \$867,610 in cash and transferred \$897,105 to accounts in Hong Kong.

246. By reason of the matters pleaded at paragraphs 244 and 245, CommBank contravened s 36(1) on and from 9 February 2015 with respect to Person 9.

Person 10

247. On or about 24 February 2015, CommBank provided a designated service to a person purporting to be Person 10 by opening an account in the name of Person 10.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 10.

Person 10 did not exist.

Person 10's occupation was recorded as 'unemployed'.

248. Between 4 March 2015 and 30 June 2015, 13 cash deposits totalling \$110,139 were made into CommBank Account 10.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 10.

11 of these cash deposits were made through CommBank IDMs and were under \$10,000.

2 cash deposits were made at CommBank branches and were under \$10,000.

Schedule J to the Statement of Claim.

249. Between 5 March 2015 and 30 June 2015, a total of \$108,017 was transferred from CommBank Account 10 to an account in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 10.

5 IMTs sent to Offshore Account 2.

Schedule J to the Statement of Claim.

250. CommBank suspected that the cash deposits pleaded at paragraph 248 were structured contrary to s 142 of the Act.

Particulars

SMR 543348622 dated 14 April 2015.

11 IDM deposits were under \$10,000.

2 branch deposits were under \$10,000.

251. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 10 in the name of Person 10.

Particulars

SMR 543348622 dated 14 April 2015.

CommBank suspected multiple cash deposits under \$10,000 made to Person 10's account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 (also the holder of Offshore Account 2) shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above.

The failures to report suspicious matters for the purposes of s 41

252. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 4 and 6 of Schedule J to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 14 April 2015 the AML team had reviewed all transactions on this account between 24 February 2015 and 13 April 2015 and had identified structured cash deposits on this account followed by international funds transfers to Hong Kong indicative of money laundering and avoiding reporting obligations and was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above – see SMR 543348622 dated 14 April 2015.

253. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 8 and 9 to 12 of Schedule J to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 1 July 2015 CommBank had lodged one SMR in respect of this account, being SMR 543348622 dated 14 April 2015.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paragraphs 44 and 48 to 53 above.

By 18 May 2015 CommBank was aware that the AFP were investigating transactions on this account - the s 49 notice of 18 May 2015 pleaded at paragraph 48.

On 30 June 2015 the only automated transaction monitoring alert raised on this account was triggered for large aggregate cash transactions (TM-206213A).

254. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 10 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 10, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 10 (CommBank Account 10). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 10 on 3 July 2015 terminating the customer's account on this basis.

255. By reason of the matters pleaded in paragraphs 252 to 254, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
256. By reason of the matters pleaded in paragraphs 252 and 255, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
257. By reason of the matters pleaded in paragraphs 253 and 255, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
258. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 252 and 253.

Particulars

See SMR 543348622 dated 14 April 2015. Having formed a suspicion about overseas transfers, CommBank reported IMTs, but did not correctly identify the payee with respect to the transfers identified at items 2, 4 and 6 of Schedule J to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

See SMR 564552980 dated 2 July 2015. Having formed a suspicion about overseas transfers, CommBank reported IMTs, but did not identify the payee with respect to the transfers identified at items 9 and 12 of Schedule J to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act. Further, a suspicious transaction on 30 April 2015 was never reported, as identified at item 8 of Schedule J to the Statement of Claim.

\$9,000 in cash deposits and \$108,017 transferred to accounts in Hong Kong not reported.

259. By reason of the matters pleaded in paragraphs 254 and 255, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
260. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 254.

Particulars

SMR 674014412 dated 27 July 2016.

261. By reason of the matters pleaded at paragraphs 252 to 260, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

262. On and from 17 March 2015, CommBank did not monitor Person 10 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

The account was opened on 24 February 2015. Although between 17 March 2015 and 30 June 2015, 12 cash deposits totalling \$109,100 were made into this account, only one automated transaction monitoring alert was raised on 30 June 2015. CommBank never reviewed this alert.

By 13 April 2015, CommBank was aware that this account was not being subject to transaction monitoring and yet no steps were taken to rectify this – AML Team email dated 13 April 2015 and headed ‘Refer to analytics, no trigger on structured cash deposit’. On and from 13 April 2015, \$67,550 in structured cash was deposited into this account and \$67,497 sent offshore.

On 14 April 2015 the bank reported in SMR 543348622 that it suspected multiple cash deposits under \$10,000 made to the Person 10’s account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 (also the holder of Offshore Account 2) in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations. Following this SMR being lodged, no customer due diligence was carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request.

On 30 June 2015, transaction monitoring alert TM-206213A triggered for large aggregate cash transactions but was never reviewed by the AML team.

On 1 July 2015 CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

On 2 July 2015 manual alert TM-205469A was raised and reviewed by the AML team. An SMR was lodged.

The account was not closed until 4 August 2016.

From 17 March 2015 to 30 June 2015 \$109,100 in cash deposits were made into Person 10’s account and \$107,017 was transferred to Offshore Account 2.

263. On and from 14 April 2015, CommBank did not monitor Person 10 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 10, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 10.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 10 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 30 June 2015 Person 10 deposited \$60,550 in cash and transferred \$67,497 to Offshore Account 2.

264. By reason of the matters pleaded at paragraphs 262 and 263, CommBank contravened s 36(1) on and from 24 February 2015 with respect to Person 10.

Person 11

265. On or about 24 February 2015, CommBank provided a designated service to a person purporting to be Person 11 by opening an account in the name of Person 11.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 11.

Person 11 did not exist.

Person 11's occupation was recorded as 'unemployed'.

266. Between 4 March 2015 and 30 June 2015, 143 cash deposits totalling \$1,142,625 were made into CommBank Account 11.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 11.

141 cash deposits were made through CommBank IDMs.

140 IDM deposits were under \$10,000.

2 cash deposits were made at CommBank branches and were under \$10,000.

Schedule K to the Statement of Claim.

267. Between 5 March 2015 and 30 June 2015, a total of \$1,140,867 was transferred from CommBank Account 11 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 11.

24 IMTs totalling \$1,140,209 were sent to Offshore Account 2.

1 IMT of \$658 was sent to Offshore Account 3.

Schedule K to the Statement of Claim.

268. CommBank suspected that the cash deposits pleaded at paragraph 266 were structured contrary to s 142 of the Act.

Particulars

SMR 543348622 dated 14 April 2015.

139 IDM deposits were under \$10,000.

2 branch deposits were under \$10,000.

269. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 11 in the name of Person 11.

Particulars

SMR 543348622 dated 14 April 2015 reported that CommBank suspected multiple cash deposits under \$10,000 made to Person 11's account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 (also the holder of Offshore Account 2) in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

270. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 3, 5, 8, 10 and 12 of Schedule K to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 14 April 2015, the AML team had reviewed transactions on Person 11's account from 28 February 2015 to 7 April 2015 and had identified an ongoing pattern of intense structured deposits to avoid reporting obligations followed by suspicious offshore transfers in this period – see SMR 543348622 lodged on 14 April 2015 and transaction monitoring alerts TM-187061A and TM-189037A triggered on 1 and 9 April 2015 and reviewed by the AML team on 13 April 2015.

271. By no later than 28 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 14 to 17 of Schedule K to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 28 April 2015 the AML team reviewed transaction monitoring alert TM-189894A. The AML team reviewed account activity since the last SMR was reported to AUSTRAC on 14 April 2015 and identified that the suspicious activity reported on 14 April 2015 was ongoing and noted 'activity continues however as it is not excessive and last report was only two weeks ago will close as not suspicious'.

272. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 40 to 51 of Schedule K to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 1 July 2015, CommBank had raised and reviewed 8 automated transaction monitoring alerts and 2 manual alerts with respect to this account and had lodged 2 SMRs, being SMR 543348622 and 558859889.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paragraphs 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

By 18 May 2015 CommBank was aware that the AFP was investigating transactions on this account - the s 49 notice of 18 May 2015 pleaded at paragraph 48.

273. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 11 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 11, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 11 (CommBank Account 11). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 11 on 15 June 2015 terminating the customer's account on this basis.

- 274. By reason of the matters pleaded in paragraphs 270 to 273, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 275. By reason of the matters pleaded in paragraphs 270 and 274, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
- 276. By reason of the matters pleaded in paragraphs 272 and 274, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
- 277. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 270 and 272.

Particulars

See SMR 543348622 dated 14 April 2015. CommBank reported its suspicions with respect to \$249,508 of IMTs, but did not correctly identify the payee - see items 2, 3, 5, 8, 10 and 12 of Schedule K to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

CommBank did not report its suspicions with respect to ongoing transactions on and from 11 June 2015 as set out at items 40 to 51 of Schedule K to the Statement of Claim.

\$248,900 in cash deposits and \$497,055 transferred to accounts in Hong Kong not reported.

- 278. By reason of the matters pleaded in paragraphs 271 and 274, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 28 April 2015, being 1 May 2015.
- 279. It was not until 11 June 2015 that CommBank gave the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraph 271.

Particulars

SMR 558859894 dated 11 June 2015.

Having reviewed the account on 28 April 2015 and identified the suspicious activity in SMR 543348622 continued, the AML team did not report its suspicions with respect to this ongoing activity until 11 June 2015. See items 14 to 17 of Schedule K to the Statement of Claim.

\$99,000 in cash deposits and \$99,948 transferred to Hong Kong reported late.

280. By reason of the matters pleaded in paragraphs 273 and 274, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
281. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraph 273.

Particulars

SMR 674014225 dated 27 July 2016.

282. By reason of the matters pleaded at paragraphs 270 to 281, CommBank contravened s 41(2)(a) of the Act on 4 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

283. On and from 1 April 2015, CommBank did not monitor Person 11 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 1 April 2015 and 16 June 2015, 8 automated transaction monitoring alerts and 2 manual alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 13 April 2015 the AML team reviewed transaction monitoring alerts TM-187061A triggered on 1 April 2015 for large aggregate cash transactions and TM-189037A triggered on 9 April 2015 for structured withdrawals.

SMR 543348622 was lodged 14 April 2015, reporting that the highly suspicious pattern of activity on this account was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above and was indicative of money laundering and avoiding reporting obligations. However, after lodging this SMR, no customer due diligence was carried out.

On 28 April 2015 the AML team reviewed transaction monitoring alert TM-189894A triggered on 15 April 2015 for large aggregate cash transactions. The reviewer identified that the activity continued but was not excessive and had been reported two weeks earlier. The alert was closed, no SMR was lodged and no customer due diligence was carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious

accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request.

On 28 May 2015 manual alert TM-198647A was raised by a manager of Leichhardt CommBank branch, reporting in respect of this customer and another customer, Person 14, 'This morning we had an error in our IDM (intelligent deposit machine) saying it was full. This is very unusual for our branch so I looked up the report and saw that there was 2 accounts used to make multiple deposits each just short of \$50K in each account. In the IDM there is a limit of 200 notes per transaction...Upon further investigation it appears that both accounts/profiles have been established through internet banking. I have looked through the transactions and it looks like each profile has deposited then transferred overseas at least \$1Mil over the last month or so'.

TM-198647A was not reviewed by the AML team until 29 and 30 June 2015, notwithstanding the known high ML/TF risks. The AML team determined that as a report had been submitted to AUSTRAC on 11 June 2015 for similar activity, no further investigation was required.

On 11 June 2015 the AML team had reviewed transaction monitoring alerts TM-193109A triggered on 4 May 2015, TM-197103A triggered on 18 May 2015, TM-198471A triggered on 26 May 2015 and TM-199301A triggered on 1 June 2015. In relation to TM-193109A, the first reviewer noted that 'since last SMR reported...customer has only received \$129,250 in structured deposits...activity at this time does not warrant further report at this time'. However, the alert was re-opened on the same day and SMR 558859889 lodged in response to all 4 alerts.

On 11 June 2015 the AML team initiated termination of the customer for 'intense structuring, funds sent offshore'. This was approved by the business unit, RBS, on 12 June 2015.

On 15 June 2015 CommBank sent a letter to the customer advising the account would be closed. In spite of the known high risks, the customer was given 30 days' notice of closure. Structured deposits and offshore transfers through this account continued until 30 June 2015. From 15 June 2015 to 30 June 2015 cash deposits totalling \$199,000 were made into Person 11's account and \$197,447 was transferred to accounts overseas.

On 30 June 2015 the AML team reviewed transaction monitoring alert TM-203377A triggered on 16 June 2015 for large aggregate cash transactions. The reviewer noted that an SMR had been submitted to AUSTRAC on 11 June 2015 for similar activity so no further investigation was required. The alert was closed and no SMR was lodged.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General

Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

As at 14 October 2016, the account was pending closure.

From 1 April 2015 to 30 June 2015 \$1,092,125 in cash was deposited into Person 11's account and \$1,041,039 was transferred to accounts overseas.

CommBank lodged 1 late TTR totalling \$10,000 with respect to this account.

284. On and from 14 April 2015, CommBank did not monitor Person 11 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 11, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 11.

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 11 June 2015 with respect to Person 11, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 11.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 11 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 30 June 2015 Person 11 deposited \$891,965 in cash and transferred \$891,129 to accounts overseas.

285. By reason of the matters pleaded at paragraphs 283 and 284, CommBank contravened s 36(1) on and from 1 April 2015 with respect to Person 11.

Person 12

286. On or about 24 February 2015, CommBank provided a designated service to a person purporting to be Person 12 by opening an account in the name of Person 12.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 12.

Person 12 did not exist.

Person 12's occupation was recorded as 'unemployed'.

287. Between 4 March 2015 and 19 June 2015, 144 cash deposits totalling \$1,207,925 were made into CommBank Account 12.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 12.

142 cash deposits were through CommBank IDMs.

137 IDM deposits were under \$10,000.

2 cash deposits under \$10,000 were made at CommBank branches.

Schedule L to the Statement of Claim.

288. Between 5 March 2015 and 19 June 2015, a total of \$1,206,336 was transferred from CommBank Account 12 to an account in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 12.

26 IMTs totalling \$1,206,336 sent to Offshore Account 2.

Schedule L to the Statement of Claim.

289. CommBank suspected that the cash deposits pleaded at paragraph 287 were structured contrary to s 142 of the Act.

Particulars

SMR 543348622 dated 14 April 2015.

136 IDM deposits were under \$10,000.

1 branch deposit was under \$10,000.

290. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 12 in the name of Person 12.

Particulars

On 14 April 2015 CommBank reported in SMR 543348622 dated 14 April 2015 that it suspected multiple cash deposits under \$10,000 made to the Person 12's account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 (also the holder of Offshore Account 2) in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

291. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 3, 6, 9, 10, 12, and 14 of Schedule L to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 14 April 2015, the AML team had reviewed transactions on Person 12's account between 24 February 2015 and 13 April 2015 and had identified multiple cash deposits under \$10,000 made to the Person 12's account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to an account in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was indicative of money laundering and was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above – see SMR 543348622 dated 14 April 2015.

292. By no later than 30 May 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 16 to 41 of Schedule L to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 30 May 2015 transaction monitoring alert TM-189892A was reviewed by the AML team which identified that the suspicious activity reported on 14 April 2015 was ongoing and noted 'activity continues however as it is not excessive and last report was only two weeks ago will close as not suspicious at this stage'.

293. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 51 to 58 of Schedule L to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 1 July 2015, CommBank had raised and reviewed 7 automated transaction monitoring alerts with respect to this account and had lodged 2 SMRs, being SMRs 543348622 dated 14 April 2015 and 558952829 dated 12 June 2015.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paragraphs 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

294. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 12 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 12, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 12 (CommBank Account 12). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 12 on 15 June 2015 terminating the customer's account on this basis.

- 295. By reason of the matters pleaded in paragraphs 291 to 294, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 296. By reason of the matters pleaded in paragraphs 291 and 295, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
- 297. By reason of the matters pleaded in paragraphs 293 and 295, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
- 298. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the designated services pleaded at paragraphs 291 and 293.

Particulars

See SMR 543348622 dated 14 April 2015. Having formed a suspicion about the overseas transfers, CommBank reported IMTs but did not correctly identify the payee of the transfers identified at items 2, 3, 6, 9, 10, 12, and 14 of Schedule L to the Statement of Claim. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

CommBank did not report its suspicions with respect to transactions on and from 11 June 2015 as set out at identified items 51 to 58 of Schedule L to the Statement of Claim.

\$148,620 in cash deposits and \$407,618 transferred to an account in Hong Kong were never reported.

299. By reason of the matters pleaded at paragraphs 292 and 295, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 30 May 2015, being 3 June 2015.
300. It was not until 12 June 2015 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 292.

Particulars

SMR 558952829 dated 12 June 2015.

Having reviewed the account on 30 May 2015 and identified the suspicious activity in SMR 543348622 continued, the AML team did not report its suspicions with respect to this ongoing activity until 12 June 2015. See items 16 to 41 of Schedule L to the Statement of Claim.

\$649,430 in cash deposits and \$649,132 transferred to Hong Kong reported late.

301. By reason of the matters pleaded at paragraphs 294 and 295, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
302. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 294.

Particulars

SMR 674009972 dated 27 July 2016.

303. By reason of the matters pleaded at paragraphs 291 to 302, CommBank contravened s 41(2)(a) of the Act on 4 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

304. On and from 27 March 2015, CommBank did not monitor Person 12 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 27 March 2015 and 1 June 2015, 7 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 13 April 2015 the AML team reviewed transaction monitoring alert TM-189038A triggered on 9 April 2015 for structured withdrawals. SMR 543348622 was lodged 14 April 2015, reporting that the highly suspicious pattern of activity on this account was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above and was indicative of money

laundering and avoiding reporting obligations. However, after lodging this SMR, no customer due diligence was carried out.

On 28 and 30 April 2015 the AML team reviewed transaction monitoring alerts TM-189892A triggered on 15 April 2015 for large aggregate cash transactions and TM-190952A triggered on 21 April 2015 for structured withdrawals. In relation to TM-189892A, the reviewer concluded that since the customer had been reported to AUSTRAC on 14 April 2015 the activity had continued but was not excessive and the last report was only two weeks ago so no further action was required. The alerts were closed, no SMR was lodged and no customer due diligence was carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request with a view to identifying, mitigating and managing the ML/TF risks.

On 11 June 2015 the AML team reviewed transaction monitoring alerts TM-193107A triggered on 4 May 2015 for large aggregate cash transactions, TM-197102A triggered on 18 May 2015 for large aggregate cash transactions, TM-198472A triggered on 26 May 2015 for structured withdrawals and TM-199448A triggered on 1 June 2015 for structured deposits across branches. SMR 558952829 was lodged on 12 June 2015, and the alerts were closed.

On 11 June 2015 the AML team initiated termination of the customer's account for intense structuring followed by funds being transferred offshore, which was approved by the business unit, RBS.

On 15 June 2015 CommBank sent a letter to the customer advising the account would be closed. The customer was given 30 days' notice in spite of the known high risks. Structured deposits totalling \$49,750 and offshore transfers totalling \$49,730 were put through this account on 19 June 2015.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 27 March 2015 to 19 June 2015 \$1,141,625 in cash was deposited into Person 12's account and \$1,090,419 was transferred to accounts in Hong Kong.

The account was not closed until 4 August 2016.

CommBank lodged 5 late TTRs totalling \$50,200 with respect to this account.

305. On and from 14 April 2015, CommBank did not monitor Person 12 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 12, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 12.

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 12 June 2015 with respect to Person 12, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 12.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 12 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 19 June 2015 Person 12 deposited \$957,700 in cash and transferred \$947,276 to Hong Kong.

306. By reason of the matters pleaded at paragraphs 304 and 305, CommBank contravened s 36(1) on and from 27 March 2015 with respect to Person 12.

Person 13

307. On or about 16 March 2015, CommBank provided a designated service to a person purporting to be Person 13 by opening an account in the name of Person 13.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 13.

Person 13 did not exist.

Person 13's occupation was recorded as 'unemployed'.

308. Between 26 March 2015 and 17 June 2015, 64 cash deposits totalling \$520,550 were made into CommBank Account 13 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 13.

62 IDM deposits were under \$10,000.

Schedule M to the Statement of Claim.

309. Between 26 March 2015 and 12 June 2015, a total of \$549,970 was transferred from CommBank Account 13 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 13.

9 IMTs totalling \$389,484 sent to Offshore Account 2.

5 IMTs totalling \$160,486 sent to Offshore Account 1.

Schedule M to the Statement of Claim.

310. CommBank suspected that the cash deposits pleaded at paragraph 308 were structured contrary to s 142 of the Act.

Particulars

SMR 561634793 dated 22 June 2015.

62 IDM deposits were under \$10,000.

311. By no later than 14 April 2015, CommBank was aware of suspicious patterns of activity on CommBank Account 13 in the name of Person 13.

Particulars

SMR 543348622 dated 14 April 2015.

CommBank suspected cash deposits of \$1,000 on 26 March 2015 and \$900 on 27 March 2015 through ATMs, which were transferred to Offshore Accounts 1 and 2 account in Hong Kong shortly after deposit, were highly suspicious given that the purpose of the transfer was unknown and that the pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

312. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 2 of Schedule M to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 14 April 2015 the AML team had reviewed transactions on this account from 16 March 2015 to 13 April 2015 and had identified \$1,850 in suspicious offshore transfers from this account. The AML Team also identified a connection between this account and an ongoing pattern, on the 15 suspicious accounts, of intense structured cash deposits to avoid reporting obligations followed by suspicious offshore transfers as particularised at paragraph 44 above – see SMR 543348622 lodged on 14 April 2015.

313. By no later than 22 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 5 to 13, 15, and 17 to 32 and in relation to two of the designated services identified at item 16 of Schedule M to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 22 June 2015 the AML team had reviewed transactions on this account and identified 'a high volume of cash deposits' with subsequent multiple international funds transfers to Hong Kong – see SMR 561634793 dated 22 June 2015 and transaction monitoring alerts TM-193699A triggered on 7 May 2015, TM-197478A and TM-197415A triggered on 19 May 2015, TM-198814A triggered on 28 May 2015 and TM-199298A triggered on 1 June 2015.

By 22 June 2015, CommBank had raised and reviewed 5 automated transaction monitoring alerts with respect to this account and had lodged 2 SMRs, being SMR 543348622 and SMR 561634793.

314. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 13 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 13, suspected of using false IDs, with potential links to money laundering.

On 3 July 2015 an alert was entered on Pegasus - HRC-2388124A – recording that the AFP had confirmed it was likely that this account opened using a false identity.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 13 (CommBank Account 13). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 13 on 3 July 2015 terminating the customer on this basis.

315. By reason of the matters pleaded in paragraphs 312 to 314, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.

316. By reason of the matters pleaded in paragraphs 312 and 315, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
317. By reason of the matters pleaded in paragraphs 313 and 315, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 22 June 2015, being 25 June 2015.
318. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 312 to 313.

Particulars

See SMR 543348622 dated 14 April 2015. Having formed a suspicion with respect to overseas transfers, CommBank reported IMTs totalling \$1,850, but did not correctly identify the payee with respect to the transfers identified at item 2 of Schedule M to the Statement of Claim. The report did not contain the information specified in rules 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

SMR 561634793 dated 22 June 2015 reported the transactions identified at item 14 and the 4 structured deposits at Paddington B as identified at item 16 of Schedule M. It did not report the 2 ATM deposits (\$9,850, \$9,600) at Central Park B as identified at item 16 of Schedule M. SMR 561634793 also reported a high volume of cash deposits and multiple international funds transfers to Hong Kong but did not identify any further details about suspicions with respect to these further transactions – which are identified at items 5 to 13, 15, 17 to 32 of Schedule M to the Statement of Claim.

\$470,150 in cash deposits and \$549,090 in transfers to Hong Kong not reported.

319. By reason of the matters pleaded in paragraphs 314 and 315, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
320. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in relation to the matter pleaded at paragraph 314.

Particulars

SMR 673805164 dated 27 July 2016.

321. By reason of the matters pleaded at paragraphs 312 to 320, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

322. On and from 14 April 2015, CommBank did not monitor Person 13 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

By 14 April 2015 CommBank suspected cash deposits of \$1,000 on 26 March 2015 and \$900 on 27 March 2015 through ATMs, which

were transferred to Offshore Accounts 1 and 2 in Hong Kong shortly after deposit, were highly suspicious given that the purpose of the transfer was unknown and that the pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations. SMR 543348622 was submitted on 14 April 2015, but no customer due diligence was carried out.

Between 7 May 2015 and 1 June 2015, 5 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request.

In spite of the known high ML/TF risks, it was not until 18 and 22 June 2015 that the AML Team considered all 5 alerts triggered on this account – being TM-193699A triggered on 7 May 2015 for large aggregate cash transactions, TM-197478A triggered on 19 May 2015 for large aggregate cash transactions, TM-197415A triggered on 19 May 2015 for structured deposits, TM-198814A triggered on 28 May 2015 for structured withdrawals and TM-199298A triggered on 1 June 2015 for large aggregate cash transactions. CommBank submitted SMR 561634793, closed the alerts and carried out no customer due diligence.

It was not until 1 July 2015 that CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

On 23 October 2015 Group Security reviewed the account after the customer failed to respond to three requests for further KYC information, and noted that the customer had received cash deposits to the account at CommBank ATMs followed by IMTs to the holder of Offshore Accounts 1 and 2. The recommendation was that 'GS continue to report the suspicious activity' (KYC-3729C).

As at 14 October 2016, this account was pending closure.

From 14 April 2015 to 17 June 2015 \$530,500 in cash was deposited into Person 13's account and \$503,420 was transferred to accounts in Hong Kong.

323. On and from 14 April 2015, CommBank did not monitor Person 13 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 13, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 13.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 22 June 2015 with respect to Person 13 rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 13.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 13 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 17 June 2015 Person 13 deposited \$530,500 in cash and transferred \$503,420 to accounts in Hong Kong.

324. By reason of the matters pleaded at paragraphs 322 and 323, CommBank contravened s 36(1) on and from 14 April 2015 with respect to Person 13.

Person 14

325. On or about 16 March 2015, CommBank provided a designated service to a person purporting to be Person 14 by opening an account in the name of Person 14.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 14.

Person 14 did not exist.

Person 14's occupation was recorded as 'unemployed'.

326. Between 26 March 2015 and 29 June 2015, 184 cash deposits totalling \$1,408,325 were made into CommBank Account 14.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 14.

181 cash deposits were made through CommBank IDMs.

177 IDM deposits were under \$10,000.

3 cash deposits were made at CommBank branches and were under \$10,000.

Schedule N to the Statement of Claim.

327. Between 26 March 2015 and 29 June 2015, a total of \$1,394,243 was transferred from CommBank Account 14 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 14.

21 IMTs totalling \$990,689 sent to Offshore Account 2.

8 IMTs totalling \$350,178 sent to Offshore Account 1.

1 IMT of \$49,978 sent to Offshore Account 3.

Schedule N to the Statement of Claim.

328. CommBank suspected that the cash deposits pleaded at paragraph 326 were structured contrary to s 142 of the Act.

Particulars

177 IDM deposits were under \$10,000.

3 branch deposits were under \$10,000.

SMR 543348622 dated 14 April 2015.

329. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 14 in the name of Person 14.

Particulars

SMR 543348622 dated 14 April 2015 reported that CommBank suspected intensely structured deposits had been made through CommBank ATMs, which were transferred to Offshore Account 1 in Hong Kong shortly after deposit, was highly suspicious given that the purpose of the transfer was unknown and that the pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

330. By no later than 14 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 7, 8, 13 and 20 of Schedule N to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 14 April 2015, the AML team had reviewed all transactions on this account up until 13 April 2015 and had identified structured cash deposits on this account followed by international funds transfers to Hong Kong indicative of money laundering and avoiding reporting obligations. The team also identified the account was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above – see SMR 543348622 dated 14 April 2015.

331. By no later than 5 May 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 23, 26, 27 and 30 of Schedule N to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 5 May 2015, the AML team had reviewed all transactions on this account between 14 April 2015 and 20 April 2015 and had identified further structured cash deposits on this account followed by international funds transfers to Hong Kong indicative of money laundering and avoiding reporting obligations – see SMR 548973368 dated 5 May 2015.

332. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 61, 62 and in relation to one of the deposits at item 63 of Schedule N to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 18 May 2015 CommBank was aware that the AFP was investigating transactions on this account - the s 49 notice of 18 May 2015 pleaded at paragraph 48.

By no later than 1 July 2015, CommBank had raised and reviewed 16 automated transaction monitoring alerts with respect to this account and had lodged 3 SMRs, being SMRs 543348622 dated 14 April 2015, 548973368 dated 5 May 2015 and 562299492 dated 23 June 2015.

On 29 and 30 June 2015 the AML Team reviewed a manual alert that had been raised a month before on 28 May 2015 – TM-198647A. This alert or STR was raised by a manager of Leichhardt CommBank branch in respect of this customer and another customer, Person 11 reporting 'This morning we had an error in our IDM (intelligent deposit machine) saying it was full. This is very unusual for our branch so I looked up the report and saw that there was 2 accounts used to make multiple deposits each just short of \$50K in each account. In the IDM there is a limit of 200 notes per transaction...Upon further investigation it appears that both accounts/profiles have been established through internet banking. I have looked through the transactions and it looks like each profile has deposited then transferred overseas at least \$1Mil over the last month or so'. On 29 and 30 June 2015, the AML team determined that as a report had been submitted to AUSTRAC on 11 June 2015 in relation to Person 11 for similar activity, no further investigation was required.

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account - see paras 44 and 48 to 53 above.

333. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 14 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 14, suspected of using false IDs, with potential links to money laundering.

On 3 July 2015 an alert was entered on Pegasus - HRC-2388124A – recording that the AFP had confirmed it was likely that this account opened using a false identity.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 14 (CommBank Account 14). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 14 on 3 July 2015 terminating the customer on this basis.

334. By reason of the matters pleaded in paragraphs 330 to 333, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
335. By reason of the matters pleaded in paragraphs 330 and 334, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 April 2015, being 17 April 2015.
336. By reason of the matters pleaded in paragraphs 331 and 334, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 5 May 2015, being 8 May 2015.
337. By reason of the matters pleaded in paragraphs 332 and 334, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
338. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 330 to 332.

Particulars

See SMR 543348622 dated 14 April 2015. Having formed a suspicion with respect to overseas transfers, CommBank reported funds were sent to Offshore Account 1, but did not identify Offshore Account 2 which was also a payee of funds – see items 2, 7, 8 and 13 of Schedule N to the Statement of Claim. The report did not contain the information specified in rules 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

See SMR 548973368 dated 5 May 2015. Having formed a suspicion about the patterns of transactions on this account between 14 April 2015 and 20 April 2015, CommBank reported a number of cash deposits and IMTs during that period, but did not report the deposit at item 26 of Schedule N to the Statement of Claim. The SMR also did not correctly identify all payees of IMTs – see items 23, 27 and 30 of Schedule N. The report did not contain the information specified in rules 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

SMR 571592964 dated 28 July 2015 did not report CommBank's suspicions with respect to the transactions at items 61, 62 and the \$300 deposit specified at item 63.

\$118,310 in cash deposits and \$349,482 transferred to accounts in Hong Kong were not reported.

339. By reason of the matters pleaded in paragraphs 333 and 334, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
340. It was not until 27 July 2015 that CommBank gave the AUSTRAC CEO an SMR in relation to the matter pleaded at paragraph 333.

Particulars

SMR 674011651 dated 27 July 2016.

341. By reason of the matters pleaded at paragraphs 330 to 340, CommBank contravened s 41(2)(a) of the Act on 4 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

342. On and from 30 March 2015, CommBank did not monitor Person 14 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

No transaction monitoring alerts were raised on this account until 13 April 2015, in spite of 35 cash deposits under \$10,000 totalling \$287,960 being made into this account between 30 March 2015 and 10 April 2015. From 30 March 2015 to 12 April 2015, \$348,040 was sent offshore.

Between 13 April 2015 and 6 September 2015, 18 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the

alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

By 14 April 2015 CommBank suspected multiple cash deposits under \$10,000 made to Person 14's account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was indicative of money laundering and was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above – see SMR 543348622 dated 14 April 2015. Having lodged this SMR, no customer due diligence was carried out.

On 13 April 2015 transaction monitoring alerts TM-189525A and TM-189609A triggered for large aggregate cash transactions and structured withdrawals and on 20 April 2015 transaction monitoring alert TM-190830A triggered for structured deposits across branches. These alerts were not reviewed by the AML team until 5 and 6 May 2015, in spite of the known high risks. SMR 548973368 was lodged, the alerts were closed and no customer due diligence carried out.

On 10 May 2015 a batch alert HRC-2239595A was raised on this account, with the alert description titled 'OTH not employed'. The alert was never reviewed and no customer due diligence carried out.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request.

Between 18 May 2015 and 5 June 2015, 9 transaction monitoring alerts were triggered.

On 18 May 2015 transaction monitoring alert TM-197100A triggered for large aggregate cash transactions and TM-197157A triggered for high frequency deposits into HRC; on 25 May 2015 TM-198069A triggered for large withdrawals from HRC accounts, on 28 May 2015 TM-198813A triggered for structured withdrawals, on 1 June 2015 TM-199297A, TM-199447A and TM-199493A triggered for large aggregate cash transactions and structured deposits across branches, and high frequency deposits into HRC account, and on 5 June 2015 TM-200030A and TM-203078A triggered for large credits into HRC accounts and large withdrawals from HRC accounts.

The 9 alerts were not reviewed by the AML team until 17 and 18 June 2015, in spite of the known high ML/TF risks.

A further 3 alerts were triggered on 15, 16 and 17 June 2015 - respectively TM-203078A for high frequency deposits into HRC

account; TM-203474A triggered for large withdrawals from HRC accounts and TM-203625A triggered for structured withdrawals. These alerts were reviewed by the AML Team on 19 June 2015.

SMR 562299492 was submitted on 23 June 2015, the (12) alerts closed and no customer due diligence carried out.

On 29 and 30 June 2015 the AML Team reviewed a manual alert that had been raised a month before on 28 May 2015 – TM-198647A. This alert or STR was raised by a manager of Leichhardt CommBank branch in respect of this customer and another customer, Person 11, reporting 'This morning we had an error in our IDM (intelligent deposit machine) saying it was full. This is very unusual for our branch so I looked up the report and saw that there was 2 accounts used to make multiple deposits each just short of \$50K in each account. In the IDM there is a limit of 200 notes per transaction...Upon further investigation it appears that both accounts/profiles have been established through internet banking. I have looked through the transactions and it looks like each profile has deposited then transferred overseas at least \$1Mil over the last month or so'. On 29 and 30 June 2015, the AML team determined that as a report had been submitted to AUSTRAC on 11 June 2015 in relation to Person 11 for similar activity, no further investigation was required. The alert was closed, no SMR was lodged and no customer due diligence carried out.

Also on 29 and 30 June 2015, the AML Team reviewed TM-205136A triggered on 25 June 2015 for high frequency deposits into HRC account. The AML Team determined that as an SMR had been submitted on 23 June 2015 for similar activity, no further investigation was required. No SMR was lodged, the alert was closed and no customer due diligence carried out.

On 1 July 2015, CommBank placed a stop on CommBank Account 14 in the name of Person 14 at the request of the AFP.

On 9 July 2015 and 11 August 2015, CommBank sent letters to the customer attempting to collect further KYC. CommBank did not receive a response to these letters. Earlier on 10 June 2015, CommBank had also written to the customer seeking further KYC information and had received no response.

On 22 and 28 July 2015 the AML Team reviewed transaction monitoring alerts TM-205958A and TM-206025A triggered on 29 June 2015 for large withdrawals from HRC accounts and large aggregate cash transactions. Termination of the customer's account was initiated.

On 13 August 2015 manual alert TM-217003A raised on another account held by Person 14 (CommBank Account 114) as a result of an internal AML Team email dated 13 August 2015 at 8:12am with subject line 'FW: SMR Inquiry' asking the AML team submit an SMR as CommBank Account 14 held by customer 'was mentioned in intel

regarding the recent spate of intensive IDM deposit structuring and has yet to have an SMR submitted under their name', was reviewed by the AML team on 13 and 19 August 2015. The AML team decided that since termination of the customer had been initiated and no transactions had been conducted since account opening that the alert could be closed. No SMR was lodged.

On 6 September 2015 manual alert HRC-2590612A was raised for false names and fake ID and was reviewed by the AML team on 7 September 2015, 7 December 2015, 24 February 2016, 30 May 2016, 5 June 2016 and 27 June 2016. The recommendation following each review was to retain the customer and review in 3 months. It was not until 27 June 2016 that an SMR was lodged.

The account was not closed until 4 August 2016.

From 30 March 2015 to 30 June 2015 \$1,406,425 in cash deposits were made into Person 14's account and \$1,392,395 was transferred to accounts in Hong Kong.

CommBank lodged 4 late TTRs totalling \$40,250 with respect to this account.

343. On and from 14 April 2015, CommBank did not monitor Person 14 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 14, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 14.

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 5 May 2015 with respect to Person 14, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 14.

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 23 June 2015 with respect to Person 14, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 14.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 14 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

The account was not closed until 4 August 2016.

From 14 April 2015 to 30 June 2015 Person 14 deposited \$1,008,215 in cash and transferred \$994,385 to accounts in Hong Kong.

344. By reason of the matters pleaded at paragraphs 342 and 343, CommBank contravened s 36(1) on and from 30 March 2015 with respect to Person 14.

Person 15

345. On or about 16 March 2015, CommBank provided a designated service to a person purporting to be Person 15 by opening an account in the name of Person 15.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 15.

Person 15 did not exist.

Person 15's occupation was recorded as 'unemployed'.

346. Between 27 March 2015 and 30 June 2015, 68 cash deposits totalling \$545,870 were made into CommBank Account 15.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 15.

67 cash deposits were made through CommBank IDMs.

66 IDM deposits were under \$10,000.

1 cash deposit was made at a CommBank branch and was under \$10,000.

Schedule O to the Statement of Claim.

347. Between 27 March 2015 and 30 June 2015, a total of \$542,018 was transferred from CommBank Account 15 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 15.

6 IMTs totalling \$249,050 sent to Offshore Account 1.

3 IMTs totalling \$147,248 sent to Offshore Account 2.

4 IMTs totalling \$143,770 sent to Offshore Account 5.

1 IMT of \$950 sent to Offshore Account 4.

1 IMT of \$1,000 sent to Offshore Account 8.

Schedule O to the Statement of Claim.

348. CommBank suspected that the cash deposits pleaded at paragraph 346 were structured contrary to s 142 of the Act.

Particulars

SMR 543348622 dated 14 April 2015.

SMR 559692804 dated 15 June 2015.

66 IDM deposits were under \$10,000.

1 branch deposit was under \$10,000.

349. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 15 in the name of Person 15.

Particulars

SMR 543348622 dated 14 April 2015 reported that CommBank suspected multiple cash deposits under \$10,000 made to the Person 15's account were being structured through IDMs to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 1 in Hong Kong shortly after deposit; and that this highly suspicious pattern of activity was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

350. By no later than 15 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 4, 6, 8, 10, 12, 16, 17, 19 and 21 of Schedule O to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 14 April 2015, the AML team had reviewed all transactions on this account between 26 March 2015 and 13 April 2015 and had identified structured cash deposits on this account followed by international funds transfers to Hong Kong indicative of money laundering and identified it as connected to the same highly suspicious activity on the 15 suspicious accounts particularised at paragraph 44 above - SMR 543348622 dated 14 April 2015.

By 18 May 2015 CommBank was aware that the AFP was investigating transactions on this account - the s 49 notice of 18 May 2015 pleaded at paragraph 48.

On 15 June 2015 the AML team had reviewed all transactions on this account between 14 April 2015 and 12 June 2015 and identified that this account 'continues to receive excessive intense structured cash deposits followed by IFT's, the matter is again reported as suspicious' – SMR 559692804 dated 15 June 2015, transaction monitoring alerts TM-191962A and TM-198529A reviewed by the AML team on 12 June 2015 and transaction monitoring alert TM-202319A reviewed by the AML team on 15 June 2015.

On 15 June 2015 the AML team recommend the customer's account be terminated for blatant excessive intensely structured cash deposits.

351. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 22 to 30 of Schedule O to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 1 July 2015 CommBank had detailed suspicions that this account was being used to structure cash deposits and launder the funds offshore and was aware that the AFP was investigating transactions on this account – see paragraphs 44 and 48 to 53 above.

Email from Senior Analyst AML & Sanctions Operations to CommBank Intelligence Analyst of 1 July 2015 at 2.27pm.

By no later than 1 July 2015, CommBank had raised and reviewed 3 transaction monitoring alerts with respect to this account and had lodged 2 SMRs, being SMRs 543348622 dated 14 April 2015 and 559692804 dated 15 June 2015.

352. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 15 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 15, suspected of using false IDs, with potential links to money laundering.

On 3 July 2015 an alert was entered on Pegasus - HRC-2388124A – recording that the AFP had confirmed it was likely that this account opened using a false identity.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 15 (CommBank Account 15). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank

wrote to Person 15 on 16 July 2015 terminating the customer's account on this basis.

- 353. By reason of the matters pleaded in paragraphs 350 to 352, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 354. By reason of the matters pleaded in paragraphs 350 and 353, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 15 June 2015, being 18 June 2015.
- 355. By reason of the matters pleaded in paragraphs 351 and 353, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
- 356. By reason of the matters pleaded in paragraphs 352 and 353, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015
- 357. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 350 and 351.

Particulars

See SMR 559692804 dated 15 June 2015. Having formed a suspicion about overseas transfers, CommBank reported IMTs from 16 April 2015 to 15 June 2015 but did not identify all payees (see item 17 of Schedule O to the Statement of Claim), and did not indicate the total funds transferred to each payee (see items 4, 6, 8, 10, 12, 16, 19 and 21 of Schedule O to the Statement of Claim). The report did not contain the information specified in rules 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

CommBank did not report its suspicions with respect to transactions on and from 17 June 2015 as set out at items 22 to 30 of Schedule O to the Statement of Claim.

\$151,850 in cash deposits and \$541,148 transferred to accounts in Hong Kong were never reported.

- 358. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in relation to the matter pleaded at paragraph 352.

Particulars

SMR 674006284 dated 27 July 2016.

- 359. By reason of the matters pleaded at paragraphs 350 to 358, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 360. On and from 14 April 2015, CommBank did not monitor Person 15 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

By 14 April 2015, the AML team had reviewed transactions on this account and had identified an international funds transfer to Offshore Account 1 on 27 March 2015 with the 'purpose unknown'. The team also identified the account was connected to the same highly suspicious activity on the other 15 suspicious accounts particularised at paragraph 44 above – see SMR 543348622 dated 14 April 2015.

Between 27 April 2015 and 2 July 2015, 5 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer.

On 18 May 2015 the AFP issued a s 49 notice to CommBank requesting further information with respect to this account in order to proceed with an AFP investigation arising from or relating to the matters referred to in SMR 543348622 pertaining to the 16 suspicious accounts – pleaded at paragraph 48 above. No customer due diligence was carried out in response to this request.

On 12, 13 and 15 June 2015, the AML Team reviewed 3 transaction monitoring alerts - TM-191962A raised on 27 April 2015, TM-198529A raised on 27 May 2015 and TM-202319A raised on 11 June 2015, all triggered for large aggregate cash transactions. SMR 559692804 was lodged on 15 June 2015 and the alerts were closed.

On 15 June 2015 the AML team initiated termination of the customer's account for blatantly depositing (excessive) intensely structured cash deposits to recently opened account, which was described as high risk activity. Termination was approved by RBS on 15 June 2015, but no steps taken to close the account. After 15 June 2015, \$141,850 was deposited into the account in amounts under \$10,000 and \$148,248 sent offshore.

On 30 June 2015 transaction monitoring alert TM-206380A triggered for high frequency deposits into HRC accounts and on 2 July 2015 TM-206522A triggered for large withdrawals from HRC accounts, but were not reviewed by the AML team until 27 and 28 July 2015. The AML Team identified that activity continued but as an SMR was previously submitted on 15 June 2015 there was no further value in re-reporting. The alert was closed.

A stop was put on the account on 1 July 2015 at the request of the AFP – email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm confirming that stops had been placed on 25 accounts at the request of the AFP, including the account of Person 15.

As at 14 October 2016, the account was pending closure.

From 14 April 2015 to 30 June 2015 \$544,970 in cash was deposited into Person 15's account and \$541,148 was transferred to accounts in Hong Kong.

CommBank lodged 1 late TTR totalling \$10,000 with respect to this account.

361. On and from 14 April 2015, CommBank did not monitor Person 15 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 14 April 2015 with respect to Person 15, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 15.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 15 June 2015 with respect to Person 15, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 15.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 15 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 14 April 2015 to 30 June 2015 Person 15 deposited \$544,970 in cash and transferred \$541,148 to accounts in Hong Kong.

362. By reason of the matters pleaded at paragraphs 360 and 361, CommBank contravened s 36(1) on and from 14 April 2015 with respect to Person 15.

Person 16

363. On or about 24 February 2015, CommBank provided a designated service to a person purporting to be Person 16 by opening an account in the name of Person 16.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 16.

Person 16 did not exist.

Person 16's occupation was recorded as 'unemployed'.

364. By no later than 14 April 2015, CommBank was aware of suspicious activity on CommBank Account 16 in the name of Person 16.

Particulars

SMR 543348622 dated 14 April 2015 reported one cash deposit followed by a transfer to Hong Kong.

The failures to report suspicious matters for the purposes of s 41

365. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 16 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 16, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 16 (CommBank Account 16). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID.

- 366. By reason of the matter pleaded in paragraph 365, s 41(1)(d) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 367. By reason of the matter pleaded in paragraphs 365 and 366, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
- 368. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matter pleaded at paragraph 365.

Particulars

SMR 674011653 dated 27 July 2016.

- 369. By reason of the matters pleaded at paragraphs 365 to 368, CommBank contravened s 41(2)(a) of the Act.

The additional 3 suspicious accounts

Person 17

- 370. On or about 23 March 2015, CommBank provided a designated service to a person purporting to be Person 17 by opening an account in the name of Person 17.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 17.

Person 17 did not exist.

Person 17's occupation was recorded as 'unemployed'.

371. Between 15 April 2015 and 30 June 2015, 80 cash deposits totalling \$657,740 were made into CommBank Account 17.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 17.

73 cash deposits were made through CommBank IDMs.

72 IDM deposits were under \$10,000.

7 cash deposits were made at CommBank branches and were under \$10,000.

Schedule P to the Statement of Claim.

372. Between 16 April 2015 and 30 June 2015, a total of \$639,174 was transferred from CommBank Account 17 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 17.

Schedule P to the Statement of Claim.

373. CommBank suspected that the cash deposits pleaded at paragraph 371 were structured contrary to s 142 of the Act.

Particulars

SMR 560869615 dated 19 June 2015.

72 IDM deposits were under \$10,000.

7 branch deposits were under \$10,000.

374. By no later than 19 June 2015, CommBank was aware of suspicious activity on CommBank Account 17 in the name of Person 17.

Particulars

SMR 560869615 dated 19 June 2015 reported unusually large cash transactions indicative of money laundering.

The failures to report suspicious matters for the purposes of s 41

375. By no later than 19 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 22, 25, 27 to 35 and some of the designated services identified at item 26 of Schedule P to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 19 June 2015, the AML Team had reviewed transactions on Person 17's account from 28 May 2015 to 1 June 2015, and had also conducted a 'further review' of the account, identifying a 'high volume of cash deposits', with funds subsequently remitted to Hong Kong – see SMR 560869615 dated 19 June 2015.

376. By no later than 24 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 37, 38, 40 and 42 to 44 of Schedule P to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 24 July 2015, the AML Team had reviewed Person 17's account from 19 June 2015 to 24 July 2015 and had identified further 'excessive' structured cash deposits followed by transfers to Hong Kong in this period – see SMR 570451166 dated 24 July 2015.

By 24 July 2015, 7 automated transaction monitoring alerts had been raised on this account and reviewed by the AML team – TM-192738A, TM-197099A, TM-198944A, TM-201817A, TM-203981A, TM-2360822A and TM-206044A.

By 1 July 2015 CommBank was aware that the AFP was investigating transactions on this account - 1 July 2015 email from AFP to Executive General Manager Intelligence at 2:58pm with subject line 'As discussed' confirming that the AFP are looking at all transactions to the holder of Offshore Accounts 1 and 2 in Hong Kong and attaches a list of all account names identified as linked, including Person 17 – see paragraph 49.

Also see 1 July 2015 email from from Executive General Manager Intelligence, Group Security to AFP at 5:55pm confirming that stops had been placed on 25 accounts at the request of the AFP, including the account of Person 17.

377. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 17 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 17, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account

held by Person 17 (CommBank Account 17). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 17 on 3 July 2015 terminating the customer's account on this basis.

- 378. By reason of the matters pleaded in paragraphs 375 to 377, s 41(1)(f)(iii) and/or s41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 379. By reason of the matters pleaded in paragraphs 375 and 378, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 19 June 2015, being 24 June 2015.
- 380. By reason of the matters pleaded in paragraphs 376 and 378, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 24 July 2015, being 29 July 2015.
- 381. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 375 and 376.

Particulars

See SMR 560869615 dated 19 June 2015. CommBank reported deposits on 28 and 29 May 2015 and some of the deposits on 1 June 2015, but did not report their suspicions with respect to the deposits made between 15 April 2015 and 24 May 2015 or between 2 and 15 June 2015. Further, having formed a suspicion about the overseas transfers, CommBank did not report the amount of funds transferred or any payees. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

See SMR 558859894 dated 24 July 2015. CommBank reported 8 structured cash deposits totalling \$74,850 during the period 21 to 29 June 2015, but did not report their suspicions with respect to any other deposits between 19 and 30 June 2015. Further, having formed a suspicion about the overseas transfers, CommBank did not report the amount of funds transferred or all payees. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

\$539,060 in cash deposits and \$639,174 in transfers to accounts in Hong Kong were not reported.

- 382. By reason of the matters pleaded at paragraphs 377 and 378, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.

383. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in relation to the matter pleaded at paragraph 377.

Particulars

SMR 674003297 dated 27 July 2016.

384. By reason of the matters pleaded at paragraphs 375 to 383, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

385. On and from 1 May 2015, CommBank did not monitor Person 17 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 1 May 2015 and 29 June 2015, 7 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 1, 18 and 29 May 2015 transaction monitoring alerts TM-192738A, TM-197099A and TM-198944A triggered for large aggregate cash transactions and structured withdrawals. On 8 June 2015 transaction monitoring alert TM-201817A triggered for large aggregate cash transactions. These alerts were not reviewed by the AML team until 17, 18 and 19 June 2015. SMR 560869615 was lodged on 19 June 2015, the alerts closed and no customer due diligence carried out.

On 19 June 2015 transaction monitoring alert TM-203981A triggered for large aggregate cash transactions and was reviewed by the AML team on 23 and 25 June 2015. The AML team concluded that this was a duplicate alert and that an SMR had already been submitted.

The alert was closed and no due diligence carried out.

On 23 June 2015 transaction monitoring alert TM-2360822A was raised on this account, with the alert description titled 'OTH not employed'. The alert was never reviewed and no customer due diligence carried out.

On 1 July 2015 the AFP advised the Executive General Manager Intelligence by email that it was investigating all transactions to the holder of Offshore Accounts 1 and 2 in Hong Kong, attaching a list of all account names identified as linked, including Person 17 – see paragraph 49.

On 1 July 2015 a stop was placed on this account at the request of the AFP.

On 8 July 2015 an email between CommBank Intelligence Analysts in Group Security was sent at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID.

On 23 and 24 July 2015 the AML Team reviewed transaction monitoring alert TM-206044A triggered on 29 June 2015 for large aggregate cash transactions. SMR 570451166 was lodged on 24 July 2015 and the alert was closed.

On 18 May 2015, 2 June 2015 and 17 July 2015, CommBank sent three letters to Person 17 attempting to collect further KYC from the customer. There was no response to any of these letters and no customer due diligence was carried out.

The account was not closed until 4 August 2016.

From 1 May 2015 to 30 June 2015 \$600,260 in cash was deposited into Person 17's account and \$590,744 was transferred to accounts in Hong Kong.

CommBank lodged 1 late TTR totalling \$12,000 with respect to this account.

386. On and from 19 June 2015, CommBank did not monitor Person 17 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 19 June 2015 with respect to Person 17, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 17.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 17 until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 19 June 2015 to 30 June 2015 Person 17 deposited \$99,000 in cash and transferred \$109,748 to accounts in Hong Kong.

387. By reason of the matters pleaded at paragraphs 385 and 386, CommBank contravened s 36(1) on and from 1 May 2015 with respect to Person 17.

Person 18

388. On or about 14 April 2015, CommBank provided a designated service to a person purporting to be Person 18 by opening an account in the name of Person 18.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 18.

Person 18 did not exist.

Person 18's occupation was recorded as 'unemployed'.

389. Between 15 April 2015 and 30 June 2015, 80 cash deposits totalling \$674,500 were made into CommBank Account 18.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 18.

78 cash deposits were made through CommBank IDMs.

73 IDM deposits were under \$10,000.

2 cash deposits were made at CommBank branches and were under \$10,000.

Schedule Q to the Statement of Claim.

390. Between 16 April 2015 and 30 June 2015, a total of \$673,344 was transferred from CommBank Account 18 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 18.

9 IMTs totalling \$367,438 sent to Offshore Account 5.

7 IMTs totalling \$300,006 sent to Offshore Account 2.

1 IMT of \$4,700 sent to Offshore Account 4.

1 IMT of \$600 sent to Offshore Account 8.

1 IMT of \$600 sent to Offshore Account 3.

Schedule Q to the Statement of Claim.

391. CommBank suspected that the cash deposits pleaded at paragraph 389 were structured contrary to s 142 of the Act.

Particulars

SMR 561643923 dated 22 June 2015 reported a high volume of cash deposits with the majority of structured amounts at multiple CommBank ATMs in NSW, indicative of money laundering.

73 IDM deposits were under \$10,000.

2 branch deposits were under \$10,000.

392. By no later than 22 June 2015, CommBank was aware of suspicious activity on CommBank Account 18 in the name of Person 18.

Particulars

SMR 561643923 dated 22 June 2015 reported a high volume of cash deposits with the majority of structured amounts at multiple CommBank ATMs in NSW, indicative of money laundering.

The failures to report suspicious matters for the purposes of s 41

393. By no later than 22 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 7, 8, 9, 12 to 35 and 37 of Schedule Q to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 22 June 2015, the AML Team had reviewed transactions on Person 18's account from 19 May 2015 to 20 May 2015, and had also conducted 'a review' of the account which identified a 'high volume of cash deposits with the majority of [sic] structured amounts', with funds subsequently remitted to Hong Kong – see SMR 561643923 dated 22 June 2015.

394. By no later than 27 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 39 and 41 of Schedule Q to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 27 July 2015, the AML Team had reviewed transactions on Person 18's account from the last report on 22 June 2015 to 27 July 2015 and identified ongoing activity involving cash deposits and offshore transfers to Hong Kong during that time – see SMR 571134053 dated 27 July 2015.

By 27 July 2015, 4 automated transaction monitoring alerts had been raised and reviewed on this account – TM-193795A, TM-197475A, TM-198943A, TM-199295A and TM-2026211A.

1 July 2015 email from AFP to Executive General Manager Intelligence, Group Security at 2:58pm with subject line 'As discussed' confirming that the AFP are looking at all transactions to the holder of Offshore Accounts 1 and 2 in Hong Kong and attaches a list of all account names identified as linked, including Person 18.

1 July 2015 email from Executive General Manager Intelligence, Group Security to AFP at 5:55pm confirming that stops had been placed on 25 accounts at the request of the AFP, including the account of Person 18.

395. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 18 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 18, suspected of using false IDs, with potential links to money laundering.

On 3 July 2015 an alert was entered on Pegasus - HRC-2388124A – recording that the AFP had confirmed it was likely that this account opened using a false identity.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 18 (CommBank Account 18). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 18 on 3 July 2015 terminating the customer's account on this basis.

- 396. By reason of the matters pleaded in paragraphs 393 to 395, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 397. By reason of the matters pleaded in paragraphs 393 and 396, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 22 June 2015, being 25 June 2015.
- 398. By reason of the matters pleaded in paragraphs 394 and 396, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 27 July 2015, being 30 July 2015.
- 399. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 393 and 394.

Particulars

SMR 561643923 dated 22 June 2015 reported cash deposits on 19 and 20 May 2015, but having formed a suspicion with respect to a high volume of structured cash deposits at multiple ATMs, CommBank's suspicions with respect to the transactions at items 1, 3, 6, 7, 13, 15, 17, 19, 20, 23, 25, 26, 27, 29, 30, 32 and 35 were not reported.

SMRs 561643923 dated 22 June 2015 and 571134053 dated 27 July 2015 reported CommBank's suspicions that funds were transferred to Hong Kong, but did not identify the payee. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

\$429,450 in cash deposits and \$673,344 sent to accounts in Hong Kong not reported.

- 400. By reason of the matters pleaded at paragraphs 395 and 396, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
- 401. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 395.

Particulars

SMR 674010005 dated 27 July 2016.

- 402. By reason of the matters pleaded at paragraphs 393 to 401, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 403. On and from 8 May 2015, CommBank did not monitor Person 18 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 8 May 2015 and 6 September 2015, 4 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 8 May 2015 and 19 May 2015 transaction monitoring alerts TM-193795A, TM-197475A and TM-198943A triggered for large aggregate cash transactions and structured withdrawals but were not reviewed by the AML team until 19 and 26 June 2015.

On 1 June 2015 transaction monitoring alert TM-199295A triggered for large aggregate cash transactions but was not reviewed by the AML team until 19 and 22 June 2015.

SMR 561643923 was submitted on 22 June 2015 in response to the above 4 alerts, the alerts were closed and no customer due diligence carried out.

On 1 July 2015 the AFP advised the Executive General Manager Intelligence by email that it was looking at all transactions to the

holder of Offshore Accounts 1 and 2 in Hong Kong, attaching a list of all account names identified as linked, including Person 18.

On 1 July 2015 a stop was placed on this account at the request of the AFP.

On 8 July 2015 an email between CommBank Intelligence Analysts in Group Security was sent at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID.

On 24 and 27 July 2015 the AML Team reviewed transaction monitoring alert TM-2026211A triggered on 30 June 2015 for large aggregate cash transactions. SMR 571134053 was lodged on 27 July 2015.

On 24 July 2015 the AML team initiated termination of the customer's account for blatant excessive intensely structured deposits followed by IMTs to Offshore Account 2.

On 28 July 2015 Senior Analyst, AML & Sanctions sent an email within Group Security with subject line 'As discussed' confirming that as a stop has been placed on the account, it will not be terminated at this stage.

On 6 September 2015 a manual alert was raised on the account for a false name and fake ID and was reviewed by the AML team on 7 December 2015, 24 February 2016 and 25 May 2016. Each time the alert was reviewed a further review was scheduled for the next 3 months but no SMR was submitted until 27 July 2016.

On 7 September 2015 termination of the customer's account was approved.

The account was not closed until 4 August 2016.

From 8 May 2015 to 30 June 2015 \$655,500 in cash was deposited into Person 18's account and \$604,524 was transferred to accounts in Hong Kong.

CommBank lodged 5 late TTRs totalling \$50,000 with respect to this account.

404. On and from 22 June 2015, CommBank did not monitor Person 18 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 22 June 2015 with respect to Person 18, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 18.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 18

until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email from Executive General Manager Intelligence, Group Security to AFP dated 1 July 2015 at 5:55pm).

From 22 June 2015 to 30 June 2015 Person 18 deposited \$99,950 in cash and transferred \$99,928 to an account in Hong Kong.

405. By reason of the matters pleaded at paragraphs 403 and 404, CommBank contravened s 36(1) on and from 8 May 2015 with respect to Person 18.

Person 19

406. On or about 13 April 2015, CommBank provided a designated service to a person purporting to be Person 19 by opening an account in the name of Person 19.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 19.

Person 19 did not exist.

Person 19's occupation was recorded as 'unemployed'.

407. Between 28 May 2015 and 30 June 2015, 27 cash deposits totalling \$202,400 were made into CommBank Account 19 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 19.

All IDM deposits were under \$10,000.

Schedule R to the Statement of Claim.

408. Between 28 May 2015 and 30 June 2015, a total of \$201,474 was transferred from CommBank Account 19 to accounts in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 19.

5 IMTs totalling \$200,274 sent to Offshore Account 2.

1 IMT of \$600 sent to Offshore Account 3.

1 IMT of \$600 sent to Offshore Account 8.

Schedule R to the Statement of Claim.

409. CommBank suspected that the cash deposits pleaded at paragraph 407 were structured contrary to s 142 of the Act.

Particulars

SMR 562878558 dated 25 June 2015.

All IDM deposits were under \$10,000.

410. By no later than 25 June 2015, CommBank was aware of suspicious activity on CommBank Account 19 in the name of Person 19.

Particulars

SMR 562878558 dated 25 June 2015 reported structured cash deposits at various ATMs in NSW through the account, indicative of avoiding reporting obligations and money laundering.

The failures to report suspicious matters for the purposes of s 41

411. By no later than 1 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1, 2 and 5 to 9 of Schedule R to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMRs 562878558 dated 25 June 2015 and 570451164 dated 24 July 2015.

By 1 July 2015, 2 automated transaction monitoring alerts had been raised and reviewed on this account – TM-199293A and TM-206042A.

30 June 2015 email from Leichhardt Branch, to Group Security headed 'Urgent!!!' reporting suspicions about IDM cash deposits and offshore transfers on Person 19's account on 30 June 2015. The branch reported that this was one example of a trend the branch had noticed involving IDMs. The email reported that 'We have had people coming in and depositing about 5 times into account with \$50 notes.. this is just short of \$10,000.00 Then that night there is a transfer sent to china for just short of \$50K. The person who is making the deposit would clearly know the process as sometimes they deposit into all different accounts until the ATM is full then leave. Today at about 1:05 the ATM Alarm triggered.. I knew that someone was making this kind of deposit at the ATM because if a deposit takes an extended amount of time it triggers the alarm..I Approached the client to see if he needed any assistance.. he said he was Fine.. I believe that there should be another security measure in place as this is crazy.. if you review these peoples accounts they have sent millions and millions overseas!! I am emailing to find out what we should do.. if we should be sending a suspect transaction report each time? Or calling group security? However if we are to be sending these suspect transaction reports it seems crazy as we would need to manually review all deposit made through our IDMs and there is no standards operating procedure for this for any branches with IDMs attached and from reviewing the transactions on some of these accounts it have [sic] been happening all over Sydney'.

By no later than 30 June 2015 CommBank had identified suspicious offshore transfers from Person 19's account to Offshore Account 2, Offshore Account 7 and Offshore Account 3.

1 July 2015 email from AFP to Executive General Manager Intelligence, Group Security at 2:58pm with subject line 'As discussed' confirming that the AFP are looking at all transactions to the holder of Offshore Accounts 1 and 2 in Hong Kong and attaches a list of all account names identified as linked, including Person 19.

1 July 2015 email from Executive General Manager Intelligence, Group Security to AFP at 5:55pm confirming stops had been placed on 25 accounts at the request of the AFP, including the account of Person 19.

412. By no later than 3 July 2015, CommBank suspected on reasonable grounds that Person 19 was not the person he claimed to be.

Particulars

On 1 July 2015 the AFP advised the Executive General Manager Intelligence, Group Security, that this customer's identity was false – see Group Security email of 1 July 2015 at 3.06pm.

3 July 2015 email sent from the Intelligence Team to the AML team at 5:22pm advising that the AFP has identified 21 customers, including Person 19, suspected of using false IDs, with potential links to money laundering.

6 July 2015 email from CommBank Intelligence Analyst to Executive General Manager Intelligence at 1:34pm with subject line 'RE: As discussed' confirming that a number of accounts have been confirmed by the AFP for using false identities, including the account held by Person 19 (CommBank Account 19). The Executive General Manager Intelligence forwarded this advice to the Executive Manager AML Team at 5.23pm on 6 July 2015.

6 July 2015 email from Group Head, AML Team to Executive Manager AML Team at 5.50pm advising that 'Given the nature of the matter I would have thought SMRs are appropriate on all the clients?'

Also see 8 July 2015 email between CommBank Intelligence Analysts in Group Security at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID. The bank wrote to Person 19 on 3 July 2015 terminating the customer's account on this basis.

413. By reason of the matters pleaded in paragraphs 411 and 412, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
414. By reason of the matters pleaded in paragraphs 411 and 413, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2015, being 6 July 2015.
415. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraph 411.

Particulars

SMR 562878558 dated 25 June 2015 reported the designated services on 1 June 2015, but did not report its suspicions with respect to the transactions identified at items 1, 2, 5 and 6 to 9 of Schedule R to the Statement of Claim.

\$52,400 in cash deposits and \$51,540 transferred to accounts in Hong Kong not reported.

416. By reason of the matters pleaded in paragraphs 412 and 413, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 July 2015, being 8 July 2015.
417. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 412.

Particulars

SMR 674009970 dated 27 July 2016.

418. By reason of the matters pleaded at paragraphs 411 to 417, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

419. On and from 1 June 2015, CommBank did not monitor Person 19 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 1 June 2015 and 29 June 2015, 2 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 1 June 2015 transaction monitoring alert TM-199293A triggered for large aggregate cash transactions but was not reviewed by the AML team until 24 and 25 June 2015. An SMR was submitted, the alert was closed and no customer due diligence carried out.

On 1 July 2015 the AFP advised CommBank that it was looking at all transactions to the holder of Offshore Accounts 1 and 2 in Hong Kong and attaches a list of all account names identified as linked, including Person 19.

Also on 1 July 2015, at the request of the AFP, CommBank put a stop on this account.

On 3 July 2015 email sent within the AML Team at 5:22pm (forwarding email on 1 July 2015 at 2:58pm) advising that the AFP has identified 21 customers suspected of using false IDs, with potential links to money laundering and requests in relation to 10 of

these customers, including Person 19, that they be requested to re-identify themselves at a CommBank branch with proper identification.

On 5 July 2015 alert HRC 2392426A was raised on this account, with the alert description titled 'OTH not employed'. On 6 July 2015 the alert was resolved and closed 'due to low risk score'.

On 8 July 2015 an email between CommBank Intelligence Analysts in Group Security was sent at 12:57pm with the subject line 'For Review: SNA & Financial Analysis of Syndicates Group 1 and 2' confirming the AFP had advised this account was opened using a false ID.

On 23 and 24 July 2015 the AML team reviewed transaction monitoring alert TM-206042A triggered on 29 June 2015 for large aggregate cash transactions. An SMR was submitted and the AML team recommended termination of the customer's account for blatant excessive intensely structured deposits followed by IFTIs to Offshore Account 2.

On 28 July 2015 Senior Analyst, AML & Sanctions sent an email within Group Security with subject line 'As discussed' confirming that as a stop has been placed on the account, the account will not be terminated at this stage.

On 6 September 2015 manual alert HRC-2590596A was raised for false name and fake ID and was reviewed by the AML team on 7 September 2015, which noted that Group Security was instructed on 14 July 2015 to place a block on all the accounts that have been opened in false names and with fake IDs and not to return any funds to these customers, and determined that as a result of this the termination could not proceed but to follow up in 3 months. The AML team reviewed HRC-2590596A on 7 December 2015, 24 February 2016, 25 May 2016 and 30 May 2016 and on each occasion confirmed the HRC rating.

As at 14 October 2016, the account was pending closure.

From 1 June 2015 to 30 June 2015 \$201,600 in cash was deposited into Person 19's account and \$200,704 was transferred to accounts in Hong Kong.

420. On and from 25 June 2015, CommBank did not monitor Person 19 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 25 June 2015 with respect to Person 19, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 19.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 19

until 1 July 2015 when CommBank put a stop on this account at the request of the AFP (email Executive General Manager Intelligence to AFP dated 1 July 2015 at 5.55pm).

From 25 June 2015 to 30 June 2015 Person 19 deposited \$100,000 in cash and transferred \$99,956 to an account in Hong Kong.

421. By reason of the matters pleaded at paragraphs 419 and 420, CommBank contravened s 36(1) on and from 1 June 2015 with respect to Person 19.

The 11 fake name accounts – overview of the money laundering from 30 June 2015 to 24 August 2015

422. Between 30 June 2015 and 24 August 2015, 577 cash deposits totalling \$4,789,975 were made into 11 CommBank accounts in fake names through IDMs.

Particulars

Person 20 – CommBank Account 20.

Person 21 – CommBank Account 21.

Person 22 – CommBank Account 22.

Person 23 – CommBank Account 23.

Person 24 – CommBank Account 24.

Person 25 – CommBank Account 25.

Person 26 – CommBank Account 26.

Person 27 – CommBank Account 27.

Person 28 – CommBank Account 28.

Person 29 – CommBank Account 29.

Person 30 – CommBank Account 30.

Email of 27 August 2015 at 11.18pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank and Senior Intelligence Analyst, Group Security, CommBank.

Email of 4 September 2015 at 12.24pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

573 of the 577 cash deposits were under \$10,000.

423. Between 30 June 2015 and 25 August 2015 approximately \$4.7 million was transferred from these 11 accounts to accounts in Hong Kong.

Particulars

By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to Offshore Accounts 7 and 8, Offshore Account 3 and Offshore Accounts 1 and 2 – see paragraph 51 pleaded above.

From the additional 11 fake name accounts:

\$3,067,993 transferred to Offshore Account 8.

\$1,649,486 transferred to Offshore Account 13.

\$1,020 transferred to the Offshore Account 4.

424. The accounts particularised at paragraph 422 were operated using the same pattern identified by CommBank on and from 1 July 2015.

Particulars

See the pleadings at paragraphs 50 and 51 above.

On 11 August 2015, a member of the AML Team noted that 'this [modus operandi of] Malaysian, structured cash deposits at ATMs has high visibility from the Intelligence team' – see email between AML Team members dated 11 August 2015 at 1.50pm.

On 13 August 2015 the AFP issued a request under s 49 of the Act seeking information relating to IFTIs sent from accounts held by Persons 20 to 29.

On 25 August 2015, the Executive Manager, Intelligence and Planning, Group Security, noted 'we have investigated three criminal syndicates involving cash structuring (laundering) via our IDMs over the past 6-8 weeks' – see email from Executive Manager, Intelligence and Planning, Group Security to AML Team members dated 25 August 2015 at 6.12pm.

On 27 August 2015, the CommBank Intelligence Team noted that Person 20 was part of 'Syndicate 4' – see email from Intelligence Analyst, Group Security to Executive Manager, Intelligence and Planning, Group Security dated 27 August 2015 at 3.15pm.

The contraventions of ss 41 and 36 in relation to the 11 fake accounts

Person 20

425. On or about 9 June 2015, CommBank provided a designated service to a person purporting to be Person 20 by opening an account in the name of Person 20.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 20.

Person 20's occupation was recorded as 'unemployed'.

Person 20 did not exist.

426. Between 30 June 2015 and 24 August 2015, 87 cash deposits totalling \$787,050 were made into CommBank Account 20 through CommBank IDMs.

Particulars

Item 3, table 1, s 6.

CommBank statement for CommBank Account 20.

86 of these cash deposits were under \$10,000.

Schedule S to the Statement of Claim.

427. Between 30 June 2015 and 24 August 2015, a total of \$786,674 was transferred from CommBank Account 20 to the Offshore Account 8 in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6.

CommBank statement for CommBank Account 20.

Schedule S to the Statement of Claim.

428. CommBank suspected that all but one of the cash deposits pleaded at paragraph 426 were structured contrary to s 142 of the Act.

Particulars

SMR 568597086 dated 17 July 2015.

SMR 578691979 dated 25 August 2015.

429. By no later than 17 July 2015, CommBank was aware of suspicious activity on CommBank Account 20 in the name of Person 20.

Particulars

SMR 568597086 dated 17 July 2015, which reported multiple structured cash deposits in a newly opened account where the source of funds is unknown, followed by wire payments to Offshore Account 8, was a suspicious pattern of activity and indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

430. By no later than 25 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 16 to 21 and 28 to 36 of Schedule S may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMRs 568597086 dated 17 July 2015 and 578691979 dated 25 August 2015.

By 25 August 2015, 6 transaction monitoring alerts had been raised and reviewed on this account – TM-209855A, TM-209899A, TM-211018A, TM-212967A, TM-215070A and TM-218406A.

In particular, by no later than 17 July 2015, CommBank was aware that blatant and intense structured IDM deposits were being sent offshore to Offshore Account 8. By SMR 568597086, all suspicious activity on the account was reported up until 15 July 2015.

On 13 August 2015, the AFP issued a notice under s 49 of the Act seeking information in relation to an investigation with respect to a

number of accounts, including CommBank Account 20 in the name of Person 20.

On 17 August 2015 the AML team reviewed three transaction monitoring alerts (TM-211018A for structured withdrawals of \$298,970 in 6 transactions over 10 days on 7, 8, 13, 14, 16, 17 July 2015, TM-212967A for large aggregate cash transactions over 4 business days – 14, 15, 16, 27 July 2015 and TM-215070A for large aggregate cash transactions of \$149,100 over 3 business days – 27 July and 4 and 7 August 2015). The AML team concluded that a 'review since last reported [as an SMR] found the activity has continued'. In spite of identifying suspicious activity, the alerts were closed and no SMR was lodged with respect to the suspicious activity identified between 16 July 2015 and 17 August 2015.

By 25 August 2015 the AML Team had reviewed transactions on Person 20's account between 15 July 2015 and 21 August 2015 and had identified ongoing structured cash deposits followed by IFTIs to Hong Kong during this period – see SMR 578691979 dated 25 August 2015. See also transaction monitoring alert TM-218406A.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 20 in the name of Person 20 - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security.

On 27 August 2015 the Intelligence Team in Group Security, emailed the AML Team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015, AFP asked Group Security, CommBank to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 20] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 20]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

A compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transactions records and customer interaction records for CommBank Account 20 in the name of Person 20.

431. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 20 was not the person he claimed to be.

Particulars

The AFP advised Group Security, CommBank that CommBank Account 20 in the name of Person 20 had been opened in a false name – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

The AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

SMR 673785059 dated 27 July 2016.

432. By reason of the matters pleaded in paragraphs 430 and 431, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
433. By reason of the matters pleaded in paragraphs 430, 431 and 432, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
434. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraph 430.

Particulars

See SMR 578691979 dated 25 August 2015. Having formed suspicions with respect to structured cash deposits followed by overseas transfers between 15 July 2015 and 21 August 2015, CommBank reported the 15 structured deposits between 7 and 19 August 2015 inclusive, but did not report its suspicions with respect to any other transactions during this period. The report did not contain the information specified in rule 18.2(19) of the Rules, contrary to s 41(3)(b) of the Act.

\$337,500 in structured cash deposits and \$337,356 transferred to Hong Kong were never reported.

435. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded in paragraph 431.

Particulars

SMR 673785059 dated 27 July 2016.

436. By reason of the matters pleaded at paragraphs 430 to 435, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

437. On and from 10 July 2015, CommBank did not monitor Person 20 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 10 July 2015 and 25 August 2015, 6 automated transaction monitoring alerts and 1 manual alert were raised on this account.

CommBank failed to review all of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to the Offshore Accounts 7 and 8, to Offshore Account 3 and to Offshore Accounts 1 and 2 – see paragraph 51 above.

On 10 July 2015 transaction monitoring alert TM-209855A was raised for structured deposits across branches.

On 14 July 2015 TM-209899A raised manually by the Market City Branch due to 'No evidence of income. Large, frequent cash deposits of just under \$10K to IDM. Sent as an IMT straight away as an amount just under \$50K. Alarm bells ringing for AML/CTF. [CommBank Account 20] opened online'.

These two alerts were reviewed by the AML Team on 15 July 2015 and SMR 568597086 lodged 17 July 2015. This SMR describes the same typology of suspicious activity the bank had identified by 1 July 2015 as particularised above.

On 13 August 2015, the AFP issued a notice under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 20 in the name of Person 20. CommBank did not carry out any customer due diligence in response to the s 49 request.

Three further transaction monitoring alerts which had been raised on 16 July 2015, 27 July 2015 and 7 August 2015 were not reviewed by the AML Team until 17 and 20 August 2015 in spite of the known high ML/TF risks: respectively, TM-211018A for structured withdrawals; TM-212967A for large aggregate cash transactions; and TM-215070A for large aggregate cash transactions. Whilst the AML Team concluded that structured cash deposits and offshore transfers were continuing, the alerts were closed with no further action on the basis that an SMR had been lodged on 17 July 2015. No SMR was lodged and no customer due diligence was carried out.

A further transaction monitoring alert was raised on 19 August 2015 (TM-218406A for large aggregate cash transactions) and reviewed by the AML Team on 21 and 25 August 2015. An SMR was submitted on 25 August 2015 and termination of the account was initiated (TERM 1311C) for 'intense blatant structuring at ATMs with the funds subsequently going offshore to [the holder of Offshore Accounts 7 and 8] in Hong Kong'.

By this time, on 25 August 2015, the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 20 in the name of Person 20 - email of 25 August 2015 at 3.03pm from AFP to Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 20 to other accounts including to the holder of Offshore Accounts 7 and 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 20] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 20]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

On 4 September 2015 a high risk customer report prepared by Group Security for Person 23, Person 20, Person 25, Person 26, Person 27 and Person 24, identifying intense structured deposits totalling \$2.6 million followed by IMTs to the holder of Offshore Accounts 7 and 8 and noting that the AFP had confirmed these accounts were opened in false names. Group Security recommended exiting the relationships.

CommBank did not put a stop on this account until 18 September 2015.

On 24 September 2015 CommBank reviewed a final alert that had been raised on 25 August 2015 (TM-219432A) for structured withdrawals. As a termination case had been initiated and no further account activity had taken place since the last SMR, the alert was closed with no further action.

The account was not closed until 4 August 2016.

From 18 July 2015 to 24 August 2015 \$446,400 in structured cash was deposited into this account and \$446,204 transferred to Offshore Account 8 in Hong Kong.

CommBank reported 1 late TTR totalling \$10,000 with respect to this account.

438. On and from 17 July 2015, CommBank did not monitor Person 20 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 17 July 2015 with respect to Person 20, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 20.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 24 August 2015 with respect to Person 20, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 20.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 20 until 18 September 2015 when it put a stop on this account.

CommBank did not close the account in response to the suspected money laundering until 4 August 2016.

From 18 July 2015 to 24 August 2015 \$446,400 in structured cash deposits were made into Person 20's account (CommBank Account 20) and \$446,204 was sent to Offshore Account 8 account in Hong Kong.

439. By reason of the matters pleaded at paragraphs 437 and 438, CommBank contravened s 36(1) on and from 17 July 2015 with respect to Person 20.

Person 21

440. On or about 22 June 2015, CommBank provided a designated service to a person purporting to be Person 21 by opening an account in the name of Person 21.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 21.

Person 21's occupation was recorded as 'unemployed'.

Person 21 did not exist.

441. Between 10 July 2015 and 24 August 2015, 69 cash deposits totalling \$581,900 were made into CommBank Account 21 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 21.

All of these cash deposits were under \$10,000.

Schedule T to the Statement of Claim.

442. Between 10 July 2015 and 21 August 2015, a total of \$541,274 was transferred from CommBank Account 21 to Offshore Account 8 account in Hong Kong.

Particulars

Items 3 and 29 table 1, s 6 of the Act.

CommBank statement for CommBank Account 21.

Schedule T to the Statement of Claim.

443. CommBank suspected that the cash deposits pleaded at paragraph 441 were structured contrary to s 142 of the Act.

Particulars

SMR 569436956 dated 21 July 2015.

SMR 578691977 dated 25 August 2015.

444. By no later than 21 July 2015, CommBank was aware of suspicious activity on CommBank Account 21 in the name of Person 21.

Particulars

SMR 569436956 dated 21 July 2015, which reports multiple cash deposits under \$10,000 made to this account followed by transfer of funds offshore, the activity being an attempt to avoid reporting and is deemed suspicious, indicative of money laundering and avoiding reporting obligations.

This SMR was lodged after a branch manager raised a manual alert on 15 July 2015 (TM-209931A) relating to frequent IDM deposits of just under \$10,000, followed by offshore transfers, following a similar pattern to Person 20.

The failures to report suspicious matters for the purposes of s 41

445. By no later than 25 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 7–14 and 21–25 of Schedule T may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 25 August 2015 the AML Team had reviewed all transactions on this account between 18 July 2015 and 21 August 2015 and had identified continued structured cash deposits (with instances of up to seven structured cash deposited conducted on the same day) followed by offshore transfers to Hong Kong – see SMR 578691977 dated 25 August 2015.

By 25 August 2015, 4 automatic transaction monitoring alerts and 1 manual alert had been triggered and reviewed on this account – TM-210763A; TM-209931A; TM-213494A; TM-214615A and TM-218401A.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By 13 August 2015, CommBank was on notice that Person 21 was engaging in similar conduct by reason of the AFP request under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 21 in the name of Person 21. CommBank did not carry out any customer due diligence in response to the s 49 request, with a view to identifying, mitigating and managing ML/TF risks.

On 24 August 2015 Kha Weng Foong was arrested at the Eastgardens CommBank branch immediately after he deposited \$40,050 into CommBank Account 21 in the name of Person 21.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 21 in the name of Person 21 - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

On 27 August 2015 the Intelligence Team in Group Security, emailed the AML team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015 at 12.24pm, the AFP asked Group Security, CommBank to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 21] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 21]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

A Compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transactions records and customer interaction records for CommBank Account 21 in the name of Person 21.

446. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 21 was not the person he claimed to be.

Particulars

The AFP advised Group Security, CommBank that CommBank Account 21 in the name of Person 21 had been opened in a false name - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

The AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

- 447. By reason of the matters pleaded in paragraphs 445 and 446, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 448. By reason of the matters pleaded in paragraphs 445, 446 and 447, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
- 449. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 445.

Particulars

See SMR 578691977 dated 25 August 2015. The AML Team reviewed the account on and from 18 July 2015 and found that suspicious transactions continued. However, CommBank did not report its suspicions with respect to transactions which took place between 21 July 2015 and 4 August 2015 and between 20 August 2015 and 24 August 2015. The report did not contain the information specified in rule 18.2(19) of the Rules, contrary to s 41(3)(b) of the Act.

\$338,700 in cash deposits and \$298,222 transferred to an account in Hong Kong were never reported.

- 450. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 446.

Particulars

SMR 673785060 dated 27 July 2016.

- 451. By reason of the matters pleaded at paragraphs 445 to 450, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 452. On and from 14 July 2015, CommBank did not monitor Person 21 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 14 July 2015 and 19 August 2015, 1 manual alert and 5 automated transaction monitoring alerts were raised on this account. CommBank failed to review all of these alerts in a timely manner,

having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to Offshore Accounts 7 and 8, to Offshore Account 3 and to Offshore Accounts 1 and 2 – see paragraph 51 above.

STR -TM 209931A was raised manually on 15 July 2015 by the Market City branch for 'Frequent IDM deposits of just under \$10K cash. AML/CTF alarm bells ringing. Money being sent to same place overseas as IMT. Very similar [to Person 20]. Please monitor and investigate to prevent further loss to the group. When they did the IDM deposit the machine went out of service; possibly counterfeit notes upsetting the machine'. The AML Team reviewed this alert on 17 and 21 July 2015 and lodged SMR 569436956 on 21 July 2015. The alert was closed and no customer due diligence was carried out, in spite of the very high and specifically detailed risks set out in STR - TM 209931A.

SMR 569436956 lodged on 21 July 2015 describes the same typology of suspicious activity the bank had identified by 1 July 2015 as particularised above.

On 13 August 2015, the AFP issued request under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 21 in the name of Person 21. CommBank did not carry out any customer due diligence in response to the s 49 request.

Three further transaction monitoring alerts were raised on 14 July 2015, 29 July 2015 and 4 August 2015 - respectively, TM – 210763A for large aggregate cash transactions; TM – 213494A for structured withdrawals and TM- 214615A for large aggregate cash transactions - but not reviewed by the AML Team until 13 August 2015 in spite of the known high ML/TF risks. On 13 August 2015 a member of the AML Team noted that a 'review of the account found that the activity continues, therefore no added value to report the similar activity in three months time' but on 19 August 2015 another member of the team disagreed, noting that 'further investigation required due to over \$250K in structured cash deposits since the last report in July' and recommending an SMR be lodged and that termination be initiated

'for intense blatant structuring at ATMs with the funds subsequently going offshore to [the holder of Offshore Accounts 7 and 8]'.

In the interim, on 19 August 2015, TM – 218401A was raised for large aggregate cash transactions. The alert was reviewed by the AML Team on 20 and 25 August 2015 and SMR 578691977 was lodged on 25 August 2015.

On 24 August 2015 a high risk customer report was prepared by Group Security noting that a 2 month review identified 64 intensely structured cash deposits (\$531,900) via ATMs and 12 IFTIs (\$541,274) to [the holder of Offshore Accounts 7 and 8] and recommending exiting the relationship. See also TERM-1299C.

On 24 August 2015 the business unit (RBS) agreed to terminate the relationship.

On 24 August 2015 Kha Weng Foong was arrested at the Eastgardens CommBank branch immediately after he deposited \$40,050 into CommBank Account 21 in the name of Person 21.

These deposits were never reported.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 21 in the name of Person 21 - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

On 25 August 2015 a letter was sent to the customer advising that the account would be closed and giving him 30 days' notice, in spite of the known high ML/TF risks and in spite of Foong's arrest at the CommBank branch immediately after transacting on this account.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 21 to other accounts including to the holder of Offshore Account 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 21] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 21]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

CommBank did not put a stop on this account until 18 September 2015.

As at 14 October 2016, the account was pending closure.

From 14 July 2015 to 24 August 2015 \$577,850 in structured cash was deposited into this account through IDMs and \$537,254 sent to Offshore Account 8 in Hong Kong.

453. On and from 21 July 2015, CommBank did not monitor Person 21 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 21 July 2015 with respect to Person 21, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 21.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 25 August 2015 with respect to Person 21, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 21.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 21 until 18 September 2015 when it put a stop on this account.

As at 14 October 2016, the account was pending closure.

From 21 July 2015 to 24 August 2015 Person 21 deposited \$488,650 in structured cash at IDMs and sent \$448,098 to Offshore Account 8 in Hong Kong.

454. By reason of the matters pleaded at paragraphs 452 and 453, CommBank contravened s 36(1) on and from 21 July 2015 with respect to Person 21.

Person 22

455. On or about 5 July 2015, CommBank provided a designated service to a person purporting to be Person 22 by opening an account in the name of Person 22.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 22.

Person 22's occupation was recorded as 'unemployed'.

Person 22 did not exist.

456. Between 10 July 2015 and 24 August 2015, 36 cash deposits totalling \$269,350 were made into CommBank Account 22 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 22.

All of these cash deposits were under \$10,000.

Schedule U to the Statement of Claim.

457. Between 10 July 2015 and 24 August 2015, a total of \$269,194 was transferred from CommBank Account 22 to Offshore Account 13 in Hong Kong.

Particulars

Items 3 and 29 table 1, s 6 of the Act.

CommBank statement for CommBank Account 22.

Schedule U to the Statement of Claim.

458. CommBank suspected that the cash deposits pleaded at paragraph 456 were structured contrary to s 142 of the Act.

Particulars

SMR 576005265 dated 14 August 2015.

SMR 580115292 dated 31 August 2015.

459. By no later than 14 August 2015, CommBank was aware of suspicious activity on CommBank Account 22 in the name of Person 22.

Particulars

SMR 576005265 dated 14 August 2015 reported that cash deposits were being made into Person 22's account when records indicate Person 22 is unemployed and the source of funds are unknown; that these deposits were followed by IFTIs to the holder of Offshore Account 13 is considered inconsistent with the customer's profile and deemed suspicious and indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

460. By no later than 14 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1, 2, 4, 6, 7 and 8 of Schedule U may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 14 August 2015 the AML Team had conducted a 'review' of Person 22's account and had identified structured cash deposits followed by offshore transfers – see SMR 576005265 dated 14 August 2015.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 13 August 2015, CommBank was on notice of similar suspicious activity on Person 22's account, by reason of the s 49 request issued by the AFP seeking information in relation to an

461. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 22 was not the person he claimed to be.

The AFP advised Group Security, CommBank that CommBank Account 22 in the name of Person 22 had been opened in a false name - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

462. By no later than 31 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 10 to 14 of Schedule U may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

SMR 580115292 dated 31 August 2015 noted that the suspicious activity reported in SMR 576005265 dated 14 August 2015 appeared to be ongoing.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 22 to other accounts including to the holder of Offshore Account 13 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 28 August 2015 Group Security sent an internal email which recommended termination noting 'high risk blatant intense structuring to avoid TTR obligations followed by transfers to [the holder of Offshore Account 13] in HK'. It was also noted that the 'Activity is identical to Malaysian nationals and others that have previously been terminated. This time anglo name and NSW drivers licence as ID and funds sent again to an individual in Hong Kong'.

On 4 September 2015 at 12.24pm, the AFP asked Group Security, CommBank to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 22] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 22]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

A Compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transactions records and customer interaction records for CommBank Account 22 in the name of Person 22.

- 463. By reason of the matters pleaded in paragraphs 460 to 462, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 464. By reason of the matters pleaded in paragraphs 460 and 463, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 August 2015, being 19 August 2015.
- 465. By reason of the matters pleaded in paragraphs 461 and 463, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
- 466. By reason of the matters pleaded in paragraphs 462 and 463, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 31 August 2015, being 3 September 2015.
- 467. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 460 and 462.

Particulars

See SMR 576005265 dated 14 August 2015. CommBank only reported its suspicions with respect to cash deposits totalling \$89,400 made on 14 July 2015 and 7 August 2015. Having formed a suspicion about the overseas transfers, CommBank reported its suspicions with respect to IMTs, but did not properly identify the payee of those funds, as the payee's name was spelt incorrectly and no account details were included. The report did not contain the information specified in rule 18.2(21)(k) to (r), contrary to s 41(3)(b) of the Act.

See SMR 580115292 dated 31 August 2015. Having formed a suspicion that activity reported in SMR 576005265 was ongoing, CommBank reported its suspicions with respect to transactions on 19 August 2015, but did not report its suspicions with respect to other transactions occurring on 20 and 24 August 2015 (items 11 to 14 of

Schedule U). The report did not contain the information specified in rule 18.2(21)(k) to (r), contrary to s 41(3)(b) of the Act.

\$119,950 in cash deposits and \$219,824 transferred to an account in Hong Kong were never properly reported.

468. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 461.

Particulars

SMR 673785074 dated 27 July 2016.

469. By reason of the matters pleaded at paragraphs 460 to 468, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

470. On and from 14 July 2015, CommBank did not monitor Person 22 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 14 July 2015 and 20 August 2015, 1 manual alert and 3 automated transaction monitoring alerts were raised on this account.

CommBank failed to review all of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

Although between 10 July 2015 and 24 August 2015 there were 36 cash deposits under \$10,000 on this account totalling \$269,350, no automated alerts were ever raised for structuring.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 13 August 2015, CommBank was on notice that the AFP was investigating a number of offshore transfers with respect to Person 22's account, by reason of the s 49 request issued by the AFP seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 22 in the name of Person 22. CommBank did not carry out any customer due diligence in response to the s 49 request.

Transaction monitoring alerts were raised on 14 July 2015 and 7 August 2015 but were not reviewed by the AML Team until 13 and 14 August 2015 respectively, TM-210761A for large aggregate cash transactions and TM-215064A for large aggregate cash transactions.

SMR 576005265 was lodged on 14 August 2015, the alerts were closed and no customer due diligence was carried out.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 22 in the name of Person 22 - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

A further transaction monitoring alert was raised on 19 August 2015 (TM-218396A for large aggregate cash transactions AML10006_P - \$118,500 over 3 days – 7, 10, 19 August 2015) and reviewed by the AML Team on 24 and 31 August 2015. SMR 580115292 lodged on 31 August 2015.

Also during this time, on 20 August 2015 a manual alert or STR was raised (TM – 218658A) by the Market Place Leichhardt branch reporting that 'A customer came into the branch to deposit through the IDM doing multiple transactions setting our alarms off three times due to the amount of cash he deposited'. The description given of the customer was 'Male who was tall with black hair of Asian background'. This was not reviewed by the AML Team until 24 August 2015 by which time it had been determined that an SMR would be lodged with respect to TM-218396A).

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 22 to other accounts including to the holder of Offshore Account 13 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 28 August 2015 Group Security sent an internal email which recommended termination of the account noting 'high risk blatant intense structuring to avoid TTR obligations followed by transfers to [the holder of Offshore Account 13] in HK'. It was also noted that the 'Activity is identical to Malaysian nationals and others that have previously been terminated. This time anglo name and NSW drivers licence as ID and funds sent again to an individual in Hong Kong'.

See also TERM-1327C.

On 31 August 2015 the business unit (RBS) approved termination.

On 1 September 2015 a letter was sent to the customer advising the account would be closed, giving the customer 30 days' notice in spite of the known high ML/TF risks.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 22] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 22]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

CommBank did not put a stop on the account until 18 September 2015.

The account was closed on 2 October 2015.

From 14 July 2015 to 24 August 2015 \$268,250 in structured cash was deposited into the account through IDMs and \$268,124 sent to Offshore Account 13 in Hong Kong

471. On and from 14 August 2015, CommBank did not monitor Person 22 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 14 August 2015 with respect to Person 22, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 22.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 31 August 2015 with respect to Person 22, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 22.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 22 until 18 September 2015 when it put a stop on this account.

CommBank did not close the account in response to the suspected money laundering until 2 October 2015.

From 14 August 2015 to 24 August 2015 \$149,150 in structured cash was deposited into this account through IDMs and \$149,088 sent to Offshore Account 13 in Hong Kong.

472. By reason of the matters pleaded at paragraphs 470 and 471, CommBank contravened s 36(1) on and from 14 July 2015 with respect to Person 22.

Person 23

473. On or about 22 June 2015, CommBank provided a designated service to a person purporting to be Person 23 by opening an account in the name of Person 23.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 23.

Person 23's occupation was recorded as 'sales'.

Person 23 did not exist.

474. Between 28 July 2015 and 21 August 2015, 36 cash deposits totalling \$300,940 were made into CommBank Account 23 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 23.

All of these cash deposits were under \$10,000.

Schedule V to the Statement of Claim.

475. Between 28 July 2015 and 21 August 2015, a total of \$300,772 was transferred from CommBank Account 23 to Offshore Account 8 account in Hong Kong.

Particulars

Items 3 and 29 table 1, s 6 of the Act.

CommBank statement for CommBank Account 23.

Schedule V to the Statement of Claim.

476. CommBank suspected that the cash deposits pleaded at paragraph 474 were structured contrary to s 142 of the Act.

Particulars

SMR 581247480 dated 2 September 2015.

All cash deposits were under \$10,000.

477. By no later than 2 September 2015, CommBank was aware of suspicious activity on CommBank Account 23 in the name of Person 23.

Particulars

SMR 581247480 dated 2 September 2015.

CommBank suspected that multiple structured cash deposits were being made to avoid reporting obligations and funds subsequently were transferred offshore to the holder of Offshore Accounts 7 and 8 in Hong Kong, indicative of money laundering.

The failures to report suspicious matters for the purposes of s 41

478. By no later than 2 September 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1, 2, 3 and 5 to 14 of Schedule V to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 2 September 2015 the AML team had reviewed transactions on this account and had identified structured cash deposits followed by international funds transfers to Hong Kong indicative of money laundering and avoiding reporting obligations – see SMR 581247480 dated 2 September 2015. See also TM-214716A triggered on 5 August 2015 and TM-218400A triggered on 19 August 2015.

On 13 August 2015, the AFP issued a notice under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 23 in the name of Person 23.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 23 in the name of Person 23 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 23 to other accounts including to the holder of Offshore Accounts 7 and 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 27 August 2015 the Intelligence Team in Group Security, emailed the AML Team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015 at 12.24pm, the AFP asked Group Security to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 23] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 23]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

A Compliance officer at CommBank provided the AFP with a signed affidavit dated 9 September 2015 annexing transaction records and customer interaction records for CommBank Account 23 in the name of Person 23.

479. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 23 was not the person he claimed to be.

Particulars

The AFP advised Group Security, CommBank that CommBank Account 23 in the name of Person 23 had been opened in a false name - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

The AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

480. By reason of the matters pleaded in paragraphs 478 and 479, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.

481. By reason of the matters pleaded in paragraphs 478 and 480, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 2 September 2015, being 7 September 2015.
482. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 478.

Particulars

See SMR 581247480 dated 2 September 2015. Having formed a suspicion about the structured deposits and offshore transfers on this account, CommBank did not report its suspicions with respect to the relevant transactions other than those which occurred on 5 August 2015. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

\$251,340 in cash deposits and \$300,772 transferred to accounts in Hong Kong never reported.

483. By reason of the matters pleaded in paragraphs 479 and 480, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
484. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 479.

Particulars

SMR 673785546 dated 27 July 2016.

485. By reason of the matters pleaded at paragraphs 478 to 484, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

486. On and from 5 August 2015, CommBank failed to monitor Person 23 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 5 August 2015 and 19 August 2015, 2 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

Although during the period 28 July 2015 to 21 August 2015 there were 36 cash deposits under \$10,000 totalling \$300,940, no automated alerts for structuring were ever raised.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to Offshore Accounts 7 and 8, Offshore Account 3 and Offshore Accounts 1 and 2 – see paragraph 51 above.

By no later than 13 August 2015, CommBank was on notice that the AFP was investigating a number of offshore transfers with respect to Person 23's account, by reason of the s 49 request issued by the AFP seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 23 in the name of Person 23. CommBank did not carry out any customer due diligence in response to the s 49 request.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 23 in the name of Person 23 - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 23 to other accounts including to the holder of Offshore Account 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

Transaction monitoring alerts TM-214716A raised on 5 August 2015 for large aggregate cash transactions and TM-218400A raised on 19 August 2015 for large aggregate cash transactions were not reviewed by the AML team until 1 and 2 September 2015, in spite of the known high ML/TF risks. SMR 581247480 was lodged on 2 September 2015, noting that it did not report suspicions with respect to the transactions on 7, 10, and 19 August 2015. The alerts were closed.

On 4 September 2015 Group Security prepared a high risk customer report for Person 23, Person 20, Person 25, Person 26, Person 27 and Person 24, identifying 'intense structured deposits totalling of \$2.6 million followed by IMTs to [the holder of Offshore Accounts 7 and 8]' and AFP advice confirming these accounts were opened in false names. Group Security recommended the relationship be terminated.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 23] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the

same group and the AFP have advised that these accounts are in false names [including Person 23]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

On 4 September 2015 the AML Team initiated termination (TERM 1339C).

CommBank also put a stop on the account on 4 September 2015.

The account was not closed until 17 February 2016.

From 5 August 2015 to 21 August 2015 \$299,540 in structured cash was deposited into this account through IDMs and \$249,424 sent to the Offshore Account 8 in Hong Kong.

487. By reason of the matters pleaded at paragraph 486, CommBank contravened s 36(1) on and from 5 August 2015 with respect to Person 23.

Person 24

488. On or about 22 June 2015, CommBank provided a designated service to a person purporting to be Person 24 by opening an account in the name of Person 24.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 24.

Person 24's occupation was recorded as 'unemployed'.

Person 24 did not exist.

489. Between 10 July 2015 and 24 August 2015, 47 cash deposits totalling \$398,800 were made into CommBank Account 24 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 24.

46 of these cash deposits were under \$10,000.

Schedule W to the Statement of Claim.

490. Between 10 July 2015 and 24 August 2015, a total of \$398,554 was transferred from CommBank Account 24 to Offshore Accounts 4 and 13 account in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of Act.

CommBank statement for CommBank Account 24.

9 IMTs to Offshore Account 13 in Hong Kong.

1 IMT of \$1,020 to Offshore Account 4 in Hong Kong.

Schedule W to the Statement of Claim.

491. CommBank suspected that all but one of the cash deposits pleaded at paragraph 489 were structured contrary to s 142 of the Act.

Particulars

SMR 578595746 dated 24 August 2015.

492. By no later than 24 August 2015, CommBank was aware of suspicious activity on CommBank Account 24 in the name of Person 24.

Particulars

SMR 578595746 dated 24 August 2015.

CommBank suspected intense structured cash deposits since account opening followed by large international funds transfers to the holder of Offshore Account 13 in Hong Kong; activity suspicious due to the receipt of aggregate cash deposits followed by IFTIs to Hong Kong that was not consistent with customer's profile and that was indicative of money laundering.

The failures to report suspicious matters for the purposes of s 41

493. By no later than 24 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 6 and 11 to 21 of Schedule W to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 24 August 2015, the AML team had reviewed transactions on Person 24's account from 22 June 2015 and had identified an ongoing pattern of intense structured cash deposits followed by suspicious offshore transfers in this period – see SMR 578595746 dated 24 August 2015. See also TM-212066A triggered on 21 July 2015, TM-212067A triggered on 7 August 2015 and TM-218547A triggered on 20 August 2015.

Transaction monitoring alert TM–212066A raised on 21 July 2015 for large aggregate cash activity was reviewed by members of the AML Team on 20 and 24 August 2015, who concluded that the alert related to similar activity between 27 July 2015 and 7 August 2015, as reported in SMR 578595746.

Transaction monitoring alert TM–218547A raised on 20 August 2015 for large aggregate cash activity between 7 and 20 August 2015 was reviewed by members of the AML Team on 20 and 24 August 2015, who concluded that the customer had already been reported in SMR 578595746.

On 13 August 2015, the AFP issued a notice under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 24 in the name of Person 24.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 24 in the name of Person 24 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 24 to other accounts including to the holder of Offshore Account 13 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 27 August 2015 the Intelligence Team in Group Security, emailed the AML Team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015 at 12.24pm, the AFP asked Group Security to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 24] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 24]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

A Compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transactions records and customer interaction records for CommBank Account 24 in the name of Person 24.

494. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 24 was not the person he claimed to be.

Particulars

The AFP advised Group Security, CommBank that CommBank Account 24 in the name of Person 24 had been opened in a false name - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

The AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

495. By reason of the matters pleaded in paragraphs 493 and 494, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.

496. By reason of the matters pleaded in paragraphs 493 and 495, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 24 August 2015, being 27 August 2015.
497. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 493.

Particulars

See SMR 578595746 dated 24 August 2015. Having formed a suspicion about intense structured cash deposits since the account opening followed by IMTs to the holder of Offshore Account 13, CommBank failed to report its suspicions with respect to account activity between 10 July 2015 and 26 July 2015 and between 8 August 2015 and 24 August 2015. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s41(3)(b) of the Act.

\$298,900 in cash deposits and \$298,718 transferred to accounts in Hong Kong never reported.

498. By reason of the matters pleaded in paragraphs 494 and 495, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
499. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 494.

Particulars

SMR 673785556 dated 27 July 2016.

500. By reason of the matters pleaded at paragraphs 493 to 499, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

501. On and from 21 July 2015, CommBank did not monitor Person 24 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 21 July 2015 and 25 August 2015, 4 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions

involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to Offshore Accounts 7 and 8, Offshore Account 3 and to Offshore Accounts 1 and 2 – see paragraph 51 above.

By no later than 13 August 2015, CommBank was on notice that the AFP was investigating a number of offshore transfers with respect to Person 24's account, by reason of the s 49 request issued by the AFP seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 24 in the name of Person 24. CommBank did not carry out any customer due diligence in response to the s 49 request.

Transaction monitoring alerts raised on 21 July 2015 (TM-212066A) and 7 August 2015 (TM-212067A), for large aggregate cash transactions were not reviewed by the AML Team until 20 and 24 August 2015, in spite of the known high ML/TF risks. A further alert raised on 20 August 2015 (TM-218547A) for large aggregate cash transactions was also considered on 20 and 24 August 2015. SMR 578595746 was lodged on 24 August 2015 and the alert closed.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 24 in the name of Person 24 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

A further transaction monitoring alert was raised on 25 August 2015 (TM-219424A for structured withdrawals on 21, 24 and 25 August 2015) but not reviewed by the AML Team until 4 and 11 September 2015. The alert was closed and no SMR lodged on the basis that the customer had recently been reported.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 24 to other accounts including Offshore Account 13 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 24] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 24]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

On 4 September 2015 Group Security prepared a high risk customer report for Person 23, Person 20, Person 25, Person 26, Person 27

and Person 24, identifying 'intense structured deposits totalling of \$2.6 million followed by IMTs to [the holder of Offshore Accounts 7 and 8]' and AFP advice confirming these accounts were opened in false names. Group Security recommended the relationship be terminated.

On 4 September 2015 the AML Team recommended termination of the account for intense blatant structuring with subsequent IFTIs to the holder of Offshore Account 13 – TERM 1341C.

CommBank also put a stop on the account on 4 September 2015.

The account was not closed until 19 February 2016.

From 21 July 2015 to 24 August 2015 \$396,800 in structured cash was deposited into Person 24's account (CommBank Account 24) and \$396,624 was transferred to Offshore Account 13 in Hong Kong.

CommBank reported 1 late TTR totalling \$10,000 with respect to this account.

502. By reason of the matters pleaded at paragraph 501, CommBank contravened s 36(1) on and from 21 July 2015 with respect to Person 24.

Person 25

503. On or about 4 July 2015, CommBank provided a designated service to a person purporting to be Person 25 by opening an account in the name of Person 25.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 25.

Person 25's occupation was recorded as 'unemployed'.

Person 25 did not exist.

504. Between 22 July 2015 and 21 August 2015, 50 cash deposits totalling \$400,420 were made into CommBank Account 25 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 25.

All of these cash deposits were under \$10,000.

Schedule X to the Statement of Claim.

505. Between 22 July 2015 and 21 August 2015, a total of \$400,489 was transferred from CommBank Account 25 to the Offshore Account 8 in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 25.

Schedule X to the Statement of Claim.

506. CommBank suspected that the cash deposits pleaded at paragraph 504 were structured contrary to s 142 of the Act.

Particulars

SMR 579459736 dated 27 August 2015.

507. By no later than 27 August 2015, CommBank was aware of suspicious activity on CommBank Account 25 in the name of Person 25.

Particulars

SMR 579459736 dated 27 August 2015.

CommBank suspected that intense structured cash deposits were being made to avoid reporting obligations; that the suspected structured cash deposits were being transferred overseas; and that this conduct within a short period of time appears suspicious and indicative of money laundering.

The failures to report suspicious matters for the purposes of s 41

508. By no later than 27 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1, 2, 4, and 6 to 18 of Schedule X may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 27 August 2015, the AML Team had reviewed the transactions on this account and had identified structured cash deposits on this account followed by international funds transfers to Hong Kong indicative of money laundering and avoiding reporting obligations – SMR 579459736 dated 27 August 2015 and transaction monitoring alerts TM-212959A triggered on 27 July 2015, TM-215066A triggered on 7 August 2015 and TM-218399A triggered on 19 August 2015.

On 13 August 2015, the AFP issued a notice under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 25 in the name of Person 25.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 25 in the name of Person 25 - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 25 to other accounts including to the holder of Offshore Accounts 7 and 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 27 August 2015 the Intelligence Team in Group Security, emailed the AML Team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015 at 12.24pm, the AFP asked the Executive General Manager Intelligence, Group Security to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 25] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 25]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

A Compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transactions records and customer interaction records for CommBank Account 25 in the name of Person 25.

509. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 25 was not the person he claimed to be.

Particulars

The AFP advised Group Security, CommBank that CommBank Account 25 in the name of Person 25 had been opened in a false name – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

The AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

510. By reason of the matters pleaded in paragraphs 508 and 509, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
511. By reason of the matters pleaded in paragraphs 508 and 510, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 27 August 2015, being 1 September 2015.
512. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 508.

Particulars

See SMR 579459736 dated 27 August 2015. Having formed a suspicion about a pattern of structured cash deposits and overseas transfers on the account, CommBank only reported cash deposits on

26 and 27 July 2015, and did not report the amount or payee of any of the overseas transfers. The report did not contain the information specified in rules 18.2(19) or 18.2(21)(k) to (r), contrary to s 41(3)(b) of the Act.

\$300,420 in cash deposits and \$400,489 transferred to accounts in Hong Kong were never reported.

513. By reason of the matters pleaded in paragraphs 509 and 510, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
514. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 509.

Particulars

SMR 673785639 dated 27 July 2016.

515. By reason of the matters pleaded at paragraphs 508 to 514, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

516. On and from 27 July 2015, CommBank did not monitor Person 25 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 27 July 2015 and 19 August 2015, 3 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

Although for the period 22 July 2015 to 22 August 2015 there were 50 cash deposits under \$10,000, no automated alerts for structuring were ever raised.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to Offshore Account 7 and 8, Offshore Account 3 and to Offshore Accounts 1 and 2 – see paragraph 51 above.

By no later than 13 August 2015, CommBank was on notice that the AFP was investigating a number of offshore transfers with respect to the Person 25 account, by reason of the s 49 request issued by the AFP seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 25 in the name of Person 25. CommBank did not carry out any customer due diligence in response to the s 49 request.

Three transaction monitoring alerts were raised on this account but not considered by the AML Team until 25 and 27 August 2015. These were TM-212959A raised on 27 July 2015 for large aggregate cash transactions; TM-215066A raised on 7 August 2015 for large aggregate cash transactions and TM-218399A raised on 19 August 2015 for large aggregate cash transactions. Once these alerts were reviewed, SMR 579459736 was lodged and termination was initiated (TERM 1313C).

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 25 in the name of Person 25 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 25 to other accounts including to the holder of Offshore Accounts 7 and 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 4 September 2015, an internal email within CommBank's Group Security team reported that 'We have identified these individuals [including Person 25] to be part of a syndicate group involved in ATM cash structuring. The names you have mentioned are all part of the same group and the AFP have advised that these accounts are in false names [including Person 25]. ... Law enforcement authorities have not requested us to keep any of these accounts opened, and is happy for the AML Ops team to follow their existing protocols'.

On 4 September 2015, Group Security prepared a high risk customer report for Person 23, Person 20, Person 25, Person 26, Person 27 and Person 24, identifying 'intense structured deposits totalling of \$2.6 million followed by IMTs to [the holder of Offshore Accounts 7 and 8]' and AFP advice confirming these accounts were opened in false names. Group Security recommended the relationship be terminated.

CommBank also put a stop on the account on 4 September 2015.

On 8 September 2015 the business unit approved termination.

The account was not closed until 17 February 2016.

From 27 July 2015 to 21 August 2015 \$349,480 in structured cash was deposited into Person 25's account (CommBank Account 25) and \$349,598 was transferred to Offshore Account 8 in Hong Kong.

517. By reason of the matters pleaded at paragraph 516, CommBank contravened s 36(1) on and from 27 July 2015 with respect to Person 25.

Person 26

518. On or about 5 July 2015, CommBank provided a designated service to a person purporting to be Person 26 by opening an account in the name of Person 26.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 26.

Person 26's occupation was recorded as 'unemployed'.

Person 26 did not exist.

519. Between 10 July 2015 and 21 August 2015, 60 cash deposits totalling \$458,220 were made into CommBank Account 26 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 26.

All of these cash deposits were under \$10,000.

Schedule Y to the Statement of Claim.

520. Between 15 July 2015 and 21 August 2015, a total of \$438,492 was transferred from CommBank Account 26 to Offshore Account 8 in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 26.

Schedule Y to the Statement of Claim.

521. CommBank suspected that the cash deposits pleaded at paragraph 519 were structured contrary to s 142 of the Act.

Particulars

SMR 579463973 dated 27 August 2015.

522. By no later than 27 August 2015, CommBank was aware of suspicious activity on CommBank Account 26 in the name of Person 26.

Particulars

SMR 579463973 dated 27 August 2015.

CommBank suspected that there were intense structured deposits on this account; that the suspected structured cash deposits were being

transferred internationally; and that this conduct within a short period of time where the source of funds is unknown, is suspicious and indicative of money laundering.

The failures to report suspicious matters for the purposes of s 41

523. By no later than 27 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 6 to 22 of Schedule Y may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 27 August 2015 the AML team had reviewed transactions on Person 26's account and had identified a pattern of intense structured cash deposits to avoid reporting obligations followed by suspicious offshore transfers – see SMR 579463973 dated 27 August 2015. Also see TM-212577A triggered on 24 July 2015 and TM-212958A triggered on 27 July 2015.

On 13 August 2015, the AFP issued a notice under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 26 in the name of Person 26.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 26 in the name of Person 26 - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 26 to other accounts including the holder of Offshore Account 7 and 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 27 August 2015 the Intelligence Team in Group Security emailed the AML Team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015 at 12.24pm, the AFP asked the Executive General Manager Intelligence to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

A Compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transactions records and customer interaction records for CommBank Account 26 in the name of Person 26.

524. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 26 was not the person he claimed to be.

Particulars

The AFP advised Group Security, CommBank that CommBank Account 26 in the name of Person 26 had been opened in a false name - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

The AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

525. By reason of the matters pleaded in paragraphs 523 and 524, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
526. By reason of the matters pleaded in paragraphs 523 and 525, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 27 August 2015, being 1 September 2015.
527. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 523.

Particulars

See SMR 579463973 dated 27 August 2015. Having formed a suspicion about intense structuring on the account followed by overseas transfers, CommBank reported its suspicions with respect to the deposits and IMT on 24 July 2015, but did not report its suspicions with respect to any other transactions. The report did not contain the information specified in rules 18.2(19) or 18.2(21)(k) to (r), contrary to s 41(3)(b) of the Act.

\$408,450 in cash deposits and \$388,770 transferred to Hong Kong never reported.

528. By reason of the matters pleaded in paragraphs 524 and 525, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
529. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraph 524.

Particulars

SMR 673787053 dated 27 July 2016.

530. By reason of the matters pleaded at paragraphs 523 to 529, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

531. On and from 13 July 2015, CommBank did not monitor Person 26 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to Offshore Accounts 7 and 8, Offshore Account 3 and to Offshore Accounts 1 and 2 – see paragraph 51 above.

Between 13 July 2015 and 19 August 2015, 5 automated transaction monitoring alerts were raised on this account. With the exception of PAY-26373A, CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 13 July 2015, an alert was raised (PAY-26373A) querying whether the customer's request of 13 July 2015 to transfer of \$1,570 to a Hong Kong account in the name of the holder of Offshore Accounts 3, 4, 5 and 19 was a genuine transfer. As at 1 July, the AML team had formed suspicions with respect to transfers to this account – the 1 July 2015 email from Executive Manager, Intelligence & Planning, Group Security, CommBank to AFP at 11.27am noted that IMTs had been sent to 3 different account titles in Hong Kong, including to the holder of Offshore Accounts 3, 4, 5 and 19. The alert was reviewed by the AML Team on 20 July 2015. As the customer was not able to be contacted to obtain further KYC, the transfer was cancelled. The alert was closed and no further customer due diligence was carried out.

By no later than 13 August 2015, CommBank was on notice that the AFP was investigating a number of offshore transfers with respect to Person 26's account by reason of the s 49 request issued by the AFP seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 26 in the name of Person 26. CommBank did not carry out any customer due diligence in response to the s 49 request.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 26 in the name of Person 26 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 26 to other accounts including the holder of Offshore Accounts 7 and 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

Four transaction monitoring alerts remained outstanding – being TM-212577A for structured deposits across branches raised on 24 July

2015, TM-212958A for large aggregate cash transactions raised on 27 July 2015, TM-215065A for large aggregate cash transactions raised on 7 August and TM-218398A for large aggregate cash transactions raised 19 August 2015. These alerts were not reviewed by the AML Team until 24 and 27 August 2015, in spite of the known high ML/TF risks. Following review of these alerts, SMR 579463973 was lodged on 27 August 2015.

On 4 September 2015, Group Security prepared a high risk customer report for Person 23, Person 20, Person 25, Person 26, Person 27 and Person 24, identifying 'intense structured deposits totalling of \$2.6 million followed by IMTs to [the holder of Offshore Accounts 7 and 8]' and AFP advice confirming these accounts were opened in false names. Group Security recommended the relationship be terminated - TERM 1340C.

CommBank also put a stop on the account on 4 September 2015.

On 8 September 2015 the business unit approved termination.

The account was not closed until 17 February 2016.

From 15 July 2015 to 21 August 2015 \$455,620 in structured cash was deposited into Person 26's account (CommBank Account 26_ and \$438,492 was transferred to the Offshore Account 8 in Hong Kong.

532. By reason of the matters pleaded at paragraph 531, CommBank contravened s 36(1) on and from 15 July 2015 with respect to Person 26.

Person 27

533. On or about 5 July 2015, CommBank provided a designated service to a person purporting to be Person 27 by opening an account in the name of Person 27.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 27.

Person 27's occupation was recorded as 'unemployed'.

Person 27 did not exist.

534. Between 22 July 2015 and 24 August 2015, 43 cash deposits totalling \$360,430 were made into CommBank Account 27 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 27.

42 of these cash deposits were under \$10,000.

Schedule Z to the Statement of Claim.

535. Between 22 July 2015 and 21 August 2015, a total of \$350,290 was transferred from CommBank Account 27 to Offshore Account 8 account in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 27.

Schedule Z to the Statement of Claim.

536. CommBank suspected that all but one of the cash deposits pleaded at paragraph 534 were structured contrary to s 142 of the Act.

Particulars

SMR 579663156 dated 27 August 2015.

1 cash deposit was \$10,000.

537. By no later than 27 August 2015, CommBank was aware of suspicious activity on CommBank Account 27 in the name of Person 27.

Particulars

SMR 579663156 dated 27 August 2015.

CommBank suspected multiple cash deposits made to CommBank Account 27 in the name of Person 27 were being structured to avoid reporting obligations; that the suspected structured cash deposits were being transferred to Offshore Account 8 account in Hong Kong; and that this pattern of activity within a short period of time, where the source of funds is unknown, is suspicious, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

538. By no later than 27 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1, 2, and 6 to 20 of Schedule Z may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 27 August 2015 the AML team had reviewed all transactions on Person 27's account up until that date and had identified a pattern of structured cash deposits to avoid reporting obligations followed by suspicious offshore transfers – see SMR 579663156 dated 27 August 2015. See also TM-212963A triggered on 27 July 2015 and TM-218403A triggered on 19 August 2015.

On 13 August 2015, the AFP issued a notice under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 27 in the name of Person 27.

On 24 August 2015 Kha Weng Foong was arrested at the Eastgardens CommBank branch immediately after he deposited \$9,950 into CommBank Account 27 in the name of Person 27.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 27 in the name of Person 27 - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 27 to other accounts including to the holder of Offshore Accounts 7 and 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 27 August 2015 the Intelligence Team in Group Security, emailed the AML Team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015 at 12.24pm, the AFP asked the Executive General Manager Intelligence to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

A Compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transactions records and customer interaction records for CommBank Account 27 in the name of Person 27.

539. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 27 was not the person he claimed to be.

Particulars

The AFP advised Group Security, CommBank that CommBank Account 27 in the name of Person 27 had been opened in a false name – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

The AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

540. By reason of the matters pleaded in paragraphs 538 and 539, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
541. By reason of the matters pleaded in paragraphs 538 and 540, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 27 August 2015, being 1 September 2015.

542. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 538.

Particulars

SMR 579663156 dated 27 August 2015. Having formed a suspicion about patterns of structured cash deposits and overseas transfers, CommBank reported transactions on 27 July 2015, but did not report its suspicions with respect to items 1, 2, and 6 to 20 of Schedule Z. The report did not contain the information specified in rules 18.2(19) or 18.2(21)(k) to (r), contrary to s 41(3)(b) of the Act.

\$310,430 in cash deposits and \$300,312 transferred to accounts in Hong Kong never reported.

543. By reason of the matters pleaded in paragraphs 539 and 540, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
544. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 539.

Particulars

SMR 673787225 dated 27 July 2016.

545. By reason of the matters pleaded at paragraphs 538 to 544, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

546. On and from 27 July 2015, CommBank did not monitor Person 27 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Two automated transaction monitoring alerts were raised on this account for large aggregate cash activity, the first on 27 July 2015 and the second on 19 August 2015. CommBank failed to review the first alert in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. As a result, CommBank failed to monitor the customer with a view to identifying, mitigating and managing these ML/TF risks.

Although 42 cash deposits under \$10,000 totalling \$350,430 were made into this account between 22 July and 24 August 2015, no automated alerts were ever raised on this account for structuring.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to Offshore Accounts 7 and 8 accounts, Offshore Account 3 and to Offshore Accounts 1 and 2 – see paragraph 51 above.

By no later than 13 August 2015, CommBank was on notice that the AFP was investigating a number of offshore transfers with respect to Person 27's account (CommBank Account 27), by reason of the s 49 notice issued by the AFP. CommBank did not carry out customer due diligence in response to this request.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 27 in the name of Person 27 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

On 25 August 2015 two transaction monitoring alerts were reviewed by the AML Team – respectively, TM-212963A raised on 27 July 2015 for large aggregate cash transactions and TM-218403A raised on 19 August 2015 for large aggregate cash transactions. Termination of the account was initiated on 25 August 2015 – TERM-1314C – and SMR 579663156 was lodged on 27 August 2015.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 27 to other accounts including to the holder of Offshore Accounts 7 and 8 – email of 26 August 2015 at 11.44am from the AFP to Group Security, CommBank.

On 4 September 2015, Group Security prepared a high risk customer report for Person 23, Person 20, Person 25, Person 26, Person 27 and Person 24, identifying 'intense structured deposits totalling of \$2.6 million followed by IMTs to [the holder of Offshore Accounts 7 and 8]' and AFP advice confirming these accounts were opened in false names. Group Security recommended the relationship be terminated.

CommBank put a stop on the account on 7 September 2015.

As at 14 October 2016, the account was pending closure.

CommBank reported 1 late TTR totalling \$10,000 with respect to this account.

From 27 July 2015 to 24 August 2015 \$339,050 in structured cash was deposited into this account and \$348,940 sent to Offshore Account 8 in Hong Kong.

547. By reason of the matters pleaded at paragraph 546, CommBank contravened s 36(1) on and from 27 July 2015 with respect to Person 27.

Person 28

548. On or about 22 June 2015, CommBank provided a designated service to a person purporting to be Person 28 by opening an account in the name of Person 28.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 28.

Person 28's occupation was recorded as 'unemployed'.

Person 28 did not exist.

549. Between 22 July 2015 and 24 August 2015, 44 cash deposits totalling \$382,820 were made into CommBank Account 28 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 28.

All of these cash deposits were under \$10,000.

Schedule AA to the Statement of Claim.

550. Between 22 July 2015 and 24 August 2015, a total of \$382,606 was transferred from CommBank Account 281 to Offshore Account 13 in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 28.

Schedule AA to the Statement of Claim.

551. CommBank suspected that the cash deposits pleaded at paragraph 549 were structured contrary to s 142 of the Act.

Particulars

SMR 580598743 dated 1 September 2015.

552. By no later than 1 September 2015, CommBank was aware of suspicious activity on CommBank Account 28 in the name of Person 28.

Particulars

SMR 580598743 dated 1 September 2015.

CommBank suspected multiple cash deposits made to Person 28's account were being structured to avoid reporting obligations; that the suspected structured cash deposits were being transferred to the holder of Offshore Account 13 in Hong Kong; and that as Person 28's account had received multiple intense structured cash deposits where the source of funds is unknown, the activity is deemed suspicious and indicative of money laundering and avoiding reporting obligations.

553. By no later than 1 September 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 8 and 13 to 18 of Schedule AA to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By 1 September 2015 the AML team had reviewed transactions on this account from 22 June 2015 and had identified structured cash deposits on this account followed by international funds transfers to Hong Kong indicative of money laundering and avoiding reporting obligations – SMR 580598743 dated 1 September 2015 and transaction monitoring alerts TM-212961A triggered on 27 July 2015, TM-215068A triggered on 7 August 2015, TM-218549A triggered on 20 August 2015, TM-218583A triggered on 20 August 2015 and TM-218611A triggered on 20 August 2015.

On 13 August 2015, the AFP issued a notice under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 28 in the name of Person 28.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 28 in the name of Person 28 - email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 28 to other accounts including to the holder of Offshore Account 13 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 27 August 2015 the Intelligence Team in Group Security, emailed the AML Team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015 at 12.24pm, the AFP asked Group Security to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

A Compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transactions records and customer interaction records for CommBank Account 28 in the name of Person 28.

554. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 28 was not the person he claimed to be.

Particulars

The AFP advised Group Security, CommBank that CommBank Account 28 in the name of Person 28 had been opened in a false name – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

The AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

555. By reason of the matters pleaded in paragraphs 553 and 554, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
556. By reason of the matters pleaded in paragraphs 553 and 555, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 September 2015, being 4 September 2015.
557. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 553.

Particulars

See SMR 580598743 dated 1 September 2015. Having formed a suspicion about the transactions on the account up to 1 September 2015, CommBank only reported its suspicions with respect to the transactions on 19 and 20 August 2015, but did not report its suspicions with respect to any other transactions which occurred before 1 September 2015. The report did not contain the information specified in rule 18.2(19) of the Rules, contrary to s 41(3)(b) of the Act.

\$299,420 in cash deposits and \$299,236 transferred to accounts in Hong Kong never reported.

558. By reason of the matters pleaded in paragraphs 554 and 555, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
559. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 554.

Particulars

SMR 673787226 dated 27 July 2016.

560. By reason of the matters pleaded at paragraphs 553 to 559, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

561. On and from 27 July 2015, CommBank did not monitor Person 28 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 27 July 2015 and 25 August 2015, 7 automated transaction monitoring alerts were raised on this account. CommBank failed to review the alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. As a result, CommBank failed to monitor the customer with a view to identifying, mitigating and managing these ML/TF risks.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 13 August 2015, CommBank was on notice that the AFP was investigating a number of offshore transfers with respect to the Person 28's account (CommBank Account 28), by reason of the s 49 notice issued by the AFP. CommBank failed to carry out customer due diligence in response to this request, with a view to identifying, mitigating and managing ML/TF risks.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 28 in the name of Person 28 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 28 to other accounts including to the holder of Offshore Account 13 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

The AML Team did not review the first 6 alerts raised on this account until 24 August 2015, in spite of the known high ML/TF risks. Even then, the AML Team did not complete its review of this account until 1 September 2015. These alerts were TM-212961A raised on 27 July 2015 for large aggregate cash transactions; TM-215068A raised on 7 August 2015 for large aggregate cash transactions; TM-218549A raised on 20 August 2015 for large aggregate cash transactions; TM-218583A raised on 20 August 2015 for HRC high frequency deposits into HRC; TM-218611A raised on 20 August 2015 for structured deposits across branches; and TM-218700A raised on 21 August 2015 for HRC large withdrawals from HRC accounts. An SMR was submitted on 1 September 2015, and termination initiated (TERM

1329C) for 'intense blatant structuring with subsequent IFTIs to [the holder of Offshore Account 13] Identical pattern to the Malaysian nationals who have been terminated'.

Also on 1 September 2015 the AML Team reviewed transaction monitoring alert TM-219426A raised on 25 August 2015 for structured withdrawals, but took no further action on the basis that an SMR had been lodged in respect of TM-218611A.

On 2 September 2015, CommBank sent a letter to Person 28 advising his account would be terminated on 2 October 2015, giving 30 days' notice of the account closure in spite of the known high ML/TF risks.

CommBank did not put a stop on the account until 18 September 2015.

The account was not closed until 4 August 2016.

From 27 July 2015 to 24 August 2015 \$331,800 in structured cash was deposited into this account and \$331,638 sent to Offshore Account 13 in Hong Kong.

562. By reason of the matters pleaded at paragraph 561, CommBank contravened s 36(1) on and from 27 July 2015 with respect to Person 28.

Person 29

563. On or about 9 June 2015, CommBank provided a designated service to a person purporting to be Person 29 by opening an account in the name of Person 29.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 29.

Person 29's occupation was recorded as 'unemployed'.

Person 29 did not exist.

564. Between 9 July 2015 and 24 August 2015, 72 cash deposits totalling \$600,445 were made into CommBank Account 29 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 29.

71 of these cash deposits were under \$10,000.

Schedule AB to the Statement of Claim.

565. Between 9 July 2015 and 24 August 2015, a total of \$600,132 was transferred from CommBank Account 29 to Offshore Account 13 in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 29.

Schedule AB to the Statement of Claim.

566. CommBank suspected that all but one of the cash deposits pleaded at paragraph 564 were structured contrary to s 142 of the Act.

Particulars

SMR 576013035 dated 14 August 2015.

SMR 580306558 dated 31 August 2015.

71 cash deposits were under \$10,000.

1 cash deposit was \$10,000.

567. By no later than 14 August 2015 CommBank was aware of suspicious activity on CommBank Account 29 in the name of Person 29.

Particulars

SMR 576013035 suspected structured deposits during July and August 2015 followed by IMTs to Offshore Account 13 in Hong Kong; noting that Person 28's account was newly opened, that he was unemployed and the source of funds unknown, the activity was considered inconsistent with his profile, suspicious and indicative of money laundering and avoiding reporting obligations.

Further, on 31 August 2015, CommBank suspected that Person 29's account continued to receive structured cash deposits followed by IMTs; CommBank suspected the structured deposits were made to avoid reporting obligations and were indicative of money laundering – SMR 580306558.

The failures to report suspicious matters for the purposes of s 41

568. By no later than 31 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 23 to 30 of Schedule AB may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 31 August 2015, the AML team had reviewed all transactions on this account from 14 August 2015 and had identified that structured cash deposits and international funds transfers to Hong Kong, indicative of money laundering and avoiding reporting obligations, as reported in SMR 576013035 dated 14 August 2015 were ongoing – see SMR 580306558 dated 31 August 2015. See also TM-210765A triggered on 14 July 2015, TM-214718A triggered on 5 August 2015, TM-218404A triggered on 19 August 2015 and TM-219430A triggered on 25 August 2015.

On 13 August 2015, the AFP issued a notice under s 49 of the Act seeking information in relation to an investigation with respect to a number of accounts, including CommBank Account 29 in the name of Person 29.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 29 in the name of Person 29 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 29 to other accounts including to the holder of Offshore Account 13 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 27 August 2015 the Intelligence Team in Group Security, emailed the AML Team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015 at 12.24pm, the AFP asked Group Security to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

A Compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transaction records and customer interaction records for CommBank Account 29 in the name of Person 29.

569. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 29 was not the person he claimed to be.

Particulars

The AFP advised Group Security, CommBank that CommBank Account 29 in the name of Person 29 had been opened in a false name – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security CommBank.

The AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

570. By reason of the matters pleaded in paragraphs 568 and 569, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
571. By reason of the matters pleaded in paragraphs 568 and 570, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 31 August 2015, being 3 September 2015.
572. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraph 568.

Particulars

See SMR 580306558 dated 31 August 2015. Having formed a suspicion that the suspicious activity identified in SMR 576013035 dated 14 August 2015 had continued, CommBank reported its suspicions with respect to transactions on 19 August 2015, but did not report its suspicions with respect to any other transactions which occurred after 14 August 2015. The report did not contain the information specified in rule 18.2(19) of the AML/CTF Rules, contrary to s 41(3)(b) of the Act.

\$197,700 in cash deposits and \$197,608 transferred to accounts in Hong Kong never reported.

573. By reason of the matters pleaded in paragraphs 569 and 570, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
574. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 569.

Particulars

SMR 673787270 dated 27 July 2016.

575. By reason of the matters pleaded at paragraphs 568 to 574, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

576. On and from 14 July 2015, CommBank did not monitor Person 29 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 14 July 2015 and 25 August 2015, 4 automated transaction monitoring alerts were raised on this account. CommBank failed to review the first alert in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

Although 71 cash deposits under \$10,000 totalling \$590,445 were made into this account between 11 June 2015 and 24 August 2015, it was not until 20 August 2015 that the first transaction monitoring alert relating to structured (withdrawals) was raised.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 13 August 2015, CommBank was on notice that the AFP was investigating a number of offshore transfers with respect to Person 29's account, by reason of the s 49 notice issued by the AFP. CommBank failed to carry out customer due diligence in response to this request.

The AML Team did not review transaction monitoring alerts TM-210765A raised on 14 July 2015 for large aggregate cash transactions and TM-214718A raised on 5 August 2015 for large aggregate cash transactions until 13 August 2015. SMR 576013035 was lodged on 14 August 2015, the alerts were closed and no customer due diligence carried out.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 29 in the name of Person 29 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 29 to other accounts including to the holder of Offshore Account 13 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

Transaction monitoring alert TM-218404A raised on 19 August 2015 for large aggregate cash transactions was reviewed by the AML Team on 24 and 31 August 2015. SMR 580306558 was lodged and termination initiated (TERM 1325C) 'for intense blatant structuring with subsequent IFTIs to [the holder of Offshore Account 13]. Identical pattern to the Malaysian nationals'.

Termination of the relationship was approved on 31 August 2015 by the business unit, RBS.

On 1 September 2015 a letter was sent to Person 29 advising his account would be closed with 30 days' notice, in spite of the known high ML/TF risks.

CommBank did not put a stop on the account until 18 September 2015.

A further outstanding transaction monitoring alert raised on 25 August 2015 (TM-219430A for structured withdrawals personal) was not reviewed by the AML Team until 24 September 2015. Although the AML Team identified the transactional activity as suspicious, no SMR was lodged and the alert was closed.

The account was not closed until 4 August 2016.

From 14 July 2015 to 24 August 2015 \$599,595 in structured cash was deposited into this account and \$599,312 sent to Offshore Account 13 in Hong Kong.

577. On and from 14 August 2015, CommBank did not monitor Person 29 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 14 August 2015 with respect to Person 29 rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 29.

Having formed a suspicion for the purposes of section 41 of the Act and having submitted an SMR on 31 August 2015 with respect to Person 29 rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 29.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 29 until 18 September 2015 when it put a stop on this account.

CommBank did not close the account in response to the suspected money laundering until 4 August 2016.

From 14 August 2015 to 24 August 2015 Person 29 deposited \$247,200 in structured cash and sent \$247,088 to Offshore Account 13 in Hong Kong.

578. By reason of the matters pleaded at paragraphs 576 and 577, CommBank contravened s 36(1) on and from 14 July 2015 with respect to Person 29

Person 30

579. On or about 9 June 2015, CommBank provided a designated service to a person purporting to be Person 30 by opening an account in the name of Person 30.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 30.

Person 30's occupation was recorded as 'unemployed'.

Person 30 did not exist.

580. Between 7 August 2015 and 21 August 2015, 33 cash deposits totalling \$249,600 were made into CommBank Account 30 through CommBank IDMs.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 30.

All of these cash deposits were under \$10,000.

Schedule AC to the Statement of Claim.

581. Between 7 August 2015 and 21 August 2015, a total of \$250,052 was transferred from CommBank Account 30 to Offshore Account 8 in Hong Kong.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 30.

Schedule AC to the Statement of Claim.

582. CommBank suspected that the cash deposits pleaded at paragraph 580 were structured contrary to s 142 of the Act.

Particulars

SMR 580307411 dated 31 August 2015.

583. By no later than 31 August 2015, CommBank was aware of suspicious activity on CommBank Account 30 in the name of Person 30.

Particulars

SMR 580307411 dated 31 August 2015.

CommBank suspected that multiple cash deposits made to Person 30's account were being intensely structured to avoid reporting obligations; that the suspected structured cash deposits were being transferred to the holder of Offshore Accounts 7 and 8 in Hong Kong; that Person 30 is unemployed; and that the activity is ongoing; and that this pattern of activity is ongoing and suspicious, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

584. By no later than 31 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 5–12 of Schedule AC may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

By no later than 31 August 2015, the AML team had reviewed transactions on Person 30's account and had identified an ongoing pattern of intensely structured cash deposits to avoid reporting obligations followed by suspicious offshore transfers – see SMR 580307411 dated 31 August 2015 and transaction monitoring alerts TM-216724A triggered on 10 August 2015 and TM-218753A triggered on 21 August 2015.

On 31 August 2015, the AML team initiated termination of the customer's account noting 'High Risk customers. Intense blatant structuring with subsequent IFT's to Hong Kong company [the holder of Offshore Accounts 7 and 8]. Identical pattern to the Malaysian nationals' – see SMR 580307411 dated 31 August 2015

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 30 in the name of Person 30 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 30 to other accounts including to the holder of Offshore Account 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

On 27 August 2015 the Intelligence Team in Group Security, emailed the AML Team in Group Security asking it to 'ensure to submit SMRs for the following individuals [lists Person 21, Person 22, Person 23, Person 24, Person 25, Person 20, Person 26, Person 27, Person 28, Person 29 and Person 30]'.

On 4 September 2015 at 12.24pm, the AFP asked Group Security to 'escalate [their request for documents] to the highest priority at CBA. As I mentioned last week, 21 million in cash has been laundered by this syndicate and 5 persons have now been arrested (including 3 in Hong Kong)'.

A Compliance officer, CommBank, provided the AFP with a signed affidavit dated 9 September 2015 annexing transactions records and customer interaction records for CommBank Account 30 in the name of Person 30.

585. By no later than 25 August 2015, CommBank suspected on reasonable grounds that Person 30 was not the person he claimed to be.

Particulars

On 25 August 2015 the AFP advised Group Security, CommBank that CommBank Account 30 in the name of Person 30 had been opened in a false name – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

On 4 September 2015 the AFP advised that a false NSW drivers' licence had been used to open this account – two emails of 4 September 2015 at 12.24pm and 1.53pm from AFP to Executive Manager, Intelligence & Planning, Group Security, CommBank.

586. By reason of the matters pleaded in paragraphs 584 and 585, s 41(1)(f)(iii) and/or s 41(1)(d) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
587. By reason of the matters pleaded in paragraphs 584 and 586, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 31 August 2015, being 3 September 2015.
588. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 584.

Particulars

See SMR 580307411 dated 31 August 2015. Having formed suspicions about the transactions on 7 August 2015 and that the suspicious account activity was 'ongoing', CommBank did not report its suspicions with respect to transactions after 7 August 2015. The report did not contain the information specified in rule 18.2(19) of the Rules, contrary to s 41(3)(b) of the Act.

\$200,000 in cash deposits and \$199,912 transferred to accounts in Hong Kong never reported.

589. By reason of the matters pleaded in paragraphs 585 and 586, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
590. It was not until 27 July 2016 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 585.

Particulars

SMR 673790695 dated 27 July 2016.

591. By reason of the matters pleaded at paragraphs 584 to 590, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

592. On and from 10 August 2015, CommBank did not monitor Person 30 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Two automated transaction monitoring alerts were raised on this account; the first on 10 August 2015 and the second on 21 August 2015. CommBank failed to review these alert in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. As a result, CommBank failed to monitor the customer with a view to identifying, mitigating and managing these ML/TF risks.

Although 33 cash deposits under \$10,000 were made into this account between 7 August 2015 and 21 August 2015, no transaction monitoring alerts were ever raised for structuring.

By 1 July 2015 CommBank had identified a suspicious pattern of activity on a number of CommBank accounts where the account holder was generally of Malaysian background in Australia on a holiday visa; the account had recently been opened; transactions involving blatant structuring at ATMs was occurring; and funds would be sent offshore.

By no later than 1 July 2015, CommBank had identified a suspicious pattern of international money transfers sent from a number of CommBank accounts, including from 11 of the 16 suspicious accounts, to Offshore Accounts 7 and 8, Offshore Account 3 and to Offshore Accounts 1 and 2 – see paragraph 51 above.

On 25 August 2015 the AFP advised Group Security, CommBank, that 2 persons had been arrested in connection with money laundering, including through CommBank Account 30 in the name of Person 30 – email of 25 August 2015 at 3.03pm from AFP to Senior Intelligence Analyst, Group Security, CommBank.

By no later than 26 August 2015, CommBank was aware that structured IDM deposits were being sent offshore from a number of accounts including CommBank Account 30 to other accounts including to the holder of Offshore Account 8 – email of 26 August 2015 at 11.44am from AFP to Group Security, CommBank.

The AML Team did not consider transaction monitoring alerts raised on 10 August 2015 and 21 August 2015 until 28 and 31 August 2015 – respectively, TM-216724A for large aggregate cash transactions and TM-218753A for large aggregate cash transactions. On 31 August 2015, SMR 580307411 was lodged on 31 August 2015 and termination was initiated ‘for intense blatant structuring followed by IFTIs to [the holder of Offshore Accounts 7 and 8]. Identical pattern to Malaysian nationals’ (TERM 1326C).

On 31 August 2015, the AML team initiated termination of the customer’s account noting ‘High Risk customers. Intense blatant structuring with subsequent IFT’s to Hong Kong company [the holder of Offshore Accounts 7 and 8]. Identical pattern to the Malaysian nationals’ – see SMR 580307411 dated 31 August 2015.

On 1 September 2015 CommBank sent a letter to Person 30 advising his account would be closed with 30 days’ notice, in spite of the known high ML/TF risks.

CommBank did not put a stop on the account until 18 September 2015.

The account was not closed until 4 August 2016.

593. By reason of the matters pleaded at paragraph 592, CommBank contravened s 36(1) on and from 10 August 2015 with respect to Person 30.

Syndicate No 2

Overview of money laundering in 2014

594. On 19 January 2015, Person 31, Person 32 and Kean Wai Wong were arrested and charged with dealing in proceeds of crime contrary to section 400.4(2) of the *Criminal Code Act 1995* (Cth) in connection with a methylamphetamine (ice) importation syndicate.

Particulars

The AFP Statement of Facts alleged that Person 32 laundered over \$900,000, that Person 31 laundered over \$800,000, and that Kean Wai Wong laundered over \$500,000 through their respective CommBank accounts.

On 19 May 2017, Kean Wai Wong was sentenced to 3 years' imprisonment in relation to this offence. Person 31 and Person 32 are awaiting sentence.

These funds were the proceeds of a drug importation syndicate.

595. Between 19 June 2014 and 2 January 2015, Person 31, Person 32 and Person 33 deposited \$2,272,435 in cash into CommBank accounts.

Particulars

Schedules AD to AF to the Statement of Claim.

260 cash deposits through CommBank IDMs, 150 of these being under \$10,000.

12 cash deposits at CommBank branches, 1 of which was under \$10,000.

596. Between 20 June 2014 and 22 December 2014, Person 31, Person 32 and Person 33 transferred \$2,276,503 from CommBank accounts to other accounts held with different financial institutions in Australia.

Particulars

Included in this sum were transfers totalling \$1,846,720 to Domestic Account 1, transfers totalling \$115,000 to CommBank Account 33 and transfers totalling \$150,000 to Domestic Account 2.

Person 31

597. On or about 19 June 2014, CommBank provided a designated service to Person 31 by opening an account in the name of Person 31.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 31.

Person 31's occupation was recorded as 'unemployed'.

598. Between 19 June 2014 and 2 January 2015, 97 cash deposits totalling \$858,215 were made into CommBank Account 31.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 31.

90 of the cash deposits were made through CommBank IDMs, 48 of which were under \$10,000.

7 deposits were made at CommBank branches, 1 of which was under \$10,000.

Schedule AD to the Statement of Claim.

599. Between 20 June 2014 and 22 October 2014, a total of \$856,298 was transferred from CommBank Account 31 in the name of Person 31 to two Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 31.

19 transfers totalling \$826,298 sent to Domestic Account 1.

1 transfer of \$30,000 sent to Domestic Account 2.

600. CommBank suspected that some of the cash deposits pleaded at paragraph 598 were structured contrary to s 142 of the Act.

Particulars

SMR 475489160 dated 30 July 2014.

SMR 497548723 dated 22 October 2014.

601. By no later than 30 July 2014, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 31 in the name of Person 31.

Particulars

SMR 475489160 dated 30 July 2014 notes that from 19 June 2014 to 30 July 2014 there were 24 cash deposits totalling \$216,715 and the funds were predominantly transferred to Domestic Account 1 in five payments totalling \$216,565 made between 30 June 2014 and 23 July 2014. CommBank reported the unusual account activity was inconsistent with the customer's profile, suspicious in nature and indicative of money laundering.

See also SMR 497548723 dated 22 October 2014.

The failures to report suspicious matters for the purposes of s 41

602. By no later than 23 September 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 23 to 38 of Schedule AD to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 18 and 23 September 2014, two transaction monitoring alerts were reviewed by the AML Team, being TM-142564A raised on 23 August 2014 for cash activity involving unique branch and TM-145978A raised on 11 September 2014 for structured withdrawals personal of \$149,320 in 16 transactions over 10 days – 1, 2, 11 September 2014.

The AML Team reviewed transactions on the account from 30 July 2014 to 18 September 2014 and identified that the same suspicious activity on the account had continued since the last SMR on 30 July 2014 but concluded that 'a re-report at this time not felt warranted'.

The activity reported by CommBank on 30 July 2014 in SMR 475489160 was identified as inconsistent with the customer's profile, suspicious in nature and indicative of money laundering.

- 603. By reason of the matters pleaded in paragraph 602, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 604. By reason of the matters pleaded in paragraphs 602 and 603, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 23 September 2014, being 26 September 2014.
- 605. CommBank did not give the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 602 until 22 October 2014.

Particulars

SMR 497548723 dated 22 October 2014.

On 22 October 2014 SMR 497548723 lodged which notes that a review from '30 July 2014 to 22 October 2014 revealed \$639,730 received in 71 cash deposits'. The SMR also notes that '\$639,730 was transferred in 14 transactions primarily to [Domestic Account 1] and [Domestic Account 2]'.

Deposits totalling \$256,970 and transfers totalling \$256,700 were reported late.

- 606. By reason of the matters pleaded at paragraphs 602 to 605, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

- 607. On and from 2 July 2014, CommBank did not monitor Person 31 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 2 July 2014 and 20 October 2014, 7 automated transaction monitoring alerts were raised on this account. CommBank failed to review all of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these

ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 2 July 2014 transaction monitoring alert TM-132411A triggered for structured withdrawals (11 transactions on 30 June and 2 July 2014), but was not reviewed by the AML team until 30 July 2014.

Transaction monitoring alert TM-137263A, triggered on 12 July 2014 for cash activity involving unique branch, was also not reviewed by the AML Team until 30 July 2014.

Following review of these alerts, SMR 475489160 was lodged on 30 July 2014, the alerts were closed and no customer due diligence was carried out.

Two further alerts were triggered on 23 August 2014 and 11 September 2014, but not reviewed by the AML Team until 18 and 23 September 2014. Respectively, these alerts were TM-142564A triggered for cash activity involving unique branches and TM-145978A for structured withdrawals personal (\$149,320 in 16 transactions on 1, 2 and 11 September 2014).

In reviewing these alerts, the AML Team identified that the same suspicious activity on the account had continued since the last SMR on 30 July 2014 but that 'a re-report at this time not felt warranted'. The alerts were closed, no SMR was lodged and no customer due diligence was carried out.

A further three alerts were triggered on 20 September 2014, 8 October 2014 and 20 October 2014, but not reviewed by the AML Team until 22 October 2014. Respectively, these alerts were TM-147682A for cash activity involving unique branches; TM-150896A for structured withdrawals (\$101,720 in 12 transactions on 8 October 2014) and TM-152297A for structured withdrawals (\$265,730 in 29 transactions on 8, 9, 14, 20 October 2014).

Having reviewed these alerts, SMR 497548723 was lodged on 22 October 2014, the alerts were closed and no customer due diligence was carried out.

From 2 July 2014 to 2 January 2015 Person 31 deposited \$798,105 in 89 cash deposits and transferred \$806,312 to other Australian accounts in 21 separate transactions, primarily to Domestic Account 1 and Domestic Account 2.

Throughout the period that the Person 31 account was open, CommBank was aware of suspicious cash activity involving Domestic Account 1. By July 2014 CommBank approved termination of a CommBank account held Domestic Account 1 for suspicious cash deposits predominantly through ATMs and due to suspicions it was operating an unregistered money service business.

On 27 October 2015 the AFP emailed CommBank seeking information and documents about Person 31 in relation to an ongoing investigation into alleged contraventions of sections 307.1 and 400.1

of the *Criminal Code* (Cth). No customer due diligence was carried out in response to the contact with law enforcement.

The account was not stopped or closed until 19 September 2016.

CommBank lodged 42 late TTRs totalling \$420,030 in respect of this customer.

608. On and from 30 July 2014, CommBank did not monitor Person 31 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having formed a s 41 suspicion by no later than 30 July 2014 and having lodged an SMR with respect to Person 31, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 31.

Having formed a suspicion for the purposes of s 41 of the Act and having formed a s 41 suspicion by no later than 22 October 2014 and having lodged an SMR with respect to Person 31, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 31.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 31 until the account was closed on 19 September 2016.

From 31 July 2014 to 2 January 2015 Person 31 deposited \$641,500 in 73 cash deposits and transferred \$639,730 to other Australian accounts in 14 separate transactions, primarily to Domestic Account 1 and Domestic Account 2.

609. By reason of the matters pleaded at paragraphs 607 and 608, CommBank contravened s 36(1) on and from 2 July 2014 with respect to Person 31.

Person 32

610. On or about 16 July 2014, CommBank provided a designated service to Person 32 by opening an account in the name of Person 32.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 32.

Person 32's occupation was recorded as 'unemployed'.

611. Between 28 July 2014 and 14 January 2015, 117 cash deposits totalling \$913,080 were made into CommBank Account 32 in the name of Person 32.

Particulars

Account statement for CommBank Account 32.

Schedule AE to the Statement of Claim.

112 deposits were made through CommBank IDMs.

78 IDM deposits were under \$10,000.

34 deposits made at IDMs of \$10,000.

5 deposits were made at CommBank branches.

4 branch deposits were under \$10,000.

612. Between 28 July 2014 and 22 December 2014, a total of \$908,924 was transferred from CommBank Account 32 in the name of Person 32 to 5 Australian based bank accounts.

Particulars

Account statement for CommBank Account 32.

Schedule AE to the Statement of Claim.

\$693,452 transferred to Domestic Account 1.

\$115,000 transferred to CommBank Account 33.

\$30,000 transferred to Domestic Account 2.

\$34,500 transferred to Domestic Account 3.

\$35,972 transferred to CommBank Account 34.

613. CommBank suspected that some of the cash deposits pleaded in paragraph 611 were structured contrary to s 142 of the Act.

Particulars

SMR 494648275 lodged on 13 October 2014.

SMR 518562841 lodged on 7 January 2015.

Transaction monitoring alerts TM-145773A, TM-151358A and TM-163298A.

614. By no later than 11 October 2014, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 32 in the name of Person 32.

Particulars

On 11 October 2014 an email was sent internally within Group Security headed 'Unre-registered Money Remitter' - recommending termination – '..as [Person 32's] account has received what appears to be intentionally structured cash deposits totalling \$486,700 within a three month period, the majority of which have been conducted in what appears to be a manner to avoid agents TTR requirements, followed by transfers [of \$485,600] to a high risk Money Remittance Business [the holder of Domestic Account 1] where the origin of funds is unknown, the activity is considered suspicious in nature'.

Previously, on 10 September 2014, transaction monitoring alert TM-145773A triggered for structured withdrawals on this account, but was not reviewed by the AML team until 13 October 2014.

615. By no later than 16 October 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 27 to 31 of Schedule AE may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 16 October 2014 transaction monitoring alert TM-151358A was considered by the AML Team who reviewed transactions on the account up until 16 October 2014 and reported that there was 'evidence of unregistered money remittance in account. Large cash deposits conducted via ATM followed by NetBank debits to [Domestic Account 1]. In line with group policy for termination' but that because 'the most recent SMR conducted on 13/10/2014 under TM-145773A, no further action required'.

616. By no later than 20 November 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 32 to 39 of Schedule AE to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 20 November 2014 transaction monitoring alert TM-152315A was reviewed by AML Team members, who reported that '...customer has been reported to AUSTRAC on 13/10/2014 under ref 14437707 (TM 145773A) and TERM-627C has also been initiated. A review into the account from date of last review under TM-151385A (16/10/2014) till 20/11/2014 revealed that the activity remains unchanged'.

617. By no later than 7 January 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 42, 43, 47 and 48 of Schedule AE to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

TM-162096A reviewed by the AML Team on 7 January 2015 and SMR 518562841 dated 7 January 2015 identifies that CommBank formed a suspicion about cash deposits into this account followed by transfers to multiple third parties.

618. By reason of the matters pleaded in paragraphs 615 to 617, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
619. By reason of the matters pleaded in paragraphs 615 and 618, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 16 October 2014, being 21 October 2014.
620. By reason of the matters pleaded in paragraphs 616 and 618, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 20 November 2014, being 25 November 2014.

621. By reason of the matters pleaded in paragraphs 617 and 618, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 7 January 2015, being 12 January 2015.
622. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 616 and 617 concerning the designated services identified at items 37, 42, 43, 47 and 48 of Schedule AE to the Statement of Claim.

Particulars

See SMR 518562841 dated 7 January 2015. Having formed a suspicion about cash deposits followed by transfers to multiple third parties, CommBank reported its suspicions with respect to transfers to Domestic Account 1, but did not report that funds were sent to the Domestic Account 2, Domestic Account 3, CommBank Account 34 or CommBank Account 33. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

\$215,472 transferred to third party accounts was not reported.

623. CommBank did not give the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 615, 616 and 617 concerning the designated services identified items 27 to 36 and items 38 to 39 of Schedule AE until 7 January 2015.

Particulars

SMR 518562841 dated 7 January 2015.

\$237,850 in cash deposits reported late and \$207,850 transferred to third party accounts reported late.

624. By reason of the matters pleaded at paragraphs 615 to 623, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

625. On and from 28 July 2014, CommBank did not monitor Person 32 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Although approximately \$170,050 had been deposited by way of structured cash deposits between 28 July 2014 and 10 September 2014, no transaction monitoring alerts were raised on this account until 10 September 2014.

Between 10 September 2014 and 22 December 2014, 7 automated transaction monitoring alerts were raised on this account. CommBank failed to review all but one of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

Throughout the period that the Person 32 account was open, CommBank was aware of suspicious cash activity involving Domestic Account 1. By July 2014 CommBank had approved termination of a CommBank account held by Domestic Account 1 for suspicious cash deposits predominantly through ATMs and due to suspicions it was operating an unregistered money service business.

On 11 October 2014 an email was sent internally within Group Security headed 'Unre-registered Money Remitter' - recommending termination – '...as [Person 32's] account has received what appears to be intentionally structured cash deposits totalling \$486,700 within a three month period, the majority of which have been conducted in what appears to be a manner to avoid agents TTR requirements, followed by transfers [of \$485,600] to a high risk Money Remittance Business [the holder of Domestic Account 1] where the origin of funds is unknown, the activity is considered suspicious in nature'.

Transaction monitoring alerts raised on 10 September 2014 and 16 September 2014 were not reviewed by the AML team until 13 October 2014 – respectively, TM-145773A for structured withdrawals (\$144,650 in 19 transactions on 1 and 10 September 2014) and TM-147015A for large aggregate cash transactions (\$157,960 on 10 and 16 September 2014).

Following review of these alerts, SMR 494648275 was lodged 13 October 2014 and the alerts were closed. The 13 October 2014 SMR reported suspicious activity totalling \$486,700, including transfers to Domestic Account 1 which was described as a high risk money remittance business. The activity was described as indicative of money laundering and avoiding reporting obligations.

On 16 October 2014 termination was initiated (TERM 627C) and approved by RBS in line with group guidelines on money service businesses. Notwithstanding this decision, the account was not closed until 14 August 2015.

On 16 October 2014 the AML Team reviewed transaction monitoring alert TM-151358A triggered on 13 October 2014 for structured withdrawals (\$198,500 in 22 transactions over 10 on 7 and 13 October 2014). The AML team noted 'evidence of unregistered remittance in account. Large cash deposits conducted via ATMs followed by netbank debits to Domestic Account 1. In line with group policy for termination'. The AML Team concluded that as 'the most recent SMR was conducted on 13 October 2014 ... no further action required'.

After the decision to terminate the account was made 16 October 2014, a further \$318,530 was deposited into the account and a further \$315,531 remitted to other domestic accounts. No customer due diligence was carried out until 7 January 2015.

A further alert was raised on 20 October 2014 (TM-152315A 152315A), but was not reviewed by the AML Team until 20 November

2014. Although ongoing suspicious activity was noted, no action was taken on the basis that termination action had been initiated.

No transaction monitoring alerts were raised between 20 October 2014 and 11 December 2014 in spite of similar ongoing cash activity.

Four further transaction monitoring alerts raised on 11, 17 and (two alerts on) 22 December 2014 were not reviewed by the AML Team until 7 January 2015 – respectively, TM-162096A for large aggregate cash transactions (\$70,530 on 10 and 11 December 2014); TM-163298A triggered for structured deposits across branches (\$40,000 at 3 branches in 6 transactions on 17 December 2014); TM-164132A for HRC high frequency deposits into HRC account; and TM-164378A for large aggregate cash transactions (\$185,530 on 10, 11, 17 and 22 December 2014).

Following review of these alerts, SMR 518562841 dated 7 January 2015 was lodged.

In a 7 January 2015 email from 'AML & Sanctions Operations, Financial Crime Services' to 'Group Security Customer Risk', it was noted 'I have just submitted another SMR on the above customer and noticed he has a termination in place, could this be looked at so we can start the termination process'.

It was not until 15 January 2015 that a letter was sent to the customer giving 30 days' notice of closure of the account.

CommBank did not place a stop on the account until 17 February 2015.

The account was not closed until 14 August 2015.

From 28 July 2014 to 14 January 2015 Person 32 deposited \$912,980 in 112 cash deposits and sent \$908,924 in 19 electronic transfers to 5 other Australian accounts, including to Domestic Account 1, Domestic Account 2, Domestic Account 3, CommBank Account 33, CommBank Account 34 and CommBank Account 87.

CommBank lodged 34 late TTRs totalling \$340,000 in respect of this customer.

626. On and from 13 October 2014, CommBank did not monitor Person 32 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act by no later than 13 October 2014 and having lodged an SMR with respect to Person 32, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 32.

Having formed a suspicion for the purposes of s 41 of the Act by no later than 7 January 2015 and having lodged an SMR with respect to

Person 32, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 32.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 32.

The account was not closed until 14 August 2015, in spite of termination being approved on 16 October 2014.

From 13 October 2014 to 14 January 2015 Person 32 made \$386,380 in cash deposits and transferred \$908,924 to Australian accounts, including to Domestic Account 1, CommBank Account 33, Domestic Account 2, Domestic Account 3 and CommBank Account 34.

627. By reason of the matters pleaded at paragraphs 625 and 626, CommBank contravened s 36(1) on and from 28 July 2014 with respect to Person 32.

Person 33

628. On or about 18 September 2014, CommBank provided a designated service to Person 33 by opening an account in the name of Person 33.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 35.

Person 33's occupation was recorded as 'unemployed' or 'international traveller'.

629. Between 26 September 2014 and 1 December 2014, 58 cash deposits totalling \$501,090 were made into CommBank Account 35 through CommBank IDMs in the name of Person 33.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 35.

Schedule AF to the Statement of Claim.

All deposits were made through CommBank IDMs.

24 IDM deposits were under \$10,000.

34 IDM deposits were of \$10,000.

630. Between 26 September 2014 and 1 December 2014 a total of \$501,095 was transferred from CommBank Account 35 in the name of Person 33 to 4 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

Account statement for CommBank Account 35.

Schedule AF to the Statement of Claim.

\$326,970 transferred to Domestic Account 1.

\$90,000 transferred to Domestic Account 2.

\$34,072 transferred to CommBank Account 36.

\$10,000 transferred to Domestic Account 4.

631. CommBank suspected that some of the cash deposits pleaded at paragraph 629 were structured contrary to s 142 of the Act.

Particulars

SMR 505723594 dated 24 November 2014.

24 IDM deposits were under \$10,000.

632. By no later than 24 November 2014, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 35 in the name of Person 33.

Particulars

SMR 505723594 dated 24 November 2014.

SMR 505723594 refers to 'unusually large cash transactions' with the offence type 'money laundering'.

CommBank statement for CommBank Account 35.

The failures to report suspicious matters for the purposes of s 41

633. By no later than 24 November 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 4, 7, 10, 14, 19, 23, 27, 28, 30 and 32 of Schedule AF to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 24 November 2014, the AML team reviewed all transactions on the account and identified suspicious activity indicative of money laundering up until this date – transaction monitoring alert (TM-150668A raised on 6 October 2014 for structured withdrawals, being \$129,800 in 13 transactions on 26 September and 6 October 2014).

SMR 505723594 was lodged on 24 November 2014.

634. By no later than 23 November 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 33 and 34 of Schedule AF to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 23 November 2015 the AFP emailed OPC Compliance, CommBank advising of an investigation into offences against s 307.1 of the *Criminal Code Act 1995* and seeking banking records into relation to Person 33

Previously, on 28 October 2015, the Group Security team reviewed the account and identified suspicious activity, noting it had since ceased – KYC-2638C.

- 635. By reason of the matters pleaded in paragraphs 633 and 634, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 636. By reason of the matters pleaded in paragraphs 633 and 635, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 24 November 2014, being 27 November 2014.
- 637. By reason of the matters pleaded in paragraphs 634 and 635, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 23 November 2015, being 26 November 2015.
- 638. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 633 and 634.

Particulars

SMR 505723594 dated 24 November 2014 did not report CommBank's suspicions with respect to the amounts that had been transferred to Domestic Accounts 1 and 2. Further, having formed a suspicion with respect to transfers to other accounts, CommBank did not correctly report all relevant payees of the transfers. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

\$467,020 in transfers to Australian bank accounts were not reported as at 24 November 2014.

CommBank did not report its suspicions with respect to transactions on and from 24 November 2014, including structured deposits totalling \$34,070 and a transfer of \$34,072 to an Australian bank account.

- 639. By reason of the matters pleaded at paragraphs 633 to 638, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 640. On and from 6 October 2014, CommBank did not monitor Person 33 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Two automated transaction monitoring alerts were raised on this account on 6 and 20 October 2014. CommBank failed to review the first alert in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. CommBank failed to review the second alert at all.

The first alert of 6 October 2014 (TM-150668A for structured withdrawals – \$129,800 in 13 transactions on 26 September and 6 October 2014) was not reviewed by the AML team until 24 November

2014. SMR 505723594 was lodged, the alert was closed and no customer due diligence was carried out.

On 20 October 2014 transaction monitoring alert TM-152294A was raised for structured withdrawals (\$245,290 in 28 transactions over 10 days – 7, 9, 13, 15 and 20 October 2014) but was never reviewed.

No further transaction monitoring alerts were raised after TM-152294A although the same suspicious activity was ongoing.

On 15 June 2015, 5 August 2015 and 28 September 2015 CommBank's Group Security wrote to the customer requesting identification details and employment details, but received no response. By this time, Person 33 was in gaol.

On 28 October 2015 Group Security reviewed the account noting (in KYC-2638C record) that 'based on the Group's guidance, Group Security will be conducting Enhanced Customer Due Diligence (ECDD) on CBA customers who have failed to respond to requests for further KYC Information for a third time. Based on the findings, the Group will decide on the final recommendation...review of the account found no suspicious account activity. The activity that triggered the SMR has since ceased. Outcome – customer deemed not a risk, no further action required'.

On 23 November 2015 the AFP emailed OPC Compliance, CommBank advising of an investigation into offences against s 307.1 of the *Criminal Code Act 1995* and seeking banking records into relation to Person 33.

On 25 November 2015 CommBank provided a bankers' affidavit to the AFP providing the requested information.

Notwithstanding the communications with the AFP, no due diligence was carried out with respect to Person 33.

A stop was not put on the account until 5 July 2016 and the account was not closed until 19 September 2016.

From 6 October 2014 to 1 December 2014 Person 33 made \$431,090 in cash deposits and sent \$431,092 to other Australian bank accounts.

CommBank lodged 34 late TTRs totalling \$340,000 in respect of this account.

641. On and from 24 November 2014, CommBank did not monitor Person 33 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and submitted an SMR on 24 November 2014 with respect to Person 33, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 33.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 33.

A stop was not put on the account until 5 July 2016 and the account was not closed until 19 September 2016.

From 25 November 2014 Person 33 deposited \$34,070 in 4 cash deposits and sent \$34,072 to an Australian account in the name of CommBank Account 36.

642. By reason of the matters pleaded at paragraphs 640 and 641, CommBank contravened s 36(1) on and from 6 October 2014 with respect to Person 33.

Other money laundering involving structured deposits through IDMs and suspicious beneficiary accounts in 2014

643. The Australian based bank accounts which received transfers of funds from the CommBank accounts held by Persons 31, 32, and 33 (see paragraphs 597 to 642 above) included Domestic Accounts 1 and 2 and CommBank Account 33.
644. On and from 7 July 2014, CommBank formed suspicions in relation to cash deposits into CommBank accounts followed by transfers to the holder of Domestic Account 1.

Particulars

Between 29 November 2013 and 5 July 2014, 29 transaction monitoring alerts were raised in CommBank's system in relation to the holder of Domestic Account 1.

On 7 July 2014, CommBank lodged SMR 469118023 in relation to Person 34 (see from paragraph 648 below). The SMR reported cash deposits followed by electronic debits to Domestic Account 1, indicative of money laundering.

Between 16 July 2014 and 22 July 2014, a further 7 transaction monitoring alerts were raised in relation to the holder of Domestic Account 1.

On 24 July 2014, a member of the AML Team emailed another member of the AML Team and recommended terminating CommBank Account 37 in the name of Person 34, noting funds had been transferred to Domestic Account 1. The recommendation noted that CommBank had recently terminated its relationship with the holder of Domestic Account 1 for being a 'registered MSB' and that this entity had been 'UNS listed' – see email between AML Team members dated 24 July 2014 at 12.59 pm.

Between 24 July 2014 and 28 July 2014, a further 2 transaction monitoring alerts were raised in relation to the holder of Domestic Account 1.

On 30 July 2014, CommBank lodged SMR 475489160 in relation to Person 31 (see from paragraph 597 above). The SMR reported cash deposits followed by transfers, predominantly to Domestic Account 1, indicative of money laundering.

Between 22 August 2014 and 8 October 2014, a further 36 transaction monitoring alerts were raised in relation to the holder of Domestic Account 1.

On 11 October 2014, the AML Team was notified that Person 32 (see from paragraph 610 above) had received large and structured cash deposits which were then transferred to Domestic Account 1 – see email from AML Team member to ‘GS AML’ dated 11 October 2014 at 11.20 am.

On 13 October 2014, CommBank lodged SMR 494648275 in relation to Person 32 (see from paragraph 610 above). The SMR reported cash deposits followed by electronic debits to Domestic Account 1, a ‘high risk money remittance business’, indicative of money laundering.

On 15 October 2014, a further 2 transaction monitoring alerts were raised in relation to the holder of Domestic Account 1.

On 18 October 2014, CommBank lodged SMR 496385443 in relation to Person 35 (see from paragraph 663 below). The SMR reported cash deposits followed by electronic debits to Domestic Account 1, indicative of money laundering.

On 21 October 2014, a further transaction monitoring alert was raised in relation to the holder of Domestic Account 1.

On 22 October 2014, CommBank lodged SMR 497548723 in relation to Person 31 (see above particular and from paragraph 597 above). The SMR reported cash deposits followed by transfers to Domestic Account 1, indicative of money laundering.

On 29 October 2014, a further 2 transaction monitoring alerts were raised in relation to the holder of Domestic Account 1.

On 24 November 2014, CommBank lodged SMR 505723594 in relation to Person 33 (see from paragraph 628 above). The SMR reported cash deposits through ATMs followed by transfers to Domestic Account 1, indicative of money laundering.

Also on 24 November 2014, CommBank lodged SMR 505722018 in relation to Person 36 (see from paragraph 676 below). The SMR reported cash deposits at ATMs following by debit transfers to Domestic Account 1, indicative of money laundering.

Between 12 December 2014 and 25 December 2014, a further 9 transaction monitoring alerts were raised in relation to the holder of Domestic Account 1.

Between 26 June 2014 and 22 October 2014, \$746,298 was transferred from CommBank Account 31 in the name of Person 31 to Domestic Account 1.

Between 29 July 2014 and 22 October 2014, \$673,452 was transferred from Person 32’s CommBank account to Domestic Account 1.

Between 25 September 2014 and 22 October 2014, \$367,023 was transferred from Person 33's CommBank account to Domestic Account 1.

Between 20 March 2014 and 2 October 2014, \$969,848 was transferred from Person 34's CommBank account to Domestic Account 1.

Between 16 September 2014 and 22 October 2014, \$476,560 was transferred from Person 35's CommBank account to Domestic Account 1.

Between 26 September 2014 and 22 October 2014, \$415,785 was transferred from Person 36's CommBank account to Domestic Account 1.

Overall, between 20 March 2014 and 22 October 2014, a total of \$4,016,418 was transferred from the accounts named in the above particulars to Domestic Account 1.

645. On and from 22 October 2014, CommBank formed suspicions in relation to cash deposits into CommBank accounts followed by transfers to Domestic Account 2, held with another financial institution.

Particulars

Between 13 February 2014 and 21 October 2014, 25 transaction monitoring alerts were raised in CommBank's system in relation to the holder of Domestic Account 2.

On 22 October 2014, CommBank lodged SMR 497548723 in relation to Person 31 (see from paragraph 597 above). The SMR reported cash deposits followed by transfers to an account in the name of the holder of Domestic Account 2, indicative of money laundering. As already noted, this SMR also mentioned transfers to the holder of Domestic Account 1 (see particulars to paragraph 644 above).

On 29 October 2014, a further 2 transaction monitoring alerts were raised in relation to the holder of Domestic Account 2.

On 24 November 2014, CommBank lodged SMR 505723594 in relation to Person 33 (see from paragraph 628 above). The SMR reported cash deposits through ATMs followed by transfers to an account in the name of the holder of Domestic Account 2, indicative of money laundering. As already noted, this SMR also mentioned transfers to the holder of Domestic Account 1 (see particulars to paragraph 644 above).

Also on 24 November 2014, CommBank lodged SMR 505722018 in relation to Person 36 (see from paragraph 676 below). The SMR reported cash deposits at ATMs followed by debit transfers to an account in the name of the holder of Domestic Account 2, indicative of money laundering. As already noted, this SMR also mentioned transfers to holder of Domestic Account 1 (see particulars to paragraph 644 above).

On 12 December 2014, a further 6 transaction monitoring alerts were raised in relation to the holder of Domestic Account 2.

On 21 October 2014, \$30,000 was transferred from CommBank Account 31 in the name of Person 31 to Domestic Account 2.

Between 21 October 2014 and 7 November 2014, \$90,000 was transferred from CommBank Account 35 in the name of Person 33 to Domestic Account 2.

Between 21 October 2014 and 7 November 2014, \$60,655.25 was transferred from CommBank Account 39 in the name of Person 36 to Domestic Account 2.

On 7 November 2014, \$9,050 was transferred from CommBank Account 41 in the name of Person 37 to Domestic Account 2.

Overall, between 21 October 2014 and 7 November 2014, a total of \$189,705.25 was transferred from the accounts named in the above particulars to Domestic Account 2.

646. On and from December 2014, CommBank formed suspicions in relation to cash deposits into CommBank accounts followed by transfers to CommBank Account 33.

Particulars

Between 6 December 2014 and 25 December 2014, 14 transaction monitoring alerts were raised in CommBank's system in relation to the holder of CommBank Account 33.

Between 17 December 2014 and 22 December 2014, \$115,000 was transferred from CommBank Account 32 in the name of Person 32 to CommBank Account 33.

On 17 December 2014, \$50,400 was transferred from CommBank Account 41 in the name of Person 37 to CommBank Account 33.

Overall, between 27 December 2014 and 22 December 2014, \$165,400 was transferred from the accounts named in the above particulars to CommBank Account 33.

647. Throughout 2014, transfers were made to Domestic Account 1, Domestic Account 2 and CommBank Account 33 from a number of other CommBank accounts (see paragraphs 648 to 703 below).

Person 34

648. On or about 11 February 2014, CommBank provided a designated service to Person 34 by opening an account in the name of Person 34.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 37.

Person 34's occupation was recorded as 'not employed'.

649. Between 20 March 2014 and 1 October 2014, 132 cash deposits totalling \$1,075,100 were made into CommBank Account 37 in the name of Person 34.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 37.

Schedule AG to the Statement of Claim.

94 IDM deposits totalling \$572,310.

66 IDM deposits were under \$10,000.

38 branch deposits totalling \$501,960.

20 branch deposits were under \$10,000.

650. Between 20 March 2014 and 2 October 2014 a total of \$969,847 was transferred from CommBank Account 37 in the name of Person 34 to an Australian based bank account.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

Account statement for CommBank Account 37.

Schedule AG to the Statement of Claim.

31 transfers totalling \$969,848 sent to Domestic Account 1.

651. CommBank suspected that the cash deposits at paragraph 650 were structured contrary to s 142 of the Act.

Particulars

TM-148550A.

66 IDM deposits were under \$10,000.

20 branch deposits were under \$10,000.

652. By no later than 7 July 2014, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 37 in the name of Person 34.

Particulars

SMR 469118023 dated 7 July 2014.

The SMR reported reason for suspicion as 'unusually large cash transaction' and offence type as 'money laundering'.

The failures to report suspicious matters for the purposes of s 41

653. By no later than 28 July 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 45 to 69 of Schedule AG to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 28 July 2014, Group Security's Business Unit reviewed this account and approved termination of the customer in line with Group guidelines on MSB's noting 'transactional activity indicates MSB behaviour. Funds are being sent to [the holder of Domestic Account 1], which was also terminated for MSB services which is now (UNS Listed)'.

654. By no later than 3 October 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 70 to 134 of Schedule AG to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

Emails of AFP to OPC Compliance, CommBank of 1 September 2014, 11 September 2014 and 3 October 2014.

Previously, on 1 September 2014 CommBank wrote to Person 34 to advise that the account would be closed on 1 October 2014.

By 3 October 2014, 7 automated transaction monitoring alerts had been raised on this account.

By 3 October 2014, 64 transaction monitoring alerts had triggered in respect of Domestic Account 1, including 7 STR alerts and 2 manual alerts.

655. By reason of the matters pleaded in paragraphs 653 and 654 s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
656. By reason of the matters pleaded in paragraphs 653 and 655, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 28 July 2014, being 31 July 2014.
657. By reason of the matters pleaded in paragraphs 654 and 655, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 3 October 2014, being 8 October 2014.
658. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 653 and 654.

Particulars

CommBank did not report its suspicions with respect to transactions which occurred between 7 July 2014 and 25 July 2014. \$91,600 in cash was deposited into this account and \$74,277 transferred to Domestic Account 1 in this period.

Further, CommBank's suspicions with respect to transactions on and from 25 July 2014 were never reported. \$373,605 in cash was deposited into this account and \$289,345 transferred to Domestic Account 1 on and from 25 July 2014.

A total of \$465,205 in suspicious cash deposits and \$363,622 in suspicious transfers were never reported.

659. By reason of the matters pleaded at paragraphs 653 to 658, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

660. On and from 20 March 2014, CommBank did not monitor Person 34 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 20 March 2014 and 21 June 2014, \$491,160 was deposited into this newly opened account, much of it structured. No transaction monitoring alerts were raised until 21 June 2014.

By 20 March 2014, 14 transaction monitoring alerts had triggered in respect of the holder of Domestic Account 1, including 5 STR alerts.

Between 21 June 2014 and 27 September 2014, 7 automated transaction monitoring alerts were raised on this account. CommBank failed to review all of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer.

Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

Three transaction monitoring alerts were reviewed by the AML Team on 7 July 2014 - TM-129864A raised on 21 June 2014 for cash deposits made by new customers (total deposits of \$148,420 on 16, 17, 18 and 20 June 2014); TM-131525A raised on 28 June 2014 for multiple TTRs reported; and TM-131573A for TTR cash activity over certain thresholds (total TTR deposit of \$210,575 over 10 days). SMR 469118023 was submitted on 7 July 2014, the alerts were closed and no customer due diligence was carried out.

On 24 July 2014 the AML Team recommended termination for 'cash in/cash out to [the holder of Domestic Account 1] a registered MSB with AUSTRAC and terminated CBA customer for unregistered MSB activity. 69 cash deposits predominantly through ATM' - (TERM 514C). Termination was approved by the RBS on 28 July 2014, but not actioned.

After termination of the account was approved on 28 July 2014, a further \$373,605 was deposited into the account and a further \$289,345 transferred to Domestic Account 1.

Transaction monitoring alerts continued to be raised.

On 26 July 2014 transaction monitoring alert TM-138867A was raised for cash deposits made by new customers (\$51,300 on 16, 18, 21 and 23 July 2014) but was not reviewed by the AML team until 23 August 2014. The AML team concluded 'Customer was reported under TM-129864A on 7/07/2014 for similar activity. Activity

continues and re-reporting not warranted'. The alert was closed, no SMR was lodged and no customer due diligence was carried out.

On 1 September 2014, 11 September 2014 and 3 October 2014 the AFP emailed CommBank requesting information in respect of this account. No customer due diligence was carried out in response to the contact by law enforcement.

Further alerts raised on 25 September 2014 and 27 September 2014 but were not reviewed by the AML Team until 29 October 2014, respectively, TM-148550A for structured withdrawals (\$112,450 in 12 transactions on 12, 17, 22 and 25 September 2014) and TM-148775A for cash activity involving 7 unique branches. The AML Team concluded 'The Group has made a commercial decision to terminate client banking relationship and managed under TERM-541C (conduct of unregistered MSB activity). Bank records indicate that the activity was recently reported to AUSTRAC on 7 July 2014 under ref 13478731. The accounts were subsequently closed on 3 and 21 Oct 2014. A transactional review of the account since last report to closure revealed the activity continues as recently reported. No further report completed'. The alert was closed and no SMR was lodged.

From 20 March 2014 to 1 October 2014 Person 34 deposited \$1,075,100 in 132 cash deposits and sent \$969,847 in 31 electronic transfers to Domestic Account 1.

It was not until 1 September 2014 that the bank wrote to Person 34 to advise that the account would be closed on 1 October 2014.

CommBank put a stop on the account on 3 October 2014, and the account was closed on 21 October 2014.

On and from 1 September 2014, being the date CommBank sent the letter to Person 34, he deposited a further \$328,495 in 35 cash deposits and sent \$248,305 in 10 electronic transfers to Domestic Account 1.

CommBank filed 29 late TTRs totalling \$290,000 in respect of this customer.

661. On and from 7 July 2014, CommBank did not monitor Person 34 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 7 July 2014 with respect to Person 34 rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 34.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 34.

The account was not closed until 21 October 2014, even though termination was approved on 28 July 2014.

From 7 July 2014 to 2 October 2014 Person 34 deposited \$465,205 in 65 cash deposits and transferred \$363,622 to Domestic Account 1.

662. By reason of the matters pleaded at paragraphs 660 and 661, CommBank contravened s 36(1) on and from 20 March 2014 with respect to Person 34.

Person 35

663. On or about 8 September 2014, CommBank provided a designated service to Person 35 by opening an account in the name of Person 35.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 38.

Person 35's occupation was recorded as 'overseas resident'.

664. Between 16 September 2014 and 5 November 2014, 70 cash deposits totalling \$643,340 were made into CommBank Account 38 in the name of Person 35.

Particulars

Account statement for CommBank Account 38.

Schedule AH to the Statement of Claim.

61 deposits were made through CommBank IDMs.

52 IDM deposits were under \$10,000.

9 deposits made at branches.

3 branch deposits were under \$10,000.

665. Between 16 September 2014 and 7 November 2014 a total of \$581,360 was transferred from CommBank Account 38 in the name of Person 35 to 3 Australian based bank accounts.

Particulars

Account statement for CommBank Account 38.

Schedule AH to the Statement of Claim.

\$476,560 was transferred to Domestic Account 1.

\$45,950 was transferred to Domestic Account 2.

\$58,850 transferred to Domestic Account 3.

666. CommBank suspected that some of the cash deposits pleaded at paragraph 664 were structured contrary to s 142 of the Act.

Particulars

SMR 496385443 dated 18 October 2014.

55 cash deposits were under \$10,000.

The structured cash deposits were made into CommBank Account 38 through CommBank IDMs, except for branch deposits at items 1, 2 and 6 of Schedule AH to the Statement of Claim.

667. By no later than 18 October 2014, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 38 in the name of Person 35.

Particulars

SMR 496385443 dated 18 October 2014.

This SMR reported suspicions with respect to transactions 'inconsistent with customer profile' with offence type 'money laundering'. The grounds for suspicion note '31 cash deposits ranging from \$100 to \$33,050 totalling \$349,300 at multiple branches and ATM's in VIC and NSW...predominantly 8 electronic debits ranging from \$4,120 to \$90,000 totalling \$336,363 to [Domestic Account 1] which is a money remitter – two electronic debits of \$38,850 and \$20,000 totalling \$58,850 on 4 October 2014 to [Domestic Account 3] bank records indicate [Person 35] is an overseas resident from Malaysia'.

The failures to report suspicious matters for the purposes of s 41

668. By no later than 24 November 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 27 to 41 of Schedule AH to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 24 November 2014 the AML Team reviewed TM-154419A and TM-153473A which were raised on 29 October 2014 for structured deposits across branches and structured withdrawals. The AML Team concluded 'SMR was submitted to AUSTRAC on 18 October 2014 ... for aggregate cash transaction activity where funds are then transferred to an MSB [money service business]. A transactional review ... from date of last report revealed the activity continues same/unchanged. No add value in re-report at this stage. Referral was sent to GS [Group Security] AML under TM 147242A for apparent unregistered MSB [money service business] activity. Await confirmation termination can proceed'.

669. By reason of the matters pleaded in paragraph 668, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
670. By reason of the matters pleaded in paragraphs 668 and 669, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 24 November 2014, being 27 November 2014.
671. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraph 668.

Particulars

CommBank's suspicions with respect to transactions on and from 18 October 2014 have never been reported.

\$243,150 in cash deposits and \$186,150 in transfers not reported.

672. By reason of the matters pleaded at paragraphs 668 to 671, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

673. On and from 17 September 2014, CommBank did not monitor Person 35 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 17 September 2014 and 5 November 2014, 6 automated transaction monitoring alerts were raised on this account. CommBank failed to review all of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer.

Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

It was not until 18 October 2014 that the first 4 transaction monitoring alerts were reviewed by the AML Team. By this time, \$348,900 in cash had been deposited into this account and \$395,210 remitted to other domestic accounts, including Domestic Account 1.

By 18 October 2014, 85 transaction monitoring alerts had triggered in respect of Domestic Account 1, including 7 STR alerts and 2 manual alerts. Previously, CommBank had decided to terminate its own relationship with the holder of Domestic Account 1 for suspicious cash activity.

On 18 October 2014 the AML Team reviewed the following 4 alerts - TM-147242A raised on 17 September 2014 for large aggregate cash deposits (\$52,340 on 8, 12, 16 and 17 September 2014); TM-148822A raised on 27 September 2014 for cash deposits by new customers (total deposits of \$134,380 on 16, 17, 22, 24, 26 September 2014); TM-151262A raised on 11 October 2014 for cash activity involving unique branches); and TM-151360A raised on 13 October 2014 for structured withdrawals (\$157,600 in 18 transactions on 3, 6 and 13 October 2014). SMR 496385443 was lodged on 18 October 2014 and the alerts closed.

On 20 October 2014 GS AML prepared a draft recommendation for termination due to 38 cash deposits totalling \$400,290 at multiple ATMs followed by 8 electronic debits totalling \$336,363 to Domestic Account 1; 2 transfers to Domestic Account 3, noting that this was a [new] customer visiting from Malaysia and not working. The draft recommendation noted: 'Discussions held with [Retail Banking Service], decision remains to not submit for termination as the

customer appears to have since ceased activity and this does not warrant termination’.

Notwithstanding the conclusion that the activity had ceased, two further transaction alerts were raised on 28 October 2014 and 5 November 2014, but not considered by the AML Team until 24 November 2014 – respectively, TM-153473A for structured withdrawals (\$174,600 in 21 transactions on 20, 22 and 28 October 2014) and TM-154419A for structured deposits across branches (\$32,950 at 3 branches over 4 transactions on 5 November 2014).

In reviewing the alerts, the AML Team noted that ‘SMR was submitted to AUSTRAC on 18 Oct 2014 ...for aggregate cash transaction activity where funds are then transferred to an MSB. A transactional review of account...held by [Person 35] from date of last report, revealed the activity continues same/unchanged. No value add in re-report at this stage.’ The alerts were closed, no SMR was lodged and no customer due diligence was carried out.

From 18 October 2014 to 6 November 2014 Person 35 deposited \$243,150 in 33 cash deposits and sent \$186,150 in 4 electronic transfers to Domestic Account 1 and Domestic Account 2.

On 1 May 2015, 13 July 2015 and 25 August 2015 CommBank sent letters to Person 35 requesting updated KYC details, but received no response.

The account was not stopped and closed until 19 September 2016.

674. On and from 18 October 2014, CommBank did not monitor Person 35 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 18 October 2014 with respect to Person 35, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 35.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 35.

Although the AML Team was proposing to recommend termination on 20 October 2014, the account was not stopped and closed until 19 September 2016.

From 18 October 2014 to 6 November 2014 Person 35 deposited \$243,150 in 33 cash deposits and sent \$186,150 in 4 electronic transfers to Domestic Account 1 and Domestic Account 2.

675. By reason of the matters pleaded at paragraphs 673 and 674, CommBank contravened s 36(1) on and from 17 September 2014 with respect to Person 35.

Person 36

676. On or about 18 September 2014, CommBank provided a designated service to Person 36 by opening an account in the name of Person 36.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 39.

Person 36's occupation was recorded as 'unemployed'.

677. Between 26 September 2014 and 3 December 2014, 69 cash deposits totalling \$556,440 were made into CommBank Account 39 in the name of Person 36.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 39.

Schedule AI to the Statement of Claim.

68 deposits were made through CommBank IDMs.

1 branch deposit.

56 IDM deposits were under \$10,000.

678. Between 26 September 2014 and 3 December 2014 a total of \$556,440 was transferred from CommBank Account 39 in the name of Person 36 to four Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

Account statement for CommBank Account 39.

Schedule AI to the Statement of Claim.

\$415,785 transferred to Domestic Account 1.

\$60,655.25 transferred to Domestic Account 2.

679. CommBank suspected that the cash deposits pleaded at paragraph 677 were structured contrary to s 142 of the Act.

Particulars

SMR 505722018 dated 24 November 2014.

TM-150666A and TM-152293A.

56 IDM deposits were under \$10,000.

The structured cash deposits were made into CommBank Account 39 through CommBank IDMs.

680. By no later than 24 November 2014, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 39 in the name of Person 36.

Particulars

SMR 505722018 dated 24 November 2014.

This SMR reported the reasons for suspicion as 'unusually large cash transaction' and the offence type as 'money laundering'.

The failures to report suspicious matters for the purposes of s 41

681. By no later than 24 November 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 5, 8, 11, 14, 15, 18, 22, 23, 25 and 28 of Schedule AI to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 24 November 2014 transaction monitoring alerts TM-150666A, TM-152293A and TM-154390A were reviewed by the AML Team. The AML Team reviewed transactional activity on the account from 18 September 2014 to 21 November 2014 and concluded that the aggregate cash deposits and third party transfers during this period were suspicious. SMR 505722018 was lodged and the suspicious activity was reported as being indicative of money laundering.

682. By no later than 28 September 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 29 and 30 of Schedule AI to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 28 September 2015, the Group Security team reviewed the account and identified suspicious activity on the account up until December 2014. See KYC-2637A.

683. By reason of the matters pleaded in paragraph 681 and 682, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
684. By reason of the matters pleaded in paragraph 681 and 683, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 24 November 2014, being 27 November 2014.
685. By reason of the matters pleaded in paragraphs 682 and 683, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 28 September 2015, being 1 October 2015.
686. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraphs 681 and 682.

Particulars

SMR 505722018 dated 24 November 2014 did not report CommBank's suspicions with respect to the amounts that had been transferred to Domestic Account 1 and Domestic Account 2 and did not report the transfers to CommBank Account 88 at all. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

CommBank's suspicions with respect to cash deposits on and from 24 November 2014 were never reported, including \$40,000 in cash deposits and \$40,000 transferred to CommBank Account 40.

A total of \$40,000 in cash deposits and \$556,440 in transfers to Australian bank accounts were never reported.

687. By reason of the matters pleaded at paragraphs 681 to 686, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

688. On and from 6 October 2014, CommBank did not monitor Person 36 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 6 October 2014 and 5 November 2014, 3 automated transaction monitoring alerts were raised on this account. CommBank failed to review all of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer.

Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

By 6 October 2014, 68 transaction monitoring alerts had triggered in respect of the holder of Domestic Account 1, including 7 STR alerts and 2 manual alerts. Previously, CommBank had decided to terminate its own relationship with the holder of Domestic Account 1 for suspicious cash activity.

By 6 October 2014, 17 transaction monitoring alerts had triggered in respect of Domestic Account 2.

The AML Team did not action the transaction monitoring alerts triggered on this account on 6 October 2014, 20 October 2014 and 5 November 2014 until 21 and 24 November 2014.

On 6 October 2014 transaction monitoring alert TM-150666A triggered for structured withdrawals on 26 September and 6 October 2014.

On 20 October 2014 transaction monitoring alert TM-152293A triggered for structured withdrawals in 33 transactions on 9, 13, 14 and 20 October 2014.

On 5 November 2014 transaction monitoring alert TM-154390A triggered for large aggregate cash deposits on 5 November 2014.

SMR 505722018 was lodged on 24 November 2014, the alerts were closed and no customer due diligence was carried out.

On 27 May 2015, 10 July 2015 and 28 July 2015 CommBank wrote to the customer attempting to collect further KYC details. There was no

response and the matter was escalated for ECDD on 28 September 2015, by which time the account had been dormant for over 9 months. The findings included 'the activity that triggered the SMR has since ceased...customer deemed not a risk, no further action required'.

The account was not stopped and closed until 19 September 2016.

From 6 October 2014 to 3 December 2014 Person 36 deposited \$506,440 in cash deposits and sent \$506,440 in electronic transfers, including to Domestic Account 1 and Domestic Account 2.

CommBank lodged 17 late TTRs totalling \$170,000 in respect of this customer.

689. On and from 24 November 2014, CommBank did not monitor Person 36 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 24 November 2014 with respect to Person 36, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 36.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 36.

CommBank did not stop and close the account until 19 September 2016.

From 24 November 2014 to 3 December 2014 Person 36 deposited \$40,000 in 5 cash deposits and sent \$40,000 in an electronic transfer to CommBank Account 40.

690. By reason of the matters pleaded at paragraphs 688 and 689, CommBank contravened s 36(1) on and from 6 October 2014 with respect to Person 36.

Person 37

691. On or about 17 October 2014, CommBank provided a designated service to Person 37 by opening an account in the name of Person 37.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 41.

Person 37's occupation was recorded as 'unemployed'.

692. Between 17 October 2014 and 22 December 2014, 26 deposits totalling \$149,420 were made into CommBank Account 41.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 41.

Schedule AJ to the Statement of Claim.

24 deposits were made through CommBank IDMs.

23 IDM deposits were under \$10,000.

2 branch deposits were under \$10,000.

693. Between 17 October 2014 and 22 December 2014, a total of \$149,500 was transferred from CommBank Account 41 to four Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank statement for CommBank Account 41.

Schedule AJ to the Statement of Claim.

1 electronic transfer of \$50,400 sent to CommBank Account 33.

1 electronic transfer of \$9,050 sent to Domestic Account 2.

1 electronic transfer of \$90,000 sent to CommBank Account 42.

694. CommBank suspected that some of the cash deposits pleaded at paragraph 692 were structured contrary to s 142 of the Act.

Particulars

SMR 534259210 dated 9 March 2015.

23 IDM deposits were under \$10,000.

2 branch deposits were under \$10,000.

On 17 December 2014 TM-163031A STR raised by CommBank staff for 'seven cash deposits under \$10,000 made. Funds are then transferred to a 3rd party account. Person is a young Malaysian resident'. STR was not reviewed by the AML team until 9 March 2015 and SMR subsequently submitted.

The structured cash deposits were made into CommBank Account 41 through CommBank IDMs, except for two branch deposits at items 1 and 8 of Schedule AJ to the Statement of Claim.

695. By no later than 17 December 2014, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 41 in the name of Person 37.

Particulars

TM-163031A STR raised on 17 December 2014 by CommBank staff for 'seven cash deposits under \$10,000 made. Funds are then transferred to a 3rd party account. Person is a young Malaysian resident'. STR was not reviewed by AML team in TM-163031A until 9 March 2015 and SMR subsequently submitted.

SMR 534259210 dated 9 March 2015.

SMR 534259210 notes deposits appear 'to be [sic] an intentionally structured manner to avoid threshold transaction report limits'.

The failures to report suspicious matters for the purposes of s 41

696. By no later than 9 March 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 8 of Schedule AJ to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 9 March 2015 the AML Team reviewed TM-163031A, a manual alert or STR that was raised on 17 December 2014 by CommBank staff for 'seven cash deposits under \$10,000 made. Funds are then transferred to a 3rd party account. Person is a young Malaysian resident'. The AML Team reviewed transactions on the account from 9 March 2014 to 9 March 2015 and identified structured deposits followed by transfers - SMR 534259210 dated 9 March 2015.

By 17 December 2014, 33 transaction monitoring alerts had triggered in respect of the holder of Domestic Account 2.

697. By reason of the matters pleaded in paragraph 696, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
698. By reason of the matters pleaded in paragraphs 696 and 697, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 9 March 2015, being 12 March 2015.
699. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 696.

Particulars

SMR 534259210 dated 9 March 2015 did not report CommBank's suspicions with respect to the transfer of \$9,050 to Domestic Account 2.

700. By reason of the matters pleaded at paragraphs 696 to 699, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

701. On and from 17 December 2014, CommBank did not monitor Person 37 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 17 December 2014 TM-163031A STR was raised by CommBank staff for 'seven cash deposits under \$10,000 made. Funds are then transferred to a 3rd party account. Person is a young Malaysian resident'. The STR was not reviewed by AML team in TM-163031A until 9 March 2015 and an SMR subsequently submitted. CommBank failed to review the STR in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer.

No automated transaction monitoring alerts were raised on this account although from 17 December 2014 to 22 December 2014, 19 cash deposits under \$10,000, totalling \$134,400, were made into this account.

On 22 October 2014 SMR 497548723 in respect of Person 31 was lodged. This SMR reported suspicious activity with funds predominantly being transferred to Domestic Account 2.

On 24 November 2014 SMR 505723594 was lodged in respect of Person 35. This SMR reported suspicious activity with funds predominantly being transferred to Domestic Account 2.

On 24 November 2014 SMR 505722018 was lodged in respect of Person 39. This SMR reported suspicious activity with funds predominantly being transferred to Domestic Account 2.

By 17 December 2014, 33 transaction monitoring alerts had triggered in respect of the holder of Domestic Account 2.

By 17 December 2014, 7 transaction monitoring alerts had triggered in respect of the holder of CommBank Account 33.

From 17 December 2014 to 22 December 2014, Person 37 deposited \$84,400 in cash and sent \$90,000 to another Australian account.

The account was not stopped and closed until 19 September 2016.

702. On and from 9 March 2015, CommBank did not monitor Person 37 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 9 March 2015 with respect to Person 37, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 37.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 37.

CommBank did not close this account until 19 September 2016.

703. By reason of the matters pleaded at paragraphs 701 and 702, CommBank contravened s 36(1) on and from 17 December 2014, with respect to Person 37.

Other money laundering involving structured deposits through IDMs and suspicious beneficiary accounts in 2015

704. Noting the matters pleaded and particularised at paragraphs 643 and 646 above, in 2015, CommBank continued to form suspicions in relation to cash deposits into CommBank accounts followed by transfers to CommBank Account 33.

Particulars

On 9 March 2015, CommBank lodged SMR 534259210 in relation to Person 37 (see from paragraph 691 above). The SMR reported

structured cash deposits followed by transfers to the holder of CommBank Account 33, indicative of money laundering.

Between 28 August 2015 and 12 September 2015, a further 4 transaction monitoring alerts were raised in CommBank's system in relation to the holder of CommBank Account 33.

On 14 September 2015, CommBank lodged SMR 584254151 in relation to Person 39 (see from paragraph 715 below). The SMR reported cash deposits followed by a transfer to CommBank Account 33, indicative of money laundering. The SMR further noted a concern that '[Person 39] may be linked to a sophisticated syndicate'. Activity was deemed 'highly suspicious with structured cash activity and rapid movement of funds'.

Between 22 September 2015 and 26 September 2015, a further 9 transaction monitoring alerts were raised in relation to the holder of CommBank Account 33.

On 29 October 2015, the AML team recommended termination of CommBank Account 45 in the name of Person 41 in relation to intense structured cash deposits followed by transfers to multiple accounts including CommBank Account 33. It was noted that Person 41 was being referred for termination in connection with 'Syndicate 3' – see email from AML Team member to 'GS AML' dated 29 October 2015 at 3.53pm.

Between 14 October 2015 and 21 October 2015, a further 20 transaction monitoring alerts were raised in relation to the holder of CommBank Account 33.

On 30 October 2015, CommBank lodged SMR 596583270 in relation to Person 41 (see from paragraph 730 below). The SMR reported intense structured deposits followed by transfers to various accounts including CommBank Account 33. The SMR further noted a concern that Person 41 may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs.

Between 1 November 2015 and 10 November 2015, a further 3 transaction monitoring alerts were raised in relation to CommBank Account 33.

On 11 November 2015, the AML team recommended termination of CommBank Account 47 in the name of Person 42 in relation to intense structured cash deposits followed by transfers to multiple accounts including CommBank Account 33. It was noted Person 42 may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs – see email from AML Team member to 'GS AML' dated 11 November 2015 at 9.11am.

On 11 November 2015, CommBank lodged SMR 600046007 in relation to Person 42 (see from paragraph 745 below). The SMR

reported structured cash deposits followed by transfers to various accounts including CommBank Account 33. The SMR further noted a concern that Person 42 may be linked to a sophisticated money laundering syndicate.

On 20 November 2015, CommBank lodged SMR 602356254 in relation to Person 43 (see from paragraph 758 below). The SMR reported cash deposits followed by transfers to various accounts including CommBank Account 33. The SMR further noted a concern that Person 43 may be linked to a sophisticated money laundering syndicate.

Between 11 September 2015 and 19 October 2015, \$91,000 was transferred from CommBank Account 44 in the name of Person 39 to CommBank Account 33.

On 19 October 2015, \$21,780 was transferred from CommBank Account 49 in the name of Person 43 to CommBank Account 33.

On 19 October 2015, \$42,840 was transferred from CommBank Account 47 in the name of Person 42 to CommBank Account 33.

On 19 October 2015, \$43,590 was transferred from CommBank Account 45 in the name of Person 41 to CommBank Account 33.

Overall, between 11 September 2015 and 19 October 2015, a total of \$199,210 was transferred from the accounts named in the above particulars to CommBank Account 33.

705. On and from 10 July 2015, CommBank formed suspicions in relation to cash deposits into CommBank accounts followed by transfers to Domestic Account 5 held with another financial institution.

Particulars

Between 16 May 2015 and 5 July 2015, 40 transaction monitoring alerts were raised in CommBank's system in relation to the holder of Domestic Account 5.

On 10 July 2015, CommBank lodged SMR 566752229 in relation to Company 5 (see from paragraph 839 below, regarding this account's connection with Syndicate No 4). The SMR reported cash deposits followed by transfers to multiple third parties including the holder of Domestic Account 5.

Between 11 July 2015 and 8 August 2015, a further 25 transaction monitoring alerts were raised in relation to the holder of Domestic Account 5.

On 10 August 2015, the AML Team connected a single individual with both the holder of Domestic Account 5 and the holder of Domestic Account 16, noting remittance activity associated with the holder of Domestic Account 5. The AML Team suggested that an 'Unregistered MSB template be prepared so we can see if [the individual connected to the holder of Domestic Account 5 and the holder of Domestic

Account 16] can be terminated' – see email between AML Team members dated 10 August 2015 at 12.35 pm.

Between 13 August 2015 and 14 September 2015, a further 32 transaction monitoring alerts were raised in relation to the holder of Domestic Account 5.

On 18 September 2015, CommBank lodged SMR 585381580 in relation to Company 5 (see from paragraph 839 below, regarding this account's connection with Syndicate No 4). The SMR reported continued cash deposits followed by multiple large domestic transfers to several accounts including Domestic Account 5, indicative of money laundering.

On 18 September 2015, the AML Team referred an account for termination. The AML Team noted that this account had received structured cash deposits followed by transfers to Domestic Account 5, with the description '[the holder of Domestic Account 1]'. It was noted that Domestic Account 1 was a registered money remittance business in Ashfield NSW (see the matters pleaded and particularised at paragraph 643 above) – see email between AML Team members dated 18 September 2015 at 10.23am.

Between 18 September 2015 and 12 October 2015, a further 18 transaction monitoring alerts were raised in relation to the holder of Domestic Account 5.

On 13 October 2015, CommBank lodged SMR 591720317 in relation to Company 9 (see from paragraph 926 below, regarding this account's connection with Syndicate No 4). The SMR reported multiple large cash transactions followed by debit transfers to the holder of Domestic Account 5, indicative of money laundering.

Between 14 October 2015 and 28 October 2015, a further 27 transaction monitoring alerts were raised in relation to the holder of Domestic Account 5.

On 29 October 2015, the AML team recommended termination of CommBank Account 45 in the name of Person 41 in relation to intense structured cash deposits followed by transfers to multiple accounts. It was noted that Person 41 was being referred for termination in connection with 'Syndicate 3', which involved an 'MO with transactions to the same [Domestic Bank 2] account under [the holder of Domestic Account 5]' – see email from AML Team member to GS AML dated 29 October 2015 at 3.53pm.

On 30 October 2015, CommBank lodged SMR 596583270 in relation to Person 41 (see from paragraph 730 below). The SMR reported intense structured deposits followed by transfers to various accounts including Domestic Account 5. The SMR further noted a concern that Person 41 may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs.

On 1 November 2015, a further 2 transaction monitoring alerts were raised in relation to the holder of Domestic Account 5.

On 4 November 2015, the AML team recommended a customer identified as part of 'syndicate three' for SMR consideration, noting that transactions went to a Domestic Bank 2 account with description '[the holder of Domestic Account 5]'. Background regarding '[the holder of Domestic Account 5]' was requested, although it was noted that there was 'no rush' in relation to this issue – see emails between AML Team members dated 4 November 2015 at 10.44am and 3.22pm.

On 5 November 2015, a further transaction monitoring alert was raised in relation to Domestic Account 5.

On 11 November 2015, the AML team recommended termination of CommBank Account 47 in the name of Person 42 in relation to intense structured cash deposits followed by transfers to multiple accounts including Domestic Account 5. It was noted Person 42 may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs – see email from AML Team member to GS AML dated 11 November 2015 at 9.11am.

On 11 November 2015, CommBank lodged SMR 600046007 in relation to Person 42 (see from paragraph 745 below). The SMR reported structured cash deposits followed by transfers to various accounts including Domestic Account 5. The SMR further noted a concern that Person 42 may be linked to a sophisticated money laundering syndicate.

On 14 November 2015, a further 2 transaction monitoring alerts were raised in relation to the holder of Domestic Account 5.

On 19 November 2015, CommBank lodged SMR 602069181 in relation to Company 8 (see from paragraph 909 below, regarding this account's connection with Syndicate No 4). The SMR reported aggregate high value cash deposits followed by multiple rapid electronic debit movements to several parties, including the holder of Domestic Account 5.

On 20 November 2015, CommBank lodged SMR 602356254 in relation to Person 43 (see from paragraph 758 below). The SMR reported cash deposits followed by transfers to various parties including the holder of Domestic Account 5. The SMR further noted a concern that Person 43 may be linked to a sophisticated money laundering syndicate.

On 25 November 2015, a further 2 transaction monitoring alerts were raised in relation to the holder of Domestic Account 5.

Between 14 September 2015 and 12 October 2015, \$228,756 was transferred from CommBank Account 44 in the name of Person 39 to Domestic Account 5.

Between 8 October 2015 and 13 October 2015, \$64,285 was transferred from CommBank Account 47 in the name of Person 42 to Domestic Account 5.

Between 13 October 2015 and 13 November 2015, \$221,123 was transferred from CommBank Account 45 in the name of Person 41 to Domestic Account 5.

On 27 October 2015, \$91,755 was transferred from CommBank Account 49 in the name of Person 43 to Domestic Account 5.

Overall, between 14 September 2015 and 27 October 2015, a total of \$605,919 was transferred from the accounts named in the above particulars to Domestic Account 5.

- 706. Throughout 2015, transfers to the holders of CommBank Account 33 and Domestic Account 5 were made from a number of CommBank accounts (see paragraphs 708 to 770 below).
- 707. On and from 14 September 2015, CommBank was forming suspicions about sophisticated money laundering syndicates that were opening bank accounts with Malaysian passports and laundering funds by structuring cash deposits at ATMs.

Particulars

By 14 September 2015, CommBank had identified a 'sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs' - see SMR 584254151 dated 14 September 2015 relating to Person 39.

By 28 October 2015, Group Security had identified that Person 41 may be connected with money laundering 'Syndicate 3' – see internal Group Security email from Intelligence Analyst, Group Security, Financial Services to AML Team with the subject line 'SMR Referral – Syndicate 3'.

On 30 October 2015, CommBank lodged SMR 596583270 in relation to Person 41. The SMR reported intense structured deposits followed by transfers to various accounts. The SMR further noted a concern that Person 41 may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs.

On 10 November 2015 an STR was raised in relation to Person 42 by an Intelligence Analyst, and forwarded to 'GS AML' by email copied to other AML Team members with suspicion identity details described as 'IDM cash deposits consistent with syndicate three – Money laundering though the Group's IDMs'. STR also notes 'Multiple cash deposits made through Group IDMs totalling approximately AUD\$210,000 with links to known money laundering syndicate members. Transactions made to known [Domestic Bank 2] accounts with description [the holder of Domestic Account 5], CBA accounts INO [the holder of CommBank Account 33]'.

On 11 November 2015, CommBank lodged SMR 600046007 in relation to Person 42. The SMR reported cash deposits followed by

multiple third party transfers. The SMR further noted a concern that Person 42 may be linked to a sophisticated money laundering syndicate.

On 18 November 2015 an STR was raised in relation to Person 43 by an Intelligence Analyst, and forwarded to GS AML by email and copied to other AML Team members with suspicion identity details described as 'IDM cash deposits consistent with syndicate three – Money laundering through the Group's IDMs'. STR also notes 'Multiple cash deposits made through Group IDMs totalling approximately AUD\$322,685 with links to known money laundering syndicates. Transactions made to known [Domestic Bank 2] accounts with description [the holder of Domestic Account 5]'.

On 20 November 2015, CommBank lodged SMR 602356254 in relation to Person 43. The SMR reported cash deposits followed by multiple third party transfers. The SMR noted a concern that Person 43 may be linked to a sophisticated money laundering syndicate.

Person 38

708. On or about 30 December 2014, CommBank provided a designated service to Person 38 by opening an account in the name of Person 38.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 43.

Person 38's occupation was recorded as 'unemployed'.

709. Between 8 January 2015 and 17 February 2015, 23 cash deposits totalling \$179,940 were made into CommBank Account 43 in the name of Person 38.

Particulars

Account statement of CommBank Account 43.

Schedule AK to the Statement of Claim.

21 cash deposits made through CommBank IDMs.

9 IDM deposits were under \$10,000.

2 deposits at branches.

1 branch deposit was under \$10,000.

710. Between 8 January 2015 and 17 February 2015, a total of \$197,240 was transferred from CommBank Account 43 in the name of Person 38 to 3 Australian based bank accounts.

Particulars

Account statement for CommBank Account 43.

Items 3, 7, 12 and 15, Schedule AK to the Statement of Claim.

\$50,000 transferred to Domestic Account 3.

\$100,000 transferred to CommBank Account 92.

\$47,240 transferred to Domestic Account 9.

711. CommBank suspected that the cash deposits pleaded at paragraph 709 were structured contrary to s 142 of the Act.

Particulars

SMR 552695012 dated 19 May 2015 and TM-173721A.

SMR 552695012 dated 19 May 2015 reports the reasons for suspicion as 'unusually large cash transaction' and 'unusual account activity' and the offence type as 'money laundering'.

9 IDM deposits were under \$10,000.

1 branch deposit was under \$10,000.

The failure to carry out ongoing customer due diligence contrary to section 36

712. On and from 9 February 2015, CommBank did not monitor Person 38 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Automated transaction monitoring alerts were raised on this account on 9 and 21 February 2015. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

On 9 February 2015 transaction monitoring alert TM-173721A triggered for structured deposits across branches but was not reviewed by the AML team until 19 May 2015.

On 21 February 2015 transaction monitoring alert TM-175643A triggered for cash deposits made by new customers but was not reviewed by the AML team until 19 May 2015.

A stop was put on the account on 3 August 2016 with the reason recorded as 'large IDM cash deposits'.

The account was not closed until 10 August 2016.

CommBank lodged 12 late TTRs for this account totalling \$120,000.

713. On and from 19 May 2015, CommBank did not monitor Person 38 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

The s 41 suspicion was formed on 19 May 2015 – see TM-173721A and TM-175643A.

Having formed a s 41 suspicion and having submitted an SMR on 19 May 2015 with respect to Person 38, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 38.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 38.

CommBank did not put a stop on the account until 3 August 2016, and the account was not closed until 10 August 2016.

714. By reason of the matters pleaded at paragraphs 712 and 713, CommBank contravened s 36(1) on and from 9 February 2015, with respect to Person 38.

Person 39

715. On or about 31 August 2015, CommBank provided a designated service to Person 39 by opening an account in the name of Person 39.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 44.

Person 39's occupation was recorded as 'unemployed'.

716. Between 31 August 2015 and 4 November 2015, 57 cash deposits totalling \$418,750 were made into CommBank Account 44 in the name of Person 39.

Particulars

Account statement for CommBank Account 44.

Schedule AL to the Statement of Claim.

56 deposits were under \$10,000.

717. Between 11 September 2015 and 2 November 2015 a total of \$418,216 was transferred from CommBank Account 44 in the name of Person 39 to 5 Australian based bank accounts.

Particulars

Account statement for CommBank Account 44.

Items 3, 5, 7, 9, 13, 16, 20, 25 and 26, Schedule AL to the Statement of Claim.

\$91,000 was transferred to CommBank Account 33.

\$228,756 was transferred to Domestic Account 5.

718. CommBank suspected that the cash deposits pleaded at paragraph 716 were structured contrary to s 142 of the Act.

Particulars

SMR 584254151 dated 14 September 2015 lodged in respect of Person 39, Person 40 and the holder of CommBank Account 33.

54 IDM deposits were under \$10,000.

2 branch deposits under \$10,000.

SMR 594682911 dated 23 October 2015.

See also TM-227746A.

719. By no later than 14 September 2015, CommBank was aware of highly suspicious patterns of transactions on CommBank Account 44 in the name of Person 39.

Particulars

SMR 584254151 dated 14 September 2015, which reported that 'customer holds a Malaysian passport and is settling in Australia. [The holder of CommBank Account 33] identifies themselves as an import/export company with [Person 40] being the sole director. CBA has concerns Person 39 may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs...In conclusion, activity is deemed highly suspicious with structured cash activity and rapid movement of funds'. The activity was reported as being indicative of money laundering, avoiding reporting obligations, and currency not declared at border.

The failures to report suspicious matters for the purposes of s 41

720. By no later than 23 October 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 4 to 13, 16 and 18 to 20 of Schedule AL to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 594682911 dated 23 October 2015.

Four transaction monitoring alerts were reviewed by the AML Team on 23 October 2015, being TM-226959A (for large cash deposits on 11, 14, 21 and 23 September 2015); TM-227058A (for high frequency deposits on 11, 14, 21 and 23 September 2015); TM-227746A (for 8 structured deposits on 26 September 2015) and TM-232268A (for large aggregate deposits between 12 and 15 October 2015).

SMR 594682911 dated 23 October 2015 reported 8 structured deposits between 11 and 15 October 2015 and noted that 'the structured cash deposits have continued since date of last report (14 Sep 2015) and are intensifying. Further review found following the cash deposits [Person 39] subsequently conducts account transfers to multiple CBA third party accounts in addition to [Domestic Account 5]. As [Person 39] continues to receive high volume structured cash deposits, followed by rapid movement of funds, the activity is deemed highly suspicious'.

721. By no later than 18 May 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 21 to 27 of Schedule

AL to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

A stop was placed on account on 18 May 2016 for 'links to known Money Laundering Malaysian Syndicate – Structured IDM cash deposits'.

- 722. By reason of the matters pleaded in paragraphs 720 and 721, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 723. By reason of the matters pleaded in paragraphs 720 and 722, s41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 23 October 2015, being 28 October 2015.
- 724. By reason of the matters pleaded in paragraphs 721 and 722, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 18 May 2016, being 23 May 2016.
- 725. At no time has CommBank given the AUSTRAC CEO an SMR in respect of matters pleaded at paragraphs 720 and 721 concerning the designated services at items 4 to 13, 16 and 18 to 27 of Schedule AL to the Statement of Claim.

Particulars

SMR 584254151 dated 14 September 2015 reported 7 structured deposits through IDMs into this account totalling \$54,000 followed by a \$54,000 transfer to CommBank Account 33.

Whilst the SMR 594682911 dated 23 October 2015 noted that structured cash deposits had continued and intensified since 14 September 2015, CommBank only fully reported its suspicions with respect to 8 cash deposits between 11 and 15 October 2015 totalling \$54,000. Whilst this SMR also noted transfers to the holder of Domestic Account 5, it did not report any detail on the amount of funds that had been transferred to this account, nor did it identify any other payees of transfers. The report did not contain the information specified in rules 18.2(19) 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

CommBank did not report its suspicions with respect to transactions on and from 24 October 2015.

CommBank did not report a total of \$310,700 in cash deposits and \$364,216 in transfers to Australian bank accounts, including Domestic Account 5 and CommBank Account 33.

- 726. By reason of the matters pleaded at paragraphs 720 to 725, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 727. On and from 14 September 2015, CommBank did not monitor Person 39 in relation to the provision of designated services on and from 14 September 2015 with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 11 September 2015 and 15 October 2015, 5 automated transaction monitoring alerts were raised on this account. CommBank failed to review all of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer.

Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

By no later than 14 September 2015 CommBank had formed 'concerns that [Person 39] may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs' and yet it permitted Person 39 to keep laundering money until 4 November 2015 – see SMR 584254151 dated 14 September 2015 and transaction monitoring alert TM-224458A triggered on 11 September 2015 for large aggregate cash deposits (\$54,050 on 31 August 2015 and 11 September 2015).

On lodging SMR 584254151, TM-224458A was closed and no customer due diligence was carried out.

By 14 September 2015, 18 transaction monitoring alerts had triggered in respect of the holder of CommBank Account 33, including 2 STR alerts.

Also by 14 September 2015, 98 transaction monitoring alerts had triggered in respect of the holder of Domestic Account 5, including 5 STR alerts.

Four further transaction monitoring alerts were raised on this account – two on 23 September 2015, one on 28 September 2015 and one on 15 October 2015, but were not reviewed by the AML Team until 22 and 23 October 2015.

Respectively, these alerts were TM-226959A for large aggregate cash deposits (\$187,200 on 11, 14, 21 and 23 September 2015); TM-227058A for HRC high frequency deposits into HRC (\$187,200 on 25 counts on 11, 14, 21 and 23 September 2015); TM-227746A for structured deposits across branches (\$60,000 at 3 branches over 8 transactions on 28 September 2015); and TM-232268A for large aggregate cash deposits (\$54,000 on 12 and 15 October 2015).

Following review of these alerts SMR 594682911 was lodged on 23 October 2015 notes 'the structured cash deposits have continued since date of last report (14 Sep 2015) and are intensifying. Further review found following the cash deposits [Person 39] subsequently conducts account transfers to multiple CBA third party accounts in addition to [Domestic Account 5]. As [Person 39] continues to receive high volume structured cash deposits, followed by rapid movement of funds, the activity is deemed highly suspicious'.

On lodging SMR 594682911, TM-224458A was closed and no customer due diligence was carried out.

No further transaction monitoring alerts were raised on this account after 15 October 2015.

On and from 30 October 2015, CommBank had identified a number of other accounts apparently connected to sophisticated money laundering syndicates using Malaysian passports, along with structured deposits at IDMs – see SMR 596583270 dated 30 October 2015 in relation to Person 41, SMR 600046007 dated 11 November 2015 in relation to Person 42 and SMR 602356254 dated 20 November 2015 relating to Person 43. This did not prompt CommBank to carry out any customer due diligence with respect to Person 39.

It was not until 18 May 2016 that a stop was placed on account for 'links to known Money Laundering Malaysian Syndicate – Structured IDM cash deposits'.

The account was not closed until 10 August 2016.

From 14 September 2015 to 4 November 2015 Person 39 deposited \$364,700 in 49 cash deposits and sent \$364,216 in 8 electronic transfers to 5 Australian bank accounts, including to CommBank Account 33 and Domestic Account 5.

728. On and from 14 September 2015, CommBank did not monitor Person 39 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion and having submitted an SMR on 14 September 2015 with respect to Person 39, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 39.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 39.

On 18 May 2016 a stop was placed on account for 'links to known Money Laundering Malaysian Syndicate – Structured IDM cash deposits'.

The account was not closed until 10 August 2016.

From 14 September 2015 to 4 November 2015 Person 39 deposited \$364,700 in 49 cash deposits and sent \$364,216 in 8 electronic transfers to 5 Australian bank accounts, including to CommBank Account 33 and Domestic Account 5.

729. By reason of the matters pleaded at paragraphs 727 and 728, CommBank contravened s 36(1) on and from 14 September 2015 with respect to Person 39.

Person 41

730. On or about 6 October 2015, CommBank provided a designated service to Person 41 by opening an account in the name of Person 41.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 45.

Person 41's occupation was recorded as 'unemployed'.

731. Between 6 October 2015 and 28 November 2015, 54 cash deposits totalling \$417,050 were made into CommBank Account 45 in the name of Person 41.

Particulars

Account statement for CommBank Account 45.

Schedule AM to the Statement of Claim.

52 deposits made through CommBank IDMS were under \$10,000.

2 deposits made at branches.

1 branch deposit was under \$10,000.

732. Between 9 October 2015 and 30 November 2015 a total of \$417,020 was transferred from CommBank Account 45 in the name of Person 41 to 5 Australian based bank accounts.

Particulars

Account statement for CommBank Account 45.

Schedule AM to the Statement of Claim.

\$221,123 transferred to Domestic Account 5.

\$43,590 transferred to CommBank Account 33.

\$52,807 transferred to CommBank Account 46.

733. CommBank suspected that the cash deposits pleaded at paragraph 731 were structured contrary to s 142 of the Act.

Particulars

SMR 596583270 dated 30 October 2015.

52 deposits made through CommBank IDMS were under \$10,000.

1 branch deposit was under \$10,000.

734. By no later than 30 October 2015, CommBank was aware of suspicious patterns of transactions on CommBank Account 45 in the name of Person 41.

Particulars

SMR 596583270 dated 30 October 2015 which reported intense structured deposits followed by transfers to various accounts and that 'CBA has concerns Person 41 may be linked to a sophisticated

syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs'.

This SMR recorded the reasons for suspicion as 'avoiding reporting obligations' and offence type as 'money laundering'.

The failures to report suspicious matters for the purposes of s 41

735. By no later than 30 October 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 5, 7, 8, 10, 15 to 17 and in relation to some of the designated services at items 6, 9, 12, 13 and 14 of Schedule AM to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

See SMR 596583270 dated 30 October 2015 in respect of Person 41 and the holder of CommBank Account 33. This SMR notes 'CBA has concerns [Person 41] may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs'.

See also transaction monitoring alerts TM-231653A, TM-233391A and TM-234001A reviewed by the AML team on 30 October 2015.

See also Group Security emails of 28 and 29 October 2015 (particularised further below).

736. By no later than 25 January 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 18 and 19 of Schedule AM to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 596583270 dated 30 October 2015 and SMR 621186098 dated 25 January 2016.

Transaction monitoring alerts TM-238678A and TM-242142A were reviewed by the AML Team on 22 and 25 January 2016. The AML Team identified ongoing structuring since the date of the last SMR (30 October 2015), followed by third party transfers.

737. By reason of the matters pleaded in paragraphs 735 and 736, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
738. By reason of the matters pleaded in paragraphs 735 and 737, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 30 October 2015, being 4 November 2015.
739. By reason of the matters pleaded in paragraphs 736 and 737, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 January 2016, being 29 January 2016.

740. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded at paragraph 735 and 736.

Particulars

Although SMR 596583270 dated 30 October 2015 referred to intense structuring since 9 October 2015 followed by transfers to accounts including Domestic Account 5, CommBank Account 46 and CommBank Account 33, CommBank only fully reported its suspicions with respect to 10 structured deposits totalling \$86,000 between 19 and 26 October 2015.

SMR 596583270 dated 30 October 2015 did not report CommBank's suspicions with respect to the amounts that had been transferred to third party accounts including Domestic Account 5, CommBank Account 46 and CommBank Account 33.

Although CommBank had identified ongoing intense structuring connected with a money laundering syndicate, for which the account had been terminated as at 22 and 25 January 2016, SMR 621186098 only reported CommBank's suspicions with respect to 8 structured deposits on 28 November 2015 and one transfer to CommBank Account 90 on 30 November 2015.

CommBank did not report its suspicions with respect to a total of \$250,450 in cash deposits and \$337,020 in third party transfers, including to Domestic Account 5 and CommBank Account 33.

The SMR did not contain the information specified in rules 18.2(19) 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

741. By reason of the matters pleaded at paragraphs 735 to 740, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

742. On and from 12 October 2015, CommBank did not monitor Person 41 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 12 October 2015 and 30 November 2015, 5 automated transaction monitoring alerts were raised on this account. Having reviewed the first three alerts and having identified that Person 41 may be linked to a sophisticated money laundering syndicate, CommBank failed to review subsequent alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

Although 53 deposits were under \$10,000, no automated alerts for structuring were raised on this account.

By 12 October 2015, 25 alerts triggered in respect of the holder of CommBank Account 33 including 3 STR alerts and one manual alert.

By 12 October 2015, 114 alerts triggered in respect of the holder of Domestic Account 5, including 9 STR alerts and 2 manual alerts.

By 28 October 2015 Group Security had identified that Person 41 may be connected with money laundering 'Syndicate 3' – internal Group Security email with the subject line 'SMR Referral – Syndicate 3'.

By 29 October 2015 the AML Team in Group Security had recommended termination of the relationship (TERM 1548C) as 'transactional profiling has identified the account was established 6 Oct 2015 and has received intense structured cash deposits since 9 Oct 2015, followed by transfers to various accounts including [Domestic Account 5] and 2 CBA accounts – [CommBank Account 46] and [CommBank Account 33]. CBA has concerns Person 41 may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured deposits at ATMs'. Also noted that 'intel was received from the intelligence team to review account activity'.

The suspicion formed by CommBank in the 29 October 2015 email that funds being sent to the holder of Domestic Account 5 were suspicious was previously reported in SMR reports, including in SMR 584254151 lodged on 14 September 2015 in respect of Person 39.

By 30 October 2015 CommBank had reported to AUSTRAC 'concerns that Person 41 may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs' and yet it permitted Person 41 to keep laundering money until 28 November 2015 – see SMR 596583270 dated 30 October 2015 and transaction monitoring alerts TM-231653A triggered on 12 October 2015 for large aggregate cash deposits (\$50,050 in 3 days – 6, 9 and 12 October 2015); TM-233391A triggered on 22 October 2015 for HRC high frequency deposits into HRC accounts (\$152,000 on 21 counts – 9, 12, 13, 19, 21 and 22 October 2015) and TM-234001A triggered on 26 October 2015 large aggregate cash deposits (\$152,000 on 13, 19, 21, 22 and 26 October 2015).

On lodging SMR 596583270, the above alerts were closed and no customer due diligence was carried out.

On 10 November 2015, CommBank sent a letter to Person 41 advising account will be closed on 10 December 2015. Person 41 was given 30 days' notice of closure notwithstanding concerns identified in October 2015 that she was connected to a sophisticated money laundering syndicate.

From 10 November 2015 (when Person 41 was advised account was to be closed) to 30 November 2015, Person 41 continued to deposit \$165,000 in 21 cash deposits and sent \$165,514 in 2 electronic

transfers to two Australian bank accounts, including Domestic Account 5.

Two further alerts were raised 13 and 30 November 2015 – respectively TM-238678A for large aggregate cash deposits (\$85,000 on 13 November 2015) and TM-242142A for large aggregate cash deposits (\$80,000 in 1 day on 30 November 2015). The AML Team never reviewed the first alert and did not review the second alert until 22 and 25 January 2016.

CommBank put a stop on the account on 14 December 2015, and the account was closed on 15 December 2015.

Suspicious that other accounts were connected to sophisticated money laundering syndicates continued to be reported to AUSTRAC after CommBank decided to terminate its relationship with Person 41, but before it proceeded to close the account – see SMR 600046007 dated 11 November 2015 in relation to Person 42 and SMR 602356254 dated 20 November 2015 relating to Person 43. This did not prompt CommBank to close Person 41's account sooner.

A manual alert was run on 27 January 2016 - TM AML3 SMR TM-242142A. In spite of the fact that the account had already been closed for suspected links to a money laundering syndicate, CommBank determined that this customer was not high risk.

From 12 October 2015 to 30 November 2015 \$337,000 in cash deposits were made to Person 41's account and \$364,213 was transferred to several Australian bank accounts, including Domestic Account 5.

743. On and from 30 October 2015, CommBank did not monitor Person 41 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion by no later than 30 October 2015 when SMR 596583270 was lodged, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 41.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 41.

CommBank put a stop on the account on 14 December 2015.

The account was closed on 15 December 2015.

From 30 October 2015 to 30 November 2015 Person 41 made \$165,000 in cash deposits and transferred \$165,514 to two Australian bank accounts, including to Domestic Account 5.

744. By reason of the matters pleaded at paragraphs 742 and 743, CommBank contravened s 36(1) on and from 30 October 2015 with respect to Person 41.

Person 42

745. On or about 25 September 2015, CommBank provided a designated service to Person 42 by opening an account in the name of Person 42.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 47.

Person 42's occupation was recorded as 'unemployed'.

746. Between 25 September 2015 and 5 November 2015, 27 cash deposits totalling \$210,435 were made into CommBank Account 47 in the name of Person 42.

Particulars

Account statement for CommBank Account 47.

Schedule AN to the Statement of Claim.

25 IDM deposits were under \$10,000.

2 deposits were made at CommBank branches.

1 branch deposit was under \$10,000.

747. Between 8 October 2015 and 5 November 2015 a total of \$202,175 was transferred from CommBank Account 47 in the name of Person 42 to 3 Australian based bank accounts.

Particulars

Account statement for CommBank Account 47

Items 3, 5, 9 and 12, Schedule AN to the Statement of Claim.

\$42,840 transferred to CommBank Account 33.

\$64,286 transferred to Domestic Account 5.

748. CommBank suspected that all but one of the cash deposits pleaded at paragraph 746 were structured contrary to s 142 of the Act.

Particulars

SMR 600046007 dated 11 November 2015 lodged in respect of Person 42, the holder of CommBank Account 33 and the holder of CommBank Account 48.

25 IDM deposits were under \$10,000.

1 branch deposit under \$10,000.

11 November 2015 email within Group Security advising 'Malaysian National [Person 42] ... received 11 intense structured cash deposits totalling \$72,500 between 7 and 13 October 2015 at the Campsie and Ashfield ATMs in NSW'.

749. By no later than 11 November 2015, CommBank was aware of suspicious patterns of transactions on CommBank Account 47 in the name of Person 42.

Particulars

SMR 600046007 dated 11 November 2015 lodged in respect of Person 42, the holder of CommBank Account 33 and the holder of CommBank Account 48 reporting intense structured cash deposits followed by transfers to other accounts, indicative of money laundering and avoiding reporting obligations.

On 10 November 2015 an STR was raised by an Intelligence Analyst in Group Security and forwarded to 'GS AML' by email with suspicion identity details described as 'IDM cash deposits consistent with syndicate three – Money laundering through the Group's IDMs'. STR also notes 'Multiple cash deposits made through Group IDMs totalling approximately AUD\$210,000 with links to known money laundering syndicate members. Transactions made to known [Domestic Bank 2] accounts with description [holder of Domestic Account 5], CBA accounts INO [holder of CommBank Account 33]'.

11 November 2015 internal Group Security email.

The failures to report suspicious matters for the purposes of s 41

750. By no later than 11 November 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 3, 5 and 6 to 12 of Schedule AN to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 600046007 dated 11 November 2015 lodged in respect of Person 42, the holder of CommBank Account 33 and the holder of CommBank Account 48. The SMR reported intense structured cash deposits and noted transactional profiling had identified the account was established on 25 September 2015 and 'the activity is ongoing, followed by transfers to various accounts'. The SMR further noted CommBank's concerns that Person 42 'may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs'.

See also transaction monitoring alert TM-231934A.

On 10 November 2015 an STR was raised by an Intelligence Analyst in Group Security and forwarded to 'GS AML' by email with suspicion identity details described as 'IDM cash deposits consistent with syndicate three – Money laundering through the Group's IDMs'. STR also notes 'Multiple cash deposits made through Group IDMs totalling approximately AUD\$210,000 with links to known money laundering syndicate members. Transactions made to known [Domestic Bank 2] with description [holder of Domestic Account 5], CBA accounts INO [holder of CommBank Account 33]'.

11 November 2015 internal Group Security email advising 'CBA has concerns [Person 42] may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering

funds via structured cash deposits at ATMs' and that this suspicious activity had been ongoing since the account was opened on 25 September 2015.

The same suspicions had been reported earlier, including in respect of Person 39 in SMR 584254151 lodged on 14 September 2015 and in respect of Person 41 in SMR 596583270 dated 30 October 2015.

- 751. By reason of the matters pleaded in paragraph 750, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 752. By reason of the matters pleaded in paragraphs 750 and 751, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 November 2015, being 16 November 2015.
- 753. At no time has CommBank given the AUSTRAC CEO an SMR with respect to the matters pleaded in paragraph 750.

Particulars

Although SMR 600046007 dated 11 November 2015 referred to intense structuring since the account was opened followed by transfers to various accounts including Domestic Account 5, CommBank Account 33 and CommBank Account 48, CommBank only reported its suspicions with respect to 11 structured deposits totalling \$72,500 between 7 and 13 October 2015.

SMR 600046007 dated 11 November 2015 did not report any detail regarding CommBank's suspicions with respect to the amounts that had been transferred to Domestic Account 5, CommBank Account 33 and CommBank Account 48.

\$137,885 in cash deposits and \$202,175 in domestic transfers to Australian bank accounts, including Domestic Account 5 and CommBank Account 33, were not reported.

The SMR did not contain the information specified in rules 18.2(19) 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

- 754. By reason of the matters pleaded at paragraphs 750 to 753, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

- 755. On and from 13 October 2015, CommBank did not monitor Person 42 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Only one automated alert was raised on this account on 13 October 2015 for large aggregate cash deposits (\$72,500 on 7 and 13 October 2015). CommBank failed to review this alert in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer.

On reviewing this alert on 11 November 2015, the AML Team submitted SMR 600046007 and initiated termination (TERM 1592C) noting 'Malaysian national ... has received blatant structured cash deposits in a short period of time, to a newly established account, where the true origin of funds is unknown'. Also see 11 November 2015 internal Group Security email.

Although 26 deposits under \$10,000 were made into this account, no automated alerts for structuring were raised.

By 13 October 2015, CommBank had identified similar patterns of suspicious activity connected to money laundering syndicates – see SMR 584254151 lodged on 14 September 2015 in respect of Person 39.

By 13 October 2015, 115 alerts triggered in respect of the holder of Domestic Account 5, including 9 STR alerts and a manual alert.

By 13 October 2015, 27 alerts triggered in respect of the holder of CommBank Account 33, including 3 STR alerts.

On 10 November 2015 a manual alert or STR was raised by an Intelligence Analyst in Group Security and forwarded to 'GS AML' by email with suspicion identity details described as 'IDM cash deposits consistent with syndicate three – Money laundering through the Group's IDMs'. STR also notes 'Multiple cash deposits made through Group IDMs totalling approximately AUD\$210,000 with links to known money laundering syndicate members. Transactions made to known [Domestic Bank 2] accounts with description [holder of Domestic Account 5], CBA accounts INO [holder of CommBank Account 33]'.

From 13 October 2015 to 5 November 2015, Person 42 deposited \$170,385 in 19 cash deposits and transferred \$170,395 to Australian bank accounts, including to Domestic Account 5 and CommBank Account 33.

The same suspicions had been reported earlier, including in respect of Person 39 in SMR 584254151 lodged on 14 September 2015 and in respect of Person 41 in SMR 596583270 dated 30 October 2015.

Whilst termination was initiated on 11 November 2015 the account was not stopped and closed until 19 September 2016.

756. On and from 11 November 2015, CommBank did not monitor Person 42 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion by no later than 11 November 2015 when an SMR was lodged with respect to Person 42, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 42.

CommBank did not undertake measures appropriate to the circumstances as specified in rule 15.10 with respect to Person 42.

Whilst the account was recommended for termination on 11 November 2015 it was not closed until 19 September 2016.

757. By reason of the matters pleaded at paragraphs 755 and 756, CommBank contravened s 36(1) on and from 13 October 2015 with respect to Person 42.

Person 43

758. On or about 12 October 2015, CommBank provided a designated service to Person 43 by opening an account in the name of Person 43.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 49.

Person 43's occupation was recorded as 'overseas visitor'.

759. Between 12 October 2015 and 30 November 2015, 59 cash deposits totalling \$402,735 were made into CommBank Account 49 through CommBank IDMs in the name of Person 43.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 49.

Schedule AO to the Statement of Claim.

All cash deposits were under \$10,000.

760. Between 16 October 2015 and 30 November 2015 a total of \$402,694 was transferred from CommBank Account 49 in the name of Person 43 to 6 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

Account statement for CommBank Account 49.

Schedule AO to the Statement of Claim.

\$91,755 was transferred to Domestic Account 5 and \$21,780 to CommBank Account 33.

761. CommBank suspected that the cash deposits pleaded at paragraph 759 were structured contrary to s 142 of the Act.

Particulars

SMR 602356254 dated 20 November 2015 lodged in respect of Person 43 and the holder of CommBank Account 33.

59 IDM deposits were under \$10,000.

762. By no later than 20 November 2015, CommBank was aware of highly suspicious patterns of transactions on CommBank Account 49 in the name of Person 43.

Particulars

SMR 602356254 dated 20 November 2015 lodged in respect of Person 43 and the holder of CommBank Account 33.

This SMR recorded the reasons for suspicion as 'avoiding reporting obligations' and 'unusual account activity' and the offence type as 'money laundering'. The SMR also reported 'CBA has concerns that [Person 43] may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs'.

The failures to report suspicious matters for the purposes of s 41

763. By no later than 20 November 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified items 1 to 15 and 17 of Schedule AO to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 602356254 dated 20 November 2015 and SMR 626147433 dated 11 February 2016.

SMR 602356254 dated 20 November 2015 reported intense structured cash deposits and noted that transactional profiling had identified the account was established and 'the activity is ongoing, followed by transfers to various accounts'. The SMR also noted CommBank's concerns that '[Person 43] may be linked to a sophisticated syndicate, opening bank accounts with Malaysian passports and laundering funds via structured cash deposits at ATMs'.

On 18 November 2015 an STR was raised by an Intelligence Analyst in Group Security and forwarded to 'GS AML' by email with suspicion identity details described as 'IDM cash deposits consistent with syndicate three – Money laundering through the Group's IDMs'. STR also notes 'Multiple cash deposits made through Group IDMs totalling approximately AUD\$322,685 with links to known money laundering syndicates. Transactions made to known [Domestic Account 2] accounts with description [holder of Domestic Account 5]'.

The same suspicions had been reported earlier including in respect of Person 39 in SMR 602356254 lodged on 14 September 2015, in respect of Person 41 in SMR 596583270 dated 30 October 2015 and in respect of Person 42 in SMR 600046007 on 11 November 2015.

764. By reason of the matters pleaded in paragraph 763, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
765. By reason of the matters pleaded in paragraphs 763 and 764, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 20 November 2015, being 25 November 2015.
766. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 763.

Particulars

Although SMR 602356254 dated 20 November 2015 referred to intense structuring since the account was opened followed by transfers to various accounts including Domestic Account 5 and CommBank Account 33, it only specifically reported CommBank's suspicions with respect to 11 structured deposits totalling \$91,000 on 13 November 2015.

SMR 602356254 dated 20 November 2015 did not report CommBank's suspicions with respect to the amounts that had been transferred to various accounts including Domestic Account 5 and CommBank Account 33.

SMR 626147433 dated 11 February 2016 only reported CommBank's suspicions with respect to transactions on 30 November 2015.

The report did not contain the information specified in rules 18.2(19) 18.2(21)(k) to (r) of the AML/CTF Rules, contrary to s 41(3)(b) of the Act.

\$231,735 in cash deposits and \$322,685 transferred to Australian bank accounts was not reported, including transfers to CommBank Account 33 and Domestic Account 5.

767. By reason of the matters pleaded at paragraphs 763 to 766, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

768. On and from 19 October 2015, CommBank did not monitor Person 43 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 19 October 2015 and 30 November 2015, 5 automated transaction monitoring alerts and 1 manual alert were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Having reviewed the alerts, the AML Team recommended termination, but this recommendation was never approved by the business unit.

Although 59 deposits under \$10,000 were made into this account, no automated alerts for structuring were raised.

Four automated transaction monitoring alerts were reviewed by the AML Team on 19 and 20 November 2015, respectively, TM-232779A triggered on 19 October 2015 for large aggregate cash deposits (\$53,600 over 4 days – 12, 15, 16 and 19 October 2015); TM-233949A triggered on 26 October 2015 for HRC high frequency deposits into HRC account (\$145,305 on 23 counts – 15, 16, 19, 20, 21, 22, 26 October 2015); TM-235512A triggered on 3 November 2015 for large aggregate cash deposits (\$121,755 over 4 days – 21,

22, 26 October and 3 November 2015) and TM-238781A triggered on 13 November 2015 for HRC high frequency deposits into HRC account (\$177,380 on 24 counts – 3, 4, 13 November 2015). SMR 602356254 dated 20 November 2015 was lodged and termination initiated (TERM1607C) for 'links to known money laundering syndicates – intense structuring'.

On 18 November 2015 a manual alert or STR was raised by an Intelligence Analyst in Group Security and forwarded to 'GS AML' by email with suspicion identity details described as 'IDM cash deposits consistent with syndicate three – Money laundering through the Group's IDMs'. STR also notes 'Multiple cash deposits made through Group IDMs totalling approximately AUD\$322,685 with links to known money laundering syndicates. Transactions made to known [Domestic Bank 2] accounts with description [holder of Domestic Account 5]'.

On 29 January 2016, an internal CommBank email was sent to 'GS AML' to advise that the termination alert for this account would be closed as no BU (business unit) approval had been obtained.

A stop was not put on the account until 2 July 2016 for 'links to known Money Laundering Malaysian Syndicate – Structured IDM cash deposits'.

The account was not closed until 10 August 2016.

The same suspicions had been reported earlier in respect of Person 39 in SMR 602356254 lodged on 14 September 2015, in respect of Person 41 in SMR 596583270 dated 30 October 2015 and in respect of Person 42 in SMR 600046007 on 11 November 2015.

By 20 November 2015, 49 alerts triggered in respect of the holder of CommBank Account 33, including 3 STR alerts and a manual alert.

By 20 November 2015, 147 alerts triggered in respect of the holder of Domestic Account 5, including 9 STR alerts and 3 manual alerts.

From 20 November 2015 to 30 November 2015 Person 43 deposited \$80,000 in 10 cash deposits and sent \$80,009 in electronic transfers to an Australian bank account.

769. On and from 20 November 2015, CommBank did not monitor Person 43 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion by no later than 20 November 2015 and having submitted an SMR with respect to Person 43, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 43.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 43.

The account was not closed until 10 August 2016.

From 20 November 2015 to 30 November 2015 Person 43 deposited \$80,000 in 10 cash deposits and sent \$80,009 in electronic transfers to an Australian bank account.

770. By reason of the matters pleaded at paragraphs 768 and 769, CommBank contravened s 36(1) on and from 19 October 2015 with respect to Person 43.

Syndicate No 3

771. In August 2015 and October 2015, Person 76, Person 77 and Jizhang Lu were arrested and charged with dealing with property reasonably suspected of being proceeds of crime contrary to section 400.9 of the *Criminal Code Act 1995* (Cth) in connection with a liquid methamphetamine manufacture and importation syndicate.

Particulars

AFP Statement of Facts, which alleges that both Person 76 and Person 77 were involved in the deposit of cash into CommBank Account 50 in the name of Company 1.

Both Person 76 and Person 77 were employees of Company 1.

On 16 October 2015, Jizhang Lu, a further person connected with Syndicate No 3, was arrested and charged with dealing with property reasonably suspected of being proceeds of crime contrary to section 400.9 of the *Criminal Code Act 1995* (Cth) in connection with cash deposits made to CommBank Account 50 in the name of Company 1.

Jizhang Lu was ultimately sentenced to 2 years' imprisonment for each of two charges, with a non parole period of 1 year and 8 months.

772. The AFP allege that between 16 February 2015 and 26 August 2015, \$17,665,340 in cash was deposited into a CommBank account in the name of Company 1.

Particulars

AFP Statements of Facts for Person 76, Person 77 and Jizhang Lu.

The AFP allege that these funds were the proceeds of a drug importation syndicate and were proceeds of crime within the meaning of the *Criminal Code Act 1995* (Cth).

773. On or about 25 November 2009, CommBank provided a designated service to Company 1 by opening an account in the name of Company 1.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 50.

774. Between 26 November 2014 and 26 August 2015 1,103 cash deposits totalling \$27,236,341 were made into CommBank Account 50 in the name of Company 1.

Particulars

Account statement for CommBank Account 50.

Item 3, table 1, s 6 of the Act.

Schedule AP to the Statement of Claim.

89 of these deposits were made at CommBank branches.

1,014 of these deposits were made through CommBank IDMs.

511 of these deposits were under \$10,000.

The cash deposits under \$10,000 were made into CommBank Account 50 through CommBank IDMs, except for that at item 394 of Schedule AP, which was made at a CommBank branch.

These cash deposits included the \$17,665,340 in cash deposits referred to at paragraph 772 above.

775. CommBank suspected that some of the cash deposits pleaded at paragraph 774 were structured contrary to s 142 of the Act.

Particulars

SMR 546798625 dated 28 April 2015 reported that a transactional review from 27 April 2014 to 27 April 2015 identified 407 cash deposits which 'indicate[d] intent to structure' in order to avoid reporting obligations.

511 cash deposits to the account between 26 November 2014 and 26 August 2015 were under \$10,000.

776. Between 26 November 2014 and 26 August 2015 147 international money transfers totalling \$26,475,360 were sent from CommBank Account 50 in the name of Company 1 to offshore accounts.

Particulars

Account statement for CommBank Account 50.

Item 3, table 1, s 6 of the Act.

Schedule AP to the Statement of Claim.

CommBank charged \$22 for each IMT, totalling \$3,234 on these transactions.

777. By no later than 28 April 2015, CommBank considered CommBank Account 50 in the name of Company 1 to be high risk and suspicious.

Particulars

SMR 546798625 dated 28 April 2015 reported that 1,050 cash deposits totalling \$14,967,782, comprising structured cash and excess cash, followed by 96 IFTIs totalling \$14,706,360, which was suspicious, high risk and indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

778. By no later than 28 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 3 to 4, 10 to 11, 17, 245 to 247, 312, 325 to 326, 333, 339, 343 to 344, 348, 351, 353, 355 and 357 to 358 of Schedule AP to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 546798625 dated 28 April 2015.

On 21 and 28 April 2015, the AML Team reviewed 4 transaction monitoring alerts – being TM-186200A triggered on 28 March 2015 for cash activity over certain threshold; TM-186312A also triggered on 28 March 2015 for cash activity involving unique branch; TM-189383A triggered on 11 April 2015 for cash activity over certain threshold and TM-190384A triggered on 18 April 2015 for cash activity involving unique branch. The AML Team conducted a transactional review from 27 April 2014 to 27 April 2015 and identified 1,050 cash deposits totalling \$14,967,782, comprising structured cash and excess cash, followed by 96 IFTIs totalling \$14,706,360, which was concluded to be suspicious, high risk and indicative of money laundering and avoiding reporting obligations.

779. By no later than 13 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 412, 414, 417 to 418, 424 to 425, 427 to 429, 434 to 435, 439, 441 to 442, 444 to 446, 448 to 449 and 454 to 455 of Schedule AP to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

A monitoring order was issued to CommBank on 5 August 2015 under the *Proceeds of Crime Act 2002* (Cth) with respect to CommBank Account 50.

On 10 August 2015, the AML Team reviewed an STR raised manually on 7 August 2015 by the Chatswood branch (TM-215024A) for third parties making 'very large cash deposits very regularly'.

On 11 August 2015, the AML Team reviewed a further 4 automated transaction monitoring alerts, being – TM-211443A triggered on 18 July 2015 for cash activity involving unique branch; TM-211585A also triggered on 18 July 2015 for cash activity over certain threshold; TM-213984A triggered on 1 August 2015 for cash activity over certain threshold and TM-215319A triggered on 8 August 2015 for cash activity involving unique branch.

The AML Team conducted a transactional review from 16 July 2015 (the date of the last SMR) to 11 August 2015 and concluded that Company 1 'continued to receive large cash deposits from two different states where the source of funds is unknown, [and that] the activity is still considered suspicious'. SMR 575687356 was submitted on 13 August 2015, reporting that the activity was indicative of money laundering.

780. By no later than 14 September 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 457 to 459, 462 to 463 and 468 of Schedule AP to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

A monitoring order was issued to CommBank on 5 August 2015 under the *Proceeds of Crime Act 2002* (Cth) with respect to CommBank Account 50.

On 26 August 2015, the orders of the Supreme Court of New South Wales blocking all transactions on CommBank Account 50 in the name of Company 1 were served on CommBank.

On 14 September 2015 the AML Team reviewed two transaction monitoring alerts – TM-217513A triggered on 15 August 2015 and TM-218958A triggered on 22 August 2015.

SMR 584247124 was lodged on 14 September 2015, and reported 9 cash deposits totalling \$1,208,500 between 11 August 2015 and 21 August 2015. The SMR reported that a 'review of the account since the [last SMR] report date found the large cash deposits are continuing and appears to be intensifying. Following the cash deposits the funds are debited via wire transfers to [Offshore Account 16] in Hong Kong and [Offshore Account 17] in Hong Kong. Bank records further indicate a Supreme Court of NSW's restraining order in respect to [Company 1] received on 26 August 2015'.

- 781. By reason of the matters pleaded in paragraphs 778 to 780, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 782. By reason of the matters pleaded in paragraphs 778 and 781, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 28 April 2015 being 1 May 2015.
- 783. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 778.

Particulars

SMR 546798625 dated 28 April 2015.

CommBank did not fully report its suspicions with respect to the international money transfers. Although CommBank reported close to the total amount of international money transfers during the relevant period in SMR 546798625 dated 28 April 2015 by expressing the reported transfers as a percentage of the whole, CommBank did not identify all relevant payees: the SMR did not report that funds were transferred to Offshore Account 14, Offshore Account 15, Offshore Account 16, or Offshore Account 17. A total of \$3,113,040 was transferred to these accounts between 26 November 2014 and 27 April 2015. The report did not contain the information specified in rules 18.2(19) or 18.2(21)(k) to (r), contrary to s 41(3)(b) of the Act.

- 784. By reason of the matters pleaded in paragraphs 779 and 781, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 13 August 2015 being 18 August 2015.
- 785. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 779.

Particulars

SMR 575687356 dated 13 August 2015 only reported CommBank's suspicions with respect to cash deposits made to the account.

CommBank did not report its suspicions with respect to a total of \$5,525,000 in international money transfers (taking place between 16 July and 11 August 2015 inclusive). The report did not contain the information specified in rules 18.2(19) or 18.2(21)(k) to (r), contrary to s 41(3)(b) of the Act.

786. By reason of the matters pleaded in paragraphs 780 and 781, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 September 2015 being 17 September 2015.
787. At no time has CommBank given the AUSTRAC CEO an SMR in respect of matters pleaded at paragraph 780.

Particulars

SMR 584247124 dated 14 September 2015.

SMR 584247124 dated 14 September 2015 reported that wire transfers had been made to Offshore Account 16 in Hong Kong and Offshore Account 17 in Hong Kong, but did not report any detail on the amounts that had been transferred.

CommBank's suspicions with respect to a total of \$481,200 in large cash deposits and \$1,000,000 in international money transfers (taking place between 12 August 2015 and 26 August 2015 inclusive) were therefore not reported.

The report did not contain the information specified in rules 18.2(19) or 18.2(21)(k) to (r), contrary to s 41(3)(b) of the Act.

788. By reason of the matters pleaded at paragraphs 778 to 787, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

789. On and from 26 November 2014, CommBank did not monitor Company 1 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

The account was opened on 25 November 2014.

Between 28 February 2015 and 28 August 2015, 19 automated transaction monitoring alerts were raised on this account in relation to cash activity involving unique branch (AMLTTR90010_C) and cash activity over certain threshold (AMLTTR90051_C). One manual alert or STR was also raised by the Chatswood branch. CommBank failed to review most of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer.

Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating

and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

No automatic transaction monitoring alerts for structuring were ever triggered with respect to this account, although 511 cash deposits under \$10,000 were made into this account on and from 26 November 2014.

Between 28 February 2015 and 14 March 2015, 4 transaction monitoring alerts were raised but not reviewed by the AML Team until 23 March 2015. These alerts did not result in the lodgement of an SMR.

See transaction monitoring alerts TM-176763A triggered on 28 February 2015, TM-176878A triggered on 28 February 2015, TM-183537A triggered on 14 March 2015 and TM-183390A triggered on 14 March 2015. On reviewing these alerts, the AML Team concluded 'A 12 month transactional review of the account identified multi cash deposits received in VIC daily high value via branch and lower values via ATM which appear as business takings – meat trade is cash intensive. The debits are often high value IFTs via CommBiz, client holds FX account as the [sic] trade internationally. The director, [Person 44] has plans to open two stores locally in Melbourne and Hurstville. No AML concern identified, account activity reviewed as in line with stated nature of business, all debits in particular are business related'.

Between 28 March 2015 and 18 April 2015, a further 4 transaction monitoring alerts were raised and yet it was not until 28 April 2015 that the first SMR was lodged.

See transaction monitoring alerts TM-186200A triggered on 28 March 2015, TM-186312A triggered on 28 March 2015, TM-189383A triggered on 11 April 2015 and TM-190384A triggered on 18 April 2015 but not reviewed by the AML Team until 21 April 2015. On reviewing these alerts, the AML Team concluded 'the activity is very cash intensive with multiple structured cash deposits received in single days. Im [sic] unable to see any wages or business transactions either'. These alerts appeared to lead to the filing of an SMR on 28 April 2015 – SMR 546798625. On filing the SMR, the alerts were closed and no customer due diligence was carried out.

A further transaction monitoring alert (TM-194055A) was triggered on 9 May 2015 but not reviewed by the AML Team until 12 June 2015. The AML Team concluded that the same activity the subject of the first SMR was not suspicious. In reaching this conclusion, the AML Team did not have any regard to the reasoning and conclusion reached in SMR 546798625 of 28 April 2015, including the lack of evidence of wages or business transactions. The alert was closed and no customer due diligence was carried out.

Four further transaction monitoring alerts were reviewed by the AML Team on 14 July 2015, being - TM-204104A and TM-204248A

triggered on 20 June 2015, and TM-207157A and TM-207235A triggered on 4 July 2015. These alerts appeared to lead to the filing of an SMR on 16 July 2015 - SMR 568294154. On filing the SMR, the alerts were closed and no customer due diligence was carried out.

A monitoring order was issued to CommBank on 5 August 2015 under the *Proceeds of Crime Act 2002* (Cth) with respect to Company 1's account (CommBank Account 50).

A further four transaction monitoring alerts were triggered but not reviewed by the AML Team until 11 August 2015 - see TM-211443A and TM-211585A triggered on 18 July 2015, TM-213984A triggered on 1 August 2015, and TM-215319A triggered on 8 August 2015.

Also, on 7 August 2015, an STR was raised by RBS staff at the Chatswood branch (TM-215024A) for third parties making 'very large cash deposits very regularly'. The descriptions of the third parties were noted as '2 male asian [sic] 5'10" dark hair 1 female asian [sic] 5'6"'. On 10 August 2015, this STR was reviewed by the AML Team.

On 11 August 2015, an SMR was drafted, and it was finalised and submitted on 13 August 2015 – SMR 575687356. On filing the SMR, the alerts were closed and no customer due diligence was carried out, notwithstanding the monitoring order.

Transaction monitoring alerts TM-217513A triggered on 15 August 2015, and TM-218958A triggered on 22 August 2015 were reviewed by the AML Team on 14 September 2015 and SMR 584247124 was filed. On filing the SMR, the alerts were closed and no customer due diligence was carried out, notwithstanding the monitoring order.

On 26 August 2015, the Supreme Court of New South Wales made orders blocking all transactions on CommBank Account 50 in the name of Company 1, which were subsequently served on CommBank. CommBank put a stop on the account on 26 August 2015.

It was not until 21 October 2015 that a termination letter was sent to Company 1 and to Person 44 giving notice that all accounts will be terminated on 30 days' notice.

As at 14 October 2016, the account was pending closure.

On 7 December 2015, an internal Group Security email was sent noting the Order made on 26 August 2016 restrains the funds, and that the funds must not be released to the customer.

From 26 November 2014 to 26 August 2015 Company 1 deposited \$27,236,341.25 in cash and sent \$26,475,360 offshore.

CommBank lodged 504 late TTRs totalling \$5,335,860.

CommBank also lodged 10 late TTRs totalling \$100,000 relating to Person 76.

790. On and from 28 April 2015, CommBank did not monitor Company 1 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having submitted an SMR on 28 April 2015 with respect to Company 1, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 1.

Having submitted an SMR on 26 July 2015 with respect to Company 1, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 1.

Having submitted an SMR on 13 August 2015 with respect to Company 1, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 1

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 1 until 26 August 2015 when it put a stop on the account in accordance with the orders made by the Supreme Court of New South Wales.

From 28 April 2015 to 26 August 2015 Company 1 deposited \$12,228,679.25 in cash and sent \$11,769,000 offshore.

791. By reason of the matters pleaded at paragraphs 789 and 790, CommBank contravened s 36(1) on and from 26 November 2014 with respect to Company 1.

Syndicate No 4

792. Between 16 February 2015 and 25 February 2016, over \$21 million in cash was deposited into 11 CommBank accounts at branches or through IDMs in Sydney and Perth.

Particulars

Schedules AQ to AZ and AAA to the Statement of Claim.

Company 2 – CommBank Account 51.

Company 3 – CommBank Account 52.

Company 4 – CommBank Account 53.

Company 5 – CommBank Account 54.

Person 48 – CommBank Account 55.

Company 6 – CommBank Account 56.

Company 7 – CommBank Account 57.

Company 8 – CommBank Account 58.

Company 9 – CommBank Account 59.

Company 10 – CommBank Account 60.

Company 11 – CommBank Account 61.

These deposits were the illicit proceeds of a drug importation and distribution syndicate.

On 25 November 2015 the AFP first advised CommBank that the Company 2, Company 3, Company 4, Company 5, Company 6, Company 7, Company 9 and Company 10 accounts were connected with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

At that time, Person 48 was listed as the director of Company 5.

On 17 December 2015 the AFP first advised CommBank that the Company 11 account was connected with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

On 20 January 2016, the AFP (WA) forwarded a s 49 request seeking further information about the Company 8 account 'in order to proceed with an AFP investigation arising from or in relation to the information contained in [TTRs pertaining to [Company 8] and [the holder of CommBank Account 63]]'.

Person 78 was arrested in connection with money laundering through these accounts on 14 December 2015. He was charged with dealing in proceeds of crime contrary to section 400.3(1) of the *Criminal Code Act 1995* (Cth).

Person 79 was arrested in connection with money laundering through these accounts and charged with dealing in proceeds of crime contrary to section 400.4(2) of the *Criminal Code Act 1995* (Cth).

Yeuk Tung Kong was arrested in connection with money laundering through these accounts and charged with dealing in property reasonably suspected of being proceeds of crime contrary to section 400.9(1) of the *Criminal Code Act 1995* (Cth), in addition to a drug importation offence contrary to section 307.5 of the *Criminal Code Act 1995* (Cth). Yeuk Tung Kong was sentenced to 7.5 years imprisonment in relation to these charges.

Wai Ki Vicky Fung was arrested in connection with money laundering through these accounts and charged with dealing in property reasonably suspected of being proceeds of crime contrary to section 400.9(1) of the *Criminal Code Act 1995* (Cth). Wai Ki Vicky Fung was sentenced to 3 years imprisonment in relation to these charges.

Man Chun Mak was arrested in connection with money laundering through these accounts and charged with dealing in property reasonably suspected of being proceeds of crime contrary to section 400.9(1) of the *Criminal Code Act 1995* (Cth). Man Chun Mak was sentenced to 1 year and 3 months' imprisonment in relation to these charges.

Yiu Pong Tang was arrested in connection with money laundering through these accounts and charged with dealing in proceeds of crime contrary to section 400.4(2) of the *Criminal Code Act 1995* (Cth). Yiu Pong Tang was sentenced to 10 months' imprisonment in relation to this charge.

Hoi Tung Lau was arrested in connection with money laundering through these accounts and charged with dealing in proceeds of crime contrary to section 400.6(2) of the *Criminal Code Act 1995* (Cth). Hoi Tung Lau was fined \$5,000 in relation to this charge.

Person 80 was arrested in connection with money laundering through these accounts and charged with dealing in proceeds of crime contrary to section 400.3(1) of the *Criminal Code Act 1995* (Cth), in addition to a drug offence contrary to section 6(1)(c) of the *Misuse of Drugs Act 1981* (WA).

Company 2

793. On or about 12 February 2015, CommBank provided a designated service to Company 2 by opening an account in the name of Company 2.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 51.

Company 2's business was recorded as 'computer accessories [sic] retail'.

The company director and secretary was recorded as Person 45.

794. Between 16 February 2015 and 6 August 2015, 130 cash deposits totalling \$1,344,750 were made into CommBank Account 51 in the name of Company 2.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 51.

Schedule AQ to the Statement of Claim.

5 of these cash deposits were made at CommBank branches.

125 of these cash deposits were made through CommBank IDMs.

48 of these cash deposits were under \$10,000.

795. CommBank suspected that some of the cash deposits pleaded at paragraph 794 were structured contrary to s 142 of the Act.

Particulars

SMR 560649574 dated 17 June 2015.

48 of the cash deposits to the account were under \$10,000.

The structured cash deposits were made into CommBank Account 51 through CommBank IDMs, except for those at items 1, 3, 46, 57 and 93 of Schedule AQ to the Statement of Claim, which were made at CommBank branches.

796. Between 18 February 2015 and 7 August 2015 a total of \$1,388,754 was transferred from CommBank Account 51 in the name of Company 2 to 24 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

This included transfers to Domestic Account 14, Domestic Account 15 and CommBank Account 52.

CommBank statement for CommBank Account 51.

Schedule AQ to the Statement of Claim.

797. By no later than 17 June 2015, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 51 in the name of Company 2.

Particulars

SMR 560649574 dated 17 June 2015 with respect to both Company 2 and Company 3, which reports 'suspicious behaviour' with the offence type 'money laundering'.

A separate but related SMR 560509505 was lodged on the same day with respect to Company 4.

These SMRs were triggered by transaction monitoring alert TM-196368A dated 15 May 2015, which was a manual 'STR' alert raised by retail staff at the Cronulla Branch. The STR records that accounts

in the names of Company 3 and Company 4 each received two \$10,000 cash deposits in \$50 notes through a Cronulla ATM. The STR concluded “after perusing the accounts it appears this same kind of activity is done at multiple IDMs ... the money is then transferred to an OFI”. This STR was not reviewed by the AML Team until 17 June 2015. On reviewing the STR on 17 June 2015, the AML Team identified that the director of Company 3 is also the director of Company 2 and that the same pattern of structured deposits at ATMs, followed by third party transfers, was occurring on Company 2’s account.

The failures to report suspicious matters for the purposes of s 41

798. By no later than 17 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2, 7, 11, 14, 16, 17, 19, 21, 23, 25, 30–32, 35, 38, 40, 42, 43, 47, 49–50, 52, 54, 56, 59, 61, 63–64, 66, 68–69, 73, 81–84, and 87 of Schedule AQ to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 17 June 2015 the AML team had reviewed transactions on this account from 25 February 2015 to 17 June 2015 and had identified a large number of suspicious cash deposits and transfers to multiple third parties indicative of money laundering – see SMR 560649574 dated 17 June 2015.

799. By no later than 7 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 88, 89, 90, 92–100, and 102–108 of Schedule AQ to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 7 August 2015 the AML team had reviewed transactions on this account from 12 February 2015 to 7 August 2015, following a manual alert or STR (TM-214689A) being raised by the Artamon branch on 4 August 2015 for multiple IDM deposits under \$10,000, totalling \$40,000 followed by immediate Netbank transfers. The AML team identified a high volume of large cash deposits on this account followed by transfers to multiple individuals and businesses indicative of money laundering – see SMR 574117549 dated 7 August 2015. See also TM-214689A triggered on 4 August 2015.

By 7 August 2015 the AML Team had reviewed another manual transaction monitoring alert or STR (TM-214841A) raised by the Artamon branch on 6 August 2015 for cash deposits totalling \$85,000 through IDMs on 5 August 2015. The AML Team determined the activity on 5 August 2015 was similar to the suspicious activity reported in SMR 574117549. However, it decided not to report the

suspicious \$85,000 deposit on the basis that the suspicious activity on 4 August 2015 had been reported.

By 21 August 2015 a HRC Report was prepared by CommBank and emailed within Group Security. The HRC report considered Company 2, as well as related entity Company 3, and their Director, Person 45.

The report found that neither Company 2 nor Company 3 had a shopfront, online presence or virtual POS or merchant facility. The registered business address for both entities was in fact Person 45's residential address. A transactional review conducted on CommBank Account 51 found 130 cash deposits via the ATM and branch network totalling \$1,344,750, and that these funds were transferred to different businesses and unknown third parties. The HRC report noted that Group Security recommended exiting the client/banker relationship.

The 21 August 2015 email reports that, after conducting a further review of Company 2's account, Group Security found that the activity in the account did not match the stated nature of the business, and recommended ceasing the client/banker relationship with Company 2.

On 24 August 2015 the AML Team recommended that this account be closed. The Retail Banking Service business unit approved termination on the same day.

On 26 August 2015 a letter was sent to the customer giving 30 days' notice that the account would be closed.

On 29 September 2015 CommBank stopped and closed this account.

On 25 November 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 51 in the name of Company 2 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

CommBank provided the requested information and documents to the AFP under cover of their letter dated 22 December 2015.

A search warrant in respect of this account was executed at CommBank premises on 4 April 2016.

800. By reason of the matters pleaded in paragraphs 798 and 799, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
801. By reason of the matters pleaded in paragraphs 798 and 800, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 17 June 2015, being 22 June 2015.
802. By reason of the matters pleaded in paragraphs 799 and 800, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 7 August 2015, being 12 August 2015.
803. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 798 and 799.

Particulars

SMR 560649574 dated 17 June 2015 and SMR 574117549 dated 7 August 2015.

See SMR 560649574 dated 17 June 2015. Having formed a suspicion about transfers to other bank accounts based on a review for the period from 25 February 2015 to 17 June 2015, CommBank reported that all funds had been transferred to multiple third parties, but did not report the payee details for the transfers. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s41(3)(b) of the Act.

Although CommBank formed the suspicion that there were continuing high volume large cash deposits followed by transfers to multiple third parties in the period up to 7 August 2015, SMR 574117549 dated 7 August 2015 did not report the details of the payee of the funds and only reported the IDM deposits on 4 August 2015 that were identified in a manual alert or STR (TM-214689A), which was raised by the Artamon branch. CommBank failed to report its suspicions with respect to other IDM deposits which took place up to 7 August 2015. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

\$327,000 in cash deposits and \$1,388,754 transferred to third parties never reported.

804. By reason of the matters pleaded at paragraphs 798 to 803 CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

805. On and from 25 February 2015, CommBank did not monitor Company 2 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 25 February 2015 and 7 August 2015 just under \$1.4 million was deposited to this account by way of large and structured cash deposits at IDMs and branches, including 47 cash deposits under \$10,000. However, no automated alerts were ever raised against this account in relation to this activity.

Two manual alerts were raised against the account on 4 and 6 August 2015 by branch staff, some 6 months after the patterns of large and structured cash activity began.

SMR 560649574 dated 17 June 2015 reported structured cash deposits on 25, 26 and 27 February 2015, noting this was 8.02% of total deposits. No transaction monitoring alert had been raised by this structuring. The suspicious activity was identified when other suspicious activity occurred on another account (that of Company 3) with a common director. Having lodged SMR 560649574, CommBank

carried out no customer due diligence with respect to this customer with a view to identifying, mitigating and managing ML/TF risks.

By 17 June 2015, \$1,027,750 in structured and large cash deposits and \$983,787.25 in third party transfers had already been made through this account – see items 1–87 of Schedule AQ to the Statement of Claim.

No customer due diligence was carried out with respect to this account until 21 August 2015, when the HRC Report with respect to Company 2, Company 3, and Person 45 was prepared. A transactional review conducted on Company 2's account for the purposes of the HRC Report found 130 cash deposits via the ATM and branch network totalling \$1,344,750, and that these funds were transferred to different businesses and unknown third parties.

On 24 August 2015 the AML Team recommended that this account be closed. The Retail Banking Service business unit approved termination on the same day.

On 26 August 2015 a letter was sent to the customer giving 30 days' notice that the account would be closed, in spite of the known high ML/TF risks.

On 29 September 2015 CommBank stopped and closed this account.

CommBank lodged 83 late TTRs totalling \$948,450.

806. On and from 17 June 2015, CommBank did not monitor Company 2 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion and having submitted an SMR on 17 June 2015 with respect to Company 2, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 2.

Having formed a s 41 suspicion and having submitted an SMR on 7 August 2015 with respect to Company 2, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 2.

As at 17 June 2015, CommBank had identified a connection between suspicious activity on Company 2's account and accounts held by Company 3 and Company 4 – see SMR 560649574 dated 17 June 2015.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 2 until 21 August 2015, when the AML Team prepared an HRC report. A transactional review conducted on Company 2's account for the purposes of the HRC Report found 130 cash deposits via the ATM and branch network totalling \$1,344,750, and that these funds were transferred to different businesses and unknown third parties.

Notwithstanding these findings, CommBank did not close CommBank Account 51 until 29 September 2015, giving the customer 30 days' notice of closure.

From 17 June 2015 to 7 August 2015 Company 2 deposited \$317,000 in cash and transferred \$404,967.50 to other Australian accounts.

807. By reason of the matters pleaded at paragraphs 805 and 806, CommBank contravened s 36(1) on and from 25 February 2015 with respect to Company 2.

Company 3

808. On or about 12 February 2015, CommBank provided a designated service to Company 3 by opening an account in the name of Company 3.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank account 52.

Company 3's business was recorded as 'sound equipment retail'.

The company director and secretary was recorded as Person 45.

809. Between 16 February 2015 and 8 July 2015, 315 cash deposits totalling \$3,339,925 were made into CommBank Account 52 in the name of Company 3.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 52.

Schedule AR to the Statement of Claim.

24 of these cash deposits were made at CommBank branches.

291 of these cash deposits were made through CommBank IDMs.

66 of these cash deposits were under \$10,000.

810. Between 17 February 2015 and 9 July 2015 a total of \$3,364,939 was transferred from CommBank Account 52 in the name of Company 3 to 33 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

This included transfers to Domestic Account 16, Domestic Account 5, and Domestic Account 17.

CommBank statement for CommBank Account 52.

Schedule AR to the Statement of Claim.

811. CommBank suspected that some of the cash deposits pleaded at paragraph 809 were structured contrary to s 142 of the Act.

Particulars

SMR 560649574 dated 17 June 2015.

66 of the cash deposits to the account were under \$10,000.

The structured cash deposits were made into CommBank Account 52 through CommBank IDMs, except for those at items 15 and 40 of Schedule AR to the Statement of Claim, which were made at CommBank branches.

812. By no later than 17 June 2015, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 52 in the name of Company 3.

Particulars

SMR 560649574 lodged 17 June 2015 with respect to both Company 3 and Company 2.

A separate but related SMR 560509505 was lodged on the same day with respect to Company 4.

These SMRs were triggered by transaction monitoring alert TM-196368A dated 15 May 2015, which was a manual 'STR' alert raised by retail staff at the Cronulla Branch. The STR records that accounts in the name of Company 3 and Company 4 each received two \$10,000 cash deposits in \$50 notes through a Cronulla ATM. The STR concluded "after perusing the accounts it appears this same kind of activity is done at multiple IDMs ... the money is then transferred to an OFI". This STR was not reviewed by the AML Team until 17 June 2015. On reviewing the STR on 17 June 2015, the AML Team identified that the director of Company 3 is also the director of Company 2 and that the same pattern of structured deposits at ATMs, followed by third party transfers, was occurring on Company 2's account.

The failures to report suspicious matters for the purposes of s 41

813. By no later than 17 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 3, 4, 7, 11, 14, 16, 20, 22, 26–28, 32, 35, 37, 39, 43, 44, 46, 49, 51, 54, 58, 61–62, 65, 66, 68, 71, 74, 75, 79, 85, 86, 88, 89, 96, 97, 100, 103, 106–108, 111, 114, 117, 119, 125, 126, 130–132, 134–137, 140, 142–144, 146, 149, 153, 156, 158–160, 162 and 163 of Schedule AR to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 17 June 2015 the AML team had reviewed transactions on this account between 17 February 2015 and 17 June 2015 and had identified a large number of cash deposits to this account followed by transfers to multiple third parties indicative of money laundering – see SMR 560649574 dated 17 June 2015.

814. By no later than 21 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 164 to 191 of Schedule AR to the Statement of Claim may be relevant to the investigation of, or

prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 21 August 2015 an HRC Report had been prepared by Group Security and sent to RBS Risk Management. The HRC report considered Company 2, as well as related entity Company 3, and their Director, Person 45. The report found that neither Company 2 nor Company 3 had a shopfront, online presence or virtual POS or merchant facility. The registered business address for both entities was in fact Person 45's residential address. A transactional review conducted on CommBank Account 52 found 316 cash deposits via the ATM and branch network totalling \$3,349,625, and that these funds were transferred to different businesses and unknown third parties. The HRC report noted that Group Security recommended exiting the relationship.

On 25 August 2015 the AML Team recommended that this account be closed.

On 26 August 2015 a letter was sent to the customer giving 30 days' notice that the account would be closed.

On 29 September 2015 CommBank closed this account.

SMR 560649574 dated 17 June 2015 noted transfers had been made to Domestic Account 16. From 1 July 2014, the holder of Domestic Account 16 produced transactions monitoring alerts in CommBank's system regularly (for example, 9 alerts were generated in March 2015 alone).

By no later than 6 May 2015, the holder of Domestic Account 16 was being considered for referral for termination as a CommBank customer – see email within the AML Team, Group Security, dated 6 May 2015.

By no later than 26 May 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from another account of concern in the name of Person 46 – see email within the AML Team, Group Security, dated 26 May 2015.

By no later than 8 July 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from Company 5 and Person 48, being other accounts of concern in relation to Syndicate No 4 – see email within the AML Team, Group Security, dated 8 July 2015.

On 25 November 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 52 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

CommBank provided the requested information and documents to the AFP under cover of their letter dated 23 December 2015.

A search warrant in respect of this account was executed at CommBank premises on 4 April 2016.

815. By reason of the matters pleaded in paragraphs 813 and 814, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
816. By reason of the matters pleaded in paragraphs 813 and 815, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 17 June 2015 being 22 June 2015.
817. By reason of the matters pleaded in paragraphs 814 and 815, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 21 August 2015 being 26 August 2015.
818. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 813 and in relation to the matters pleaded at paragraph 814 concerning the designated services identified at item 164 to 182 and 184 to 191 of Schedule AR to the Statement of Claim.

Particulars

See SMR 560649574 dated 17 June 2015. Having formed a suspicion that funds deposited in cash had been transferred to multiple third parties during the period between 17 February 2015 and 17 June 2015, CommBank reported details of one payee but did not report the details of the other payees and the volume of funds sent to each payee. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s41(3)(b) of the Act.

A total of \$674,305 in large and structured cash deposits and a total of \$3,364,939 in domestic transfers were not reported.

819. It was not until 11 July 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at 814 concerning the designated services identified at item 183 of Schedule AR to the Statement of Claim.

Particulars

SMR 78380755 dated 11 July 2017.

\$30,000 cash deposit reported late.

820. By reason of the matters pleaded at paragraphs 813 to 819, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

821. On and from 16 February 2015 CommBank did not monitor Company 3 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 16 February 2015 and 9 July 2015 just under \$3.5 million was deposited to this account by way of large and structured cash deposits at IDMs and branches, including 66 cash deposits under \$10,000. However, no automated transaction monitoring alerts were ever raised with respect to this account.

One manual alert was raised on 15 May 2015 (TM-196368A) for both Company 3 and Company 4 but by this time \$1,864,670 in cash had already been deposited and \$1,849,147 had been transferred to third parties.

SMR 560649574 dated 17 June 2015 reported large cash deposits on 17 February 2015, noting this was 1.8% of total deposits. These large cash deposits did not raise any automated transaction monitoring alerts. Having lodged SMR 560649574, CommBank carried out no customer due diligence with respect to this customer with a view to identifying, mitigating and managing the ML/TF risks.

By 17 June 2015, \$2,635,620 in structured and large cash deposits and \$2,660,035 in third party transfers had already been made through this account – see items 1–22 and 24–163 of Schedule AR to the Statement of Claim.

No customer due diligence was carried out with respect to this account until 21 August 2015, when the HRC Report with respect to Company 2, Company 3, and Person 45 was prepared. A transactional review conducted on CommBank Account 52 found 316 cash deposits via the ATM and branch network totalling \$3,349,625, and that these funds were transferred to different businesses and unknown third parties. The HRC report noted that Group Security recommended exiting the client/banker relationship.

The account was not stopped and closed until 29 September 2015, the customer having been given 30 days' notice of closure in spite of the known high ML/TF risks.

From 16 February 2015 to 9 July 2015 Company 3 deposited \$3,339,925 in cash and transferred \$3,364,939 to other Australian accounts.

CommBank lodged 227 late TTRs totalling \$2,310,905.

822. On and from 17 June 2015, CommBank did not monitor Company 3 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion and having submitted an SMR on 17 June 2015 with respect to Company 3, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 3.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 3

until 21 August 2015, when the AML Team prepared an HRC report. A transactional review conducted on CommBank Account 52 for the purposes of the HRC report found 316 cash deposits via the ATM and branch network totalling \$3,349,625, and that these funds were transferred to different businesses and unknown third parties.

As at 17 June 2015, CommBank had also identified a connection between suspicious activity on Company 3's account with accounts in the names of Company 2 and Company 4 – see SMR 560649574 dated 17 June 2015.

The account was not stopped and closed until 29 September 2015, with the customer being given 30 days' notice of closure.

From 17 June 2015 to 9 July 2015 Company 3 deposited \$704,305 in cash and sent \$704,904 to other Australian accounts.

823. By reason of the matters pleaded at paragraphs 821 and 822, CommBank contravened s 36(1) on and from 16 February 2015 with respect to Company 3.

Company 4

824. On or about 2 April 2015, CommBank provided a designated service to Company 4 by opening an account in the name of Company 4.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 53.

Company 4's business was recorded as 'footwear retailing'.

The company director was recorded as Person 47.

825. Between 2 April 2015 and 23 July 2015, 351 cash deposits totalling \$4,292,720 were made into CommBank Account 53 in the name of Company 4.

Particulars

CommBank statement for CommBank Account 53.

Schedule AS to the Statement of Claim.

36 of these cash deposits were made at CommBank branches.

315 of these cash deposits were made through CommBank IDMs.

52 of these cash deposits were under \$10,000.

826. Between 28 April 2015 and 23 July 2015 a total of \$4,272,093 was transferred from CommBank Account 53 in the name of Company 4 to 14 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

This included transfers to Domestic Account 16, Domestic Account 5, and Domestic Account 17.

CommBank statement for CommBank Account 53.

Schedule AS to the Statement of Claim.

827. CommBank suspected that some of the cash deposits pleaded at paragraph 825 were structured contrary to s 142 of the Act.

Particulars

SMR 560509505 dated 17 June 2015.

52 of the cash deposits to the account were under \$10,000.

The structured cash deposits were made into CommBank Account 53 through CommBank IDMs, except for those at items 1, 53 and 54 of Schedule AS to the Statement of Claim, which were made at CommBank branches.

828. By no later than 17 June 2015, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 53 in the name of Company 4.

Particulars

SMR 560509505 dated 17 June 2015.

On 2 May 2015 transaction monitoring alert TM-192959A triggered for cash deposits made by new customers and was sent to the AML team for review on 6 May 2015, but was not reviewed by the AML team until 17 June 2015.

On 13 June 2015 transaction monitoring alert TM-202780A triggered for cash deposits made by new customers and was sent to the AML team for review on 14 June 2015, and was reviewed by the AML team on 17 June 2015.

STRs were also raised on 30 April 2015 (TM-191862A) and 15 May 2015 (TM-196368A) by branch staff, but were not reviewed by the AML team until 17 June 2015.

The failures to report suspicious matters for the purposes of s 41

829. By no later than 17 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 4, 10, 11, 14, 15, 17, 21, 25, 26, 29, 32, 35, 38, 39, 42, 45, 48, 50, 56, 58, 65, 67, 70, 72, 75, 77, 79–80, 82, 85, 90–91, 94, 97, 102, 104, 108, 110, 114–115, 117, 119, 123, 124, 128 and 129 of Schedule AS to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 17 June 2015 the AML team had reviewed transactions on the account between 2 April 2015 (account opening) and 17 June 2015 and had identified a large number of cash deposits followed by transfers to multiple third parties, including the holder of Domestic Account 16, indicative of money laundering – see SMR 560509505 dated 17 June 2015. See also transaction monitoring alert TM-192959A triggered on 2 May 2015, manual alert STR (TM-191862) raised on 30 April 2015 and manual alert STR (TM-196368A) raised

on 15 May 2015, which were both not reviewed by the AML team until 17 June 2015. STR TM-191862 noted 'customer came into branch with 3rd party deposit of \$30,000 cash (all 50s)' and STR TM-196368A noted \$10,000 had been deposits in ATMs in 50s and 'after perusing the accounts it appears this same kind of activity is done at multiple IDMs...the money is then transferred to an OFI'.

830. By no later than 25 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 130 to 155, 159, 160, 165, and 170 to 180 of Schedule AS to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 25 August 2015 the AML team had reviewed transactions on this account from 17 June 2015 to 25 August 2015 and had identified the suspicious activity reported in SMR 560509505 lodged on 17 June 2015 in respect of this account was ongoing – see SMR 578718016 dated 25 August 2015.

By no later than 6 May 2015, the holder of Domestic Account 16 was being considered for referral for termination as a CommBank customer – see email within the AML Team, Group Security, dated 6 May 2015.

By no later than 26 May 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from another account of concern in the name of Person 46 – see email within the AML Team, Group Security, dated 26 May 2015.

By no later than 8 July 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from Company 5 and Person 48, being other accounts of concern in relation to Syndicate No 4 – see email within the AML Team, Group Security, dated 8 July 2015.

On 25 November 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 53 in the name of Company 4 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

CommBank provided the requested information and documents to the AFP under cover of their letter dated 30 December 2015.

A search warrant in respect of this account was executed at CommBank premises on 4 April 2016.

831. By reason of the matters pleaded in paragraphs 829 and 830, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.

832. By reason of the matters pleaded in paragraphs 829 and 831, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 17 June 2015, being 22 June 2015.
833. By reason of the matters pleaded in paragraphs 830 and 831, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 August 2015, being 28 August 2015.
834. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 829 and 830.

Particulars

SMRs 560509505 dated 17 June 2015 and 578718016 dated 25 August 2015.

See SMR 560509505 dated 17 June 2015. Having formed a suspicion that funds deposited in cash had been transferred to multiple third parties during the period since the account opened on 2 April 2015, CommBank reported details of one payee but did not report the details of the other payees and the volume of funds sent to each payee. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

Although CommBank formed a suspicion that there were ongoing suspicious high volume cash deposits followed by transfers to third parties indicative of money laundering, SMR 578718016 dated 25 August 2015 referred to ongoing suspicious activity but did not report the details of this activity. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

\$1,297,160 in cash deposits and \$4,272,093 in domestic transfers were never reported.

835. By reason of the matters pleaded at paragraphs 829 to 834, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

836. On and from 30 April 2015, CommBank did not monitor Company 4 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 30 April 2015 and 18 July 2015, 3 automated transaction monitoring alerts and 2 manual alerts were raised on this account. CommBank failed to review these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and identifying, mitigating and managing ongoing ML/TF risks.

Between 2 April 2015 and 23 July 2015 just under \$4.3 million was deposited to this account by way of large and structured cash deposits at IDMs and branches, including 52 cash deposits under \$10,000. However, no automated alerts for structuring or large aggregate cash deposits were raised on this account.

The first alert on this account was the manual alert raised by branch staff in East Perth on 30 April 2015, but not reviewed by the AML Team until 17 June 2015.

The first automated alert, for cash deposits made by new customers, was not raised until 2 May 2015 and not reviewed by the AML Team until 17 June 2015.

SMRs 560509505 dated 17 June 2015 and 578718016 dated 25 August 2015.

SMR 560509505 dated 17 June 2015 reported large cash deposits on 27, 28 and 30 April 2015 and 1 May 2015, noting this was 13.38% of total deposits. Having lodged SMR 560509505 and having identified \$350,200 of suspicious cash deposits, CommBank carried out no customer due diligence with respect to this customer with a view to identifying, mitigating and managing the ML/TF risks.

As at 17 June 2015 CommBank had identified a connection between suspicious activity on Company 4's account with accounts held by Company 2 and Company 3' – see SMR 560649574 dated 17 June 2015.

Unlike Company 2 and Company 3, no HRC report was prepared with respect to Company 4's account, and the account was not recommended for timely closure.

On 25 November 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 53 in the name of Company 4 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'. The AFP sent similar correspondence to CommBank on the same day in relation to Company 2 and Company 3. In spite of receiving this correspondence, CommBank carried out no customer due diligence with respect to Company 4.

CommBank did not put a stop on CommBank Account 53 until 30 January 2016.

CommBank did not close CommBank Account 53 until 10 August 2016.

By no later than 6 May 2015, the holder of Domestic Account 16 was being considered for referral for termination as a CommBank customer – see email within the AML Team, Group Security, dated 6 May 2015.

By no later than 26 May 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from another account of concern in the name of Person 46 – see email within the AML Team, Group Security, dated 26 May 2015.

By no later than 8 July 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from Company 5 and Person 48, being other accounts of concern in relation to Syndicate No 4 – see email within the AML Team, Group Security, dated 8 July 2015.

From 30 April 2015 to 23 July 2015 Company 4 deposited \$4,111,220 in cash and transferred \$4,091,066 to other Australian accounts.

CommBank lodged 267 late TTRs totalling \$2,790,200.

837. On and from 17 June 2015, CommBank did not monitor Company 4 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion and having submitted an SMR on 17 June 2015 with respect to Company 4, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 4.

Having formed a s 41 suspicion and having submitted an SMR on 25 August 2015 with respect to Company 4, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 4.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 4 until 30 January 2016 when it put a stop on the account.

CommBank did not close CommBank Account 53 until 10 August 2016.

From 17 June 2015 to 23 July 2015 Company 4 deposited \$1,677,110 in cash and transferred \$1,656,637 to other Australian accounts.

838. By reason of the matters pleaded at paragraphs 836 and 837, CommBank contravened s 36(1) on and from 2 April 2015 with respect to Company 4.

Company 5

839. On or about 24 April 2015, CommBank provided a designated service to Company 5 by opening an account in the name of Company 5.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 54.

Company 5's business was recorded as 'clothing retail'.

The company director was recorded as Person 48.

840. Between 24 May 2015 and 2 October 2015, 325 cash deposits totalling \$5,181,715 were made into CommBank Account 54 in the name of Company 5.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 54.

Schedule AT to the Statement of Claim.

66 of these cash deposits were made at CommBank branches.

259 of these cash deposits were made through CommBank IDMs.

32 of these cash deposits were under \$10,000.

841. Between 25 May 2015 and 5 October 2015 a total of \$5,181,665 was transferred from CommBank Account 54 in the name of Company 5 to 17 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

This included transfers to Domestic Account 5, Domestic Account 16, Domestic Account 17, Domestic Account 18, and Company 9's CommBank account.

CommBank statement for CommBank Account 54.

Schedule AT to the Statement of Claim.

842. CommBank suspected that some of the cash deposits pleaded at paragraph 840 were structured contrary to s 142 of the Act.

Particulars

SMRs 566752229 dated 10 July 2015, 575703381 dated 13 August 2015 and 585381580 dated 18 September 2015.

32 of the cash deposits to the account were under \$10,000.

The structured cash deposits were made into CommBank Account 54 through CommBank IDMs, except for that at item 152 of Schedule AT to the Statement of Claim, which was made at a CommBank branch.

843. By no later than 10 July 2015, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 54 in the name of Company 5.

Particulars

SMR 566752229 dated 10 July 2015.

On 13 June 2015 transaction monitoring alert TM-202774A triggered for cash deposits made by new customers and was sent to the AML team for review on 14 June 2015, but was not reviewed by the AML team until 8 July 2015.

On 4 July 2015 transaction monitoring alert TM-207034A triggered for cash deposits made by new customers and was sent to the AML

team for review on 8 July 2015, but was not reviewed by the AML team until 10 July 2015.

The failures to report suspicious matters for the purposes of s 41

844. By no later than 10 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 3, 6, 7, 9, 12, 15, 17, 19, 23, 24, 26, 28, 31, 36, 39, 41, 45, 49, 54, 57, 58, 61, 64, 65, 71–75, 78, 82 and 85 of Schedule AT to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 10 July 2015 the AML team had reviewed transactions on this account between 24 April 2015 and 10 July 2015 and had identified a large number of cash deposits followed by transfers to multiple third parties, including to the holder of Domestic Account 16 and the holder of Domestic Account 5 indicative of money laundering – see SMR 566752229 dated 10 July 2015 and transaction monitoring alert TM-2022774A, which was triggered on 13 June 2015 and reviewed by the AML team on 10 July 2015.

845. By no later than 16 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 88, 92 and 93 of Schedule AT to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By no later than 16 July 2015 the AML team had reviewed transaction monitoring alert TM-207034A triggered on 4 July 2015 for cash deposits and had identified that an SMR had already been lodged on 10 July 2015 and so no further SMR was lodged.

846. By no later than 13 August 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 99, 102, 104, 107, 110, 112, 115, 117, 121, 124, 132, 133 and 134 of Schedule AT to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 13 August 2015 the AML team had reviewed transactions on the account between the last SMR being lodged on 10 July 2015 and 13 August 2015, and had identified that this account continued to receive a high volume of cash deposits followed by multiple large domestic transfers to third parties indicative of money laundering – see SMR 575703381 dated 13 August 2015. See also transaction monitoring alert TM-215441A reviewed by the AML team on 12 August 2015 which triggered on 8 August 2015 for cash deposits.

847. By no later than 18 September 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 135 to 143, 147 and

150 to 184 of Schedule AT to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 18 September 2015 the AML team had reviewed all transactions on this account up to 18 September 2015 and had identified that the suspicious activity identified in SMRs previously lodged on 10 July 2015 and 13 August 2015 had intensified and that the cash deposits continue to be followed by multiple, rapid and large domestic transfers to several third parties including the holder of Domestic Account 5 and the holder of Domestic Account 16. The AML team identified that the activity continues to be indicative of money laundering – see SMR 585381580 dated 18 September 2015. See also transaction monitoring alerts reviewed by the AML team on 18 September 2015, being TM-220535A triggered on 29 August 2015, TM-224775A and TM-224794A triggered on 12 September 2015, and TM-227441A triggered on 26 September 2015.

On 18 September 2015, Company 5's account was referred for termination and was 'blatantly and solely using CBA products to conduct this activity' – see email within the AML Team, Group Security, dated 18 September 2015.

848. By no later than 26 October 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 185 to 215 of Schedule AT to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 26 October 2015 the AML team had reviewed transaction monitoring alert TM-227441A which triggered on 26 September 2015 for 22 TTRs over 10 days and noted that a review of the account showed cash deposits had not intensified and were not significant enough to warrant re-reporting.

By 30 October 2015 the AML team had reviewed manual alert STR TM-228193A raised on 2 October 2015 by RBS staff and noted 'STR received from Kardinya Branch in regards to [Company 5]...advised by AFP that this transaction was likely to occur in advance. 50K deposit in 50s. CBA has terminated business account and an SMR was submitted to AUSTRAC under TM-220535A on 18 Sept 2015. Accounts have since been closed. No value in rereporting'.

On 22 October 2015 CommBank closed this account.

On 25 November 2015 the AFP wrote to OPC Compliance CommBank seeking information and documents relating to CommBank Account 54 in the name of Company 5 in connection with an investigation into serious criminal offences including 'drug

importation and illegal processing of money in connection with that activity'.

CommBank provided the requested information and documents to the AFP under cover of their letter dated 31 December 2015.

SMRs 566752229 dated 10 July 2015 and 585381580 dated 18 September 2015 noted transfers had been made to Domestic Account 16. By no later than 6 May 2015, the holder of Domestic Account 16 was being considered for referral for termination as a CommBank customer – see email within the AML Team, Group Security, dated 6 May 2015.

By no later than 26 May 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from another account of concern in the name of Person 46 – see email within the AML Team, Group Security, dated 26 May 2015.

By no later than 8 July 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from Company 5 and Person 48 – see email within the AML Team, Group Security, dated 8 July 2015.

A search warrant in respect of this account executed at CommBank premises on 4 April 2016.

It is noted that \$123,000 was transferred from this account to Domestic Account 17 on 26 May 2015, 8 June 2015 and 30 June 2015, noting that by 17 June 2015, CommBank was aware of suspicious activity involving Company 3 (the holder of Domestic Account 17).

- 849. By reason of the matters pleaded in paragraphs 844 to 848, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 850. By reason of the matters pleaded in paragraphs 844 and 849, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 10 July 2015, being 15 July 2015.
- 851. By reason of the matters pleaded in paragraphs 845 and 849, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 16 July 2015, being 21 July 2015.
- 852. By reason of the matters pleaded in paragraphs 846 and 849, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 13 August 2015, being 18 August 2015.
- 853. By reason of the matters pleaded in paragraphs 847 and 849, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 18 September 2015, being 23 September 2015.
- 854. By reason of the matters pleaded in paragraphs 848 and 849, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 26 October 2015, being 29 October 2015.

855. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 844 to 846, the matters pleaded at paragraph 847 concerning the designated services identified at items 150 to 156 and 158 to 184 of Schedule AT to the Statement of Claim and in relation to the matters pleaded at 848 concerning the designated services identified at items 185 to 210 and 212 to 215 of Schedule AT to the Statement of Claim.

Particulars

SMRs 566752229 dated 10 July 2015, 575703381 dated 13 August 2015 and 585381580 dated 18 September 2015.

See SMR 566752229 dated 10 July 2015. Having formed a suspicion about transfers to other Australian accounts during the period between 24 April 2015 and 10 July 2015, CommBank did not report details of the transfers, including the payee. The report did not contain the information specified in rule 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

Although CommBank had formed the suspicion that there were continuing intense deposits followed by domestic transfers in the period up until 13 August 2015, SMR 575703381 dated 13 August 2015 did not report the amounts transferred to third parties, or any of the payees. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

By 18 September 2015, even though CommBank had identified that the suspicious activity identified in the SMRs previously lodged on 10 July 2015 and 13 August 2015 had intensified in the period up until 18 September 2015 and that the cash deposits continued to be followed by multiple and rapid domestic transfers to several third parties, CommBank only fully reported its suspicions with respect to cash deposits which took place between 26 and 28 August 2015. CommBank did not report its suspicions with respect to any other cash deposits up to 18 September 2015. It also did not report the amounts transferred to third parties, or any of the payees. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

A total of \$1,902,290 in large and structured cash deposits and a total of \$5,181,665 in domestic transfers were not reported.

856. It was not until 11 July 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 847 and 848 concerning items 157 and 211 of Schedule AT to the Statement of Claim.

Particulars

SMR 783807553 dated 11 July 2017.

\$70,000 in large cash deposits reported late.

857. By reason of the matters pleaded at paragraphs 844 to 856, CommBank contravened s 41(2)(a) of the Act on 5 occasions.

858. On and from 13 June 2015, CommBank did not monitor Company 5 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 13 June 2015 and 10 October 2015, 10 automated transaction monitoring alerts and 3 manual alerts were raised on this account. CommBank failed to review many of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and identifying, mitigating and managing ongoing ML/TF risks.

Between 24 May 2015 and 2 October 2015 about \$5.2 million was deposited to this account by way of large and structured cash deposits at IDMs and branches, including 32 cash deposits under \$10,000. However, no automated alerts for structuring or large aggregate cash deposits were raised on this account.

At no stage did CommBank did prepare an HRC report.

SMR 566752229 dated 10 July 2015 reported the (unidentified) cash deposits on 1 and 2 June 2015, noting this was 5.7% of total deposits. This SMR was lodged following TM-202774A raised on 13 June 2015 for cash deposits made by new customers - \$799,950 deposited in 48 transactions between 1 June 2015 and 12 June 2015, but not reviewed by the AML Team until 8 July 2015. Having lodged SMR 566752229, CommBank closed the alert and carried out no customer due diligence.

Another transaction monitoring alert had been raised on 4 July 2015 (TM-207034A) for cash deposits made by new customers – \$605,050 deposited in 41 transactions between 22 June 2015 and 3 July 2015.

The AML Team reviewed this alert on 10 and 16 July 2015 but determined no SMR was required because SMR 566752229 had been lodged. The alert was closed and no customer due diligence was carried out.

By 10 July 2015, \$2,089,535 in structured and large deposits and \$1,979,472 in third party transfers had already been made through this account – see items 1–91 of Schedule AT to the Statement of Claim.

A further 2 transaction monitoring alerts were raised on 18 July 2015 and 8 August 2015 but not reviewed by the AML Team until 11 August 2015 – respectively, TM-211400A for cash deposits made by new customers – \$511,575 deposited in 21 transactions between 9 July 2015 and 17 July 2015 – 2 structured deposits on 9 July 2015 and TM-215441A for cash deposits made by new customers – \$224,900 deposited in 8 transactions on 31 July, 6 and 7 August

2015 (including 1 structured deposit on 7 August 2015). SMR 575703381 was lodged on 13 August 2015, the alerts were closed and no customer due diligence was carried out.

A further 4 transaction monitoring alerts were raised on 29 August 2015, two on 12 September 2015 and one on 17 September 2015 and reviewed by the AML Team on 18 September 2015 – respectively, TM-220535A – (Cash deposits made by new customers) – \$541,890 deposited in 27 transactions between 20 August 2015 and 28 August 2015 – 2 structured deposits on 24 August 2015; TM-224775A - (Cash deposits made by new customers) - \$711,250 deposited in 46 transactions between 31 August 2015 and 11 September 2015 – 1 structured deposits on 11 September 2015; TM-224794A – (multiple TTRs reported) – 20 TTRs over 10 days and TM-225656A – STR raised by RBS staff – large cash deposits and large transfers OFI's on the same day – raised by the Sylvania Branch – manual alert created by Group Security on 18 September 2015 – referral for termination noting cash deposits totalling \$4,442,315 followed by rapid transfer of funds to other institutions including Domestic Account 16. SMR 585381580 was lodged on 18 September 2015, the alerts were closed and no customer due diligence was carried out.

By no later than 18 September 2015, CommBank was aware that activity on Company 5's account appeared to be intensifying (SMR 585381580 dated 18 September 2015).

On 18 September 2015, Company 5's account was referred for termination and was 'blatantly and solely using CBA products to conduct this activity' – being, large cash activity followed by third party transfers, including to the holder of Domestic Account 16, indicative of an unregistered money service business, similar to Company 2 – see email within the AML Team, Group Security, dated 18 September 2015 and Pegasus termination records of 18 September 2015. However, CommBank did not close CommBank Account 5 in the name of Company 5 until 22 October 2015.

On and from 18 September 2015, Company 5 deposited \$739,400 in cash and sent \$806,528 to other Australian accounts.

After initiating termination, a further 4 transaction monitoring alerts were raised as follows: 2 alerts on 26 September 2015, one on 2 October 2015 and one on 10 October 2015 but not reviewed by the AML Team until 26 October 2015 – respectively, TM-227441A - (multiple TTRs reported) – 22 TTRs over 10 days; TM-227602A - (Cash deposits made by new customers) – \$599,400 in 40 transactions between 14 September 2015 and 25 September 2015 – 2 structured deposits on 15 September 2015, and 2 on 24 September 2015; and TM-230020A - (Cash deposits made by new customers) - \$399,700 deposited in 18 transactions between 28 September 2015 and 2 October 2015 – 1 structured deposit on 30 September 2015.

On review of these alerts on 26 October 2015, the AML Team noted that termination had been initiated for 'un-registered MSB' but determined that as a 'review of account shows cash deposits have not intensified and not significant enough to warrant re-reporting'.

CommBank stopped and closed CommBank Account 54 in the name of Company 5 on 22 October 2015.

A further two manual transaction monitoring alerts or STRs raised on 2 and 8 October 2015 were not reviewed by the AML Team until 30 October 2015 – respectively, TM-228193A raised by RBS staff at Kardinya because 'advised by AFP in advance that transaction was likely, \$50K deposit in 50s'; and TM-229361A for multiple cash deposits and withdrawals at various branches. By this time the account had been closed.

SMRs 566752229 dated 10 July 2015 and 585381580 dated 18 September 2015 noted transfers had been made to Domestic Account 16. By no later than 6 May 2015, the holder of Domestic Account 16 was being considered for referral for termination as a CommBank customer – see email within the AML Team, Group Security, dated 6 May 2015.

By no later than 26 May 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from another account of concern in the name of Person 46 – see email within the AML Team, Group Security, dated 26 May 2015.

By no later than 8 July 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from Company 5 and Person 48 – see email within the AML Team, Group Security, dated 8 July 2015.

From 13 June 2015 to 5 October 2015 Company 5 deposited \$3,968,615 in cash and sent \$3,972,623 to other Australian accounts.

CommBank lodged 158 late TTRs totalling \$1,652,290.

859. On and from 10 July 2015, CommBank did not monitor Company 5 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion and having submitted an SMR on 10 July 2015 with respect to Company 5, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 5.

Having formed a s 41 suspicion and having submitted an SMR on 13 August 2015 with respect to Company 5, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 5.

Having formed a s 41 suspicion and having submitted an SMR on 18 September 2015 with respect to Company 5, rule 15.9(3) required

CommBank to apply its enhanced customer due diligence program to Company 5.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 5.

This account was not closed until 22 October 2015.

From 10 July 2015 to 5 October 2015 Company 5 deposited \$3,092,180 in cash and sent \$3,202,193 to other Australian accounts.

860. By reason of the matters pleaded at paragraphs 858 and 859, CommBank contravened s 36(1) on and from 13 June 2015 with respect to Company 5.

Person 48

861. On or about 24 April 2015, CommBank provided a designated service to Person 48 by opening an account in the name of Person 48.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 55.

Person 48 was recorded as being 'self employed' and as being the Director of Company 5.

862. Between 24 May 2015 and 1 July 2015, 33 cash deposits totalling \$320,050 were made into CommBank Account 55 in the name of Person 48.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 55.

Schedule AU to the Statement of Claim.

The 33 cash deposits were made through CommBank IDMs.

2 of these cash deposits were under \$10,000.

863. Between 24 May 2015 and 6 October 2015 a total of \$320,042 was transferred from CommBank Account 55 in the name of Person 48 to 3 Australian based bank accounts.

Particulars

Items and 29, table 1, s 6 of the Act.

This included transfers to Domestic Account 16, Domestic Account 5, and CommBank Account 59 in the name of Company 9.

CommBank statement for CommBank Account 55.

Schedule AU to the Statement of Claim.

864. By no later than 18 September 2015, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 55 in the name of Person 48.

Particulars

The failures to report suspicious matters for the purposes of s 41

865. By no later than 10 July 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 10, 11, 12 and 13 of Schedule AU to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 10 July 2015 the AML team had reviewed transactions on this account and had identified large cash deposits followed by transfers to multiple third parties indicative of money laundering – see SMR 566752229 dated 10 July 2015 which was also lodged in relation to Company 5.

866. By no later than 22 October 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 14 of Schedule AU to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

SMR 585381673 dated 18 September 2015.

On 22 October 2015 CommBank closed this account.

By no later than 8 July 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from Company 5 and Person 48 – see email within the AML Team, Group Security, dated 8 July 2015.

From 1 July 2014, the holder of Domestic Account 16 produced transaction monitoring alerts in CommBank's system regularly (for example, 9 alerts were generated in March 2015 alone).

By no later than 6 May 2015, the holder of Domestic Account 16 was being considered for referral for termination as a CommBank customer – see email within the AML Team, Group Security, dated 6 May 2015.

By no later than 26 May 2015, Domestic Account 16 was identified by CommBank as having received debit transfers from another account of concern in the name of Person 46 – see email within the AML Team, Group Security, dated 26 May 2015.

SMR 566752229 dated 10 July 2015 (regarding Company 5, but to which Person 48 is Party 2) noted transfers had been made to Domestic Account 5. From 16 May 2015, the holder of Domestic Account 16 produced transaction monitoring alerts in CommBank's system regularly (for example, 14 alerts were generated in June 2015 alone).

By no later than 9 July 2015, a Domestic Bank 2 account in the name of '[the holder of Domestic Account 5]' was identified as having received funds from persons of interest – see email within the Intelligence Team, Group Security, dated 9 July 2015.

By no later than 10 July 2015, a Domestic Bank 2 account in the name of the holder of Domestic Account 5 was identified as having received debit transfers from Company 5, being another account of concern in relation to Syndicate 4 – see SMR 566752229.

By no later than 10 August 2015, a Domestic Bank 2 account in the name of the holder of Domestic Account 5 was identified as a beneficiary of funds from Person 49, who received structured deposits and then moved money rapidly to Domestic Account 16 – see email within the AML Team, Group Security, dated 10 August 2015.

By no later than 18 September 2015, Domestic Account 5 and Domestic Account 18 were both identified as having received debit transfers from Company 5, being another account of concern in relation to Syndicate No 4 – see SMR 585381580.

By no later than 13 October 2015, Domestic Account 5 was identified as having received debit transfers from Company 9, being another account of concern in relation to Syndicate No 4 – see SMR 591720317.

The transfer pleaded at item 14 of Schedule AU to the Statement of Claim was to CommBank Account 59 in the name of Company 9.

- 867. By reason of the matters pleaded in paragraphs 865 and 866, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 868. By reason of the matters pleaded in paragraphs 865 and 867, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 10 July 2015, being 15 July 2015.
- 869. By reason of the matters pleaded in paragraphs 866 and 867, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 22 October 2015, being 27 October 2015.
- 870. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraphs 865 and 866 concerning the designated services identified at items 1 to 10 and 12 to 14 of Schedule AU to the Statement of Claim.

Particulars

SMR 585381673 dated 18 September 2015.

See SMR 566752229 dated 10 July 2015. Although CommBank formed a suspicion that Person 48's account was receiving 'large cash deposits followed by transfers to multiple third parties', no details of the amounts deposited or transferred, or any of the payees, were reported. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

A total of \$260,050 in large cash deposits and a total of \$320,042 in domestic transfers were not reported.

871. It was not until 18 September 2015 that CommBank gave the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 865 concerning the designated services identified at item 11 of Schedule AU to the Statement of Claim.

Particulars

SMR 585381673 dated 18 September 2015.

A total of \$60,000 in large cash deposits reported late.

872. By reason of the matters pleaded at paragraphs 865 to 871, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

873. On and from 24 May 2015, CommBank did not monitor Person 48 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 24 May 2015 and 6 October 2015 more than \$320,000 was deposited into this account by way of large and structured cash deposits at IDMs and branches, including 2 cash deposits under \$10,000. However, no automated alerts were raised against this account in relation to this activity.

Person 48 is named as 'Agent – Party 2' and as the director of Company 5 in SMR 575703381.

By 10 July 2015, \$2,089,535 in structured and large deposits and \$1,979,472 in third party transfers had already been made through Company 5's account – see items 1–91 of Schedule AT to the Statement of Claim.

From 24 May 2015 to 6 October 2015, Person 48 deposited \$320,050 in cash and sent \$320,042 to third party domestic accounts.

The account was stopped and closed on 22 October 2015.

CommBank lodged 31 late TTRs totalling \$310,050 with respect to this account.

874. On and from 10 July 2015, CommBank did not monitor Person 48 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion about this account for the purposes of s 41 of the Act on 10 July 2015, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 48 – see SMR 566752229 dated 10 July 2015 which was lodged in relation to Person 48 and Company 5 Ltd, of which Person 48 is a director.

Having formed a suspicion about this account for the purposes of s 41 of the Act on 18 September 2015, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 48.

By 10 July 2015, \$2,089,535 in large deposits and \$1,979,472 in third party transfers had already been made through the Company 5's account – see items 1–91 of Schedule AT to the Statement of Claim.

Having submitted a further SMR on 18 September 2015 with respect to Person 48, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 48.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 48 until the account was stopped and closed on 22 October 2015.

From 10 July 2015 to 6 October 2015 Person 48 sent \$145 to CommBank Account 59 in the name of Company 9.

875. By reason of the matters pleaded at paragraphs 873 and 874, CommBank contravened s 36(1) on and from 24 May 2015 with respect to Person 48.

Company 6

876. On or about 17 June 2015, CommBank provided a designated service to Company 6 by opening an account in the name of Company 6.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 56.

The company director was recorded as Person 50.

877. Between 8 July 2015 and 13 August 2015, 33 cash deposits totalling \$514,800 were made into CommBank Account 56 in the name of Company 6.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 56.

Schedule AV to the Statement of Claim.

The 33 cash deposits were made through CommBank IDMs.

5 of these cash deposits were under \$10,000.

878. CommBank suspected that some of the cash deposits pleaded at paragraph 877 were structured contrary to s 142 of the Act.

Particulars

SMR 605886704 dated 2 December 2015.

5 of the cash deposits to this account were under \$10,000.

The structured cash deposits were made into CommBank Account 56 through CommBank IDMs.

879. Between 8 July 2015 and 13 August 2015 a total of \$511,438 was transferred from CommBank Account 56 in the name of Company 6 to 7 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

This included transfers to Domestic Account 15 and Domestic Account 17.

CommBank statement for CommBank Account 56.

Schedule AV to the Statement of Claim.

880. By no later than 25 November 2015, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 56 in the name of Company 6.

Particulars

On 25 November 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 56 in the name of Company 6 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

SMR 605886704 dated 2 December 2015.

The failures to report suspicious matters for the purposes of s 41

881. By no later than 25 November 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 21 of Schedule AV to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 25 November 2015 CommBank had been notified that the AFP were investigating activity on this account. On 25 November 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 56 in the name of Company 6 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

On 30 November 2015, TM-241855A was manually raised in response to the 'IDM TTR Issue'.

By 2 December 2015 the AML team had reviewed transactions between 17 June 2015 and 2 December 2015 and had identified 'intense cash deposits followed by rapid movement of funds to multiple third party accounts' – see SMR 605886704 dated 2 December 2015.

CommBank provided the requested information and documents to the AFP under cover of their letter dated 16 December 2015.

A search warrant in respect of this account was executed at CommBank premises on 4 April 2016.

882. By reason of the matters pleaded in paragraph 881, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
883. By reason of the matters pleaded in paragraph 881 and 882, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 November 2015, being 30 November 2015.
884. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 881 concerning the designated services identified at items 1 to 11, 13, 16, 18 and 21 of Schedule AV to the Statement of Claim.

Particulars

See SMR 605886704 dated 2 December 2015. Although the AML team reviewed the account from 17 June 2015 and identified intense cash deposits followed by rapid movement of funds to multiple third party accounts, only CommBank's suspicions with respect to the cash deposits in the period 9 to 13 August 2015 were reported. CommBank did not report the balance of suspicious cash deposits to the account, nor did it report its suspicions with respect to the amounts of any third party transfers, or identify all payees. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

A total of \$243,900 in large cash deposits and a total of \$511,438 in domestic transfers were not reported.

885. It was not until 2 December 2015 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 881 concerning the designated services identified at items 12, 14, 15, 17, 19 and 20 of Schedule AV to the Statement of Claim.

Particulars

Having formed a suspicion about the transactions on this account by 25 November 2015, the bank did not report these transactions until 2 December 2015.– see SMR 605886704 dated 2 December 2015.

\$270,900 in cash deposits reported late.

886. By reason of the matters pleaded at paragraphs 881 to 885, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

887. On and from 8 July 2015, CommBank did not monitor Company 6 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 8 July 2015 and 13 August 2015 more than \$500,000 was deposited to this account by way of large and structured cash deposits at IDMs and branches, including 5 cash deposits under \$10,000. However, no automated alerts were raised against this account in relation to this activity.

CommBank identified suspicious cash activity on this account and reported it in SMR 605886704 dated 2 December 2015. Until this time, no appropriate due diligence had been carried out on this account.

Further, on 25 November 2015 the AFP wrote to CommBank, as particularised above.

CommBank did not stop and close this account until 19 September 2016.

From 8 July 2015 to 13 August 2015, Company 6 deposited \$514,800 in cash and transferred \$511,438 to third party domestic accounts.

888. By reason of the matters pleaded at paragraph 887, CommBank contravened s 36(1) on and from 8 July 2015 with respect to Company 6.

Company 7

889. On or about 30 June 2015, CommBank provided a designated service to Company 7 by opening an account in the name of Company 7 .

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 57.

Company 7's business was recorded as 'mens [sic] clothing store'.

The company director and secretary was recorded as Person 51.

890. Between 29 July 2015 and 16 October 2015, 139 cash deposits totalling \$2,548,630 were made into CommBank Account 57 in the name of Person 7.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 57.

Schedule AW to the Statement of Claim.

31 of these cash deposits were made at CommBank branches.

108 of these cash deposits were made through CommBank IDMs.

16 of these cash deposits were under \$10,000.

891. CommBank suspected that some of the cash deposits pleaded at paragraph 890 were structured contrary to s 142 of the Act.

Particulars

SMR 584248596 dated 14 September 2015.

16 of the cash deposits to the account were under \$10,000.

The structured cash deposits were made into CommBank Account 57 through CommBank IDMs.

Schedule AW to the Statement of Claim.

892. Between 5 August 2015 and 19 October 2015 a total of \$2,548,575 was transferred from CommBank Account 57 in the name of Company 7 to 12 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

This included transfers to Domestic Account 5 and Domestic Account 15.

CommBank statement for CommBank Account 57.

Schedule AW to the Statement of Claim.

893. By no later than 14 September 2015, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 57 in the name of Company 7.

Particulars

SMR 584248596 dated 14 September 2015.

On 15 August 2015 transaction monitoring alert TM-217489A triggered for cash deposits made by new customers and was sent to the AML team for review on 16 August 2015, but was not reviewed by the AML team until 14 September 2015.

On 29 August 2015 transaction monitoring alert TM-220532A triggered for cash deposits made by new customers and was sent to the AML team for review on 30 August 2015, but was not reviewed by the AML team until 14 September 2015.

On 16 September 2015, an STR was raised by RBS staff at the Campsie branch (TM-225435A) for third party deposits to the account totalling \$50,000. On 17 September 2015, this STR was reviewed by the AML Team and it was concluded that activity had not intensified and was not significant enough to warrant re-reporting.

On 23 September 2015, an STR was raised by RBS staff at the University of WA branch (TM-226832A) for third party deposits to the account totalling \$40,000. A further STR was raised that same day by RBS staff at the Claremont branch (TM-226834A) for deposits from an unknown third party to the account totalling \$50,000. On 24 September 2015, these STRs were reviewed by the AML Team and it was concluded that the matter should be re-reported.

The failures to report suspicious matters for the purposes of s 41

894. By no later than 14 September 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 12, 14, 15, 17 and 19 to 35 of Schedule AW to the Statement of Claim may be relevant to the investigation

of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 14 September 2015 the AML team had reviewed transactions between 30 June 2015 and 14 September 2015 and had identified a large number of cash deposits made in a short period of time followed by transfers to a money remitter indicative of money laundering - see SMR 584248596 dated 14 September 2015.

895. By no later than 17 September 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 36 to 41 of Schedule AW to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 17 September 2015 the AML team had reviewed transaction monitoring alert TM-224766A triggered on 12 September 2015 for cash deposits, and had reviewed transactions on this account since last report and noted '[Company 7] was recently reported to AUSTRAC for large cash deposits followed by debit transfers on 14 September 2015, since last report the activity continues however it has not intensified and is not significant enough to warrant re-reporting'. See also transaction monitoring alerts TM-217489A triggered on 15 August 2015 and TM220532A triggered on 29 August 2015, which both alerted for cash deposits on this account and were not reviewed by the AML team until 14 September 2015.

896. By no later than 25 September 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 42 to 47, 50, 53 and 54 of Schedule AW to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 25 September 2015 the AML team had reviewed transactions on this account and had identified the suspicious cash activity appeared to be intensifying and continued to be followed by transfers to multiple MSBs – see SMR 587290495 dated 25 September 2015.

897. By no later than 22 October 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 55 to 99 of Schedule AW to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

On 17 September 2015, the AML Team recommended that this account be closed because it exhibited similar activity to Company 2's account (CommBank Account 51).

On 22 October 2015 CommBank closed this account.

On 25 November 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 57 in the name of Company 7 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

CommBank provided the requested information and documents to the AFP under cover of their letter dated 18 December 2015.

A search warrant in respect of this account was executed at CommBank premises on 4 April 2016.

- 898. By reason of the matters pleaded in paragraphs 894 to 897, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 899. By reason of the matters pleaded in paragraphs 894 and 898, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 14 September 2015, being 17 September 2015.
- 900. By reason of the matters pleaded in paragraphs 895 and 898, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 17 September 2015, being 22 September 2015.
- 901. By reason of the matters pleaded in paragraphs 896 and 898, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 September 2015, being 30 September 2015.
- 902. By reason of the matters pleaded in paragraphs 897 and 898, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 22 October 2015, being 27 October 2015.
- 903. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 894 concerning the designated services identified at items 2 to 12, 14, 17 and 19 to 35 of Schedule AW to the Statement of Claim, in relation to the matters pleaded at paragraphs 895 and 896, and in relation to the matters pleaded at paragraph 897 concerning the designated services identified at items 55 to 69, 71 to 87 and 89 to 99 of Schedule AW to the Statement of Claim.

Particulars

See SMR 584248596 dated 14 September 2015. Having formed a suspicion about the large volume of cash deposits followed by transfers out of this account, CommBank reported its suspicions with respect to cash deposits from 20 August 2015 to 25 August 2015 but did not report the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act, with respect to any other transactions.

Although CommBank formed the suspicion that there was continuing and intensifying cash deposits followed by transfers in the period up to 25 September 2015, SMR 587290495 dated 25 September 2015 only reported its suspicions with respect to cash deposits on 22 and 23 September 2015. CommBank did not report the information

specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act, with respect to any other transactions during this period.

A total of \$2,048,850 in large and structured cash deposits and a total of \$2,548,575 in domestic transfers were not reported.

904. It was not until 11 July 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 894 concerning the designated services identified at items 1 and 15 of Schedule AW to the Statement of Claim and SMR in relation to the matters pleaded at paragraph 897 concerning the designated services identified at items 70 and 88 of Schedule AW to the Statement of Claim.

Particulars

SMR 783817300 dated 11 July 2017.

\$169,780 in large cash deposits reported late.

905. By reason of the matters pleaded at paragraphs 894 to 904, CommBank contravened s 41(2)(a) of the Act on 4 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

906. On and from 15 August 2015, CommBank did not monitor Company 7 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 15 August 2015 and 3 October 2015, 7 automated transaction monitoring alerts and 4 manual alerts were raised on this account. CommBank failed to review many of these alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer. Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and identifying, mitigating and managing ongoing ML/TF risks.

SMRs 584248596 dated 14 September 2015 and 587290495 dated 25 September 2015.

On 14 September 2015 the AML team reviewed transaction monitoring alerts TM-217489A which triggered on 15 August 2015 for cash deposits and TM-220532A which triggered on 29 August 2015 for cash deposits. SMR 584248596 dated 14 September 2015 was lodged, the alerts were closed and no customer due diligence carried out.

On 16 September 2015, an STR was raised by RBS staff at the Campsie branch (TM-225435A) for third party deposits to the account totalling \$50,000. The AML team reviewed the STR on 17 September 2015 and noted that a transactional review of the triggering account since the last report revealed the activity continued, 'however has not intensified and is not significant enough to warrant re-reporting at this

stage'. The alert was closed and no customer due diligence was carried out.

Also on 17 September 2015, the AML team reviewed transaction monitoring alert TM-224766A triggered for cash deposits on 12 September 2015 and created a manual alert TM-225455A to conduct a review of the account. The reviewer concluded that as Company 7 was recently reported to AUSTRAC for large cash deposits followed by debit transfers on 14 September 2015, since last report the activity continues however it has not intensified and is not significant enough to warrant re-reporting. The reviewer of TM-225455A recommended termination of the account, the alerts were closed, no SMR was lodged, and no customer due diligence was carried out.

On 23 September 2015, two STRs were raised by RBS staff (TM-226832A and TM-2226834A) for third party deposits to the account totalling \$40,000. A further STR was raised that same day by RBS staff at the Claremont branch (TM-226834A) for deposits from an unknown third party to the account totalling \$50,000.

When the SMR was lodged on 14 September 2015, CommBank only reported large cash deposits between 20 and 25 August 2015 (and not all cash deposits on these days) and did not carry out customer due diligence with respect to other clearly suspicious activity occurring on this account.

No appropriate customer due diligence was carried out until the account was stopped and closed on 22 October 2015.

On 27 October 2015 the AML team reviewed transaction monitoring alert TM-227591A which triggered for cash deposits on 26 September 2015 and TM-228924A which triggered on 3 October 2015 and TM-230015A which triggered on 10 October 2015 for cash deposits. The reviewer concluded that the activity was similar to that reported on 14 September 2015 and had not intensified and was not significant enough to warrant re-reporting.

From 15 August 2015 to 19 October 2015 Company 7 deposited \$2,278,730 in cash and sent \$2,279,388 to other Australian accounts.

CommBank lodged 29 late TTRs totalling \$325,000.

907. On and from 14 September 2015, CommBank did not monitor Company 7 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion by no later than 14 September 2015 with respect to Company 7, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 7.

Having formed a s 41 suspicion by no later than 25 September 2015 with respect to Company 7, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 7.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 7 until the account was stopped and closed on 22 October 2015.

From 14 September 2015 to 19 October 2015 Company 7 deposited \$1,649,000 in cash and sent \$1,739,611 to other Australian accounts.

As at 17 September 2015, CommBank had identified a connection between suspicious activity on accounts in the names of Company 2 and Company 7.

908. By reason of the matters pleaded at paragraphs 906 and 907, CommBank contravened s 36(1) on and from 15 August 2015 with respect to Company 7.

Company 8

909. On or about 9 July 2015, CommBank provided a designated service to Company 8 by opening an account in the name of Company 8.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 58.

Company 8's business was recorded as 'clothing retailing'.

The company director and secretary was recorded as Person 52.

910. Between 15 October 2015 and 25 February 2016, 161 cash deposits totalling \$3,416,740 were made into CommBank Account 58 in the name of Company 8.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 58.

Schedule AX to the Statement of Claim.

101 of these cash deposits were made at CommBank branches.

60 of these cash deposits were made through CommBank IDMs.

16 of these cash deposits were under \$10,000.

911. CommBank suspected that some of the cash deposits pleaded at paragraph 910 were structured contrary to s 142 of the Act.

Particulars

SMR 602069181 dated 19 November 2015.

16 of the cash deposits to the account were under \$10,000.

The structured cash deposits were made into CommBank Account 58 through CommBank IDMs.

912. Between 15 October 2015 and 25 February 2016 a total of \$3,414,129 was transferred from CommBank Account 58 in the name of Company 8 to 19 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

This included transfers to Domestic Account 5, Domestic Account 18, Domestic Account 21, CommBank Account 63, Domestic Account 22, and Domestic Account 23.

CommBank statement for CommBank Account 58.

Schedule AX to the Statement of Claim.

913. By no later than 19 November 2015, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 58 in the name of Company 8.

Particulars

SMR 602069181 dated 19 November 2015.

The failures to report suspicious matters for the purposes of s 41

914. By no later than 19 November 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 31, 35, 38, 42 to 63 of Schedule AX to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By no later than 19 November 2015 the AML team had reviewed transactions on this account up to 19 November 2015 and had identified aggregate high value cash deposits followed by multiple rapid transfers indicative of money laundering – see SMR 602069181 dated 19 November 2015.

915. By no later than 25 January 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 64-84, 95–134 of Schedule AX to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By no later than 25 January 2016 the AML team had reviewed transactions on this account between 19 November 2015 and 25 January 2016 and had identified aggregate high value cash deposits from third parties, including interstate deposits followed by rapid transfers indicative of money laundering and avoiding reporting obligations – see SMR 621378563 dated 25 January 2016.

By no later than 15 January 2016, CommBank was aware that the AFP were interested in Company 8's CommBank account. Email within the AML Team, Group Security, dated 15 January 2016, which states 'I just spoke to ... [CommBank] Intelligence. He's talked about the 2 businesses below that the AFP are still looking into. You lodged SMR's on them back on November (I think it was due to Intelligence info) but as they have more outstanding TM alerts, can you please submit re-reports for them. They don't need to be lengthy due to re-

report. Treat them as if you just picked up the alerts i.e. don't mention intelligence/AFP'.

On 20 January 2016, the AFP (WA) forwarded a s 49 request seeking further information about Company 8's account 'in order to proceed with an AFP investigation arising from or in relation to the information contained in [TTRs pertaining to Company 8 and [the holder of CommBank Account 63]']'.

916. By no later than 20 April 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 130-170, 172, 177-178, 181, and 183-190 of Schedule AX to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By no later than 20 April 2016 the AML team had reviewed transactions on this account between 25 January 2016 and 20 April 2016 and identified that the account continues to receive aggregate high value cash deposits followed by transfers indicative of money laundering – see SMR 645374261 dated 20 April 2016.

917. By reason of the matters pleaded in paragraphs 914 to 916, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
918. By reason of the matters pleaded in paragraphs 914 and 917, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 19 November 2015, being 24 November 2015.
919. By reason of the matters pleaded in paragraphs 915 and 917, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 January 2016, being 29 January 2016.
920. By reason of the matters pleaded in paragraphs 916 and 917, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 20 April 2016, being 26 April 2016.
921. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 914 to 916.

Particulars

SMRs 602069181 dated 19 November 2015, 621378563 dated 25 January 2016, and 645374261 dated 20 April 2016.

See SMR 602069181 dated 19 November 2015. Having formed a suspicion about the deposits and transfers occurring on this account up until 19 November 2015, CommBank only reported its suspicions with respect to transactions from 29 October 2015 to 3 November 2015. CommBank did not report its suspicions with respect to any further cash deposits, nor did it report the amounts of the transfers. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

Although CommBank formed a suspicion that the account had continued to receive aggregate high value cash deposits followed by rapid transfers in the period up until 25 January 2016, SMR 621378563 dated 25 January 2016 only reported CommBank's suspicions with respect to the transactions on 29 and 30 December 2015. CommBank did not report its suspicions with respect to any further cash deposits, nor did it report the amounts of any further transfers or identify all payees. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

See SMR 645374261 dated 20 April 2016. Having formed a suspicion that the account continued to receive large suspicious cash deposits followed by transfers, CommBank lodged a report in relation to transactions between 17 and 22 February 2016, but did not report other suspicious transactions in the period up until 26 April 2016. CommBank did not report its suspicions with respect to any further cash deposits, nor did it report the amounts of any transfers to third parties, or identify all payees. The report did not contain the information specified in rules 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

A total of \$2,738,160 in structured and large cash deposits and a total of \$3,264,466.60 in domestic transfers were not reported.

922. By reason of the matters pleaded at paragraphs 914 to 921, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

923. On and from 24 October 2015, CommBank did not monitor Company 8 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 24 October 2015 and 27 February 2016, 7 automated transaction monitoring alerts were raised on this account. CommBank failed to review the first two alerts in a timely manner, having regard to the ML/TF risks reasonably faced with respect to this customer.

Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and identifying, mitigating and managing ongoing ML/TF risks.

SMRs 602069181 dated 19 November 2015, 621378563 dated 25 January 2016 and 645374261 dated 20 April 2016.

On 24 October 2015 transaction monitoring alert TM-233600A was triggered by multiple TTRs reported and sent to the AML team for review on 26 October 2015, but was not reviewed by the AML team until 18 November 2015.

On 24 October 2015 transaction monitoring alert TM-233687A triggered for cash deposits made by new customers and was sent to the AML team for review on 26 October 2015, but was not reviewed by the AML team until 18 November 2015.

On 7 November 2015 transaction monitoring alert TM-236300A triggered for cash deposits made by new customers and was sent to the AML team for review on 9 November 2015, but was not reviewed by the AML team until 18 November 2015.

SMR 602069181 dated 19 November 2015 noted transfers had been made to Domestic Account 5. From 16 May 2015, the holder of Domestic Account 5 produced transaction monitoring alerts in CommBank's system regularly (for example, 14 alerts were generated in June 2015 alone). The alerts were closed, and no customer due diligence was carried out.

By no later than 9 July 2015, Domestic Account 5 was identified as having received funds from persons of interest – see email within the Intelligence Team, Group Security, dated 9 July 2015.

By no later than 10 July 2015, Domestic Account 5 was identified as having received debit transfers from Company 5, being another account of concern in relation to Syndicate 4 – see SMR 566752229.

By no later than 10 August 2015, Domestic Account 5 was identified as a beneficiary of funds from Person 49, who received structured deposits and then moved money rapidly to Domestic Account 16 – see email within the AML Team, Group Security, dated 10 August 2015.

By no later than 18 September 2015, the holder of Domestic Account 5 and the holder of Domestic Accounts 17, 18 and 19 were both identified as having received debit transfers from Company 5, being another account of concern in relation to Syndicate 4 – see SMR 585381580.

By no later than 13 October 2015, Domestic Account 5 was identified as having received debit transfers from Company 9, being another account of concern in relation to Syndicate 4 – see SMR 591720317.

By 19 November 2015, \$1,278,720 in structured and large deposits and \$1,249,802 in third party transfers had already been made through this account – see items 1–59 of Schedule AX to the Statement of Claim.

HRC report was prepared by the AML Team commencing on 21 January 2016. On 28 January 2016, it was recommended CommBank maintain relationship with customer and follow up in 12 months. Notes 'full ECDD performed' that same day.

From 24 October 2015 to 25 February 2016 Company 8 deposited \$2,789,890 in cash and sent \$2,784,784 to other Australian accounts.

The account was not stopped and closed until 19 September 2016.

924. On and from 19 November 2015, CommBank did not monitor Company 8 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion and having submitted an SMR on 19 November 2015 with respect to Company 8, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 8.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 8.

HRC report was prepared by the AML Team commencing on 21 January 2016. On 28 January 2016, it was recommended CommBank maintain the relationship with the customer and follow up in 12 months. Notes 'full ECDD performed' that same day.

The account was not closed until 19 September 2016.

From 19 November 2015 to 25 February 2016 Company 8 deposited \$2,138,020 in cash and sent \$2,164,327.60 to other Australian accounts.

925. By reason of the matters pleaded at paragraphs 923 and 924, CommBank contravened s 36(1) on and from 19 November 2015 with respect to Company 8

Company 9

926. On or about 6 August 2015, CommBank provided a designated service to Company 9 by opening an account in the name of Company 9.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 59.

Company 9's business was recorded as 'retail computer/software sales'.

The company director was recorded as Person 53.

927. Between 7 October 2015 and 18 February 2016, 19 cash deposits totalling \$549,900 were made into CommBank Account 59 in the name of Company 9.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 59.

Schedule AY to the Statement of Claim.

11 of these cash deposits were made at CommBank branches.

8 of these cash deposits were made through CommBank IDMs.

1 of these cash deposits was under \$10,000.

928. Between 7 October 2015 and 19 February 2016 a total of \$540,147 was transferred from CommBank Account 59 in the name of Company 9 to 5 Australian based bank accounts.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

This included transfers to the Domestic Account 5 and CommBank Account 58.

CommBank statement for CommBank Account 59.

Schedule AY to the Statement of Claim.

929. By no later than 13 October 2015, CommBank was aware of unusual and suspicious patterns of transactions on CommBank Account 59 in the name of Company 9.

Particulars

SMR 591720317 dated 13 October 2015.

Despite the volume of cash deposits made to the account within a short period, no automatic transaction monitoring alerts for suspicious cash activity were ever triggered with respect to this account.

On 9 October 2015, an STR was raised by RBS staff at the Warwick branch (TM-229659A) for third party deposits to the account totalling \$20,000. On 12 October 2015, this STR was reviewed by the AML Team and it was concluded that the matter should be reported.

On 14 October 2015, an STR was raised by RBS staff at the Kardinya branch (TM-232029A) for third party deposits to the account totalling \$50,000. A further STR was raised that same day by RBS staff at the Booragoon branch (TM-232037A) for third party deposits to the account totalling \$50,000. On 15 October 2015, these STRs were reviewed by the AML Team and it was concluded that there was no added value to re-report the matter.

The failures to report suspicious matters for the purposes of s 41

930. By no later than 13 October 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 7, 11, 12 and 15 of Schedule AY to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 13 October 2015 the AML team had reviewed transactions on this account between 6 August 2015 and 13 October 2015 and had identified multiple large cash deposits followed by transfers to third parties indicative of money laundering – see SMR 591720317 dated 13 October 2015.

On 9 October 2015 manual alert STR TM-229659A was raised by staff at Warwick branch and noted ‘third party has deposited \$20k to

account which has large cash deposits going through it, balance \$90k today but principal customer has only been in Australia 4 months’.

On 14 October 2015 STR TM-229659A was raised by RBS and noted ‘client deposit 50k into account in cash at 6163. after [sic] looking into transactions another 50k was deposited at Kardinya branch. Money transferred online to another bank account’.

On 14 October 2015 a second STR that day was raised (TM-232037A) at RBS by Booragoon WA branch which stated ‘client deposit \$50,000 in cash to account...after looking into transactions another \$50,000 was deposited at Kardinya branch. Money transferred online to another bank account with other financial institution. Bank records indicate customer was recently reported to AUSTRAC on 13 October 2015. No add value to re-report at this stage’.

931. By no later than 25 November 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 16 to 22 of Schedule AY to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 25 November 2015 the AFP had written to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 59 in the name of Company 9 in connection with an investigation into serious criminal offences including ‘drug importation and illegal processing of money in connection with that activity’.

CommBank provided the requested information and documents to the AFP under cover of their letter dated 16 December 2015.

932. By no later than 4 April 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 23 to 26 of Schedule AY to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

A search warrant in respect of this account was executed at CommBank premises on 4 April 2016.

933. By reason of the matters pleaded in paragraphs 930 to 932, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
934. By reason of the matters pleaded in paragraphs 930 and 933, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 13 October 2015, being 16 October 2015.
935. By reason of the matters pleaded in paragraphs 931 and 933, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 November 2015, being 30 November 2015.

936. By reason of the matters pleaded in paragraphs 932 and 933, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 4 April 2016, being 7 April 2016.
937. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraphs 930 and 932 and in relation to the matters pleaded at paragraph 931 concerning the designated services identified at items 16 to 18 and 20 to 22 of Schedule AY to the Statement of Claim.

Particulars

See SMR 591720317 dated 13 October 2015. Having formed a suspicion about the cash deposits and transfers, CommBank only reported its suspicions with respect to cash deposits and one transfer on 9 October 2015. CommBank did not report its suspicions with respect to any further cash deposits, nor did it report the amounts transferred to third parties. The report did not contain the information specified in rule 18.2(19) and 18.2(21)(k) to (r) of the Rules, contrary to s 41(3)(b) of the Act.

A total of \$399,900 in large cash deposits and a total of \$450,142 in domestic transfers were not reported.

938. It was not until 11 July 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 931 concerning the designated service identified at item 19 of Schedule AY to the Statement of Claim.

Particulars

SMR 783817192 dated 11 July 2017.

\$50,000 cash deposit reported late.

939. By reason of the matters pleaded at paragraphs 930 to 938, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

940. On and from 9 October 2015, CommBank did not monitor Company 9 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 9 October 2015 and 14 October 2015, 3 manual alerts were raised on this account. Having reviewed the alerts and identified the ML/TF risks, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and identifying, mitigating and managing ongoing ML/TF risks.

SMR 591720317 dated 13 October 2015.

Despite the volume of cash deposits made to the account within a short period, no automatic transaction monitoring alerts for suspicious cash activity were ever triggered with respect to this account.

On 9 October 2015, an STR was raised by RBS staff at the Warwick branch (TM-229659A) for third party deposits to the account totalling \$20,000. The AML Team reviewed this alert on 12 October 2015, and ultimately submitted an SMR in relation to these third party deposits on 13 October 2015. The alert was then closed, and no customer due diligence was carried out.

On 14 October 2015, an STR was raised by RBS staff at the Kardinya branch (TM-232029A) for third party deposits to the account totalling \$50,000. A further STR was raised that same day by RBS staff at the Booragoon branch (TM-232037A) for third party deposits to the account totalling \$50,000. The AML Team reviewed both of these alerts on 15 and 19 October 2015, and concluded that as the customer was recently reported to AUSTRAC on 13 October 2015, there was no 'add value to re-report at this stage'. The alert was then closed, and no due diligence was carried out.

SMR 591720317 dated 13 October 2015 noted transfers had been made to Domestic Account 5. From 16 May 2015, the holder of Domestic Account 5 produced transaction monitoring alerts in CommBank's system regularly (for example, 14 alerts were generated in June 2015 alone).

By no later than 9 July 2015, Domestic Account 5 was identified as having received funds from persons of interest – see email within the Intelligence Team, Group Security, dated 9 July 2015.

By no later than 10 July 2015, Domestic Account 5 was identified as having received debit transfers from Company 5, being another account of concern in relation to Syndicate 4 – see SMR 566752229.

By no later than 10 August 2015, Domestic Account 5 was identified as a beneficiary of funds from Person 49, who received structured deposits and then moved money rapidly to Domestic Account 16 – see email within the AML Team, Group Security, dated 10 August 2015.

By no later than 18 September 2015, the holder of Domestic Account 5 and the holder of Domestic Accounts 18, 19, 20 were both identified as having received debit transfers from Company 5, being another account of concern in relation to Syndicate 4 – see SMR 585381580.

The account was not stopped and closed until 19 September 2016.

From 9 October 2015 to 19 February 2016 Company 9 deposited \$369,950 in cash and sent \$380,236 to other Australian accounts.

941. On and from 13 October 2015, CommBank did not monitor Company 9 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a s 41 suspicion and having submitted an SMR on 13 October 2015 with respect to Company 9, rule 15.9(3) required

CommBank to apply its enhanced customer due diligence program to Company 9.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 9 until the account was stopped and closed on 19 September 2016.

From 13 October 2015 to 19 February 2016 Company 9 deposited \$210,000 in cash and sent \$270,104 to other Australian accounts.

942. By reason of the matters pleaded at paragraphs 940 and 941, CommBank contravened s 36(1) on and from 13 October 2015 with respect to Company 9.

Company 10

943. On or about 27 April 2015, CommBank provided a designated service to Company 10 by opening an account in the name of Company 10.

Particulars

Item 1, table 1, s 6 of the Act

CommBank Account 60.

The company director was recorded as Person 54.

944. On 1 July 2015, 8 cash deposits totalling \$60,050 were made into CommBank Account 60 in the name of Company 10.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 60.

Items 1 and 2 of Schedule AZ to the Statement of Claim.

These cash deposits were made at CommBank IDMs.

3 of these cash deposits were under \$10,000.

945. Between 29 July 2015 and 25 August 2015 a total of \$8,000 was withdrawn as cash at CommBank IDMs from CommBank Account 60 in the name of Company 10 Ltd.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 60.

Schedule AZ to the Statement of Claim.

946. By no later than 25 November 2015, CommBank was aware of suspicious activity on CommBank Account 60 in the name of Company 10.

Particulars

On 25 November 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 60 in the name of Company 10 in connection with an investigation into serious criminal offences including 'drug

importation and illegal processing of money in connection with that activity'.

The failures to report suspicious matters for the purposes of s 41

947. By no later than 25 November 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 11 of Schedule AZ to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

On 25 November 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 60 in the name of Company 10 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

CommBank provided the requested information and documents to the AFP under cover of their letter dated 17 December 2015.

A search warrant in respect of this account was executed at CommBank premises on 4 April 2016.

948. By reason of the matters pleaded in paragraph 947, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
949. By reason of the matters pleaded in paragraph 947, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 November 2015, being 30 November 2015.
950. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded in paragraph 947.
951. By reason of the matters pleaded at paragraphs 947 to 950, CommBank contravened s 41(2)(a) of the Act.

Company 11

952. On or about 6 October 2015, CommBank provided a designated service to Company 11 by opening an account in the name of Company 11.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 61.

Company 11's business was recorded as 'clothing retailing'.

The company director was recorded as Person 55.

953. Between 12 October 2015 and 14 December 2015, 2 cash deposits totalling \$21,000 were made into CommBank Account 61 in the name of Company 11.

Particulars

CommBank statement for CommBank Account 61.

Items 1 and 4 of Schedule AAA to the Statement of Claim.

954. Between 21 October 2015 and 14 December 2015 a total of \$22,030 was transferred from CommBank Account 61 in the name of Company 11 to 3 Australian based bank accounts.

Particulars

Account statement for CommBank Account 61.

Schedule AAA to the Statement of Claim.

\$1,000 was transferred to CommBank Account 62.

\$1,000 was transferred to an unidentified CommBank account.

\$20,030 was transferred to Domestic Account 18

955. Between 26 February 2016 and 31 August 2016 a total of \$1,667,570 was transferred to CommBank Account 61 in the name of Company 11 from at least 2 Australian based bank accounts.

Particulars

Account statement for CommBank Account 61.

SMR 686245410 dated 7 September 2016 notes account credits were received from Domestic Account 24 and a CommBank account in the name of Company 20.

Schedule AAA to the Statement of Claim.

956. Between 29 April 2016 and 8 August 2016 a total of \$1,178,268 was transferred from CommBank Account 61 in the name of Company 11 to 2 Australian based bank accounts.

Particulars

Account statement for CommBank Account 61.

SMR 686245410 dated 7 September 2016 suggests this activity continued until at least 31 August 2016 (the period on which the SMR reports).

Schedule AAA to the Statement of Claim.

\$354,698 was transferred to the Domestic Account 19.

\$823,570 was transferred to the Domestic Account 20.

957. By no later than 17 December 2015, CommBank was aware of suspicious activity on CommBank 61 in the name of Company 11.

Particulars

On 17 December 2015 the AFP emailed CommBank advising that this account was connected with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

958. By no later than 17 December 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 5 of Schedule AAA to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

On 17 December 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 61 in the name of Company 11 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

CommBank provided the requested information and documents to the AFP under cover of their letter dated 18 December 2015.

On 20 October 2016, SMR 700326542 was lodged. That SMR referred to CommBank Account 61, but did not report the above pleaded suspicions.

959. By no later than 7 September 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 6 to 47 of Schedule AAA to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of ~~New South Wales~~ Western Australia.

Particulars

By 7 September 2016 the AML team had reviewed transactions on this account and had identified multiple large deposits and transfers indicative of money laundering – see SMR 686245410 dated 7 September 2016.

A search warrant in respect of this account was executed at CommBank premises on 4 April 2016.

960. By reason of the matters pleaded in paragraphs 958 and 959, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
961. By reason of the matters pleaded in paragraphs 958 and 960, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 17 December 2015 being 22 December 2015.
962. By reason of the matters pleaded in paragraphs 959 and 960, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 7 September 2016 being 12 September 2016.
963. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraphs 958 concerning the designated services identified at items 1 to 3 and 5 of Schedule AAA to the Statement of Claim and in respect of the matters pleaded at paragraph 959.

Particulars

\$1,000 in cash deposits and \$2,000 transferred to other domestic accounts unreported.

964. It was not until 11 July 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 958 concerning the designated services identified at item 4 of Schedule AAA to the Statement of Claim.

Particulars

SMR 783817301 dated 11 July 2017.

\$20,000 cash deposit reported late.

965. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 959.

Particulars

SMR 686245410 dated 7 September 2016 reported only the transactions pleaded at items 48–54 of Schedule AAA to the Statement of Claim. CommBank did not report its suspicions with respect to any other account credits or transfers.

\$1,178,393 credited to account and \$1,178,268 transferred to third party domestic accounts unreported.

966. By reason of the matters pleaded at paragraphs 958 to 965, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

967. On and from 17 December 2015, CommBank did not monitor Company 11 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 17 December 2015 the AFP wrote to OPC Compliance, CommBank seeking information and documents relating to CommBank Account 61 in the name of Company 11 in connection with an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity'.

No customer due diligence was carried out with respect to this customer in response to the AFP's correspondence dated 17 December 2015.

The account was stopped and closed on 19 September 2016.

From 17 December 2015 to 31 August 2016 Company 11 received \$1,646,570 in account credits and sent \$1,178,268 to other Australian accounts.

968. On and from 17 December 2015, CommBank did not monitor Company 11 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having being advised by the AFP on 17 December 2015 that CommBank Account 61 in the name of Company 11 was connected to an investigation into serious criminal offences including 'drug importation and illegal processing of money in connection with that activity', either rule 15.9(1) or rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 11.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 11.

The account was stopped and closed on 19 September 2016.

From 17 December 2015 to 31 August 2016 Company 11 received \$1,646,570 in account credits and sent \$1,178,268 to other Australian accounts.

969. By reason of the matters pleaded at paragraphs 967 and 968, CommBank contravened s 36(1) on and from 17 December 2015 with respect to Company 11.

Structured and large cash deposits through IDMs in 2017

970. On or about 29 December 2016, CommBank provided a designated service to Person 56 by opening an account in the name of Person 56.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 64.

Person 56 was a Chinese national in Australia on a visitor visa.

971. Between 5 January 2017 and 10 January 2017, 29 cash deposits totalling \$320,000 were made into CommBank Account 64 in the name of Person 56 through IDMs.

Particulars

CommBank statement for CommBank Account 64.

Items 2–3, 5 and 8–9 of Schedule AAB to the Statement of Claim.

The failures to report suspicious matters for the purposes of s 41

972. By no later than 7 February 2017, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2–4, 6–7 and 9–12 of Schedule AAB to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 6 February 2017 AUSTRAC issued a s 49 request to CommBank in respect of this account relating to a TTR lodged in respect of a \$15,000 cash deposit on 8 January 2017.

By no later than 7 February 2017 CommBank's AML Team had completed a full transactional review of the account.

SMR 735118374 dated 7 February 2017 reported suspicious large cash deposits through IDMs on 6 and 8 January 2017, being the transactions at items 5 and 8 of Schedule AAB to the Statement of Claim. CommBank did not report its suspicions with respect to any other transactions that had occurred on the account.

On 5 January 2017, the customer had also deposited large amounts of cash through IDMs, being 12 deposits totalling \$125,000.

On 9 January 2017, \$40,000 cash was deposited into the account through IDMs in 7 deposits at 5 different IDMs located in Sydney.

Also, on 10 January 2017, \$10,000 in cash in 2 structured transactions was deposited through 2 Sydney based IDMs. Whilst the SMR reported 'further cash deposits at multiple branches and ATMs in Vic and NSW since its opening', it did not report that some of these deposits had been structured.

On 7, 8 and 10 January 2017, 3 transfers from third party accounts totalling \$124,000 were made into this account.

On 11 January 2017 a further \$369,000 was transferred out of the account.

- 973. By reason of the matters pleaded in paragraph 972, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 974. By reason of the matters pleaded in paragraph 972 and 973, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 7 February 2017 being 10 February 2017.
- 975. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 972 concerning the designated services identified at items 2–4, and 9, 11 and 12 of Schedule AAB to the Statement of Claim.

Particulars

SMR 735118374 dated 7 February 2017 reported suspicious large cash deposits through IDMs on 6 and 8 January 2017, being the transactions at items 5 and 8 of Schedule AAB to the Statement of Claim.

- 976. It was not until 15 March 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at 972 concerning the designated services identified at items 6, 7 and 10 of Schedule AAB to the Statement of Claim.

Particulars

SMR 746323335 dated 15 March 2017.

- 977. By reason of the matters pleaded at paragraphs 972 to 976, CommBank contravened s 41(2)(a) of the Act.

Cuckoo smurfing syndicates

Money laundering by Shaffi and Khan – Strike Force A1

978. On 21 May 2015, Arslan Shaffi and Salman Khan were arrested and charged with money laundering offences.

Particulars

Conduct transaction to avoid threshold reporting requirement, contrary to s 142(1) of the AML/CTF Act.

Joint commission to intend as instrument of crime, money >= \$1,000,000, contrary to section 400.3(1) of the *Criminal Code Act 1995* (Cth).

Dealing with money or property reasonably suspected of being proceeds of crime, money/property >= \$100,000, contrary to section 400.9(1) of the *Criminal Code Act 1995* (Cth).

Dealing with money or property reasonably suspected of being proceeds of crime, money/property < \$100,000, contrary to section 400.9(1A) of the *Criminal Code Act 1995* (Cth).

Shaffi and Khan were part of a cuckoo smurfing syndicate.

Arslan Shaffi was sentenced on 12 December 2016 to 5 years' imprisonment from 21 May 2015 with a 3 year non-parole period for the above charges.

Salman Khan was sentenced on 7 March 2017 to 3 years' imprisonment from 21 May 2015 with a 2 year non-parole period for the above charges.

979. NSW Police alleged that between 7 October 2014 and 21 May 2015, Shaffi and Khan laundered \$1,784,408 in structured cash deposits through 101 CommBank accounts in 255 separate transactions.

Particulars

NSW Police Statement of Facts.

The 101 CommBank accounts are detailed in Confidential Annexure C to the Statement of Claim.

980. On 26 May 2015, NSW Police sent an email to CommBank, urgently seeking documents and CCTV footage in relation to transactions on the 101 CommBank accounts.

Particulars

Email from NSW Police to OPC Compliance on 26 May 2015 at 5.08pm, attaching a spreadsheet of account details collected from deposit slips, including details relating to 101 CommBank accounts.

By this email, NSW Police advised CommBank that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in

excess of \$3 million of banking receipts which police will strongly suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

Included in the list of 101 CommBank accounts attached to the NSW Police email were the following 10 accounts:

Company 12 – CommBank Account 65.

Company 13 – CommBank Account 66.

Person 58 – CommBank Account 68.

Person 59 – CommBank Account 70.

Person 61 – CommBank Account 72.

Person 62 – CommBank Account 73.

Person 63 – CommBank Account 74.

Person 64 – CommBank Account 75.

Person 65 – CommBank Account 76.

Company 16 – CommBank Account 77.

981. At all relevant times, CommBank was aware that CommBank Account 67 in the name of Company 14 had the same beneficial owner as CommBank Account 66 in the name of Company 13.

Particulars

Paragraphs 997 to 1025 below.

982. At all relevant times, CommBank was aware that Person 58 was a signatory to CommBank Account 69 in the name of Company 15.

Particulars

Paragraphs 1026 to 1052 below.

983. In the period 24 October 2011 to 18 June 2016, 902 cash deposits under \$10,000 totalling \$7,212,752 were made into the accounts particularised in paragraphs 975 to 977 (the **12 accounts**).

Particulars

Paragraphs 985 to 1150 below.

984. CommBank failed to report to the AUSTRAC CEO (or did not report within the timeframe set out in s 41(2) of the Act) a total of \$2,311,902 in cash deposits made into 11 of the 12 accounts that it suspected were structured.

Particulars

Paragraphs 985 to 1150 below.

Section 41 of the Act.

Company 12 – CommBank Account 65

985. On or about 23 July 2014, CommBank provided a designated service to Company 12 by opening an account in the name of Company 12 .

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 65.

Company 12's business was recorded as an (unregistered) charity.

986. Between 27 October 2014 and 20 May 2015, 319 cash deposits each under \$10,000 and totalling \$2,869,730 were made into CommBank Account 65 in the name of Company 12 at CommBank branches.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 65.

Items 1 to 27 of Schedule AAC to the Statement of Claim.

987. CommBank suspected that the cash deposits pleaded at paragraph 986 were structured contrary to s 142 of the Act.

Particulars

SMRs 516267733 dated 30 December 2014, 543381915 dated 14 April 2015 and 552678602 dated 19 May 2015.

988. By no later than 30 December 2014, CommBank was aware of suspicious activity on CommBank Account 65 in the name of Company 12.

Particulars

On 27 October 2014 transaction monitoring alert TM-153190A triggered for large aggregate cash transactions on CommBank Account 65 and was sent to the AML team for review on 28 October 2014, but was not reviewed by the AML Team until 30 December 2014.

SMR 516267733 dated 30 December 2014 reported multiple structured deposits conducted in an intense manner whereby deposits consist of up to 26 structured deposits in a single day. The SMR concluded that Company 12 may have been engaging in tax evasion. Indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

989. By no later than 25 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 26 and 27 of Schedule AAC to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 25 June 2015 the AML team reviewed transaction monitoring alert TM-195832A manually raised by RBS on 13 May 2015 as a result of a man attending a branch with '\$7,500 in 50s' to deposit to CommBank Account 65. The AML Team reviewed transactions on CommBank Account 65 between 18 May 2015 and 25 June 2015, and concluded that the same activity reported as suspicious in SMR 552678602 continued, but that there was 'no added value to report the similar activity within three months period'.

In the month prior to the AML Team's review of TM-195832A, CommBank was responding to requests from NSW Police for information relating to this account.

On 4 May 2015 CommBank's Intelligence Team had recommended that Company 12 be referred to 'the Customer High Risk team, due to reputational and potential regulatory damage from suspected money laundering'.

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 65 in the name of Company 12. NSW Police advised that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly suggest are structured deposits'. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 identifying transactions including those at items 26 and 27 of Schedule AAC to the Statement of Claim as being relevant to NSW Police investigations. The email enclosed an excel file listing of all located account numbers including CommBank Account 65 in the name of Company 12 and including reference to 72 cash deposits on that account each under \$10,000 made on 26 November 2014, 25 March 2015 and 15, 18, 20 May 2015.

- 990. By reason of the matters pleaded in paragraph 989, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 991. By reason of the matters pleaded in paragraphs 989 and 990, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 25 June 2015, being 30 June 2015.
- 992. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 989.

Particulars

SMRs 516267733 dated 30 December 2014, 543381915 dated 14 April 2015 and 552678602 dated 19 May 2015.

See also SMR 510459739 dated 8 December 2014.

The total value of these unreported transactions was \$86,850, comprised of 9 cash deposits each under \$10,000.

993. By reason of the matters pleaded at paragraphs 989 to 992, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

994. On and from 27 October 2014, CommBank did not monitor Company 12 in relation to the provision of designated services (including through CommBank Account 65, CommBank Account 125, CommBank Account 126 and CommBank Account 127) with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 27 October 2014 and 20 May 2015, only 2 automated transaction monitoring alerts and 3 manual alerts or STRs were triggered on CommBank Account 65. There were significant delays with the AML Team reviewing the alerts raised on 27 October 2014, 1 February 2015 and 13 May 2015, having regard to the relevant ML/TF risk. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

No automated transaction monitoring alerts were generated with respect to structuring on CommBank Account 65, in spite of the fact that between 27 October 2014 and 20 May 2015, 319 cash deposits each under \$10,000 and totalling \$2,869,730 were made into this account.

Between 27 October 2014 and 30 December 2014, 86 cash deposits under \$10,000 totalling \$757,200 were deposited into CommBank Account 65 – comprised of 11 deposits on 27 October 2014, 14 deposits on 28 October 2014, 2 deposits on 29 October 2014, 3 deposits on 7 November 2014, 25 deposits on 26 November 2014, 2 deposits on 27 November 2014, 27 deposits on 8 December 2014 and 2 deposits on 9 December 2014.

It was not until 30 December 2014 that the AML Team reviewed TM-153190A triggered on 27 October 2014 for large aggregate cash transactions on CommBank Account 65. SMR 516267733 was lodged on 30 December 2014 reporting Company 12 'for receiving and or conducting intensely structured cash deposits in an attempt to avoid agents threshold transaction report (TTR). ... Of particular mention is that on several occasions the structuring is conducted in an intense manner whereby deposits consist of up to 26 structured deposits in a single day (26 November 2014)'. CommBank concluded the evidence suggested tax evasion and money laundering. The alert was closed and no customer due diligence was carried out.

Following SMR 516267733, some due diligence was carried out by CommBank's internal fraud team. On 23 January 2015, the internal fraud team recommended 'referring both the AML and your findings to the Intelligence Team for their consideration and, at the very least, inclusion in i-base. They may also be privy to other information which may change the dynamics of the transactional activity outlined below'.

Based on the the internal fraud team's recommendations, a manual alert (TM-171107A) was also raised on 1 February 2015.

On 28 January 2015, the matters the subject of SMR 516267733 and TM-153190A were referred to CommBank's Intelligence Team, but no review was completed until 4 May 2015.

In the meantime, between 20 March 2015 and 14 April 2015, the structured cash deposits intensified very significantly, including the following number of cash deposits each under \$10,000: 18 deposits on 20 March 2015, 22 deposits on 23 March 2015, 15 deposits on 24 March 2015, 30 deposits on 25 March 2015, 21 deposits on 26 March 2015, 2 deposits on 27 March 2015, 8 deposits on 7 April 2015, 8 deposits on 8 April 2015, 12 deposits on 9 April 2015, 14 deposits on 10 April 2015 and 25 deposits on 13 April 2015, totalling \$1,621,765.

This intense pattern of structuring did not trigger any transaction monitoring alerts or ECDD, in spite of the fact that structuring had previously been identified on this account and reported to AUSTRAC on 30 December 2014 and in spite of the fact that Company 12 had been referred to CommBank's Intelligence Team.

On 13 April 2015 transaction monitoring alert TM-189301A was manually raised by RBS staff at the Elizabeth Street branch following a third party presenting at the branch to deposit cash in 4 transactions into 2 separate accounts. The alert was reviewed by the AML Team on 14 April 2015 and SMR 543381915 lodged that day. In lodging this SMR, the AML Team did not review TM-171107A raised on 1 February 2015 and which had not yet been reviewed by the AML Team.

On 14 April 2015, CommBank's Internal fraud team emailed CommBank's Intelligence team advising that '[a]nother alert has flagged with AML relating to structured cash deposits being made to [Company 12]. At this point our team is still deciding if we will reopen this file ... for further investigation however wanted to confirm if anything adverse was located at your end'.

On 4 May 2015 CommBank Group Security forwarded an Intelligence Bulletin in respect of Company 12 to the Internal Fraud team noting that it had 'flagged multiple times for structured payments under our transaction monitoring rules'. It assessed that '[Company 12] transactions are reflective of a charitable organisation'. It recommended that the 'case should be raised with the Customer High Risk team, due to reputational and potential regulatory damage from suspected money laundering.'

Company 12 was not referred to the Customer High Risk Team in response to this recommendation.

Notwithstanding the recommendations in the Intelligence Bulletin, CommBank permitted the intense structured cash deposits to continue, including 5 deposits on 12 May 2015, 4 deposits on 13 May 2015, 5 deposits on 14 May 2015, 9 deposits on 15 May 2015, 24 deposits on 18 May 2015, 4 deposits on 19 May 2015 and 5 deposits on 20 May 2015, totalling \$489,250.

On 13 May 2015 TM-195832A was raised manually by RBS staff at the Corio Shopping Centre, Vic, reporting a man attending a branch with '\$7,500 in 50s' to deposit to CommBank Account 65.

On 18 May 2015, the AML Team reviewed TM-196553A which was triggered on 14 May 2015 for large aggregate cash transactions totalling \$101,240 over 6 business days on CommBank Account 65.

Also on 18 May 2015 the AML Team reviewed TM-171107A, outstanding since 1 February 2015. SMR 552678602 was lodged on 19 May 2015 in joint response to TM-171107A and TM-196553A. The alert was closed and no customer due diligence was carried out. In submitting SMR 552678602 on 19 May 2015, the AML Team had no regard to the Intelligence Bulletin of 4 May 2015 or to the manual alert of 13 May 2015, which was yet to be reviewed.

The structuring stopped when, on 21 May 2015, Arlsan Shaffi and Salman Khan were arrested, charged with money laundering offences and refused bail.

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 65, which following the arrest of Shaffi and Khan were suspected to be involved in over \$3 million in structured laundered cash deposits.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 identifying transactions including those at items 26 and 27 of Schedule AAC to the Statement of Claim as being relevant to NSW Police investigations. The email enclosed an excel file listing of all located account numbers including CommBank Account 65 in the name of Company 12 and including reference to 72 cash deposits on that account each under \$10,000 made on 26 November 2014, 25 March 2015 and 15, 18, 20 May 2015. (Later, on 6 August 2015 OPC Compliance provided an amended excel file to NSW Police).

No customer due diligence was carried out with a view to identifying, mitigating and managing the ML/TF risks in response to the advice by NSW Police that it was investigating transactions on this account.

During this period, in May and June 2015, CommBank attempted to collect further KYC from office holders of this customer. No response

was received. Three further letters were sent in July 2015 following up updated KYC and, again, no response was received.

In July 2015 the Intelligence Team in Group Security identified possible terrorism financing risks with respect to this account and noted that this customer had been 'flagged multiple times for structured payments under our transaction monitoring rules'.

On 10 August 2015 Group Security prepared a draft recommendation that the customer relationship not be terminated as the terrorism financing links could not be substantiated. The draft recommendation did not take into account or refer to the intense pattern of structuring on this account or the investigations being conducted by NSW Police. Group Security recommended that the customer be added as a High Risk Customer for ongoing monitoring and that SMRs already submitted be reviewed. It also recommended that the customer be reassessed at 6 month intervals. No enhanced customer due diligence proportionate to the ML/TF risk was carried out until July 2016, when a High Risk Customer report was prepared.

On 27 August 2015 Group Security identified this customer as an entity that allegedly provides support to terrorism and assessed it as a 'medium' threat to CommBank. The summary of analysis regarding Company 12 read: '... Alleged links to radicalised figures. Law enforcement has not pressed charges or designated this organisation a terrorist group or supporting entity'.

On 29 September 2015 Group Security reviewed the customer because no response had been received to the July 2015 requests for updated KYC. Group Security decided to refer the matter to a 'Senior' to 'have SMR submitted for ongoing activity'. No ECDD was conducted and no SMR was lodged.

On 29 June 2016, approval was given by a Compliance Executive, CommBank, to terminate the relationship with Company 12 with 7 days' notice, due to 'risk exposure to CBA'.

On 1 July 2016 a CommBank High Risk Customer report recommended exiting the client banker relationship with Company 12.

As at 31 January 2017 CommBank Account 125 in the name of Company 12 remained open.

995. On and from 30 December 2014, CommBank did not monitor Company 12 in relation to the provision of designated services (including through CommBank Account 65, CommBank Account 125, CommBank Account 126 and CommBank Account 127) with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 30 December 2014 with respect to Company 12, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 12.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 12 until 1 July 2016, when it prepared a High Risk Customer report which recommended exiting the client banker relationship with Company 12.

From 30 December 2014 to 20 May 2015 233 structured cash deposits totalling \$2,112,530 were made into CommBank Account 65 in the name of Company 12.

996. By reason of the matters pleaded at paragraphs 994 and 995, CommBank contravened s 36(1) on and from 27 October 2014 with respect to Company 12.

Company 13 – CommBank Account 66

997. On or about 18 April 2008, CommBank provided a designated service to Company 13 by opening an account in the name of Company 13.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 66.

Company 13's business was recorded as equipment export.

998. Between 24 October 2011 and 21 August 2015, 273 cash deposits each under \$10,000 and totalling \$2,334,955 were made into CommBank Account 66 in the name of Company 13.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 66.

Items 1 to 38 of Schedule AAD to the Statement of Claim.

999. CommBank suspected that the cash deposits pleaded at paragraph 998 were structured contrary to section 142 of the Act.

Particulars

SMRs 538168411 dated 24 March 2015 and 569874738 dated 22 July 2015.

1000. By no later than 24 March 2015, CommBank was aware of suspicious activity on CommBank Account 66 in the name of Company 13.

Particulars

On 24 March 2015 the AML Team reviewed three transaction monitoring alerts – TM-162851A triggered on 15 December 2014 for large aggregate cash transactions; TM-172030A triggered on 7 February 2015 for cash activity involving unique branch and TM-183437A triggered on 14 March 2015 for cash activity involving unique branch and was sent to the AML team for review on 16 March 2015.

SMR 538168411 dated 24 March 2015 reported deposits made in an intensely structured nature to this account, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

1001. By no later than 10 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 20–22 of Schedule AAD to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 7 April 2015 transaction monitoring alert TM-188626A triggered for large aggregate cash transactions and was reviewed by the AML team on 9 and 10 April 2015. The AML team noted that CommBank Account 66 had triggered for aggregated cash transactions from 1 April to 7 April 2015. Bank records indicated the customer was reported to AUSTRAC on 24 March 2015. A month review of the account found the activity continues, therefore no added value to report the similar activity within three months' time. The suspicious activity identified as continuing was not reported until 22 July 2015.

SMR 569874738 dated 22 July 2015.

1002. By no later than 23 January 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 37 and 38 of Schedule AAD to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMRs 538168411 dated 24 March 2015 and 569874738 dated 22 July 2015.

On 23 January 2016 at 6.11am, a member of the AML team emailed the Group Security Customer Risk team to refer Person 57, Company 13 and Company 14 for a High Risk Customer assessment. The email noted that Person 57 had 'two commercial profiles of similar names [being Company 13 and Company 14] and the commercial accounts on each have received structured cash', noting that he had been reported to AUSTRAC for this conduct 4 times. The AML Team member concluded that as Person 57 had continued to receive intense structured cash deposits to a commercial account he owns [Company 14], the activities remain highly suspicious'.

1003. By reason of the matters pleaded in paragraphs 1001 and 1002, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
1004. By reason of the matters pleaded in paragraphs 1001 and 1003, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 10 April 2015 being 15 April 2015.

1005. CommBank did not give the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1001 until 22 July 2015.

Particulars

SMR 569874738 dated 22 July 2015.

The total value of these transactions was \$107,000.

1006. By reason of the matters pleaded in paragraphs 1002 and 1003, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 23 January 2016 being 28 January 2016.
1007. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1002.

Particulars

SMRs 538168411 dated 24 March 2015 and 569874738 dated 22 July 2015.

The total value of these unreported transactions was \$48,000.

1008. By reason of the matters pleaded at paragraphs 1001 to 1007, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

1009. On and from 15 December 2014, CommBank did not monitor Company 13 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 15 December 2014 and 27 June 2015, 5 automated transaction monitoring alerts were raised on this account. CommBank failed to review all of these alerts in a timely manner, with regard to the ML/TF risks identified. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

No automated transaction monitoring alerts were generated with respect to structuring on this account, in spite of the fact that between 24 October 2011 and 21 August 2015, 275 cash deposits each under \$10,000 and totalling \$2,334,955 were made into CommBank CommBank Account 66 in the name of Company 13.

On 24 March 2015, the AML Team reviewed 3 transaction monitoring alerts, being TM-162851A triggered over 3 months earlier on 15 December 2014 for large aggregate cash transactions; TM-172030A triggered on 7 February 2015 for cash activity involving unique branch and TM-183437A triggered on 14 March 2015 for cash activity involving unique branch.

The AML team reviewed transactions between 23 March 2014 and 24 March 2015 and lodged SMR 538168411 on 24 March 2015 reporting

'153 cash deposits...of an intensely structured nature' and 82 incoming international funds transfers totalling \$12,128,361. The SMR concluded that as the client had received 'intensely structured deposits totalling \$1,368,000 within a three month period where the origin of cash is unknown', the activity was suspicious. After the SMR was lodged, the alerts were closed and no customer due diligence carried out.

On 7 April 2015 transaction monitoring alert TM-188626A triggered for large aggregate cash transactions and was reviewed by the AML team on 9 and 10 April 2015. The AML team noted that the customer was reported to AUSTRAC on 24 March 2015, that a 'month review of the account found the activity continues, therefore no added value to report the similar activity within three months' time'. The alert was closed, no SMR was lodged and no customer due diligence carried out.

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 66 in the name of Company 13. NSW Police advised that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 66 in the name of Company 13 and including reference to 22 cash deposits on that account each under \$10,000 made on 23 February 2015, 4 March 2015, 15 and 20 May 2015. No customer due diligence was carried out in response to the request from NSW Police.

On 27 June 2015 transaction monitoring alert TM-205422A triggered for cash activity involving unique branch but was not reviewed by the AML team until 20 and 22 July 2015. The AML Team conducted a transactional review of the account and found 'multiple structured cash deposits. Many of the deposits were made at multiple branches in WA, SA and VIC on any single given day. ... Following the deposits funds have been domestically and internationally wire transferred to multiple third parties. Since Company 13 have continued to receive a large amount of structured cash deposits, it appears this is an attempt to avoid reporting therefore deemed suspicious'. The AML Team did not take into account NSW Police's advice that it was investigating structuring on this account. An SMR was submitted on 22 July 2015, reporting that the activity was indicative of money laundering. The alert was closed and no customer due diligence was carried out.

On 6 August 2015 OPC Compliance, CommBank provided an amended spreadsheet to NSW Police of all located account names and numbers including CommBank Account 66 in the name of Company 13 and including reference to 22 cash deposits on that account each under \$10,000 made on 23 February 2015, 4 March 2015, 15 and 20 May 2015.

Notwithstanding NSW Police's advice that this customer was being investigated for structuring contrary to the AML/CTF Act, CommBank permitted a further \$165,395 in structured deposits into this account from 26 May 2015 until 21 August 2015.

On 23 January 2016 at 6.11 am, a member of the AML team emailed the Group Security Customer Risk team to refer Person 57, the director of Company 13, for a High Risk Customer assessment. The email noted that Person 57 had two commercial profiles of similar names (being Company 13 and Company 14) and had received structured cash deposits on each commercial account, having been reported to AUSTRAC for this conduct 4 times. The email did not refer to NSW Police investigations into this customer in relation to structuring. No High Risk Customer report was prepared with respect to Company 13 until 1 July 2016.

On 29 June 2016, approval was given by a Compliance Executive, CommBank, to terminate the relationship with Company 13, with 7 days' notice, due to 'risk exposure to CBA'.

On 1 July 2016 a CommBank High Risk Customer report recommended exiting the client banker relationship with Company 13, having conducted a transactional review of the account and a search of open source information.

CommBank Account 66 in the name of Company 13 was not closed until 22 September 2016.

From 15 December 2014 to 21 August 2015 254 structured cash deposits totalling \$2,178,955 were made into CommBank Account 66 in the name of Company 13.

1010. On and from 24 March 2015, CommBank did not monitor Company 13 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of 41 of the Act and having submitted an SMR on 24 March 2015 with respect to Company 13, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 13.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 13 until 1 July 2016, when it prepared a High Risk Customer report which recommended exiting the client banker relationship with Company 13.

From 24 March 2015 to 21 August 2015 115 structured cash deposits totalling \$910,955 were made into CommBank Account 66 in the name of Company 13.

1011. By reason of the matters pleaded at paragraphs 1009 and 1010, CommBank contravened s 36(1) on and from 15 December 2014 with respect to Company 13.

Company 14 – CommBank Account 67

1012. On or about 8 July 2015, CommBank provided a designated service to Company 14 by opening an account in the name of Company 14.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 67.

Company 14's business was recorded as equipment export.

1013. Between 27 August 2015 and 22 January 2016, 48 cash deposits each under \$10,000 and totalling \$372,348 were made into CommBank Account 67 in the name of Company 14.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 67.

Items 1 to 8 of Schedule AAE to the Statement of Claim.

1014. CommBank suspected that the cash deposits pleaded at paragraph 1013 were structured contrary to section 142 of the Act.

Particulars

SMRs 590943063 dated 9 October 2015 and 621876556 dated 27 January 2016.

1015. By no later than 9 October 2015, CommBank was aware of suspicious activity on CommBank Account 67 in the name of Company 14.

Particulars

SMR 590943063 dated 9 October 2015 which reported intensely structured cash deposits inconsistent with the customer's profile, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

1016. By no later than 9 October 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 3 of Schedule AAE to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 590943063 dated 9 October 2015, which reported suspicions that 'further structured cash activity [took] place at the end of Sep 2015'.

Previously, on 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including related CommBank Account 66 in the name of Company 13, which following the arrest of Shaffi and Khan was suspected to be involved in over \$3 million in structured, laundered cash deposits.

1017. By no later than 27 January 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 5–8 of Schedule AAE to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 621876556 dated 27 January 2016 reported that a review of the account from date last reported (being 9 October 2015) found 'intensely structured cash deposits received at multiple branches across an acute period in amongst what appear to be legitimate business transactions. As Person 57 continues to receive intense structured cash deposits to a commercial account he owns, the activities remain highly suspicious'.

Previously, on 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including related CommBank Account 66 in the name of Company 13, which following the arrest of Shaffi and Khan was suspected to be involved in over \$3 million in structured, laundered cash deposits.

1018. By reason of the matters pleaded in paragraphs 1016 and 1017, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
1019. By reason of the matters pleaded in paragraphs 1016 and 1018, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 9 October 2015 being 14 October 2015.
1020. By reason of the matters pleaded in paragraphs 1017 and 1018, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 27 January 2016 being 1 February 2016.
1021. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraphs 1016 and 1017.

Particulars

SMRs 590943063 dated 9 October 2015 and 621876556 dated 27 January 2016.

SMR 590943063 dated 9 October 2015 did not report the amount of all suspected structured deposits in September 2015. The report did not contain the information specified in rule 18.2(19), contrary to s 41(3)(b) of the Act.

SMR 621876556 dated 27 January 2016 did not report the amount of suspected structured deposits occurring after 9 December 2015. The

report did not contain the information specified in rule 18.2(19),
contrary to s 41(3)(b) of the Act.

The total value of the unreported transactions was \$130,000.

1022. By reason of the matters pleaded at paragraphs 1016 to 1021, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

1023. On and from 8 July 2015, CommBank did not monitor Company 14 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including related CommBank Account 66 in the name of Company 13, which following the arrest of Shaffi and Khan was suspected to be involved in over \$3 million in structured, laundered cash deposits. On 11 June 2015

CommBank replied to NSW Police's request for information.

CommBank permitted the same beneficial owner to open a new account on 8 July 2015, without any regard to this investigation and CommBank's own prior suspicions of intense structuring.

Between 27 August 2015 and 22 January 2016, only 2 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

Although between 27 August 2015 and 22 January 2016, 48 cash deposits each under \$10,000 and totalling \$372,348 were made into this account, no automated transaction monitoring alerts were raised for structuring.

On 5 September 2015 transaction monitoring alert TM-221945A triggered for cash deposits made by new customers but was not reviewed by the AML team until 7 and 8 October 2015. The initial review by the AML Team member on 7 August 2015 concluded that the TMA alerted on multiple cash deposits to the customer's account.

Customer has previously been reported to AUSTRAC on 24 Mar 2015 (ref: 15873477) and 22 Jul 2015 (ref: 16926631) [being related CommBank Account 66 in the name of Company 13] for structured cash deposits. A transactional review of the account found the activity is ongoing with a further 24 transactions totalling \$244K. Activity seems to occur at the end of each month and may be business related. Bank records dated Jul 2015 indicate the customer is operating his own business exporting equipment (cranes) to Asia, India and Dubai. Other account activity appears consistent with

nature of the business as described. As the structured cash activity has been reported within the last three months and does not appear to be increasing, it will not be reported again at this stage. Close as not suspicious'. On review, the AML Team supervisor disagreed and requested that an SMR be lodged. After an SMR was lodged, the alert was closed and no customer due diligence carried out – notwithstanding that the AML Team had identified this customer's connection to Company 13, which was being investigated by NSW Police for structuring, as known to CommBank.

On 12 December 2015 transaction monitoring alert TM-245111A triggered for cash deposits made by new customers, but was not reviewed by the AML team until 23 and 27 January 2016. An SMR was lodged and the alert closed.

On 23 January 2016 at 6.11 am, a member of the AML team emailed the Group Security Customer Risk team to refer Person 57, the director of Company 14, for a High Risk Customer assessment. The email noted that Person 57 had two commercial profiles of similar names (being Company 13 and Company 14) and had received structured cash deposits on each commercial account, having been reported to AUSTRAC for this conduct 4 times. The email did not refer to NSW Police investigations into Company 14 in relation to structuring.

On 29 June 2016, approval was given by a Compliance Executive, CommBank, to terminate the relationship with Company 14, with 7 days' notice, due to 'risk exposure to CBA'.

Although CommBank was aware of the structured cash deposits to CommBank Account 67 in the name of Company 14 throughout 2015 and suggested that the director of Company 14 be assessed from a High Risk Customer perspective in January 2016, no High Risk Customer report was prepared with respect to Company 14 until 1 July 2016.

On 1 July 2016 a CommBank High Risk Customer report recommended exiting the client banker relationship with Company 14.

The account was not closed until 21 September 2016.

From 27 August 2015 to 22 January 2016, 48 cash deposits each under \$10,000 and totalling \$372,348 were made into CommBank CommBank Account 67 in the name of Company 14.

1024. On and from 9 October 2015, CommBank did not monitor Company 14 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 9 October 2015 with respect to Company 14, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 14.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Company 14 until 1 July 2016, when it prepared a High Risk Customer report which recommended exiting the client banker relationship with Company 14.

From 9 October 2015 to 22 January 2016 29 structured cash deposits totalling \$225,500 were made into CommBank Account 67 in the name of Company 14.

1025. By reason of the matters pleaded at paragraphs 1023 and 1024, CommBank contravened s 36(1) on and from 8 July 2015 with respect to Company 14.

Person 58 – CommBank Account 68

1026. On or about 1 December 1989, CommBank opened an account in the name of Person 58.

Particulars

CommBank Account 68

Person 58's occupation was recorded as 'director'.

1027. Between 23 April 2015 and 8 March 2016, 69 cash deposits each under \$10,000 and totalling \$476,943 were made into CommBank Account 68 in the name of Person 58.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 68.

Items 1 to 18 of Schedule AAF to the Statement of Claim.

1028. CommBank suspected that the cash deposits pleaded at paragraph 1027 were structured contrary to section 142 of the Act.

Particulars

SMRs 562299234 dated 23 June 2015 and 647251101 dated 27 April 2016.

1029. By no later than 23 June 2015, CommBank was aware of suspicious activity on CommBank Account 68 in the name of Person 58.

Particulars

SMR 562299234 dated 23 June 2015 which reported structured cash deposits at multiple branches in NSW and Victoria, indicative of tax evasion and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

1030. By no later than 23 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 to 4 and 6 of Schedule AAF to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 23 June 2015, SMR 562299234 was lodged following review of TM-196209A and TM-198555A. TM-196209A was raised on 12 May 2015 for large aggregate cash transactions on 29 April, 30 April and 12 May 2015. The AML team reviewed this alert on 19 and 22 June 2015 and noted that it would be reported to AUSTRAC under TM-198555A. SMR 562299234 only reported the suspicions the subject of TM-198555A, noting they were indicative of tax evasion and avoiding reporting obligations.

In the weeks prior to lodging SMR 562299234, on 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 68 in the name of Person 58, which following the arrest of Shaffi and Khan were suspected to be involved in over \$3 million in structured laundered cash deposits.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 68 in the name of Person 58 and including reference to 3 cash deposits on that account each under \$10,000 on 12 May 2015.

1031. By no later than 11 August 2015 CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 9–12 of Schedule AAF to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 7 and 11 August 2015 the AML Team reviewed this account following transaction monitoring alert TM-209402A triggered on 8 July 2015 for large aggregate cash and identified ongoing structured cash activity. Upon review, it was noted that because Person 58 had been reported for similar structured cash activity on 23 June 2015, the alert should be closed. No SMR was lodged.

1032. By no later than 27 April 2016 CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 13–15 and 17–18 of Schedule AAF to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 26 and 27 April 2016 the AML Team reviewed this account following two transaction monitoring alerts – TM-262509A triggered on 4 March 2016 for large aggregate cash transactions and TM-266301A triggered on 14 March 2016 for large aggregate cash transactions including on 4, 7 and 8 March 2016. SMR 647251101 reported the suspected structuring at item 16 of Schedule AAF to the Statement of Claim and reported that ‘a transactional review of the above mentioned account found additional structured cash deposits have been received’.

1033. By reason of the matters pleaded in paragraphs 1030 to 1032, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
1034. By reason of the matters pleaded in paragraphs 1030 and 1033, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 23 June 2015 being 26 June 2015.
1035. By reason of the matters pleaded in paragraphs 1031 and 1033, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 August 2015 being 14 August 2015.
1036. By reason of the matters pleaded in paragraphs 1032 and 1033, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 26 April 2016 being 29 April 2016.
1037. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraphs 1030, 1031 and 1032.

Particulars

SMR 562299234 dated 23 June 2015 reported structured deposits on 20, 21 and 22 May 2015, but did not report deposits earlier in May and April 2015 suspected to be structured. The report did not contain the information specified in rule 18.2(19), contrary to s 41(3)(b) of the Act.

SMR 647251101 dated 27 April 2016 did not report the 'additional structured deposits' found upon a 'transactional review' of the account. The report did not contain the information specified in rule 18.2(19), contrary to s 41(3)(b) of the Act.

The total value of the unreported transactions was \$322,728.

1038. By reason of the matters pleaded at paragraphs 1030 to 1037, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

1039. On and from 12 May 2015, CommBank did not monitor Person 58 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Between 12 May 2015 and 14 March 2016, 5 automated transaction monitoring alerts were raised on this account. CommBank failed to review these alerts in a timely manner. Once the alerts were reviewed and the ML/TF risks identified, CommBank failed to monitor the customer with a view to mitigating and managing these ML/TF risks and with a view to identifying, mitigating and managing ongoing ML/TF risks.

Although from 23 April 2015 and 8 March 2016, 68 cash deposits each under \$10,000 and totalling \$476,943 were made into this account, no automated transaction monitoring alerts were raised for structuring.

On 12 May 2015 transaction monitoring alert TM-196209A triggered for large aggregate cash transactions.

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 68 in the name of Person 58, which following the arrest of Shaffi and Khan were suspected to be involved in over \$3 million in structured laundered cash deposits.

Also on or about 26 May 2015 CommBank sent a “source of wealth” form to Person 58. In the form, Person 58 declared that the source of his funds was from “business profits” and “relatives”.

On 27 May 2015 TM-198555A triggered for large aggregate cash transactions.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 68 in the name of Person 58 and including reference to 3 cash deposits on that account each under \$10,000 on 12 May 2015.

On 19, 22 and 23 June 2015, the AML Team reviewed the two outstanding transaction monitoring alerts – TM-196209A and TM-198555A. The AML Team did not have any regard to the advice from NSW Police that it was investigating structuring on this account. SMR 562299234 was lodged, the alert was closed and no customer due diligence carried out.

In or about June 2015 CommBank collected further KYC from Person 58.

On 8 July 2015 transaction monitoring alert TM-209402A triggered for large aggregate cash transactions but was not reviewed by the AML team until 7 and 11 August 2015. Upon review, it was concluded that because Person 58 had been reported for similar structured cash activity on 23 June 2015, no SMR was required. The AML Team did not have any regard to the advice from NSW Police that it was investigating structuring on this account. The alert was closed, no SMR was lodged and no customer due diligence carried out.

On 26 and 27 April 2016, the AML Team reviewed two transaction monitoring alerts – TM-262509A triggered on 4 March 2016 for large aggregate cash transactions and TM-266301A triggered on 14 March 2016 for large aggregate cash transactions. After SMR 647251101 was lodged, CommBank appears to have identified Person 58 as a High Risk Customer: HRC-3483585A.

On 29 June 2016, approval was given by a Compliance Executive, CommBank, to terminate the relationship with Person 58, with 7 days' notice, due to 'risk exposure to CBA'.

On 1 July 2016 a CommBank High Risk Customer report recommended exiting the client banker relationship with Person 58.

The account was not closed until 19 July 2016.

From 12 May 2015 to 8 March 2016 56 structured cash deposits totalling \$393,643 were made into CommBank Account 68 in the name of Person 58.

1040. On and from 23 June 2015, CommBank did not monitor Person 58 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 23 June 2015 with respect to Person 58, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 58.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 58 until 1 July 2016, when it prepared a High Risk Customer report which recommended exiting the client banker relationship with Person 58.

From 23 June 2015 to 8 March 2016 40 structured cash deposits totalling \$292,440 were made into CommBank Account 68 in the name of Person 58.

1041. By reason of the matters pleaded at paragraphs 1039 and 1040, CommBank contravened s 36(1) on and from 12 May 2015 with respect to Person 58.

Company 15 – CommBank Account 69

1042. On or about 17 August 2015, CommBank provided a designated service to Company 15 by opening an account in the name of Company 15.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 69.

Company 15's business was recorded as a charity.

Person 58 was recorded as the Chairman of Company 15.

1043. Between 13 January 2016 and 6 May 2016, 18 cash deposits each under \$10,000 and totalling \$131,750 were made into CommBank Account 69 in the name of Company 15.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 69.

Items 1 to 4 of Schedule AAG to the Statement of Claim.

1044. CommBank suspected that the cash deposits pleaded at paragraph 1043 were structured contrary to section 142 of the Act.

Particulars

SMR 649990277 dated 6 May 2016.

1045. By no later than 6 May 2016, CommBank was aware of suspicious activity on CommBank Account 69 in the name of Company 15.

Particulars

SMR 649990277 dated 6 May 2016.

The failures to report suspicious matters for the purposes of s 41

1046. By no later than 1 July 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 4 of Schedule AAG to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 1 July 2016 a CommBank High Risk Customer report was prepared in respect of this customer. A transactional review on 1 July 2016 found multiple intense structured cash deposits across multiple branches in Sydney. The report recommended exiting the client banker relationship with Company 15.

1047. By reason of the matters pleaded in paragraph 1046, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1048. By reason of the matters pleaded in paragraphs 1046 and 1047, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 1 July 2016 being 6 July 2016.
1049. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1046.

Particulars

SMR 649990277 dated 6 May 2016 reported structured deposits which occurred in January 2016, but did not report suspicions of structured deposits which occurred on 6 May 2016.

The total value of the unreported transactions was \$30,000.

1050. By reason of the matters pleaded at paragraphs 1046 to 1049, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

1051. On and from 13 January 2016, CommBank did not monitor Company 15 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

SMR 649990277 dated 6 May 2016.

From 13 January 2016 to 6 May 2016 18 structured cash deposits totalling \$131,750 were made into CommBank Account 69 in the name of Company 15.

Despite the volume of structured cash deposits made to the account within a short period, no automatic transaction monitoring alerts for structuring or other cash activity were ever triggered with respect to this account.

By no later than 23 June 2015, CommBank was aware of suspicious activity on the personal account of the chairman of Company 15, Person 58: see SMR 562299234 dated 23 June 2015 and SMR 647251101 dated 27 April 2016 in relation to related CommBank Account 68 in the name of Person 58.

On 29 June 2016, approval was given by a Compliance Executive, CommBank, to terminate the relationship with Person 58, with 7 days' notice, due to 'risk exposure to CBA'.

On 1 July 2016 a CommBank High Risk Customer report recommended exiting the client banker relationship with Company 15.

1052. By reason of the matters pleaded at paragraph 1051, CommBank contravened s 36(1) on and from 13 January 2016 with respect to Company 15.

Person 59 – CommBank Account 70

1053. On or about 4 November 2011, CommBank provided a designated service to Person 59 by opening an account in the name of Person 59.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 70.

Person 59's occupation was recorded as unemployed.

Person 60 was a signatory to this account.

1054. Between 20 June 2014 and 3 May 2016, 46 cash deposits each under \$10,000 and totalling \$262,836.55 were made into CommBank Account 70 in the name of Person 59.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 70.

Transaction monitoring alerts TM-130611A and TM-30611A.

Items 1–14 of Schedule AAH to the Statement of Claim.

1055. CommBank suspected that the cash deposits pleaded at paragraph 1054 were structured contrary to section 142 of the Act.

Particulars

SMR 689638185 dated 16 September 2016.

Transaction monitoring alert TM-130611A triggered on 24 June 2014 for structured cash deposits and reviewed by the AML team on 23 July 2014.

1056. By no later than 23 July 2014, CommBank was aware of suspicious activity on CommBank Account 70 in the name of Person 59.

Particulars

Transaction monitoring alert TM-130611A triggered on 24 June 2014 for structured cash deposits and reviewed by the AML team on 23 July 2014.

The failures to report suspicious matters for the purposes of s 41

1057. By no later than 23 July 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1–3 of Schedule AAH to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 23 July 2014 CommBank formed a suspicion that the cash deposits at items 1 to 3 of Schedule AAH to the Statement of Claim were structured.

On 24 June 2014 transaction monitoring alert TM-130611A triggered for structured cash deposits on 20, 23 and 24 June 2014. This alert was not reviewed by the AML team until 23 July 2014. Upon review, it was concluded that ‘although there are three structured cash deposits, activity does not warrant a SMR at this stage’. The AML Team recommended that CommBank ‘consider reporting if cash activity continues’.

1058. By reason of the matters pleaded in paragraphs 1057, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1059. By reason of the matters pleaded in paragraphs 1057 and 1058, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 23 July 2014 being 28 July 2014.
1060. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1057.

Particulars

SMR 689638185 dated 16 September 2016.

The total value of these unreported transactions was \$21,000.

1061. By no later than 11 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 7 of Schedule AAH to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 70 in the name of Person 59. NSW Police advised that ‘on

the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly suggest are structured deposits'. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 70 in the name of Person 59 and including reference to 4 cash deposits each under \$10,000 made on 19 May 2015, as identified at item 7 of Schedule AAH to the Statement of Claim.

- 1062. By reason of the matters pleaded in paragraphs 1061, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 1063. By reason of the matters pleaded in paragraphs 1061 and 1062, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 June 2015 being 16 June 2015.
- 1064. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1061.

Particulars

SMRs 689638185 dated 16 September 2016.

- 1065. By no later than 16 September 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 4–6 and 8-12 of Schedule AAH to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 9 September 2016 STR 20163446 was raised by a member of Group Security who concluded that 'a transactional analysis has identified structured cash deposits from Sept to Dec 2014. Further structuring in Feb 2015 and into 2016. There also appears to be layering between customer and [Person 60]'s account (CommBank Account 71). [Person 60]'s account also shows structured cash deposits since last report in 2015 and is a General Practitioner in Wodonga'.

See SMR 555472059 dated 29 May 2015 in relation to Person 60.

SMR 689638185 dated 16 September 2016 reported that a 'transaction review of the above mentioned account revealed six structured cash deposits totalling \$47,000 received between 29 April and 3 May 2016 conducted at multiple branches in NSW as well as the Keysborough Branch in Vic. There is also evidence of structured cash deposits being received into the account in May 2015. ... A further review revealed [Person 59] is receiving regular credit

transfers from [CommBank Account 71] in the name of [Person 60] with the source of funds for the transfers being structured cash deposits'.

- 1066. By reason of the matters pleaded in paragraphs 1065, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 1067. By reason of the matters pleaded in paragraphs 1065 and 1066, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 16 September 2016 being 21 September 2016.
- 1068. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1065.

Particulars

SMR 689638185 dated 16 September 2016.

SMR 689638185 reported structured cash deposits on 29 April and 3 May 2016, but did not report suspicions with respect to structured deposits which occurred prior to April 2016. In respect of suspicious transactions prior to April 2016, the report did not contain the information specified in rule 18.2(19), contrary to s 41(3)(b) of the Act.

The total value of these unreported transactions was \$164,836.55.

- 1069. By reason of the matters pleaded at paragraphs 1057 to 1068, CommBank contravened s 41(2)(a) of the Act on 3 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 1070. On and from 24 June 2014, CommBank did not monitor Person 59 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Only one automated transaction monitoring alert was raised with respect to this customer, being TM-130611A triggered on 24 June 2014 for structured cash deposits but not reviewed by the AML team until 23 July 2014. Upon review, structuring was identified. No SMR was lodged but the AML team recommended considering reporting if cash activity continued. In spite of this recommendation, the account was not the subject of any ongoing review. No due diligence was carried out with a view to mitigating and managing the ML/TF risks that had been identified. No customer due diligence was carried out with a view to identifying, mitigating and managing ongoing ML/TF risks.

No further automated transaction monitoring alerts were raised on this account, although structuring continued throughout 2015 and in April and May 2016.

On 26 May 2015 NSW Police advised CommBank of the alleged laundering of over \$3 million in structured cash deposits by Shaffi and

Khan, including through Person 59's account. CommBank carried out no due diligence on this customer in response to this email.

By no later than 29 May 2015 CommBank suspected that Person 60, a signatory to Person 59's account, was receiving structured cash deposits across multiple branches in NSW and Victoria but did not review CommBank Account 70 to which Person 60 was a signatory (SMR 555472059 dated 25 May 2015).

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 70 in the name of Person 59 and including reference to 4 cash deposits each under \$10,000 made on 19 May 2015, as identified at item 7 of Schedule AAH to the Statement of Claim. CommBank carried out no customer due diligence on this customer in response to the identification of this structuring.

An STR was raised by Group Security on 9 September 2016 and reviewed by the AML Team on 16 September 2016. This was the first time the AML Team had reviewed this account since 23 July 2014 – see transaction monitoring alert TM-306572A – notwithstanding NSW Police's advice that it was investigating structuring on this account.

From 24 June 2014 to 3 May 2016 Person 59 made \$248,836 in structured cash deposits of which AUSTRAC is presently aware and further layered these funds through the CommBank account of Person 60.

1071. On and from 23 July 2014, CommBank did not monitor Person 59 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

On 23 July 2014 a member of the AML Team formed the suspicion that structured cash deposits had been made into the account – see transaction monitoring alert TM-130611A.

Having formed this suspicion on 23 July 2014, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 59.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 59.

On 26 May 2015 NSW Police advised CommBank that money had been laundered through this account in connection with the prosecution of Mr Shaffi and Mr Khan.

From 23 July 2014 to 3 May 2016 Person 59 received \$241,836.55 in structured cash deposits of which AUSTRAC is presently aware and further layered these funds through the account of Person 60.

1072. By reason of the matters pleaded at paragraphs 1070 and 1071, CommBank contravened s 36(1) on and from 24 June 2014 with respect to Person 59.

Person 61 – CommBank Account 72

1073. On or about 14 October 2014, CommBank provided a designated service to Person 61 by opening an account in the name of Person 61.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 72.

Person 61's occupation was recorded as sales assistant.

1074. Between 20 May 2015 and 18 June 2016, 34 cash deposits each under \$10,000 and totalling \$178,797 were made into CommBank Account 72 in the name of Person 61.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 72

Items 1–12 of Schedule AAI to the Statement of Claim.

1075. CommBank suspected that the cash deposits pleaded at paragraph 1074 were structured contrary to section 142 of the Act.

Particulars

SMR 689644383 dated 16 September 2016.

1076. By no later than 26 May 2015, CommBank was aware of suspicious activity on CommBank Account 72 in the name of Person 61.

Particulars

26 May 2015 email from NSW Police to OPC Compliance,
CommBank.

See SMR 689644383 dated 16 September 2016 which reported
structured cash deposits, indicative of avoiding TTR reporting
obligations.

The failures to report suspicious matters for the purposes of s 41

1077. By no later than 11 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1 and 2 of Schedule AAI to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 26 May 2015, NSW Police sent an email to OPC Compliance,
CommBank, urgently seeking documents and CCTV footage in
relation to a number of CommBank accounts, including CommBank
Account 72 in the name of Person 61. NSW Police advised that 'on
the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN
were arrested and charged in respect to NSW offences relating to
Money Laundering. A subsequent search of their residence identified
in excess of \$3 million of banking receipts which police will strongly

suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 72 in the name of Person 61 and including reference to 3 cash deposits each under \$10,000 made on 20 May 2015.

- 1078. By reason of the matters pleaded in paragraphs 1077, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 1079. By reason of the matters pleaded in paragraphs 1077 and 1078, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 June 2015 being 16 June 2015.
- 1080. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1077.

Particulars

SMR 689644383 dated 16 September 2016.

SMR 689638185 reported structured cash deposits between 3 and 18 June 2016, but did not report suspicions of structured deposits on 20 May 2015. In respect of suspicious transactions prior to June 2016, the report did not contain the information specified in rule 18.2(19), contrary to s 41(3)(b) of the Act.

The total value of these unreported transactions was \$30,000.

- 1081. By no later than 16 September 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 3–8 of Schedule AAI to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 9 September 2015, STR 20163467 was raised by a member of Group Security who concluded that 'a transactional analysis has identified 3 structured cash deposits 20 May 2015, 2 large cash deposits 19 June 2015 and most recently 21 Apr / June 2016. ... Further structured cash deposits follows from the same account'.

This was logged as TM-306574A and reviewed by a member of the AML Team on 16 September 2016. The AML Team member concluded that a 'transactional review ... [of the account], revealed 10 structured deposits totalling \$54,525 received between 3 and 18 June 2016 conducted at multiple branches in VIC. A further review revealed further structured cash deposits received to the account in April and May 2016. A review of [another account in the name of Person 61] also revealed multiple structured cash deposits being received'.

SMR 689644383 dated 16 September 2016 was lodged in relation to structured cash deposits between 3 and 18 June 2016 only.

- 1082. By reason of the matters pleaded in paragraphs 1081, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 1083. By reason of the matters pleaded in paragraphs 1081 and 1082, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 16 September 2016 being 21 September 2016.
- 1084. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1081.

Particulars

SMR 689644383 dated 16 September 2016.

SMR 689644383 reported structured cash deposits between 3 and 18 June 2016, but did not report suspicions of structured deposits which occurred between 20 May 2015 and 27 April 2016. CommBank reported that an additional review found 'structured cash activity' in May 2015 but did not provide details of the amounts deposited or any dates for these transactions. In respect of suspicious transactions prior to June 2016, the report did not contain the information specified in rule 18.2(19), contrary to s 41(3)(b) of the Act.

The total value of these unreported transactions was \$944,272.

- 1085. By reason of the matters pleaded at paragraphs 1077 to 1084, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 1086. On and from than 20 May 2015, CommBank did not monitor Person 61 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Despite structured cash deposits being made into the account from 20 May 2015 to June 2016, no automatic transaction monitoring alerts for structuring or other cash activity were ever triggered with respect to this account.

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 72 in the name of Person 61. NSW Police advised that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

CommBank carried out no due diligence on this customer in response to the 26 May 2015 email from NSW Police.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 72 in the name of Person 61 and including reference to 3 cash deposits each under \$10,000 made on 20 May 2015. CommBank carried out no customer due diligence in response to identifying this structuring.

An STR was raised by Group Security on 9 September 2016 and reviewed by the AML Team on 16 September 2016. This was the first time the AML Team reviewed this account after the 11 June 2015 email to NSW Police.

On 22 September 2016 CommBank confirmed Person 61 as a 'high risk customer' but determined to maintain the customer relationship with a 21 month review period. In making these determinations, no regard was had to the email of 26 May 2015 from NSW Police advising of the connection between CommBank Account 72 in the name of Person 61 and the arrest of Shaffi and Khan who were suspected to be involved in over \$3 million in structured laundered cash deposits, including through this account.

From 20 May 2015 to 18 June 2016 Person 61 received \$178,797 in structured cash deposits of which AUSTRAC is presently aware.

1087. On and from 11 June 2015, CommBank did not monitor Person 61 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

On 11 June 2015 CommBank formed the suspicion for the purposes of s 41 of the Act that structured cash deposits had been made into the account – see email to NSW Police.

Having formed this suspicion on 11 June 2015, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 61.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 61.

From 11 June 2015 to 18 June 2016 Person 61 received \$158,797 in structured cash deposits of which AUSTRAC is presently aware.

1088. By reason of the matters pleaded at paragraphs 1086 and 1087, CommBank contravened s 36(1) on and from 20 May 2015 with respect to Person 61.

Person 62 – CommBank Account 73

1089. On or about 17 May 2011, CommBank provided a designated service to Person 62 by opening an account in the name of Person 62.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 73.

Person 62's occupation was recorded as student.

1090. Between 20 May 2015 and 7 June 2016, 19 cash deposits each under \$10,000 and totalling \$124,070 were made into CommBank Account 73 in the name of Person 62.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 73.

Items 1–10 of Schedule AAJ to the Statement of Claim.

These cash deposits were made at CommBank branches.

1091. CommBank suspected that the cash deposits pleaded at paragraph 1090 were structured contrary to section 142 of the Act.

Particulars

26 May 2015 email from NSW Police to OPC Compliance,
CommBank.

SMR 689643981 dated 16 September 2016.

1092. By no later than 26 May 2015, CommBank was aware of suspicious activity on CommBank Account 73 in the name of Person 62.

Particulars

26 May 2015 email from NSW Police to OPC Compliance,
CommBank.

The failures to report suspicious matters for the purposes of s 41

1093. By no later than 11 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 1 of Schedule AAJ to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 73 in the name of Person 62. NSW Police advised that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 73 in the name of Person 62 and including reference to 3 cash deposits each under \$10,000 made on 20 May 2015.

- 1094. By reason of the matters pleaded in paragraphs 1093, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 1095. By reason of the matters pleaded in paragraphs 1093 and 1094, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 June 2015 being 16 June 2015.
- 1096. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1093.

Particulars

SMR 689643981 dated 16 September 2016.

SMR 689643981 dated 16 September 2016 reported structured cash deposits between 17 May and 7 June 2016, but did not report suspicions with respect to structured deposits on 20 May 2015.

The total value of these unreported transactions was \$25,000.

- 1097. By no later than 16 September 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 2–7 of Schedule AAJ to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 12 September 2016 STR 20163498 was raised by a member of Group Security who concluded that 'a transactional analysis has identified 3 structured cash deposits on 20 May 2015 most recently on the 1 Feb 2016'.

This was logged as TM-306986A and reviewed by a member of the AML team on 16 September 2016. SMR 689643981 was lodged on 16 September 2016 which reported structured cash deposits, indicative of avoiding TTR reporting obligations.

- 1098. By reason of the matters pleaded in paragraphs 1097, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 1099. By reason of the matters pleaded in paragraphs 1097 and 1098, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 16 September 2016 being 21 September 2016.
- 1100. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1097.

Particulars

SMR 689643981 dated 16 September 2016 reported structured cash deposits between 17 May and 7 June 2016, but did not report suspicions with respect to structured deposits prior to May 2016. In

respect of suspicions formed with respect to transactions prior to May 2016, the report did not contain the information specified in rule 18.2(19), contrary to s 41(3)(b) of the Act.

The total value of these unreported transactions was \$71,500.

1101. By reason of the matters pleaded at paragraphs 1093 to 1100, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

1102. On and from 20 May 2015, CommBank did not monitor Person 62 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 19 September 2012, CommBank confirmed Person 62 as a High Risk Customer (HRC) – HRC 334422A. Following this, it is not apparent that any review of Person 62's risk rating or accounts occurred until 18 March 2015.

On 18 March 2015 CommBank confirmed Person 62's entry onto the HRC register with a follow up due in 18 months.

Despite structured cash deposits being made into to the account from 20 May 2015 to June 2016, no automatic transaction monitoring alerts for structuring or other cash activity were ever triggered with respect to this account.

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 73 in the name of Person 62. NSW Police advised that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

CommBank carried out no due diligence on this customer in response to the 26 May 2015 email from NSW Police, in spite of the fact he was already on the HRC Register.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 73 in the name of Person 62 and including reference to 3 cash deposits each under \$10,000 made on 20 May 2015. CommBank carried out no due diligence on this customer in response to the structuring identified by no later than 11 June 2015.

An STR was raised by Group Security on 9 September 2016 and reviewed by the AML Team on 16 September 2016. This was the first time the AML Team reviewed this account following the 26 May 2015 email from NSW Police and the 11 June 2015 reply.

From 20 May 2015 to 7 June 2016 Person 62 received \$124,070 in structured cash deposits of which AUSTRAC is presently aware.

1103. On and from 11 June 2015, CommBank did not monitor Person 62 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

On 11 June 2015 CommBank formed the suspicion that structured cash deposits had been made into the account – see email to NSW Police.

Having formed this suspicion on 11 June 2015, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 62.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 62.

From 11 June 2015 to 7 June 2016 Person 62 received \$99,070 in structured cash deposits of which AUSTRAC is presently aware.

1104. By reason of the matters pleaded at paragraph 1102 and 1103, CommBank contravened s 36(1) on and from 20 May 2015 with respect to Person 62.

Person 63 – CommBank Account 74

1105. On or about 13 February 2007, CommBank provided a designated service to Person 63 by opening an account in the name of Person 63.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 74.

Person 63's occupation was recorded as unemployed and student.

1106. On 26 November 2014, 5 cash deposits each under \$10,000 and totalling \$44,500 were made into CommBank Account 74 in the name of Person 63.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 74.

Item 1 of Schedule AAK to the Statement of Claim.

1107. CommBank suspected that the cash deposits pleaded at paragraph 1106 were structured contrary to section 142 of the Act.

Particulars

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to suspected structuring on a number of CommBank accounts, including CommBank Account 74 in the name of Person 63.

1108. By no later than 26 May 2015, CommBank was aware of suspicious activity on CommBank Account 74 in the name of Person 63.

Particulars

26 May 2015 email from NSW Police to OPC Compliance, CommBank.

The failures to report suspicious matters for the purposes of s 41

1109. By no later than 11 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 1 of Schedule AAK to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

26 May 2015 email from NSW Police to OPC Compliance, CommBank urgently seeking documents and CCTV footage in relation to suspected structuring on a number of CommBank accounts, including CommBank Account 74 in the name of Person 63.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing all located account numbers including CommBank Account 74 in the name of Person 63 and including reference to 5 cash deposits each under \$10,000 made on 26 November 2014.

1110. By reason of the matters pleaded in paragraphs 1109, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1111. By reason of the matters pleaded in paragraphs 1109 and 1110, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 June 2015 being 16 June 2015.
1112. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matter pleaded at paragraph 1109.
1113. By reason of the matters pleaded at paragraphs 1109 to 1112, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

1114. On and from 26 November 2014, CommBank did not monitor Person 63 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

The structured deposits on 26 November 2014 did not trigger any automated transaction monitoring alert.

Notwithstanding that on 26 May 2015 NSW Police advised CommBank of the alleged laundering of over \$3 million in structured cash deposits by Shaffi and Khan, including through Person 63's account, CommBank carried out no due diligence on this customer.

1115. By reason of the matters pleaded at paragraph 1114, CommBank contravened s 36(1) on and from 26 November 2014 with respect to Person 63.

Person 64 – CommBank Account 75

1116. On or about 25 July 2006, CommBank provided a designated service to Person 64 by opening an account in the name of Person 64.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 75.

From December 2007 Person 64's occupation was recorded as 'manager'.

1117. On 18 May 2015 and between 7 January 2016 and 12 January 2016, 11 cash deposits each under \$10,000 and totalling \$83,000 were made into CommBank Account 75 in the name of Person 64.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 75.

Items 1–5 of Schedule AAL to the Statement of Claim.

1118. CommBank suspected that the cash deposits pleaded at paragraph 1117 were structured contrary to section 142 of the Act.

Particulars

26 May 2015 email from NSW Police to OPC Compliance, CommBank.

SMR 689638307 dated 16 September 2016 which reported structured cash deposits, indicative of avoiding TTR reporting obligations.

1119. By no later than 26 May 2015, CommBank was aware of suspicious activity on CommBank Account 75 in the name of Person 64.

Particulars

26 May 2015 email from NSW Police to OPC Compliance, CommBank.

1120. By no later than 11 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at item 1 of Schedule AAL to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 75 in the name of Person 64. NSW Police advised that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing all located account numbers including CommBank Account 75 in the name of Person 64 and including reference to 5 cash deposits each under \$10,000 made on 18 May 2015.

On 12 September 2016 STR 20163498 was raised by a member of Group Security who concluded that 'a transaction review ...has revealed five structured cash deposits totalling \$34,500 received between 7 and 12 January 2016...[and] a further six structured cash deposits totalling \$48,500 received on 18 May 2016'.

This was logged as TM-306988A and reviewed by a member of the AML team on 16 September 2016. An SMR was lodged in relation to the structured cash deposits that same day.

1121. By reason of the matters pleaded in paragraph 1120, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1122. By reason of the matters pleaded in paragraphs 1120 and 1121, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 June 2015 being 16 June 2015.
1123. CommBank did not give the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1120 until 16 September 2016.

Particulars

SMR 689638307 dated 16 September 2016.

\$48,500 in cash deposits reported late.

1124. By reason of the matters pleaded at paragraphs 1120 to 1123, CommBank contravened s 41(2)(a) of the Act.

1125. On and from 18 May 2015, CommBank did not monitor Person 64 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Notwithstanding that on 26 May 2015 NSW Police advised CommBank of the alleged laundering of over \$3 million in structured cash deposits by Shaffi and Khan, including through Person 64's account, CommBank carried out no due diligence on this customer with a view to identifying, mitigating and managing the ML/TF risks.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing all located account numbers including CommBank Account 75 in the name of Person 64 and including reference to 5 cash deposits each under \$10,000 made on 18 May 2015. CommBank carried out no due diligence on this customer in response to identifying this structuring.

Despite the volume of cash deposits made to the account within a short period on and from 18 May 2015, no automatic transaction monitoring alerts for structuring or other cash activity were ever triggered with respect to this account.

An STR was raised by Group Security on 12 September 2016 and reviewed by the AML Team on 16 September 2016. This was the first time the AML Team reviewed this account following the 26 May 2015 email from NSW Police and the 11 June 2015 response.

It was not until 16 September 2016 that CommBank listed Person 64 as a high risk customer (HRC) – HRC 4239964A.

From 18 May 2015 to 12 January 2016 Person 64 received \$83,000 in structured cash deposits of which AUSTRAC is presently aware.

1126. On and from 11 June 2015, CommBank did not monitor Person 64 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

On 11 June 2015 CommBank formed the suspicion that structured cash deposits had been made into the account – see email to NSW Police.

Having formed this suspicion on 11 June 2015, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 64.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 64.

From 11 June 2015 to 12 January 2016 Person 64 received \$34,500 in structured cash deposits of which AUSTRAC is presently aware.

1127. By reason of the matters pleaded at paragraphs 1125 and 1126, CommBank contravened s 36(1) on and from 18 May 2015 with respect to Person 64.

Person 65 - CommBank Account 76

1128. On or about 27 November 2014, CommBank provided a designated service to Person 65 by opening an account in the name of Person 65.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 76.

Person 65's occupation was recorded as unemployed.

1129. Between 10 December 2014 and 27 January 2015, 13 cash deposits each under \$10,000 and totalling \$99,427 were made into CommBank Account 76 in the name of Person 65.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 76.

Items 1–4 of Schedule AAM to the Statement of Claim.

1130. CommBank suspected that the cash deposits pleaded at paragraph 1129 were structured contrary to section 142 of the Act.

Particulars

SMR 539702932 dated 30 March 2015.

1131. By no later than 30 March 2015, CommBank was aware of suspicious activity on CommBank Account 76 in the name of Person 65.

Particulars

SMR 539702932 dated 30 March 2015 which reported multiple structured cash deposits, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

1132. By no later than 11 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at paragraph 1129 may be relevant to the investigation of, or prosecution of a person, including Mr Shaffi and Mr Khan, for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 76 in the name of Person 65. NSW Police advised that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly

suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 76 in the name of Person 65 and including reference to 5 cash deposits each under \$10,000 made on 10 December 2014.

- 1133. By reason of the matters pleaded in paragraphs 1132 s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 1134. By reason of the matters pleaded in paragraphs 1132 and 1133, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 June 2015 being 16 June 2015.
- 1135. CommBank did not give the AUSTRAC CEO an SMR in relation to its suspicions about Person 65's connection to the \$3m in structured deposits laundered by Mr Shaffi and Mr Khan.

Particulars

26 May 2015 email from NSW Police to OPC Compliance, CommBank and CommBank's email response of 11 June 2015.

- 1136. By reason of the matters pleaded at paragraphs 1132 to 1134, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

- 1137. By no later than 5 December 2014, CommBank had designated Person 65 (CommBank Account 76) as a high risk customer.

Particulars

On 1 December 2014 HRC 1974639A was created with respect to Person 65, and was reviewed on 5 December 2014. Upon review, Person 65 was added to the High Risk Customer register with a follow up review being due in 12 months.

- 1138. On and from 5 December 2014, CommBank did not monitor Person 65 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 1 December 2014 HRC 1974639A was created with respect to Person 65, and was reviewed on 5 December 2014. Upon review, Person 65 was added to the High Risk Customer register with a follow up review being due in 12 months.

On 22 December 2014 transaction monitoring alert TM-164373A triggered for large aggregate cash transactions and was sent to the AML team for review on 24 December 2014, but was not reviewed by the AML team until 30 March 2015, when an SMR was lodged.

Notwithstanding that Person 65 was a high risk customer, once the SMR was lodged, the alert was closed and no customer due diligence carried out.

No customer due diligence was conducted in relation to Person 65 in response to the 26 May 2015 email from NSW Police to OPC Compliance, CommBank, notwithstanding that this customer was on the high risk register.

No customer due diligence was carried out in response to the CommBank's 11 June 2015 response to NSW Police, identifying structuring on this account, notwithstanding that this customer was on the high risk register.

The transactions listed at items 1–4 of Schedule AAM to the Statement of Claim did not trigger an automated alerts for structuring.

Following the initial review particularised above on 5 December 2014, HRC 1974639A was not reviewed until 22 April 2016. Person 65's high risk rating was confirmed. This review did not take into account the large and structured cash activity in December 2014 and January 2015 and noted 'no prior SMR alerts' notwithstanding SMR 539702932 dated 30 March 2015. The review did not have regard to the 26 May 2015 email from NSW Police advising of the connection between this account and large scale money laundering. A review was scheduled for 21 months.

From 5 December 2014 to 27 January 2015 Person 65 received \$99,427 in structured cash deposits of which AUSTRAC is presently aware.

1139. On and from 30 March 2015, CommBank did not monitor Person 65 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

On 30 March 2015 CommBank formed the suspicion for the purposes of s 41 of the Act that structured cash deposits had been made into the account – see SMR 539702932 dated 30 March 2015.

Having formed this suspicion on 30 March 2015, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 65.

CommBank did not undertake any measure appropriate to the circumstances as specified in rule 15.10 with respect to Person 65.

1140. By reason of the matters pleaded at paragraphs 1138 and 1139, CommBank contravened s 36(1) on and from 5 December 2014 with respect to Person 65.

Company 16 – CommBank Account 77

1141. On or about 11 May 2005, CommBank opened an account in the name of Company 16.

Particulars

CommBank Account 77.

Company 16's industry was recorded as 'education'.

1142. From 16 January 2015 to 14 October 2015, 47 cash deposits each under \$10,000 and totalling \$234,395.63 were made into CommBank Account 77 in the name of Company 16.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 77.

Items 1–31 of Schedule AAN to the Statement of Claim.

1143. CommBank suspected that the cash deposits listed at items 1–25 of Schedule AAN to the Statement of Claim were structured contrary to section 142 of the Act.

Particulars

26 May 2015 email from NSW Police to OPC Compliance,
CommBank.

The failures to report suspicious matters for the purposes of s 41

1144. By no later than 11 June 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1–25 of Schedule AAN to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 77 in the name of Company 16. NSW Police advised that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 77 in the name of Company 16 and including reference to 2 cash deposits each under \$10,000 made on 4 March 2015 and 7 May 2015.

1145. By reason of the matters pleaded in paragraph 1144, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1146. By reason of the matters pleaded in paragraphs 1144 and 1145, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 11 June 2015 being 16 June 2015.

1147. At no time has CommBank given the AUSTRAC CEO an SMR in respect of the matters pleaded at paragraph 1144.
1148. By reason of the matters pleaded at paragraphs 1144 to 1147, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

1149. On and from 26 May 2015, CommBank did not monitor Company 16 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 26 May 2015, NSW Police sent an email to OPC Compliance, CommBank, urgently seeking documents and CCTV footage in relation to a number of CommBank accounts, including CommBank Account 77 in the name of Company 16. NSW Police advised that 'on the evening of the 21 May 2015, Arslan SHAFFI and Salman KHAN were arrested and charged in respect to NSW offences relating to Money Laundering. A subsequent search of their residence identified in excess of \$3 million of banking receipts which police will strongly suggest are structured deposits. Evidence is now being collected so to charge SHAFFI and KHAN with offences under the Anti Money Laundering / Counter Terrorism Financing Act'.

On 11 June 2015 OPC Compliance, CommBank, replied to the NSW Police email of 26 May 2015 enclosing an excel file listing of all located account numbers including CommBank Account 77 in the name of Company 16 and including reference to 2 cash deposits each under \$10,000 made on 4 March 2015 and 7 May 2015.

No due diligence was carried out with respect to Company 16 following this contact from NSW Police.

From 26 May 2015 to 14 October 2015 Company 16 received \$34,105 in structured cash deposits of which AUSTRAC is presently aware.

1150. By reason of the matters pleaded at paragraph 1149, CommBank contravened s 36(1) on and from 26 May 2015 with respect to Company 16.

Money laundering by Singh – Strike Force A2

1151. On 28 January 2015, Mandeep Singh was arrested and charged with offences connected with money laundering.

Particulars

Mandeep Singh was charged with the following offences:

Conduct transaction to avoid threshold reporting requirement, contrary to s 142(1) of the AML/CTF Act.

Recklessly dealing with proceeds of crime contrary to s 193B(3) of the *Crimes Act 1900* (NSW).

Dealing with property suspected to be proceeds of crime contrary to s 193C(1) of the *Crimes Act 1900* (NSW).

Participating in a criminal group and contributing to criminal activity contrary to s 93T(1) of the *Crimes Act 1900* (NSW).

Singh was part of a cuckoo smurfing syndicate.

On 1 June 2017, Mandeep Singh was ultimately sentenced to 20 months' imprisonment released on recognisance in relation to the following offences:

Conduct transaction to avoid threshold reporting requirement, contrary to s 142(1) of the AML/CTF Act.

Two counts of Dealing with property reasonably suspected of being proceeds of crime contrary to s 400.9 of the *Criminal Code Act 1995* (Cth).

1152. NSW Police allege that between 10 October 2014 and 19 January 2015, Singh was party to, or caused another person to be party to, 123 transactions in contravention of s 142(1) of the Act.

Particulars

NSW Police Statement of Facts.

The total value of the 123 cash deposits was \$739,518. Of this, \$273,432 was deposited into CommBank accounts.

48 of the 123 cash deposits involved a cash deposit into a CommBank account in an amount under \$10,000.

1153. On 20 March 2015, NSW Police sent an email to CommBank, advising that deposits into 39 CommBank accounts were related to the charging of Singh for recklessly dealing with proceeds of crime contrary to s 194(3) of the *Crimes Act 1900* (NSW).

Particulars

Email from NSW Police to OPC Compliance, CommBank dated 20 March 2015.

The 39 CommBank accounts included:

Person 66 and Person 67 – CommBank Account 78 and CommBank Account 79

Person 68– CommBank Account 80

Company 17 – CommBank Account 81

Company 18 – CommBank Account 82

Person 73 – CommBank Account 83

Person 74– CommBank Account 84

(the **7 accounts**).

By this email, NSW Police advised CommBank that 'It is believed a number of these accounts, in particular those nominated under item 2

[including each of the 7 accounts, except for CommBank Account 78 in the name of Person 66 and Person 67], are accounts specifically generated for the purpose of laundering money’.

1154. On 9 April 2015, NSW Police sent an email to CommBank requesting documents in relation to the 39 CommBank accounts in relation to a prosecution of an offender for State and Commonwealth money laundering offences.

Particulars

Email of NSW Police to OPC Compliance, CommBank dated 9 April 2015.

This request included a request for documents relating to 6 of the 7 accounts.

1155. On 10 April 2015, NSW Police sent an email to CommBank in relation to the 39 CommBank accounts, including 6 of the 7 accounts.

Particulars

Email of NSW Police to OPC Compliance dated 10 April 2015.

By this email, NSW Police advised that ‘Many of the accounts have been identified as receiving structured amounts of money. If any of these CBA accounts are referred to your Investigations/Risk section, I will be more than happy to discuss how these accounts were identified with them’. CommBank has never responded to this aspect of the email.

1156. From 31 January 2012 to 18 April 2016, 276 cash deposits under \$10,000 totalling \$1,705,251 were made into the 6 of the 7 accounts.

Particulars

Paragraphs 1158 to 1246 below.

1157. CommBank failed to report to the AUSTRAC CEO a total of \$1,250,534 in cash deposits made into the 5 of the 7 accounts that it suspected were structured.

Particulars

Paragraphs 1158 to 1246 below.

Section 41 of the Act.

Person 66 and Person 67 – CommBank Account 78 and CommBank Account 79

1158. On or about 16 April 2009, CommBank provided a designated service to Person 66 and Person 67 by opening an account in the name of Person 66 and Person 67.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 78.

Person 67’s occupation was recorded as a sales manager in Iran and Person 66’s occupation was recorded as unemployed.

1159. Between 14 August 2012 and 16 August 2012 \$64,000 in cash was deposited into CommBank Account 78 in the name of Person 66 and Person 67.

Particulars

Item 3, table 1, s 6 of the Act.

Transaction monitoring alert TM-47790A.

1160. On or about 25 March 2013, CommBank provided a designated service to Person 66 and Person 67 by opening an account in the name of Person 66 and Person 67.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 79.

Person 66's and Person 67's occupations were recorded as 'self-employed café'.

1161. Between 3 June 2013 and 12 May 2015, 36 cash deposits each under \$10,000 and totalling \$188,136 were made into CommBank Account 79 in the name of Person 66 and Person 67.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 79.

Items 1–18 of Schedule AAO to the Statement of Claim.

1162. CommBank suspected that the cash deposits pleaded at paragraph 1161 were structured contrary to section 142 of the Act.

Particulars

By a 10 April 2015 email, NSW Police advised OPC Compliance, CommBank, of structuring on 39 CommBank accounts, including CommBank Account 79.

SMR 547780689 dated 30 April 2015 – which relevantly reported multiple cash deposits, both under and over \$10,000, in Victoria, South Australia and Western Australia while residing in New South Wales, indicative of money laundering.

The failures to report suspicious matters for the purposes of s 41

1163. By no later than 23 August 2012, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at paragraph 1159 may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 18 August 2012 transaction monitoring alert TM-47790A triggered for cash activity involving unique branch (being 1 deposit of \$64,000) on CommBank Account 78 and was reviewed by the AML team on 23 August 2012.

Upon review of this alert, CommBank formed a suspicion for the purposes of s 41 but decided not to report its suspicions on the basis an SMR had been lodged in relation to other transactions on this account on 8 August 2012 (SMR 298569661) and that therefore no further investigation was required. CommBank suppressed further alerts on this account for 90 days.

1164. By no later than 20 March 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at paragraph 1160 and items 1–14 of Schedule AAO to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 20 March 2015 NSW Police sent an email to OPC Compliance, CommBank, advising that deposits into 39 CommBank accounts, including CommBank Account 79, were related to the charging of Singh for recklessly dealing with proceeds of crime contrary to s 194(3) of the *Crimes Act 1900* (NSW). NSW Police sought confirmation of the BSB, account numbers and customer names so that a notice to produce could be issued for the banking transaction records of these accounts. NSW Police also advised that 'It is believed a number of these accounts, in particular those nominated under item 2 [including CommBank Account 79], are accounts specifically generated for the purpose of laundering money'. OPC Compliance, CommBank emailed these details to NSW Police on 9 April 2015.

On 9 April 2015 NSW Police emailed OPC Compliance requesting documents in relation to these 39 CommBank accounts, including CommBank Account 79, and advised these documents were sought in relation to a prosecution of an offender for both NSW and Commonwealth money laundering offences.

On 10 April 2015 NSW Police emailed OPC Compliance in relation to the 39 CommBank accounts, including CommBank Account 79, and advised that 'Many of the accounts have been identified as receiving structured amounts of money. If any of these CBA accounts are referred to your Investigations/Risk section, I will be more than happy to discuss how these accounts were identified with them'. CommBank has never responded to this aspect of the email.

On 15 April 2015 CommBank advised NSW Police that the requested documents were ready for collection. On 21 April 2015 a notice to produce was issued for the production of these documents.

1165. By reason of the matters pleaded in paragraphs 1163 and 1164, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
1166. By reason of the matters pleaded in paragraph 1163 and 1165, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 23 August 2012 being 28 August 2012.

- 1167. At no time did CommBank give the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1163.
- 1168. By reason of the matters pleaded in paragraphs 1164 and 1165, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 20 March 2015 being 25 March 2015.
- 1169. CommBank did not give the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1164 concerning the designated services identified at items 6–14 of Schedule AAO to the Statement of Claim until 30 April 2015.

Particulars

SMR 547780689 dated 30 April 2015.

- 1170. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1168 concerning the designated services identified at paragraph 1160 and at items 1–5 of Schedule AAO to the Statement of Claim.
- 1171. By reason of the matters pleaded at paragraphs 1163 to 1170, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 1172. On and from 8 August 2012, CommBank did not monitor Person 66 and Person 67 in relation to the provision of designated services (including through CommBank Accounts 78 and 79) with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

By no later than 26 March 2012, CommBank had formed suspicions with respect to large cash transactions involving these customers, indicative of money laundering and avoiding reporting obligations -
SMR 269627918 dated 26 March 2012.

On 3 August 2012 transaction monitoring alert TM-45947A triggered for large aggregate cash transactions of \$50,300 in 4 business days (including 5 cash deposits of \$9,000 each, made at multiple branches in Victoria on 2 August 2012) for CommBank Account 78 and was reviewed by the AML team on 7 and 8 August 2012. SMR 298569661 was lodged on 8 August 2012 reporting suspicions indicative of money laundering and avoiding reporting obligations.

Although this was the second SMR reporting suspicions of cash activity indicative of money laundering and avoiding reporting obligations, the alert was closed and no customer due diligence was carried out.

On 18 August 2012 transaction monitoring alert TM-47790A triggered for cash activity of \$64,000 for CommBank Account 78 and was reviewed by the AML team on 23 August 2012. Upon review, the AML team decided that no SMR and no further investigations were required, on the basis that an SMR had been lodged on 8 August 2012 with respect to TM-45947A. Notwithstanding two prior SMRs identifying suspicions of cash activity indicative of money laundering and avoiding reporting obligations, the alert was closed, further alerts

were suppressed for 90 days, and no customer due diligence was carried out.

By no later than 25 March 2013, CommBank had placed Person 67 on the high risk customer register. This rating was reviewed and confirmed on 23 June 2014 and 16 July 2014 – HRC 785428A.

Having placed Person 67 on the high risk register, CommBank did not carry out appropriate ongoing customer due diligence with a view to identifying, mitigating and managing the ML/TF risks reasonably faced.

On 9 February 2015 transaction monitoring alert TM-173504A triggered for large aggregate cash transactions of \$50,338 in 4 business days but was not reviewed by the AML team until 30 April 2015.

TM-173504A was not reviewed in a timely manner, in spite of the email from NSW Police on 20 March 2015 advising of that this account was believed to have been 'specifically generated for the purpose of laundering money' and the further NSW Police email of 10 April 2015 advising of structuring on the attached accounts and offering to discuss further with CommBank's investigations/risk sections.

Alert SMR-835 was raised on 21 April 2015 for structured cash deposits resulting in the lodgement of SMR 547780689 on 30 April 2015.

No customer due diligence was undertaken in response to the 20 March 2015 and 10 April 2015 emails from NSW Police and the AML Team had no regard to these emails in lodging SMR 547780689 on 30 April 2015.

The structured transactions listed at items 1–18 of Schedule AAO to the Statement of Claim did not trigger any transaction monitoring alert.

From 14 August 2012 to 12 May 2015 Person 66 and Person 67 (through CommBank Account 78 and CommBank Account 79) received \$252,136 in structured and large cash deposits of which AUSTRAC is presently aware.

1173. On and from 26 March 2012, CommBank did not monitor Person 66 and Person 67 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 26 March 2012, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 66 and Person 67.

CommBank did not undertake measures appropriate to the circumstances as specified in rule 15.10 with respect to Person 66 and Person 67.

On and from 26 March 2012, a further \$252,136 in large and structured cash was deposited into these accounts, of which the AUSTRAC CEO is aware.

1174. By reason of the matters pleaded at paragraphs 1172 and 1173, CommBank contravened s 36(1) on and from 26 March 2012 with respect to Person 66 and Person 67.

Person 68 – CommBank Account 80

1175. On or about 3 December 2013, CommBank provided a designated service to Person 68 by opening an account in the name of Person 68.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 80.

Person 68's occupation was recorded as unemployed.

1176. Between 29 July 2014 and 31 August 2016, 32 cash deposits each under \$10,000, totalling \$212,000, were made into CommBank Account 80 in the name of Person 68.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 80.

Items 1–18 of Schedule AAP to the Statement of Claim.

1177. CommBank suspected that the cash deposits pleaded at paragraph 1176 were structured contrary to section 142 of the Act.

Particulars

SMR 689640942 dated 16 September 2016.

By a 10 April 2015 email, NSW Police advised OPC Compliance, CommBank, of structuring on 39 CommBank accounts, including CommBank Account 80.

1178. By no later than 20 March 2015, CommBank was aware of suspicious activity on CommBank Account 80 in the name of Person 68.

Particulars

20 March 2015 email from NSW Police to OPC Compliance, CommBank.

The failures to report suspicious matters for the purposes of s 41

1179. By no later than 15 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at paragraph 1175 and at items 1–3 of Schedule AAP to the Statement of Claim may be relevant to the investigation of,

or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 20 March 2015 NSW Police sent an email to OPC Compliance, CommBank, advising that deposits into 39 CommBank accounts, including CommBank Account 80, were related to the charging of Singh for recklessly dealing with proceeds of crime contrary to s 194(3) of the *Crimes Act 1900* (NSW). NSW Police sought confirmation of the BSB, account numbers and customer names so that a notice to produce could be issued for the banking transaction records of these accounts. NSW Police also advised that 'It is believed a number of these accounts, in particular those nominated under item 2 [including CommBank Account 80], are accounts specifically generated for the purpose of laundering money'. OPC Compliance, CommBank emailed these details to NSW Police on 9 April 2015.

On 9 April 2015 NSW Police emailed OPC Compliance requesting documents in relation to these 39 CommBank accounts, including CommBank Account 80, and advised these documents were sought in relation to a prosecution of an offender for both NSW and Commonwealth money laundering offences.

On 10 April 2015 NSW Police emailed OPC Compliance in relation to the 39 CommBank accounts, including CommBank Account 80, and advised that 'Many of the accounts have been identified as receiving structured amounts of money. If any of these CBA accounts are referred to your Investigations/Risk section, I will be more than happy to discuss how these accounts were identified with them'. CommBank has never responded to this aspect of the email.

On 15 April 2015 CommBank advised NSW Police that the requested documents were ready for collection. That same day, an affidavit was sworn annexing documents requested by NSW Police, including bank statements/transactions lists for CommBank Account 80 dating from 3 December 2013. These statements included a record of the transactions listed at items 1–3 of Schedule AAP to the Statement of Claim. On 21 April 2015 a notice to produce was issued for the production of these documents.

1180. By no later than 16 May 2016, CommBank suspected on reasonable grounds that information it had concerning the designated identified at items 4–8 and 10–14 of Schedule AAP to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

In March and April 2015, NSW Police had advised CommBank that this account was being used to receive structured deposits and launder money.

On 16 May 2016 CommBank's AML Team reviewed account activity on Person 68's statement following highly suspicious cash deposits to the account from a third party, in circumstances where the source and purpose of the funds were unknown.

- 1181. By reason of the matters pleaded in paragraphs 1179 and 1180, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 1182. By reason of the matters pleaded in paragraphs 1179 and 1181, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 15 April 2015 being 20 April 2015.
- 1183. By reason of the matters pleaded in paragraphs 1180 and 1181, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 16 May 2016 being 19 May 2016.
- 1184. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1179.

Particulars

SMRs 653646962 dated 19 May 2016 and 689640942 dated 16 September 2016.

- 1185. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1180.

Particulars

SMR 653646962 dated 19 May 2016 reported that on 5 April 2016, NSW based customer Person 69 entered the Auburn branch in NSW with \$158,563 cash and distributed the funds between seven accounts, including \$18,000 to CommBank Account 80 in the name of Person 68. The SMR also reported that a 'review of [Person 68]'s account revealed additional cash deposits were received between Mar and May 2016 and the funds were used to conduct multiple home loan payments'. The SMR concluded that 'as [Person 69] has deposited a large amount of funds into several accounts where the source and purpose is unknown, the activity is considered inconsistent with the profile of the customer and is therefore deemed highly suspicious' and indicative of money laundering.

- 1186. By reason of the matters pleaded at paragraphs 1179 to 1185, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 1187. On and from 29 July 2014, CommBank did not monitor Person 68 in relation to the provision of designated services (including through CommBank Account 80 and CommBank Account 119) with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

From 29 July 2014 to 31 August 2016 Person 68 (through CommBank Account 80) received \$212,000 in structured cash

deposits of which AUSTRAC is presently aware, together with \$18,000 in a single cash deposit.

On 16 December 2013 Person 68 was added to the High Risk Customer register, with a follow up due in 3 months. Person 68's entry on the high risk register was reviewed and confirmed on 31 March 2014 with a follow up due in 3 months – HRC 1301298A.

Person 68's risk rating was not reviewed again until 7 July 2015. It was concluded there was no suspicious transactional activity, notwithstanding the 20 March 2015 email from NSW Police advising of the belief that this account had been specifically generated for the purposes of money laundering and notwithstanding that NSW Police had advised CommBank on 10 April 2015 of structuring on this account and had offered to discuss the matter further with CommBank's investigations/risk sections. Person 68's entry on the high risk register was reviewed and confirmed on 7 July 2015 with a follow up due in 3 months.

No customer due diligence was undertaken in response to the 20 March 2015 and 10 April 2015 emails from NSW Police.

Person 68's entry on the high risk register was reviewed and confirmed on 14 October 2015 with a follow up due in 3 months.

Again, it was concluded there was no suspicious transactional activity, notwithstanding the 20 March 2015 and 10 April 2015 emails from NSW Police and notwithstanding the 6 cash deposits under \$10,000 on 5 and 6 August 2015.

An alert on HRC 1301298A was re-opened on 13 January 2016 but was never reviewed. Person 68's risk rating has not been reviewed since.

On 9 April 2016 transaction monitoring alerts TM-270465A and TM-270572A were raised for cash activity over certain threshold on 5 April 2016 but were not reviewed by the AML team until 16 May 2016, notwithstanding the highly suspicious behaviour of a third party across multiple accounts.

SMR 653646962 was lodged on 19 May 2016 reporting the highly suspicious activity of a third person (Person 69) depositing \$158,563 cash into seven separate third party accounts, including \$18,000 into Person 68's account. After lodging the SMR, the alerts were closed and no customer due diligence carried out.

On 15 September 2016 transaction monitoring alert TM-0309713A was manually created by Group Security in relation to structured deposits received since the last SMR on 19 May 2016, and was reviewed by the AML team on 16 September 2016. SMR 689640942 was lodged on 16 September 2016, the alert was closed and no customer due diligence was carried out.

However, no transaction monitoring alerts were raised on this account for structuring.

1188. On and from 20 March 2015, CommBank did not monitor Person 68 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

A suspicion for the purposes of s 41 having arisen on 20 March 2015, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 68.

Having submitted an SMR on 19 May 2016, rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 68 - following the highly suspicious activity of a third person on 5 April 2016 depositing \$158,563 cash into seven separate third party accounts.

CommBank did not undertake measures appropriate to the circumstances as specified in rule 15.10 with respect to Person 68 on and from 20 March 2015, including following the 19 May 2016 SMR.

1189. By reason of the matters pleaded at paragraphs 1187 and 1188, CommBank contravened s 36(1) on and from 29 July 2014 with respect to Person 68.

Company 17 – CommBank Account 81

1190. On or about 1 August 2014, CommBank provided a designated service to Company 17 by opening an account in the name of Company 17.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 81.

Company 17's industry was recorded as film and video distribution and its directors were recorded as Person 70 and Person 71.

1191. Between 17 November 2014 and 9 December 2015, 125 cash deposits each under \$10,000, totalling \$839,204 were made into CommBank Account 81 in the name of Company 17.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 81.

Items 1–34 of Schedule AAQ to the Statement of Claim.

1192. CommBank suspected that the cash deposits pleaded at paragraph 1191 were structured contrary to section 142 of the Act.

Particulars

10 April 2015 email from NSW Police to OPC Compliance, CommBank.

SMRs 555463216 dated 29 May 2015 and 592430250 dated 15 October 2015.

HRC Report of 16 October 2015 and HRC 1801610A.

1193. By no later than 29 May 2015, CommBank was aware of suspicious activity on CommBank Account 81 in the name of Company 17.

Particulars

SMR 555463216 dated 29 May 2015 which reported 70 cash deposits ranging from \$351 to \$10,000.00 totalling \$495,636.00 from 17 November 2014 to 15 April 2015. The SMR also reported 12 direct third party credits ranging from \$9,000 to \$74,000.00 totalling \$584,400.00 in the period 21 August 2014 to 16 April 2015; including an 8 August 2014 IMT from a bank in Moscow for \$150,000 from a company registered in the Seychelles. It was noted this activity was indicative of money laundering and was highly suspicious.

The failures to report suspicious matters for the purposes of s 41

1194. By no later than 15 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at paragraph 1190 and at items 1–16 of Schedule AAQ to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 20 March 2015 NSW Police sent an email to OPC Compliance, CommBank, advising that deposits into 39 CommBank accounts, including CommBank Account 81, were related to the charging of Singh for recklessly dealing with proceeds of crime contrary to s 194(3) of the *Crimes Act 1900* (NSW). NSW Police sought confirmation of the BSB, account numbers and customer names so that a notice to produce could be issued for the banking transaction records of these accounts. NSW Police also advised that 'It is believed a number of these accounts, in particular those nominated under item 2 [including CommBank Account 81], are accounts specifically generated for the purpose of laundering money'. OPC Compliance, CommBank emailed these details to NSW Police on 9 April 2015.

On 9 April 2015 NSW Police emailed OPC Compliance requesting documents in relation to these 39 CommBank accounts, including CommBank Account 81, and advised these documents were sought in relation to a prosecution of an offender for both NSW and Commonwealth money laundering offences.

On 10 April 2015 NSW Police emailed OPC Compliance in relation to the 39 CommBank accounts, including CommBank Account 81, and advised that 'Many of the accounts have been identified as receiving structured amounts of money. If any of these CBA accounts are referred to your Investigations/Risk section, I will be more than happy to discuss how these accounts were identified with them'. CommBank has never responded to this aspect of the email.

On 15 April 2015 CommBank advised NSW Police that the requested documents were ready for collection. That same day, an affidavit was

sworn annexing documents requested by NSW Police, including bank statements/transaction lists for CommBank Account 81 dating from 1 August 2014. On 21 April 2015 a notice to produce was issued for the production of these documents.

1195. By no later than 16 October 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 17–23 and 26–27 of Schedule AAQ to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

HRC 1801610A was reviewed by a member of the AML Team on 16 September 2015 and a 12 month transactional review identified cash deposits requiring re-reporting. This report was lodged on 15 October 2015 – SMR 592430250.

See also HRC Report of 16 October 2015.

1196. By reason of the matters pleaded in paragraphs 1194 and 1195, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
1197. By reason of the matters pleaded in paragraph 1194 and 1196, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 15 April 2015 being 20 April 2015.
1198. CommBank did not give the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1194 concerning the designated services identified at items 1–16 of Schedule AAQ to the Statement of Claim until 29 May 2015.

Particulars

SMR 555463216 dated 29 May 2015.

1199. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1194 concerning the designated services identified at paragraph 1190.

Particulars

SMR 555463216 dated 29 May 2015.

An SMR was never given in relation to the suspicion that this account was specifically generated for the purpose of laundering money.

1200. By reason of the matters pleaded in paragraphs 1195 and 1196, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 16 October 2015 being 21 October 2015.
1201. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1195.

Particulars

SMR 592430250 dated 15 October 2015 reported structured deposits on 1 and 2 September 2015 and reported that ‘a review of the above mentioned account number from date of last report (29 May 2015) to 13 October 2015 found the activity continued and the cash deposits

are conducted at various different branches in NSW and Vic followed by direct debits to [Company 17]'. However, other than the structured deposits on 1 and 2 September 2015, the dates and amounts of the ongoing activity were not reported, and the report did not contain the information specified in rule 18.2(19), contrary to s 41(3)(b) of the Act.

1202. By reason of the matters pleaded at paragraphs 1194 to 1201, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

1203. On and from 3 August 2014, CommBank did not monitor Company 17 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Although between 17 November 2014 and 9 December 2015, 125 cash deposits each under \$10,000, totalling \$839,204 were made into CommBank Account 81 in the name of Company 17, no automated transaction monitoring alerts for structuring or cash activity were ever raised on this account.

On 3 August 2014 Company 17 was alerted for a risk rating. This alert was not considered by the AML team until 26 May 2015. The reviewing officer recommended that structured cash activity be referred for further assessment and added the customer to the high risk customer register, with a follow up due in 3 months – HRC 1801610A. SMR 555463216 was lodged on 29 May 2015.

The reviewing officer had no regard to the email of 20 March 2015 from NSW Police advising CommBank that it believed CommBank Account 81 was specifically generated for the purpose of laundering money. Nor did they have regard to the further NSW Police email of 10 April 2015 advising of structuring on this account and offering to discuss further with CommBank's investigations/risk sections. No customer due diligence was undertaken in response to the 20 March 2015 and 10 April 2015 emails from NSW Police. No customer due diligence was conducted following the 29 May 2015 SMR.

Further, no customer due diligence was carried out in connection with the 8 August 2014 IMT from a bank in Moscow for \$150,000 from a company registered in the Seychelles, first identified in SMR 555463216 dated 29 May 2015.

On 16 September 2015 HRC 1801610A was again reviewed by a member of the AML team, noting the SMR dated 29 May 2015 and recommending that the customer be re-reported for cash activity. The customer was retained on the high risk customer register with a follow up in 3 months. The customer was not re-reported to AUSTRAC until 15 October 2015.

On 16 October 2015 HRC 1801610A was reviewed again by a member of the AML team. The reviewing officer recommended

terminating the relationship with the customer based on due diligence performed by Group Security, noting the account had 'received structured cash deposits followed by international funds transfers which have been reported to AUSTRAC possibly to countries of diversion'.

According to HRC 1801610A, RBS approved termination on 16 October 2015. Once termination of the customer relationship was approved, no further customer due diligence was conducted with respect to the customer. Further, the termination process was not initiated until 19 November 2015 (see TERM 1610C), at which point the customer appears to have been given 30 days' notice of the intention to close the account.

In the intervening period from 16 October 2015 to 9 December 2015, Company 17 (through CommBank Account 81) received \$124,928 in structured cash deposits of which AUSTRAC is presently aware, and yet no transaction monitoring alerts were raised.

From 3 August 2014 to 9 December 2015 Company 17 (through CommBank Account 81) received \$839,204 in structured cash deposits of which AUSTRAC is presently aware.

In particular, Company 17 received \$88,300 in structured cash deposits across multiple branches in NSW and Vic on 1 December 2015 and yet no transaction monitoring alerts were raised.

By reason of the failure to comply with s 36 with respect to Company 17, CommBank failed to identify the cash deposits made into CommBank Account 81 between 20 October 2015 and 9 December 2015 (all under \$10,000 and totalling \$124,928) and failed to consider whether to report these transactions in accordance with s 41 of the Act.

1204. On and from 29 May 2015, CommBank did not monitor Company 17 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 29 May 2015 (SMR 555463216), rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 17.

CommBank did not undertake measures appropriate to the circumstances as specified in rule 15.10 with respect to Company 17 on and from 29 May 2015.

1205. By reason of the matters pleaded at paragraphs 1203 and 1204, CommBank contravened s 36(1) on and from 3 August 2014 with respect to Company 17.

Company 18 – CommBank Account 82

1206. On or about 27 February 2009, CommBank provided a designated service to Company 18 by opening an account in the name of Company 18.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 82.

Company 18's industry was recorded as 'personal and other services'
and its director was recorded as Person 72.

1207. Between 31 January 2012 and 17 November 2014, 39 cash deposits each under \$10,000, totalling \$213,321 were made into CommBank Account 82 in the name of Company 18.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 82.

Items 1–26 of Schedule AAR to the Statement of Claim.

1208. CommBank suspected that the cash deposits listed at each item in Schedule AAR to the Statement of Claim were structured contrary to section 142 of the Act.

Particulars

SMR 378959641 dated 16 July 2013.

Transaction monitoring alert TM-84872A raised manually by STR on
26 June 2013.

10 April 2015 email from NSW to OPC Compliance, CommBank.

1209. By no later than 16 July 2013, CommBank was aware of suspicious activity on CommBank Account 82 in the name of Company 18.

Particulars

SMR 378959641 dated 16 July 2013, which reported that an unidentified third party attended a CommBank branch to deposit \$8,560 into the account. It also relevantly reported further structured cash deposits totalling \$161,750 made between 15 July 2012 and 15 July 2013, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

1210. By no later than 21 August 2013, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 8–11 of Schedule AAR to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 13 August 2013 transaction monitoring alert TM-90676A triggered for structured cash deposits and was reviewed by the AML team on

21 August 2013. Upon review, the reviewing officer identified ongoing structuring since the last SMR on 16 July 2013 but determined no need to report a further SMR and recommended alerts on the account be suppressed for 90 days since date of last report.

1211. By no later than 15 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at paragraph 1206 and at items 12–26 of Schedule AAR to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 20 March 2015 NSW Police sent an email to OPC Compliance, CommBank, advising that deposits into 39 CommBank accounts, including CommBank Account 82, were related to the charging of Singh for recklessly dealing with proceeds of crime contrary to s 194(3) of the *Crimes Act 1900* (NSW). NSW Police sought confirmation of the BSB, account numbers and customer names so that a notice to produce could be issued for the banking transaction records of these accounts. NSW Police also advised that 'It is believed a number of these accounts, in particular those nominated under item 2 [including CommBank Account 82], are accounts specifically generated for the purpose of laundering money'. OPC Compliance, CommBank emailed these details to NSW Police on 9 April 2015.

On 9 April 2015 NSW Police emailed OPC Compliance requesting documents in relation to these 39 CommBank accounts, including CommBank Account 82, and advised these documents were sought in relation to a prosecution of an offender for both NSW and Commonwealth money laundering offences.

On 10 April 2015 NSW Police emailed OPC Compliance in relation to the 39 CommBank accounts, including CommBank Account 82, and advised that 'Many of the accounts have been identified as receiving structured amounts of money. If any of these CBA accounts are referred to your Investigations/Risk section, I will be more than happy to discuss how these accounts were identified with them'. CommBank has never responded to this aspect of the email.

On 15 April 2015 CommBank advised NSW Police that the requested documents were ready for collection. On 21 April 2015 a notice to produce was issued for the production of these documents.

1212. By reason of the matters pleaded in paragraphs 1210 and 1211, s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
1213. By reason of the matters pleaded in paragraph 1210 and 1212, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 21 August 2013 being 26 August 2013.
1214. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1210.

1215. By reason of the matters pleaded in paragraphs 1212 and 1211, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 15 April 2015 being 20 April 2015.
1216. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1211.
1217. By reason of the matters pleaded at paragraphs 1210 to 1216, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

1218. On and from 26 June 2013, CommBank did not monitor Company 18 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 26 June 2013 a manual STR was raised which reported that an unknown person had attended the Pymble branch 'to deposit cash close to \$10,000 to different accounts a few times this week' including CommBank Account 82. This was logged as transaction monitoring alert TM-84872A but was not reviewed by the AML Team until 15 July 2013. After an SMR was lodged, the alert was closed and no due diligence carried out with a view to identifying, mitigating and managing the ML/TF risks.

On 13 August 2013 transaction monitoring alert TM-90676A triggered for structured cash deposits but was not reviewed by the AML team until 21 August 2013. Upon review, the reviewing officer noted 'TMA alerted on 2 cash deposits in [CommBank Account 82] into [Company 18]. Refer to TM-84872A where on 16/07/2013 an SMR was submitted to AUSTRAC under reference 10294490. No additional information to report. Recommend to suppress for 90 days since date of last report'. Further alerts on the customer were suppressed on 23 August 2013. The alert was closed, no SMR was lodged and no customer due diligence carried out.

Despite the volume of cash deposits made to the account, only 1 automatic transaction monitoring alert for structuring was ever triggered with respect to this account.

No customer due diligence was undertaken in response to the 20 March 2015 and 10 April 2015 emails from NSW Police.

From 26 June 2013 to 17 November 2014 Company 18 (through CommBank Account 82) received \$151,186 in structured cash deposits of which AUSTRAC is presently aware.

1219. On and from 16 July 2013, CommBank did not monitor Company 18 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 16 July 2013 (SMR 378959641), rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 18.

CommBank did not undertake measures appropriate to the circumstances as specified in rule 15.10 with respect to Company 18 on and from 16 July 2013.

1220. By reason of the matters pleaded at paragraphs 1218 and 1219, CommBank contravened s 36(1) on and from 26 June 2013 with respect to Company 18.

Person 73 – CommBank Account 83

1221. On or about 23 September 2008, CommBank provided a designated service to Person 73 by opening an account in the name of Person 73.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 83.

Person 73's occupation was recorded as unemployed.

1222. Between 21 November 2012 and 19 November 2014, 23 cash deposits each under \$10,000, totalling \$153,180 were made into CommBank Account 83 in the name of Person 73.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 83.

Items 1–6 of Schedule AAS to the Statement of Claim

1223. CommBank suspected that the cash deposits listed at each item in Schedule AAS to the Statement of Claim were structured contrary to section 142 of the Act.

Particulars

SMRs 380610775 dated 23 July 2013 and 538169697 dated 24 March 2015.

10 April 2015 email from NSW Police to OPC Compliance, CommBank.

1224. By no later than 23 July 2013, CommBank was aware of suspicious activity on CommBank Account 83 in the name of Person 73.

Particulars

SMR 380610775 dated 23 July 2013 which reported six cash deposits under \$10,000 received on 26 June 2013 at different branches in NSW, and 6 additional cash deposits of a similar nature between 22 July 2012 and 22 July 2013, indicative of money laundering and avoiding reporting obligations.

The failures to report suspicious matters for the purposes of s 41

1225. By no later than 24 March 2015, CommBank suspected on reasonable grounds that information it had concerning the designated service identified at paragraph 1221 may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 538169697 dated 24 March 2015.

On 20 March 2015 NSW Police sent an email to OPC Compliance, CommBank, advising that deposits into 39 CommBank accounts, including CommBank Account 83, were related to the charging of Singh for recklessly dealing with proceeds of crime contrary to s 194(3) of the *Crimes Act 1900* (NSW). NSW Police sought confirmation of the BSB, account numbers and customer names so that a notice to produce could be issued for the banking transaction records of these accounts. NSW Police also advised that 'It is believed a number of these accounts, in particular those nominated under item 2 [including CommBank Account 83], are accounts specifically generated for the purpose of laundering money'. OPC Compliance, CommBank emailed these details to NSW Police on 9 April 2015.

1226. By reason of the matters pleaded in paragraph 1225 s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1227. By reason of the matters pleaded in paragraphs 1225 and 1226, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 24 March 2015 being 27 March 2015.
1228. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1225.

Particulars

SMR 538169697 dated 24 March 2015 reported 10 cash deposits made at multiple branches in NSW and Vic on 17 July and 19 November 2014, but does not report a suspicion that the account was an account generated specifically for the purpose of money laundering.

1229. By reason of the matters pleaded at paragraphs 1225 to 1228, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

1230. On and from 19 September 2012, CommBank did not monitor Person 73 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 19 September 2012 the customer was added to the High Risk Customer register. There was no review of this rating until 18 March

2015. CommBank's failure to review this high risk customer within an appropriate period contributed to the failure to identify structured cash deposits – HRC-332157A.

In the interim, on 26 June 2013 transaction monitoring alert TM-84904A triggered for large aggregate cash transactions but was not reviewed by the AML team until 22 July 2013. After an SMR 380610775 was lodged on 23 July 2013, the alert was closed and no due diligence carried out with a view to identifying, mitigating or managing the ML/TF risks.

There was no due diligence carried out on the customer until the review of HRC-332157A on 18 March 2015. This review identified 6 structured cash deposits on 17 July 2014 and 4 structured cash deposits on 19 November 2014, which were referred for a possible SMR to be submitted to AUSTRAC. The customer was maintained on the High Risk Customer (HRC) register with a follow up due in 3 months.

On 20 March 2015 NSW Police sent an email to OPC Compliance, CommBank, advising that deposits into 39 CommBank accounts, including CommBank Account 83, were related to the charging of Singh for recklessly dealing with proceeds of crime contrary to s 194(3) of the *Crimes Act 1900* (NSW). NSW Police sought confirmation of the BSB, account numbers and customer names so that a notice to produce could be issued for the banking transaction records of these accounts. NSW Police also advised that 'It is believed a number of these accounts, in particular those nominated under item 2 [including CommBank Account 83], are accounts specifically generated for the purpose of laundering money'. OPC Compliance, CommBank emailed these details to NSW Police on 9 April 2015.

On 9 April 2015 NSW Police emailed OPC Compliance requesting documents in relation to these 39 CommBank accounts, including CommBank Account 83, and advised these documents were sought in relation to a prosecution of an offender for both NSW and Commonwealth money laundering offences.

On 10 April 2015 NSW Police emailed OPC Compliance in relation to the 39 CommBank accounts, including CommBank Account 83, and advised that 'Many of the accounts have been identified as receiving structured amounts of money. If any of these CBA accounts are referred to your Investigations/Risk section, I will be more than happy to discuss how these accounts were identified with them'. CommBank has never responded to this aspect of the email.

No customer due diligence was undertaken in response to the 20 March 2015 and 10 April 2015 emails from NSW Police.

Although between 21 November 2012 and 19 November 2014, 23 cash deposits each under \$10,000, totalling \$153,180 were made into

CommBank Account 83, no automated transaction monitoring alerts were raised for structuring.

1231. On and from 23 July 2013, CommBank did not monitor Person 73 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 and having submitted an SMR on 23 July 2013 (SMR 380610775), rule 15.9(3) required CommBank to apply its enhanced customer due diligence program to to Person 73.

CommBank did not undertake measures appropriate to the circumstances as specified in rule 15.10 with respect to Person 73 on and from 16 July 2013.

1232. By reason of the matters pleaded at paragraphs 1230 and 1231, CommBank contravened s 36(1) on and from 19 September 2012 with respect to Person 73.

Person 74 – CommBank Account 84

1233. On or about 4 January 2013, CommBank provided a designated service to Person 74 by opening an account in the name of Person 74.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 84.

Person 74's industry was recorded as unemployed.

1234. Between 16 December 2013 and 18 April 2016, 21 cash deposits each under \$10,000, totalling \$99,410 were made into CommBank Account 84 in the name of Person 74.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank statement for CommBank Account 84.

Items 1–12 of Schedule AAT to the Statement of Claim.

1235. CommBank suspected that the cash deposits listed at items 5, 6 and 12 of Schedule AAT to the Statement of Claim were structured contrary to section 142 of the Act.

Particulars

10 April 2015 email from NSW Police to OPC Compliance, CommBank.

On 18 April 2016 a manual STR was raised for 2 cash deposits of \$5,000 and logged as transaction monitoring alert TM-273621A.

1236. By no later than 20 March 2015, CommBank was aware of suspicious activity on CommBank Account 84 in the name of Person 74.

Particulars

20 March 2015 email from NSW Police to OPC Compliance,
CommBank.

The failures to report suspicious matters for the purposes of s 41

1237. By no later than 15 April 2015, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at paragraph 1233 and items 1–7 of Schedule AAT to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 20 March 2015 NSW Police sent an email to OPC Compliance, CommBank, advising that deposits into 39 CommBank accounts, including CommBank Account 84, were related to the charging of Singh for recklessly dealing with proceeds of crime contrary to s 194(3) of the *Crimes Act 1900* (NSW). NSW Police sought confirmation of the BSB, account numbers and customer names so that a notice to produce could be issued for the banking transaction records of these accounts. NSW Police also advised that 'It is believed a number of these accounts, in particular those nominated under item 2 [including CommBank Account 84], are accounts specifically generated for the purpose of laundering money'. OPC Compliance, CommBank emailed these details to NSW Police on 9 April 2015.

On 9 April 2015 NSW Police emailed OPC Compliance requesting documents in relation to these 39 CommBank accounts, including CommBank Account 84, and advised these documents were sought in relation to a prosecution of an offender for both NSW and Commonwealth money laundering offences.

On 10 April 2015 NSW Police emailed OPC Compliance in relation to the 39 CommBank accounts, including CommBank Account 84, and advised that 'Many of the accounts have been identified as receiving structured amounts of money. If any of these CBA accounts are referred to your Investigations/Risk section, I will be more than happy to discuss how these accounts were identified with them'. CommBank has never responded to this aspect of the email.

On 15 April 2015 CommBank advised NSW Police that the requested documents were ready for collection. That same day, an affidavit was sworn annexing documents requested by NSW Police, including bank statements/transactions lists for CommBank Account 84 dating from 4 January 2013. On 21 April 2015 a notice to produce was issued for the production of these documents.

1238. By no later than 20 May 2016, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 11–12 of Schedule AAT to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 18 April 2016 a manual STR was raised for 2 cash deposits of \$5,000 and logged as transaction monitoring alert TM-273621A. The STR noted '2 x cash deposits both of \$5,000 each. Account name and number written on a piece of paper with CWB at the top, writing on paper known as the writing of a customer that does these deposits often and at different institutions as well, all under \$10,000 in multiple deposits'. The alert was sent to the AML team for review on 23 April 2016, but was not reviewed by the AML Team until 20 May 2016. Upon review, the reviewing officer noted that '7 days pre and post to the above cash deposits revealed no further cash received. No other significant activity found. No WC match'. No SMR was lodged, notwithstanding the branch's notification of highly suspicious activity and notwithstanding the correspondence from NSW Police on 20 March 2015 and 10 April 2015 in relation to the account.

- 1239. By reason of the matters pleaded in paragraphs 1237 and 1238 s 41(1)(f)(iii) of the Act required CommBank to give SMRs to the AUSTRAC CEO.
- 1240. By reason of the matters pleaded in paragraph 1237 and 1239, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 15 April 2015 being 20 April 2015.
- 1241. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1237.
- 1242. By reason of the matters pleaded in paragraph 1238 and 1239, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 20 May 2016 being 25 May 2016.
- 1243. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1238.
- 1244. By reason of the matters pleaded at paragraphs 1237 to 1243, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 1245. On and from 6 January 2013, CommBank did not monitor Person 74 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 6 January 2013 the customer was referred to the AML team for consideration as to whether he should be placed on the high risk customer register. This referral was not considered until 4 and 22 April 2013 at which time the customer was placed on the high risk customer register with a follow up due in 3 months. This rating was never reviewed – HRC-804565A.

No customer due diligence was undertaken in response to the 20 March 2015 and 10 April 2015 emails from NSW Police.

Notwithstanding a branch's notification of highly suspicious activity via STR (transaction monitoring alert TM-273621A), no ECDD was undertaken on this account.

From 22 April 2013 to 18 April 2016 Person 74 (through CommBank Account 84) received \$99,410 in cash deposits under \$10,000 of which AUSTRAC is presently aware and yet no automated transaction monitoring alerts were raised for structuring.

1246. By reason of the matters pleaded at paragraph 1245, CommBank contravened s 36(1) on and from 6 January 2013 with respect to Person 74.

Other suspicious activity, including through IDMs - unregistered remitter

Person 75 – CommBank Account 85 and Company 19 – CommBank Account 86

1247. On or about 29 October 2012, CommBank provided a designated service to Person 75 by opening an account in the name of Person 75.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 85.

Person 75's occupation was recorded as director and manager of
Company 19.

1248. On or about 29 October 2012, CommBank provided a designated service to Company 19 by opening an account in the name of Company 19.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 86.

Company 19's industry was recorded as import and export in wood
materials.

Person 75 was recorded as the director of Company 19.

1249. Between 25 June 2014 and 14 July 2014, 85 cash deposits totalling \$491,724 were made into CommBank Account 85 in the name of Person 75.

Particulars

Account statement for CommBank Account 85.

Schedule AAU to the Statement of Claim.

75 cash deposits were under \$10,000.

83 cash deposits were made at CommBank branches.

2 cash deposits were made through CommBank IDMs.

1250. CommBank suspected that some of the cash deposits pleaded at paragraph 1249 were structured contrary to section 142 of the Act.

Particulars

Transaction monitoring alerts TM-131033A raised by STR on 27 June
2014 and TM-134588A raised by STR on 12 July 2014.

The failures to report suspicious matters for the purposes of s 41

1251. By no later than 26 July 2014, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 1–23 of Schedule AAU to the Statement of Claim may be relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

SMR 458649809 dated 27 May 2014.

On 27 June 2014 transaction monitoring alert TM-131033A was manually raised by the Kardinya branch but not reviewed by the AML team until 25 and 26 July 2014. The alert was raised as a result of 2 deposits of \$5,800, and it noted 'alot [sic] of large deposits put into account recently and transferred to other accounts. Same third party made another deposit earlier in the week around the \$5K mark'. Upon review, the AML team concluded that '[CommBank Account 85] has since been closed in line with GS termination program TERM-459C.

Customer was recently reported on 27/05/2014 with AUSTRAC reference 13096491. Three month review (since date of previous report) shows activity has continued until closure. As account is closed no further deposits are being received. Closed as not suspicious'.

On 10 and 11 July 2014 the AML Team reviewed transaction monitoring alert TM-128846A was raised on 18 June 2014 by the Cherrybrook branch for 'third party deposit multiple deposits'. Upon review, the AML team noted '[t]he account activity is recently reported to AUSTRAC as unregistered MSB on 27 May 2014 and a termination letter is sent to customer (due date 14 July 2014) TERM459C. Closed as not suspicious at this stage'. No SMR was lodged, and no customer due diligence was carried out with a view to identifying, mitigating and managing the ML/TF risks posed by this customer through other accounts.

On 9 and 11 August 2014, the AML Team reviewed transaction monitoring alert TM-134588A which was triggered on 12 July 2014 by an STR raised by RBS. The STR was raised as a result of 1 third party cash deposit of \$9,200 on 11 July 2014, and noted 'I checked the DDA and there have been multiple deposits credited to dda and withdrawn'. Upon review, the AML team noted 'STR raised based on suspect high volume third party cash deposits. Bank records indicate client's relationship with the CBA was terminated based on a commercial decision as at 18 July 2014. SMR was last lodged on 27 May 2014 under AUSTRAC reference 13096491 for unregistered remittance activities after receiving aggregate cash, refer TM-122379A. No further action required. Closed as Not Suspicious'.

1252. By reason of the matters pleaded in paragraph 1251 s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1253. By reason of the matters pleaded in paragraph 1251 and 1252, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 26 July 2014 being 30 July 2014.
1254. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1251.
1255. By no later than 24 July 2015, CommBank suspected on reasonable grounds that information it had concerning the provision of designated services to Person 75 may be

relevant to the investigation of, or prosecution of a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

CommBank's Intelligence Team reviewed IDM deposits made into the Company 19 account between 1 January 2015 and July 2015 and concluded this activity was inconsistent with legitimate business transactions. CommBank's Intelligence Team also analysed transactions between Person 75 through Company 19 and a number of other related CommBank accounts. By the time the Executive General Manager Intelligence, Group Security emailed the AML Team on 24 July 2015, the Executive General Manager Intelligence had concluded that there was a reasonable suspicion that Person 75 was linked to unlawful activity, including unregistered money remittance.

Section 74 of the Act.

- 1256. By reason of the matters pleaded in paragraph 1255 s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
- 1257. By reason of the matters pleaded in paragraph 1255 and 1256, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 24 July 2015 being 29 July 2015.
- 1258. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1255.
- 1259. By reason of the matters pleaded at paragraphs 1251 to 1258, CommBank contravened s 41(2)(a) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

- 1260. On and from 10 June 2014, CommBank did not monitor Person 75 in relation to the provision of designated services (including, but not limited to, designated services provided through CommBank Account 85, CommBank Account 86 and CommBank Account 123) with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

HRC-1660223A was created manually on 29 May 2014 with respect to Person 75. He was determined as a High Risk Customer on 10 June 2014. This determination was confirmed on 18 July 2014. HRC-1660223A was then reviewed once on 17 October 2014, and then not until 14 September 2015. On 14 September 2015, Person 75 was removed from the High Risk Customer register.

Despite the volume of large and structured cash deposits made into CommBank Account 85 in the name of Person 75 in June and July 2014, no automatic transaction monitoring alerts were triggered with respect to this account or customer during that period.

On 18 June 2014 transactions monitoring alert TM-128846A was manually raised by the Cherrybrook branch for 'third party deposit multiple deposits' but was not reviewed by the AML team until 10 and

11 July 2014. Upon review, the AML team noted '[t]he account activity is recently reported to AUSTRAC as unregistered MSB on 27 May 2014 and a termination letter is sent to customer (due date 14 July 2014) TERM459C. Closed as not suspicious at this stage'. No SMR was lodged, and no customer due diligence carried out with a view to identifying, mitigating and managing the ML/TF risks posed by this customer through other accounts.

On 27 June 2014 transaction monitoring alert TM-131033A relating to Person 75 was manually raised the Kardinya branch for 'a lot of large deposits put into account recently and transferred to other accounts. Same third party made another deposit earlier in the week around the \$5K mark'. This was not reviewed by the AML team until 25 and 26 July 2014. Although suspicious transactions were identified, no SMR was lodged, and no customer due diligence carried out with a view to identifying, mitigating and managing the ML/TF risks posed by this customer through other accounts.

On 12 July 2014 transaction monitoring alert TM-134588A was manually raised by the Westfield Parramatta branch for third party cash deposits under \$10,000 but was not reviewed by the AML team until 9 and 11 August 2014. Although suspicious transactions were identified, no SMR was lodged, and no customer due diligence carried out with a view to identifying, mitigating and managing the ML/TF risks posed by this customer through other accounts.

On 24 July 2015 at 12.52pm, an 'Intelligence Bulletin' was forwarded to the AML team from the Intelligence team via email and attached a PowerPoint presentation. The Bulletin noted the Intelligence Team 'initially identified approximately 10,000 individuals and entities that had made three or more ATM cash deposits over \$5000 since 1 January 2015' and highlighted 6 of those 10,000 individuals and entities as having 'links to other suspicious and unlawful activity'. Person 75 is identified in the attached PowerPoint presentation as being an individual suspected of links to unlawful activity in connection with CommBank Account 86 in the name of Company 19.

See also attachment 1 to the correspondence of CommBank to AUSTRAC dated 11 November 2016.

HRC-2492356A was created on 16 August 2015 with respect to Person 75 and CommBank Account 124. On 18 August 2015, in determining a risk rating for Person 75, it was noted that they had been a 'customer of the group for less than 6 months'. It was also noted that a 3 month review of account activity found no transactions of significance. The case was then reviewed on 20 November 2015 and 19 February 2016, but no further findings were noted. The case was most recently reviewed on 23 June 2016, at which time it was recommended CommBank retain the relationship with Person 75. In assessing Person 75, no regard was had to the findings of the Intelligence Team in the Intelligence Bulletin of 24 July 2015.

HRC-3085638A was created on 3 February 2016 with respect to Company 19 and CommBank Account 86. On 9 February 2016 the AML Team confirmed this customer's HRC rating, noting that Person 75 was a related party. It was noted that the account has received aggregated cash deposits where the source of the funds was unknown and where activity on the account was inconsistent with the business profile. In assessing Company 19, no regard was had to the findings of the Intelligence Team in the Intelligence Bulletin of 24 July 2015. A follow up was recommended in 12 months.

SMR 377849092 dated 12 July 2013, SMR 424105846 dated 8 January 2014, SMR 458649809 dated 27 May 2014, SMR 479813096 dated 15 August 2014, SMR 624379887 dated 5 February 2016 and SMR 709407407 dated 21 November 2016.

From 10 June 2014 to 14 July 2014 Person 75 (through CommBank Account 85) received \$491,724 in large and structured cash deposits of which AUSTRAC is presently aware.

In spite of the known high ML/TF risks posed by Person 75, CommBank continues to deal with him through related accounts. CommBank has failed to monitor Person 75's activity through these related accounts with a view to identifying, mitigating and managing ML/TF risks.

1261. By reason of the matters pleaded at paragraph 1260, CommBank contravened s 36(1) on and from 10 June 2014 with respect to Person 75.

Strike Force B

1262. In November 2015, Strike Force B was established to investigate a money laundering syndicate controlled by Person 81.

Particulars

Police Statement of Facts.

Person 81 was arrested on 19 January 2017 and charged under s 93T of the *Crimes Act 1900* (NSW) with knowingly directing the activities of a criminal group.

NSW Police allege Person 81 laundered millions of dollars for organised crime groups.

1263. NSW Police allege that Person 81 directed Australian nationals (the **money mules**) to meet with members of organised crime groups to collect large sums of money to launder out of Australia.

Particulars

Police Statement of Facts.

Evidence seized as part of Strike Force B indicates that one of the organised crime groups (the **drug and firearms syndicate**) that was using the money laundering syndicate controlled by Person 81 had laundered just under \$42 million between 9 March 2016 and 8 August 2016.

1264. NSW Police allege that the money mules would launder the money by making structured cash deposits into numerous bank accounts through branches, ATMs and IDMs.

Particulars

Police Statement of Facts.

This form of money laundering, referred to in paragraphs 2 and 3, is known as cuckoo smurfing.

Structuring is an offence under s 142 of the Act.

1265. NSW Police allege that the money mules made structured cash deposits into the CommBank accounts identified in Schedules AAV to ACU to this Amended Statement of Claim to launder the funds of the drug and firearms syndicate.

Particulars

Police Statement of Facts.

The failure to report suspicious matters for the purposes of s 41

Money Mule 1

1266. Between 11 October 2011 and 19 April 2017, a total of \$5,462,342.18 in large and structured cash deposits were deposited into 16 CommBank accounts identified in Schedules AAV to ABK to this Amended Statement of Claim, held by Persons 82 to 97.
1267. Of the \$5,462,342.18 pleaded at paragraph 1266, 400 cash deposits totalling \$2,875,425.18 made into the 16 CommBank accounts were not reported under s 41 of the Act.

Particulars

Item 3, table 1, s 6 of the Act.

Account statements for CommBank Accounts 128 to 143.

See paragraphs 1268 to 1272 below.

37 of these cash deposits were made at IDMs or ATMs, with 29 of these being under \$10,000 and 8 being \$10,000 or more.

359 of these cash deposits were made at branches, with at least 357 of these being under \$10,000 and at least 2 being \$10,000 or more.

1268. By no later than 2 May 2017, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at Schedules AAV to ABK of the Amended Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to the CommBank accounts identified in Schedules AAV to ABK to this Amended Statement of Claim to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1269. By reason of the matters pleaded in paragraph 1268, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1270. By reason of the matters pleaded in paragraphs 1268 and 1269, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 2 May 2017, being 5 May 2017.
1271. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1268.

Particulars

SMR 254254747 dated 23 December 2011.

SMR 293761592 dated 19 July 2012.

SMR 368329918 dated 7 June 2013.

SMR 380853588 dated 24 July 2013.

SMR 543356736 dated 14 April 2015.

SMR 645300121 dated 20 April 2016.

SMR 651879807 dated 12 May 2016.

SMR 275132391 dated 23 April 2012.

SMR 401202017 dated 10 October 2013.

SMR 651976258 dated 13 May 2016.

SMR 651879137 dated 12 May 2016.

SMR 784742742 dated 13 July 2017.

SMR 656942958 dated 31 May 2016.

SMR 702618207 dated 28 October 2016.

SMR 499022629 dated 29 October 2014.

SMR 637482866 dated 23 March 2016.

SMR 656966166 dated 31 May 2016.

SMR 701355085 dated 25 October 2016.

SMR 735891866 dated 9 February 2017.

SMR 322453888 dated 21 November 2012.

SMR 610978360 dated 18 December 2015.

SMR 579892411 dated 31 August 2015.

SMR 680889964 dated 19 August 2016.

SMR 656945544 dated 31 May 2016.

SMR 488522132 dated 17 September 2014.

SMR 522283524 dated 22 January 2015.

SMR 653867168 dated 23 May 2016.

SMR 645661795 dated 21 April 2016.

SMR 656965184 dated 31 May 2016.

1272. By reason of the matters pleaded at paragraphs 1268 to 1271, CommBank contravened s 41(2)(a) of the Act on 16 occasions in respect of the cash deposits made into the 16 CommBank accounts.

The failures to carry out ongoing customer due diligence contrary to section 36

1273. On and from 23 December 2011, CommBank did not monitor Person 82 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 128 in the name of Person 82 on 24 and 29 November 2011.

Between 24 November 2011 and 13 May 2016, a total of \$894,700 in large and structured cash deposits were made into CommBank Account 128.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 23 December 2011 with respect to

Person 82, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 82.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 82.

1274. By reason of the matters pleaded at paragraph 1273, CommBank contravened s 36(1) on and from 23 December 2011 with respect to Person 82.
1275. On and from 25 July 2013, CommBank did not monitor Person 83 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 129 in the name of Person 83 on 24 and 25 July 2013.

CommBank did not lodge an SMR with respect to Person 83 until 12 May 2016 (SMR 651879807). By 12 May 2016, \$183,100 in cash had been deposited into CommBank Account 129 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 12 May 2016 with respect to Person 83, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 83.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 83.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 129 in the name of Person 83 to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1276. By reason of the matters pleaded at paragraph 1275, CommBank contravened s 36(1) on and from 25 July 2013 with respect to Person 83.
1277. On and from 5 July 2015, CommBank did not monitor Person 84 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 130 in the name of Person 84 on 5 July 2015.

Between 5 July 2015 and 17 March 2016 a total of \$47,000 in 7 deposits under \$10,000 had been made into CommBank Account 130.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 84 in respect of the cash activity on CommBank Account 130.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 130 in the name of Person 84 to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1278. By reason of the matters pleaded at paragraph 1277, CommBank contravened s 36(1) on and from 5 July 2015 with respect to Person 84.
1279. On and from 23 April 2012, CommBank did not monitor Person 85 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 131 in the name of Person 85 on 13 and 14 September 2011.

Between 13 September 2011 and 17 June 2016, a total of \$554,000 in large and structured cash deposits were made into CommBank Account 131.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 23 April 2012 with respect to Person 85, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 85.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 85.

1280. By reason of the matters pleaded at paragraph 1279, CommBank contravened s 36(1) on and from 23 April 2012 with respect to Person 85.
1281. On and from 15 December 2011, CommBank did not monitor Person 86 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 132 in the name of Person 86 on 6 December 2011.

CommBank did not lodge an SMR with respect to Person 86 until 12 May 2016 (SMR 651879137). By 12 May 2016, \$109,700 had been deposited into CommBank Account 132 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 12 May 2016 with respect to Person 86,

r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 86.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 86.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 132 in the name of Person 86 to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1282. By reason of the matters pleaded at paragraph 1281, CommBank contravened s 36(1) on and from 15 December 2011 with respect to Person 86.

1283. On and from 31 May 2016, CommBank did not monitor Person 87 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 133 in the name of Person 87 on 6 May 2016.

CommBank lodged an SMR with respect to structured cash deposits to CommBank Account 133 in the name of Person 87 on 31 May 2016 (SMR 656942958). By 31 May 2016, \$241,500 had been deposited into CommBank Account 133 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 31 May 2016 with respect to Person 87, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 87.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 87.

1284. By reason of the matters pleaded at paragraph 1283, CommBank contravened s 36(1) on and from 31 May 2016 with respect to Person 87.

1285. On and from 29 October 2014, CommBank did not monitor Person 88 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 135 in the name of Person 88 on 23 September 2014.

CommBank lodged an SMR with respect to structured cash deposits to CommBank Account 135 in the name of Person 88 on 29 October 2014 (SMR 499022629). By 29 October 2014, \$113,000 had been deposited into CommBank Account 135 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 29 October 2014 with respect to Person 88, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 88.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 88.

1286. By reason of the matters pleaded at paragraph 1285, CommBank contravened s 36(1) on and from 29 October 2014 with respect to Person 88.

1287. On and from 21 November 2012, CommBank did not monitor Person 89 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 135 in the name of Person 89 on 20 and 23 October 2014.

Between 20 October 2014 and 12 May 2016, a total of \$268,600 in large and structured cash deposits were made into CommBank Account 135.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 21 November 2012 with respect to Person 89, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 89.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 89.

1288. By reason of the matters pleaded at paragraph 1287, CommBank contravened s 36(1) on and from 21 November 2012 with respect to Person 89.

1289. On and from 14 May 2015, CommBank did not monitor Person 90 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 136 in the name of Person 90 on 14 May 2015.

CommBank did not lodge an SMR with respect to Person 90 until 18 December 2015 (SMR 610978360). By 18 December 2015, \$148,100 in cash had been deposited into CommBank Account 136 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 18 December 2015 with respect to Person 90, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 90.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 90.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to into CommBank Account 136 in the name of Person 90 to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1290. By reason of the matters pleaded at paragraph 1289, CommBank contravened s 36(1) on and from 18 December 2015 with respect to Person 90.
1291. On and from 6 August 2013, CommBank did not monitor Person 91 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 137 in the name of Person 91 on 6 August 2013.

CommBank did not lodge an SMR with respect to Person 91 until 31 August 2015 (SMR 579892411). By 31 August 2015, \$107,650 in cash had been deposited into CommBank Account 137 in large and structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 31 August 2015 with respect to Person 91, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 91.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 91.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 137 in the name of Person 91 to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1292. By reason of the matters pleaded at paragraph 1291, CommBank contravened s 36(1) on and from 31 August 2015 with respect to Person 91.
1293. On and from 29 March 2016, CommBank did not monitor Person 92 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 138 in the name of Person 92 on 29 March 2016.

CommBank did not lodge an SMR with respect to Person 92 until 31 May 2016 (SMR 656945544). By 31 May 2016, \$368,300 in cash had been deposited into CommBank Account 138 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 31 May 2016 with respect to Person 92, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 92.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 92.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 138 in the name of Person 92 to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1294. By reason of the matters pleaded at paragraph 1293, CommBank contravened s 36(1) on and from 29 March 2016 with respect to Person 92.
1295. On and from 30 August 2014, CommBank did not monitor Person 93 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 139 in the name of Person 93 on 30 August 2014.

Between 23 August 2014 and 13 May 2016, a total of \$58,400 in 13 deposits under \$10,000 had been made into CommBank Account 139.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 93 in respect of the cash activity on CommBank Account 139.

In addition to the deposits under \$10,000 made into CommBank Account 139, a number of large cash deposits were made into 5 different accounts jointly or individually held by Person 93. Between 3 January 2014 and 29 May 2017, CommBank lodged 26 TTRs totalling \$313,450 in relation to cash deposits to CommBank Account 139, CommBank Account 189, CommBank Account 190, CommBank Account 191 and CommBank Account 192. See TTR Report Numbers 721210283, 586978767, 586978765, 586978000, 586977999, 555430957, 586974190, 586974189, 528076349, 586963445, 516925407, 516919358, 515584827, 513672371, 586956202, 586952985, 586952984, 734157415, 734157414,

721210282, 586956204, 424592195, 772302559, 630211000,
624297374 and 604048649.

On 24 April 2017, the Organised Crime Squad of NSW Police issued
a Notice to Produce to CommBank seeking information and
documents relating to CommBank Account 139 in the name of
Person 93 to form part of a brief of evidence against Money Mule 1,
a money mule charged with money laundering under s 193(B)(1) of
the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in
response to this Notice.

1296. By reason of the matters pleaded at paragraph 1295, CommBank contravened s 36(1) on
and from 30 August 2014 with respect to Person 93.
1297. On and from 17 September 2014, CommBank did not monitor Person 94 in relation to the
provision of designated services with a view to identifying, mitigating and managing the
ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank
Account 140 in the name of Person 94 in January 2014.

CommBank lodged an SMR with respect to structured cash deposits
to CommBank Account 140 in the name of Person 94 on
17 September 2014. By 17 September 2014, \$81,704 had been
deposited into CommBank Account 140 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and
having submitted an SMR on 17 September 2014 with respect to
Person 94, r 15.9(3) required CommBank to apply its enhanced
customer due diligence program to Person 94.

CommBank did not undertake any measure appropriate to the
circumstances as specified in r 15.10 with respect to Person 94.

1298. By reason of the matters pleaded at paragraph 1297, CommBank contravened s 36(1) on
and from 17 September 2014 with respect to Person 94.
1299. On and from 16 May 2016, CommBank did not monitor Person 95 in relation to the provision
of designated services with a view to identifying, mitigating and managing the ML/TF risk it
reasonably faced.

Particulars

Structured cash deposits were first made into CommBank
Account 141 in the name of Person 95 on 16 May 2016.

Between 16 May 2016 and 27 May 2016, a total of \$35,000 in
7 deposits under \$10,000 had been made into CommBank Account
141.

At no stage did CommBank give the AUSTRAC CEO an SMR in
relation to Person 95 in respect of the cash activity on CommBank
Account 141.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 141 in the name of Person 95 to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1300. By reason of the matters pleaded at paragraph 1299, CommBank contravened s 36(1) on and from 16 May 2016 with respect to Person 95.
1301. On and from 11 March 2016, CommBank did not monitor Person 96 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 142 in the name of Person 96 on 11 March 2016.

CommBank did not lodge an SMR with respect to Person 96 until 21 April 2016 (SMR 645661795). By 21 April 2016, \$138,000 in cash had been deposited into CommBank Account 142 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 21 April 2016 with respect to Person 96, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 96.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 96.

After SMR 645661795 was lodged a further \$20,000 in cash was deposits into CommBank Account 142 in 3 structured deposits.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 142 in the name of Person 96 to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1302. By reason of the matters pleaded at paragraph 1301, CommBank contravened s 36(1) on and from 11 March 2016 with respect to Person 96.
1303. On and from 12 May 2016, CommBank did not monitor Person 97 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 143 in the name of Person 97 on 12 May 2016.

CommBank did not lodge an SMR with respect to Person 97 until 31 May 2016 (SMR 656965184). By 31 May 2016, \$125,000 in cash had been deposited into CommBank Account 143 in structured deposits.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 143 in the name of Person 97 to form part of a brief of evidence against Money Mule 1, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1304. By reason of the matters pleaded at paragraph 1303, CommBank contravened s 36(1) on and from 12 May 2016 with respect to Person 97.

The failure to report suspicious matters for the purposes of s 41

Money Mule 2

1305. Between 14 February 2012 and 17 October 2017, a total of \$3,444,256.75 in large and structured cash deposits were deposited into 36 CommBank accounts identified in Schedules ABL to ACU to this Amended Statement of Claim, held by Money Mule 2, Persons 98 to 135, and Company 21.
1306. Of the \$3,444,256.75 pleaded at paragraph 1305, 367 cash deposits totalling \$2,624,381.75 made into the 36 CommBank accounts were not reported under s 41 of the Act.

Particulars

Item 3, table 1, s 6 of the Act.

Account statements for CommBank Accounts 144 to 145 and 147 to 180.

See paragraphs 1307 to 1311 below.

80 of these cash deposits were made at IDMs or ATMs, with 58 of these being under \$10,000 and 22 being \$10,000 or more.

287 of these cash deposits were made at branches, with 268 of these being under \$10,000 and 19 being \$10,000 or more.

1307. By no later than 2 May 2017, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at Schedules ABL to ACU of the Amended Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of New South Wales.

Particulars

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to the CommBank accounts identified in Schedules ABL to ACU to this Amended Statement of Claim to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1308. By reason of the matters pleaded in paragraph 1307, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1309. By reason of the matters pleaded in paragraphs 1307 and 1308, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 2 May 2017, being 5 May 2017.
1310. At no time has CommBank given the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1307.

Particulars

SMR 342978518 dated 15 February 2013.

SMR 562372807 dated 24 June 2015.

SMR 469775231 dated 8 July 2014.

SMR 681687096 dated 22 August 2016.

SMR 678372587 dated 10 August 2016.

SMR 532353479 dated 2 March 2015.

SMR 776517618 dated 19 June 2017.

SMR 813345334 dated 4 October 2017.

SMR 645660578 dated 21 April 2016.

SMR 808570902 dated 21 September 2017.

SMR 827048177 dated 7 November 2017.

1311. By reason of the matters pleaded at paragraphs 1307 to 1310, CommBank contravened s 41(2)(a) of the Act on 36 occasions in respect of the cash deposits made into the 36 CommBank accounts.

The failures to carry out ongoing customer due diligence contrary to section 36

1312. On and from 17 July 2013, CommBank did not monitor Person 98 in relation to the provision of designated services (including through CommBank Account 145 and CommBank Account 146 in the name of Company 22) with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Person 98 is the beneficial owner of Company 22. On and from 6 June 2013, a total of at least \$2,630,303 in structured and large cash deposits were made into CommBank Account 146 in the name of Company 22 and a total of \$276,400 in structured cash deposits were made into CommBank Account 145 in the name of Person 98.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 17 July 2013 with respect to Company 22, of which Person 98 is beneficial owner, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 98.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 98.

On 17 July 2013, SMR 379204690 was lodged in relation to Company 22, reporting \$99,349 in structured cash deposits.

The next SMR in relation to Company 22 was lodged on 3 February 2014 (SMR 430057179). Between 17 July 2013 and 3 February 2014, a further \$450,990 in structured cash deposits had been made into CommBank Account 146.

The next SMR in relation to Company 22 was lodged on 2 April 2014 (SMR 444957943). Between 17 July 2013 and 2 April 2014, a further \$346,708 in structured cash deposits had been made into CommBank Account 146.

On 8 July 2014, SMR 469775231 was lodged in relation to Person 98, reporting \$125,000 in structured cash deposits.

The next SMR in relation to Company 22 was lodged on 20 January 2015 (SMR 521555902). Between 2 April 2014 and 20 January 2015, a further 202 structured cash deposits totalling \$1,641,256 had been made into CommBank Account 146.

The next SMR in relation to Company 22 was lodged on 7 June 2016 (SMR 659270156). Between 20 January 2015 and 7 June 2016, a further \$38,500 in structured and large cash deposits had been made into CommBank Account 146.

The next SMR in relation to Person 98 was lodged on 22 August 2016 (SMR 681687096). A further \$25,000 in cash deposits were reported.

The next SMR in relation to Company 22 was lodged on 26 September 2016 (SMR 691877905). A further \$53,500 in structured cash deposits were reported.

1313. By reason of the matters pleaded at paragraph 1312, CommBank contravened s 36(1) on and from 17 July 2013 with respect to Person 98.

1314. On and from 10 August 2016, CommBank did not monitor Person 99 and Person 100 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 147 in the names of Person 99 and Person 100 on 21 July 2016.

Between 21 July 2016 and 15 November 2016, a total of \$73,000 in structured deposits were made into CommBank Account 147. A large cash deposit of \$200,000 had also been made into CommBank Account 147 on 8 July 2016.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 10 August 2016 with respect to Person 99 and Person 100, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 99 and Person 100.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 99 and Person 100.

1315. By reason of the matters pleaded at paragraph 1314, CommBank contravened s 36(1) on and from 10 August 2016 with respect to Person 99 and Person 100.
1316. On and from 15 February 2013, CommBank did not monitor Money Mule 2 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 144 in the name of Money Mule 2 on 30 and 31 January 2013.

Between 30 January 2013 and 1 July 2016, a total of \$233,920 in large and structured cash deposits were made into CommBank Account 144.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 15 February 2013 with respect to Money Mule 2, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Money Mule 2.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Money Mule 2.

Money Mule 2 also held a second CommBank account jointly with Person 101, being CommBank Account 148. \$10,000 in cash was deposited into CommBank Account 148 in structured amounts on 20 March 2015.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and

documents to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1317. By reason of the matters pleaded at paragraph 1316, CommBank contravened s 36(1) on and from 15 February 2013 with respect to Money Mule 2.
1318. On and from 2 March 2015, CommBank did not monitor Company 21 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 149 in the name of Company 21 on 2 December 2014.

CommBank lodged an SMR with respect to structured cash deposits to CommBank Account 149 in the name of Company 21 on 2 March 2015 (SMR 532353479). By 2 March 2015, \$247,980 had been deposited into CommBank Account 149 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 2 March 2015 with respect to Company 21, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Company 21.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Company 21.

1319. By reason of the matters pleaded at paragraph 1318, CommBank contravened s 36(1) on and from 2 March 2015 with respect to Company 21.
1320. On and from 28 October 2014, CommBank did not monitor Person 103 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 151 in the name of Person 103 on 28 October 2014.

Between 28 October 2014 and 23 May 2016, a total of \$116,400 in 18 deposits under \$10,000 had been made into CommBank Account 151.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 103 in respect of the cash activity on CommBank Account 151.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 151 in the name of Person 103 to form part of a brief of evidence against Money Mule 2.

a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1321. By reason of the matters pleaded at paragraph 1320, CommBank contravened s 36(1) on and from 28 October 2014 with respect to Person 103.
1322. On and from 16 February 2012, CommBank did not monitor Person 104 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 152 in the name of Person 104 on 14 and 16 February 2012.

Between 14 February 2012 and 15 August 2014, a total of \$81,000 in 14 deposits under \$10,000 had been made into CommBank Account 152.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 104 in respect of the cash activity on CommBank Account 152.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 152 in the name of Person 104 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1323. By reason of the matters pleaded at paragraph 1322, CommBank contravened s 36(1) on and from 16 February 2012 with respect to Person 104.
1324. On and from 14 November 2013, CommBank did not monitor Person 105 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 153 in the name of Person 105 on 14 November 2013.

This activity was inconsistent with Person 105's reported occupation as a student.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 153 in the name of Person 105 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

CommBank did not lodge an SMR with respect to Person 105 until 19 June 2017 (SMR 776517618). By 9 June 2017, \$162,072 in cash had been deposited into CommBank Account 153 in large and structured deposits.

1325. By reason of the matters pleaded at paragraph 1324, CommBank contravened s 36(1) on and from 14 November 2013 with respect to Person 105.
1326. On and from 19 April 2016, CommBank did not monitor Person 107 and Person 108 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 155 in the name of Person 107 and Person 108 on 19 and 20 April 2016.

Between 19 April 2016 and 11 May 2017, a total of \$30,150 in 6 deposits under \$10,000 had been made into CommBank Account 155.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 107 and Person 108 in respect of the cash activity on CommBank Account 155.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 155 in the name of Person 107 and Person 108 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

CommBank Account 155 continued to receive structured deposits after the NSW Police Notice was responded to, with \$11,250 being deposited on 4 and 11 May 2017.

1327. By reason of the matters pleaded at paragraph 1326, CommBank contravened s 36(1) on and from 19 April 2016 with respect to Person 107 and Person 108.
1328. On and from 11 December 2015, CommBank did not monitor Person 109 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 156 in the name of Person 109 on 11 December 2015.

CommBank did not lodge an SMR with respect to Person 109 until 21 April 2016 (SMR 645660578). By 21 April 2016, \$86,500 in cash

had been deposited into CommBank Account 156 in structured deposits.

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 21 April 2016 with respect to Person 109, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 109.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 109.

After SMR 645660578 was lodged a further \$25,000 in cash was deposits into CommBank Account 156 in 3 structured deposits.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 156 in the name of Person 109 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1329. By reason of the matters pleaded at paragraph 1328, CommBank contravened s 36(1) on and from 11 December 2015 with respect to Person 109.
1330. On and from 3 January 2015, CommBank did not monitor Person 110 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 157 in the name of Person 110 on 17 February 2014.

Between 3 January 2015 and 22 July 2016, a total of \$65,000 in 13 deposits under \$10,000 had been made into CommBank Account 157.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 110 in respect of the cash activity on CommBank Account 157.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 157 in the name of Person 110 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1331. By reason of the matters pleaded at paragraph 1330, CommBank contravened s 36(1) on and from 3 January 2015 with respect to Person 110.

1332. On and from 26 July 2016, CommBank did not monitor Person 111 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 158 in the name of Person 111 on 25 and 26 July 2016.

Between 25 July 2016 and 8 March 2017, a total of \$42,200 in 6 deposits under \$10,000 had been made into CommBank Account 158.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 111 in respect of the cash activity on CommBank Account 158.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 158 in the name of Person 111 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1333. By reason of the matters pleaded at paragraph 1332, CommBank contravened s 36(1) on and from 26 July 2016 with respect to Person 111.

1334. On and from 23 January 2015, CommBank did not monitor Person 112 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 159 in the name of Person 112 on 23 January 2015.

Between 23 January 2015 and 27 February 2017, a total of \$90,568 in 15 deposits under \$10,000 had been made into CommBank Account 159.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 112 in respect of the cash activity on CommBank Account 159.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 159 in the name of Person 112 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1335. By reason of the matters pleaded at paragraph 1334, CommBank contravened s 36(1) on and from 23 January 2015 with respect to Person 112.
1336. On and from 1 April 2015, CommBank did not monitor Person 113 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 160 in the name of Person 113 on 30 March and 1 April 2015.

Between 30 March 2015 and 26 July 2016, a total of \$236,000 in 34 deposits under \$10,000 had been made into CommBank Account 160.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 113 in respect of the cash activity on CommBank Account 160.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 160 in the name of Person 113 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1337. By reason of the matters pleaded at paragraph 1336, CommBank contravened s 36(1) on and from 1 April 2015 with respect to Person 113.
1338. On and from 9 December 2014, CommBank did not monitor Person 114 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 161 in the name of Person 114 on 9 December 2014.

Between 9 December 2014 and 27 July 2016, a total of \$52,500 had been deposited in cash into CommBank Account 161. This included 4 deposits under \$10,000 totalling \$22,500.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 114 in respect of the cash activity on CommBank Account 161.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 161 in the name of Person 114 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1339. By reason of the matters pleaded at paragraph 1338, CommBank contravened s 36(1) on and from 9 December 2014 with respect to Person 114.
1340. On and from 22 October 2015, CommBank did not monitor Person 115 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 162 in the name of Person 115 on 22 October 2015.

Between 22 October 2015 and 19 October 2016 a total of \$105,950 in 18 deposits under \$10,000 had been made into CommBank Account 162.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 115 in respect of the cash activity on CommBank Account 162.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 162 in the name of Person 115 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1341. By reason of the matters pleaded at paragraph 1340, CommBank contravened s 36(1) on and from 22 October 2015 with respect to Person 115.
1342. On and from 27 September 2013, CommBank did not monitor Person 116 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 163 in the name of Person 116 on 27 September 2013.

CommBank did not lodge an SMR with respect to Person 116 until 21 September 2017 (SMR 808570902). By 21 September 2017, \$138,445 in cash had been deposited into CommBank Account 163 in large and structured deposits.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 163 in the name of Person 116 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

On 7 November 2017, CommBank lodged a further SMR in relation to large and structured cash deposits made into CommBank Account 163 in the name of Person 116, reporting deposits totalling \$119,850 made between 25 September and 17 October 2017 (SMR 827048177).

1343. By reason of the matters pleaded at paragraph 1342, CommBank contravened s 36(1) on and from 27 September 2013 with respect to Person 116.
1344. On and from 6 February 2014, CommBank did not monitor Person 117 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Structured cash deposits were first made into CommBank Account 164 in the name of Person 117 on 6 February 2014.

Between 6 February 2014 and 3 March 2017, a total of \$126,950 in 17 deposits under \$10,000 had been made into CommBank Account 164.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 117 in respect of the cash activity on CommBank Account 164.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 164 in the name of Person 117 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the *Crimes Act 1900* (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1345. By reason of the matters pleaded at paragraph 1344, CommBank contravened s 36(1) on and from 6 February 2014 with respect to Person 117.
1346. On and from 21 November 2015, CommBank did not monitor Person 118 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

Structured cash deposits were first made into CommBank Account 165 in the name of Person 118 on 15 and 21 November 2015.

Between 15 November 2015 and 6 September 2016, a total of \$89,700 in 17 deposits under \$10,000 had been made into CommBank Account 165.

At no stage did CommBank give the AUSTRAC CEO an SMR in relation to Person 118 in respect of the cash activity on CommBank Account 165.

On 24 April 2017, the Organised Crime Squad of NSW Police issued a Notice to Produce to CommBank seeking information and documents relating to CommBank Account 165 in the name of Person 118 to form part of a brief of evidence against Money Mule 2, a money mule charged with money laundering under s 193(B)(1) of the Crimes Act 1900 (NSW).

On 2 May 2017, CommBank produced information and documents in response to this Notice.

1347. By reason of the matters pleaded at paragraph 1346, CommBank contravened s 36(1) on and from 21 November 2015 with respect to Person 118.

WA Police Operation

1348. A WA Police Operation was established by WA Police in April 2017 to investigate money laundering through IDMs.

Particulars

Police Statement of Facts for Person 136 and Person 137.

Person 136

1349. On or about 8 August 2016, CommBank provided a designated service to Person 136 by opening an account in the name of Person 136.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 181.

SMR 758496015 dated 24 April 2017.

Person 136's occupation was recorded as 'tradesperson'.

WA Police allege that Person 136 was a member of a Vietnamese crime syndicate.

1350. Between 10 March 2017 and 29 May 2017, 86 cash deposits totalling \$650,250 were made into CommBank Account 181.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank Statement for CommBank Account 181.

81 of these cash deposits were made at IDMs, with 67 of these being under \$10,000.

5 of these cash deposits were made at branches, 1 of which was under \$10,000.

14 cash deposits made at IDMs and 4 cash deposits made at branches were \$10,000 or above.

Schedule ACV to the Statement of Claim.

1351. On 2 June 2017, a total of \$641,400 was transferred from CommBank Account 181 to CommBank Account 182 in the name of Person 136.

Particulars

Items 3 and 29, table 1, s 6 of the Act.

CommBank Statement for CommBank Account 181.

Schedule ACV to the Statement of Claim.

1352. CommBank suspected that many of the cash deposits pleaded at paragraph 1350 were structured contrary to s 142 of the Act.

Particulars

SMR 758496015 dated 24 April 2017 and transaction monitoring alert TM-359983A.

SMR 785882497 dated 18 July 2017 and transaction monitoring alert TM-374717A.

1353. By no later than 24 April 2017, CommBank was aware of highly suspicious activity on CommBank Account 181 in the name of Person 136.

Particulars

SMR 758496015 dated 24 April 2017 reported the following:

First, CommBank suspected Person 136 was receiving aggregate and intensely structured cash, where the true source of funds was not known and considered that the activity was considered highly suspicious.

Second, as at 24 April 2017 the balance of CommBank Account 181 was \$383,443.26 which was sourced entirely from large aggregate and structured cash deposits received predominantly between March and April 2017 primarily at the Morley and Girraween WA branches.

Third, Person 136 was the holder of a business innovation and investment (provisional) visa (subclass 188) which did not permit him to work.

The failures to report suspicious matters for the purposes of s 41

1354. By no later than 2 June 2017, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 11 to 20 of Schedule ACV to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of Western Australia.

Particulars

On 1 June 2017, WA Police sent an email to CommBank requesting an updated bank statement for CommBank Account 181 on and from 23 May 2017.

On 1 June 2017, CommBank emailed WA Police transaction lists for the period 22 May 2017 to 31 May 2017 for CommBank Account 181.

On 1 June 2017, WA Police emailed CommBank, pointing out the 'many suspicious deposits in the [CommBank Account 181] on the 23rd, 25th and 29th of MAY'. CCTV footage was requested urgently. 63 cash deposits totalling \$239,940 had been made on these 3 days.

On 2 June 2017, WA Police served CommBank with a freezing notice in respect of CommBank Account 181 on the basis that there were reasonable grounds for suspecting the funds in the account were crime-used and crime-derived.

On 2 June 2017, WA Police served another freezing notice on CommBank in respect of another CommBank account in the name of

Person 136, being CommBank Account 182, on the same grounds on the basis that there were reasonable grounds for suspecting the funds in the account were crime-used and crime-derived.

1355. By reason of the matters pleaded in paragraph 1354, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1356. By reason of the matters pleaded in paragraphs 1354 and 1355, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 2 June 2017, being 7 June 2017.
1357. It was not until 18 July 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1354.

Particulars

SMR 785882497 dated 18 July 2017.

1358. By reason of the matters pleaded at paragraphs 1354 to 1357, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

1359. On and from 6 April 2017, CommBank did not monitor Person 136 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

By 6 April 2017, two transaction monitoring alerts had been raised for structured cash deposits into this account.

CommBank did not lodge an SMR until 24 April 2017 (SMR 758496015), in spite of 4 transaction monitoring alerts being raised between 13 March 2017 and 15 April 2017. By 24 April 2017, \$384,450 in cash had been deposited into this account in large and structured deposits.

This activity was inconsistent with Person 136's reported occupation as a tradesperson.

An automated alert was first raised on this account on 13 March 2017 for structured cash deposits – see TM-354688A. It was not reviewed by a member of the AML Team until 21 April 2017.

The next automated alert was raised on 6 April 2017 for total cash deposits of \$114,000 in 8 transactions – see TM-359983A. It was not reviewed by a member of the AML Team until 21 April 2017.

On 11 April 2017, the Girrawheen branch raised a manual alert or STR for 'multiple deposits at IDM at Girrawheen branch on 10 April 2017' – see TM-362463A. It was not reviewed by a member of the AML Team until 21 April 2017.

On 15 April 2017, a fourth automated alert was raised for 'multiple TTRs' – see TM-363566A. It was not reviewed by a member of the AML Team until 21 April 2017.

SMR 758496015 was lodged on 24 April 2017 in response to the above 4 alerts. After lodging the SMR, the alerts were closed and no appropriate customer due diligence was carried out.

After the SMR was lodged on 24 April 2017, a further \$265,800 was deposited in large and structured cash.

On 4 May 2017, WA Police issued an order to produce for bank statements for accounts in the name of Person 136, along with CCTV footage for transactions on this account on 6, 10, 12 and 13 April 2017. CommBank failed to carry out any appropriate due diligence in response to this notice.

On 23, 25 and 29 May 2017, 41 cash deposits totalling \$144,400, had been made into this account.

On 26 May 2017, a KYC review of the customer was carried out – HRC-5707284A. A decision was made to maintain the relationship and re-review in 21 months. This conclusion was reached in spite of the fact that by 26 May 2017, 54 structured deposits totalling \$275,200 and \$300,000 in large cash deposits had been made into this account.

On 2 June 2017, WA Police served CommBank with freezing notices in respect of CommBank Account 181 and CommBank Account 182, on the basis that there were reasonable grounds for suspecting the funds were crime-used and crime-derived. See Freezing Notice and covering letter dated 2 June 2017.

Person 136 was arrested by WA Police on 8 June 2017. See Police Statement of Facts.

On 17 July 2017, the AML Team reviewed transaction monitoring alert TM-373537A which had been raised almost 2 months earlier on 23 May 2017 for total cash deposits of \$48,650 in 18 transactions.

Also on 17 July 2017, the AML Team reviewed TM-374717A which had been raised on 29 May 2017 for large aggregate cash deposits.

SMR 785882497 was lodged on 18 July 2017 in response to these 2 alerts.

1360. On and from 24 April 2017, CommBank did not monitor Person 136 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act and having submitted an SMR on 24 April 2017 with respect to Person 136, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 136.

CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 136 until

2 June 2017 when it froze the account in accordance with the freezing orders.

1361. By reason of the matters pleaded at paragraphs 1359 and 1360, CommBank contravened s 36(1) on and from 6 April 2017 with respect to Person 136.

Person 137

1362. On or about 4 August 2016, CommBank provided a designated service to Person 137 by opening an account in the name of Person 137.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 183.

SMR 786407888 dated 19 July 2017.

Person 137's occupation was recorded as 'non-resident'. She was married to Person 136 and resided at the same address as him.

WA Police allege that Person 136 was a member of a Vietnamese crime syndicate.

1363. Between 21 October 2016 and 25 May 2017, 22 cash deposits totalling \$104,540 were made into CommBank Account 183.

Particulars

Item 3, table 1, s 6 of the Act.

20 of these cash deposits were made at IDMs and were under \$10,000.

2 of these cash deposits were made at branches, and were under \$10,000.

Schedule ACW to the Statement of Claim.

1364. CommBank suspected that the cash deposits under \$10,000 pleaded at paragraph 1363 were structured contrary to s 142 of the Act.

Particulars

SMR 786407888 dated 19 July 2017 and transaction monitoring alert TM-373537A.

The failures to report suspicious matters for the purposes of s 41

1365. By no later than 2 June 2017, CommBank suspected on reasonable grounds that information it had concerning the designated services identified at items 3 to 4 of Schedule ACW to the Statement of Claim may be relevant to the investigation of, or prosecution of, a person for an offence against a law of the Commonwealth or of Western Australia.

Particulars

On 2 June 2017, WA Police served CommBank with a freezing notice in respect of CommBank Account 181 in the name of Person 137's husband (Person 136).

On 2 June 2017, CommBank emailed WA Police to advise that it had identified CommBank Account 183 in the name of Person 137 and advising that it had frozen the account pending a freezing notice.

On 5 June 2017, WA Police served CommBank with a freezing notice in respect of CommBank Account 183. The notice was issued on the basis that there were reasonable grounds to suspect that the funds in the account were either crime-used or crime-derived.

1366. By reason of the matters pleaded in paragraph 1365, s 41(1)(f)(iii) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1367. By reason of the matters pleaded in paragraphs 1365 and 1366, s 41(2)(a) of the Act required CommBank to give the AUSTRAC CEO an SMR by no later than 3 business days after 2 June 2017, being 7 June 2017.
1368. It was not until 19 July 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1365.

Particulars

SMR 786407888 dated 19 July 2017.

1369. By reason of the matters pleaded at paragraphs 1365 to 1368, CommBank contravened s 41(2)(a) of the Act.

The failure to carry out ongoing customer due diligence contrary to section 36

1370. On and from 4 May 2017, CommBank did not monitor Person 137 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

On 4 May 2017, WA Police issued an order to produce for bank statements for accounts in the name of Person 137 and Person 136. Person 137 was the wife of Person 136 and they resided at the same address.

On 8 May 2017, CommBank sent an email to WA Police advising that they were 'unable to match [our] records for any accounts in the name of Person 137'. Records were located and produced for Person 136.

On and from 8 May 2017, Person 137 received \$85,540 in structured cash deposits, with \$60,340 being received in 14 structured cash deposits through IDMs on 23 May 2017 alone.

On 23 May 2017, TM-373447A was raised for the large aggregate cash deposits of \$60,340 received on that day. A second alert was raised on 23 May 2017 in relation to the 14 deposits of \$60,340 – TM-373537A. These alerts were not reviewed by a member of the AML Team until 17 July 2017.

On 2 June 2017, CommBank emailed WA Police to advise that it had now identified CommBank Account 183 in the name of Person 137 and advising that it had frozen the account pending a freezing notice.

On 2 June 2017, Person 137 provided CommBank with a completed source of wealth form, advising her funds came from an overseas based property development business.

On 5 June 2017, WA Police served CommBank with a freezing notice in respect of CommBank Account 183.

Person 137 was arrested by WA Police on 8 June 2017. See Police Statement of Facts.

It was not until 19 July 2017 that CommBank lodged its first SMR in relation to this customer – SMR 786407888 in response to the two alerts raised almost 2 months earlier on 23 May 2017.

1371. By reason of the matters pleaded at paragraph 1370, CommBank contravened s 36(1) on and from 4 May 2017 with respect to Person 137.

Person 138 and Person 139

Person 138

1372. On or about 9 May 2017, CommBank provided a designated service to Person 138 by opening an account in the name of Person 138.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 184.

SMR 778565411 dated 26 June 2017.

SMR 791899346 dated 4 August 2017.

Person 138's occupation was recorded as 'unemployed'.

1373. On 9 May 2017, a cash deposit of \$2,250 was made into CommBank Account 184.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 184.

The cash deposit was made through ATM Bankstown Central A.

A CommBank debit Mastercard issued to Person 139 was used to conduct the deposit. Person 139 is Person 138's brother.

SMR 778565411 dated 26 June 2017.

1374. On 19 June 2017, a cash deposit of \$9,000 was made into CommBank Account 184.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 184.

The cash deposit was made through ATM Bankstown Central B.

A CommBank debit Mastercard issued to Person 139 was used to conduct the deposit. Person 139 is Person 138's brother.

SMR 778565411 dated 26 June 2017.

1375. On 19 June 2017, Person 138 requested a transfer of \$5,000 from CommBank Account 184 to an account in Lebanon in his name.

Particulars

Item 3, table 1, s 6 of the Act.

SMR 778565411 dated 26 June 2017.

The request to transfer these funds was made via internet banking, accessed in Lebanon.

1376. In accordance with this request, CommBank debited \$5,000 from CommBank Account 184 on 19 June 2017.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 184.

1377. On 26 June 2017, CommBank credited CommBank Account 184 with \$5,000 to reverse the international transfer requested on 19 June 2017.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 184.

On or before 21 June 2017, the requested international money transfer to Beirut was flagged and stopped in CommBank's sanctions filter on customer name match and the country profile of Lebanon.

On or about 23 June 2017, CommBank conducted a WorldCheck search (UID 251150) which revealed a match between Person 138 and a convicted terrorist.

On 26 June 2017, CommBank reported the matter to AUSTRAC for suspected financing of terrorism and did not transfer the funds to Lebanon.

SMR 778565411 dated 26 June 2017.

1378. On 19 July 2017, a cash deposit of \$9,000 was made into CommBank Account 184.

Particulars

Item 3, table 1, s 6 of the Act.

The cash deposit was made at the Bankstown Central Branch.

Account statement for CommBank Account 184.

1379. On 19 July 2017, Person 138 requested a transfer of \$5,000 from CommBank Account 184 to an account in Lebanon in his name.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 184.

The request to transfer these funds was made via internet banking accessed in Lebanon.

1380. In accordance with this request, CommBank debited \$5,000 from CommBank Account 184 on 19 July 2017.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 184.

1381. On or about 20 July 2017, CommBank transferred \$5,000 from CommBank Account 184 to an account in Lebanon in the name of Person 138.

Particulars

Item 3, table 1, s 6 of the Act.

On 20 July 2017, the outgoing payment was flagged in CommBank's sanctions filter and a decision made to fail the payment because the customer was identified as allegedly raising funds in Australia to support terrorism and had been convicted in 2005 for terrorism related activities – PAY-42309A.

In spite of this decision CommBank erroneously passed the payment to Offshore Bank 8 for processing to the Beirut based beneficiary bank, Offshore Bank 9.

Subsequently, on 20 July 2017 the error was identified and a payment cancelling request sent to Offshore Bank 8.

1382. On 2 August 2017, Person 138 requested a transfer of \$5,000 from CommBank Account 184 to an account in Lebanon in his name.

Particulars

Item 3, table 1, s 6 of the Act.

SMR 791899346 dated 4 August 2017.

Account statement for CommBank Account 184.

The request to transfer these funds was made via internet banking accessed in Lebanon.

1383. In accordance with this request, CommBank debited \$5,000 from CommBank Account 184 on 2 August 2017.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 184.

1384. On 3 August 2017, CommBank credited CommBank Account 184 with \$5,000 to reverse the international transfer requested on 2 August 2017.

Particulars

Item 3, table 1, s 6 of the Act.

Account statement for CommBank Account 184.

On 3 August 2017, the outgoing payment was flagged in CommBank's sanctions filter and a decision made to fail the payment because the customer was identified as allegedly raising funds in Australia to support terrorism and had been convicted in 2005 for terrorism related activities.

CommBank reported the matter to AUSTRAC for suspected financing of terrorism and did not transfer the funds to Lebanon.

SMR 791899346 dated 4 August 2017.

PAY-42543A.

1385. On 9 August 2017, a stop was placed on CommBank Account 184.

Particulars

Letter from Herbert Smith Freehills to the Australian Government
Solicitor dated 19 October 2017.

1386. On 15 August 2017, \$4,903.83 was returned to Offshore Bank 8 by the beneficiary bank based in Beirut, Offshore Bank 9, in relation to the transaction pleaded at paragraph 1381.

Particulars

Letter from Herbert Smith Freehills to the Australian Government
Solicitor dated 19 October 2017.

1387. On 17 August 2017, \$4,903.83 was credited to CommBank Account 184.

Particulars

Remittance note from CommBank Payment Investigations dated
17 August 2017.

1388. On 18 August 2017, \$6,225 was withdrawn from CommBank Account 184 from the Bankstown Central branch.

Particulars

Account statement for CommBank Account 184.

The withdrawal was processed, notwithstanding a stop had been
placed on the account on 9 August 2017.

1389. CommBank Account 184 was closed on 8 September 2017.

Particulars

Account statement for CommBank Account 184.

1390. On 11 September 2017, a cheque in the amount of \$4,903.83 was sent to Person 138 at the Australian residential address for Person 139.

Particulars

Letter from CommBank to Person 138 dated 11 September 2017.

The failures to report suspicious matters for the purposes of s 41

1391. By no later than 23 June 2017, CommBank suspected on reasonable grounds that the provision or prospective provision of the designated services identified at paragraphs 1375 to 1376 was preparatory to, or relevant to the investigation or prosecution of a person for, an offence covered by paragraph (a), (b) or (c) of the definition of financing of terrorism in s 5 of the Act.

Particulars

Item 3, table 1, s 6 of the Act.

On or before 21 June 2017, the requested international money
transfer to Beirut was flagged and stopped in CommBank's sanctions
filter on name (customer) match and the country profile of Lebanon.

On 21 June 2017, a manual alert was raised and due diligence carried out. The CommBank analyst noted that a public domain search identifies Person 138 as being 'found guilty of creating an illegal association, together with three other Lebanese, in order to carry out activities harming state security'. The analyst made a request with her finding to 'Please advise what KYC is required in order to make a determination': PAY-41652A.

This request was not considered until 23 June 2017 when a senior analyst (the first analyst) decided to fail the requested transfer to Beirut of \$5,000 from CommBank Account 184 because the customer had been identified as allegedly raising funds in Australia to support terrorism and had been convicted in 2005 for terrorism related activities. Also on 23 June 2017 a second analyst agreed with the recommendation to fail the requested transfer on this basis: PAY-41652A.

As part of the due diligence conducted on 23 June 2017, CommBank conducted a WorldCheck search (UID 251150) which revealed a match between Person 138 and a convicted terrorist.

An STR was raised on 23 June 2017 (TM-381816A) by the first analyst within the Financial Crime Services Group to initiate the process for submitting an SMR. The STR referred to PAY-41652A and detailed that the customer had allegedly raised funds in Australia to support terrorism, and had been convicted in Beirut in 2005 for terrorism related activities.

Even though on 23 June 2017, two analysts within the Financial Services Crime Group had failed the requested international money transfer on the basis that the customer was an alleged terrorist fund raiser with a terrorism related conviction, the STR was not reviewed by the AML Team until 26 June 2017 –TM-381816A. An SMR was lodged on 26 June 2017.

1392. By reason of the matters pleaded at paragraph 1391, s 41(g) or (h) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1393. By reason of the matters pleaded in paragraphs 1391 and 1392, s 41(2)(b) of the Act required CommBank to give the AUSTRAC CEO an SMR within 24 hours after 23 June 2017.
1394. It was not until 26 June 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1391.

Particulars

SMR 778565411 dated 26 June 2017.

1395. By no later than 20 July 2017, CommBank suspected on reasonable grounds that the provision or prospective provision of the designated services identified at paragraphs 1379 to 1381 was preparatory to, or relevant to the investigation or prosecution of a person for, an offence covered by paragraph (a), (b) or (c) of the definition of financing of terrorism in s 5 of the Act.

Particulars

Item 3, table 1, s 6 of the Act.

On 19 July 2017, the requested international money transfer to Beirut of \$5,000 from CommBank Account 184 was flagged and stopped in CommBank's sanctions filter on customer name match and the country profile of Lebanon and triggered a 'stripping detection' hit linking it to the failed transfer of 19 June 2017.

On 20 July 2017, a manual alert was raised (PAY-42309A). The analyst who created the manual alert carried out customer due diligence, detailing that the customer had allegedly raised funds in Australia to support terrorism, and had been convicted in Beirut in 2005 for terrorism related activities. The analyst recommended that the requested transfer be failed.

On 20 July 2017, a senior analyst agreed with the recommendation to fail the requested transfer to Beirut due to the customer being identified as allegedly raising funds in Australia to support terrorism and due to his conviction in 2005 for terrorism related activities. In making this determination, the analyst noted 'Please also file an STR for reporting purposes'. Another analyst reviewed the senior analyst's recommendation and agreed the payment was to be failed and that an STR was to be filed – PAY-42309A.

1396. By reason of the matters pleaded at paragraph 1395, s 41(g) or (h) of the Act required CommBank to give an SMR to the AUSTRAC CEO.
1397. By reason of the matters pleaded in paragraphs 1395 and 1396, s 41(2)(b) of the Act required CommBank to give the AUSTRAC CEO an SMR within 24 hours after 20 July 2017.
1398. It was not until 4 August 2017 that CommBank gave the AUSTRAC CEO an SMR in relation to the matters pleaded at paragraph 1395.

Particulars

SMR 791899346 dated 4 August 2017.

1399. By reason of the matters pleaded at paragraphs 1391 to 1398, CommBank contravened s 41(2)(b) of the Act on 2 occasions.

The failure to carry out ongoing customer due diligence contrary to section 36

1400. On and from 9 May 2017, CommBank did not monitor Person 138 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

CommBank did not carry out any customer due diligence in respect of Person 138 when CommBank Account 184 was opened in his name on 9 May 2017.

Person 138 was a pre-commencement customer, having previously opened a CommBank account on 27 December 1995 using an Australian passport which expired on 28 January 1997.

CommBank Account 184 was opened by Person 138's brother, Person 139, who held a power of attorney in respect of his brother. On 10 May 2017, CommBank cancelled the authority of Person 139 to operate CommBank Account 184 at the purported request of Person 138 on 10 May 2017. See Request to Cancel Authority dated 10 May 2017.

Person 138 left Australia in 1999 and has not returned to Australia since.

In 2004, Person 138 was charged by Lebanese authorities with belonging to a terrorist organisation, possession of suspicious arms and of planning to carry out terrorist acts, as detailed by CommBank in SMR 778565411 and SMR 791899346.

In 2005, Person 138 was convicted to 3 years imprisonment in Lebanon for these terrorism related offences.

By no later than 21 June 2017, CommBank was aware that Person 138 had been 'found guilty of creating an illegal association, together with three other Lebanese, in order to carry out activities harming state security': PAY-41652A.

In spite of this knowledge, CommBank took no steps to carry out customer due diligence until 23 June 2017: PAY-41652A and WorldCheck search (UID 251150).

By no later than 26 June 2017, CommBank suspected that activity on CommBank Account 184 could be related to terrorism financing. SMR 778565411 lodged on 26 June 2017.

On 30 June 2017, CommBank added Person 138 to the high risk customer register with a recommendation that he be referred for 'escalation due to suspected TF related IMT' – see HRC-5924553A.

On 5 July 2017, a high risk customer report was prepared for Person 138 – HRC-5924553A and High Risk Customer Report dated 5 July 2017. The analyst recommended exiting the relationship due to the customer being identified as allegedly raising funds in Australia to support terrorism and due to his conviction in 2005 for terrorism related activities.

On 6 July 2017, CommBank's Group Financial Crime Services recommended that CommBank Account 184 be closed on the basis that the customer poses terrorism financing risks. On 7 July 2017, CommBank's Retail Bank Services agreed with this recommendation – see email from Retail Bank Services dated 7 July 2017.

On 10 July 2017, CommBank wrote to Person 138 to advise CommBank Account 184 would be closed on 14 August 2017 – see letter to Person 138 dated 10 July 2017. In spite of suspecting terrorism financing on CommBank Account 184, CommBank gave the customer 30 days' notice of closure.

The customer attempted two further international money transfers to Beirut within the 30 day notice period.

On 20 July 2017, CommBank erroneously processed a transfer of \$5,000 from CommBank Account 184 to an account held by Person 138 in Lebanon in spite of suspecting terrorism financing in relation to an identical attempted transfer on 19 June 2017.

On 20 July 2017, the error was identified and a payment cancelling request sent to Offshore Bank 8.

Even though this was the second attempted international money transfer to Beirut that was suspected to be linked to terrorism financing, CommBank did not put a stop on CommBank Account 184 at this point.

On 2 August 2017, a third attempt was made to transfer funds from Person 138's CommBank Account 184 to Beirut.

On 3 August 2017, an STR was raised by the Sanctions Team (TM-392507A) relating to the attempted international transfer. The STR concluded that potential terrorism financing was being conducted on CommBank Account 184.

SMR 791899346 was lodged on 4 August 2017 – see TM-392507A.

On 9 August 2017, AUSTRAC issued a request under s 49 of the Act in relation to this customer.

In spite of concluding on 26 June 2017, that potential terrorism financing was being conducted on CommBank Account 184, a stop was not put on CommBank Account 184 until 9 August 2017.

1401. On and from 26 June 2017, CommBank did not monitor Person 138 in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced and did not do so in accordance with the Rules.

Particulars

Having formed a suspicion for the purposes of s 41 of the Act with respect to Person 138 and having submitted an SMR on 26 June 2017 with respect to Person 138, r 15.9(3) required CommBank to apply its enhanced customer due diligence program to Person 138.

Having concluded that potential terrorism financing was being conducted on CommBank Account 184, CommBank did not undertake any measure appropriate to the circumstances as specified in r 15.10 with respect to Person 138 until a stop was put on CommBank Account 184 on 9 August 2017.

1402. By reason of the matters pleaded at paragraphs 1400 and 1401, CommBank contravened s 36(1) on and from 9 May 2017 with respect to Person 138.

Person 139

1403. On or about 28 February 2014, CommBank provided a designated service to Company 23 by opening an account in the name of Company 23.

Particulars

Item 1, table 1, s 6 of the Act.

CommBank Account 185.

Person 139 was the sole director of Company 23.

1404. From 29 March 2014 to 21 September 2015, 120 cash withdrawals, each of \$10,000 or more and totalling \$3,054,740 were made from CommBank Account 185.

Particulars

Item 3, table 1, s 6 of the Act.

CommBank Account 185.

Confidential Annexure D.

The failure to carry out ongoing customer due diligence contrary to section 36

1405. On and from 28 February 2014, CommBank did not monitor Person 139, including through Company 23, in relation to the provision of designated services with a view to identifying, mitigating and managing the ML/TF risk it reasonably faced.

Particulars

No transaction monitoring alert was ever raised on CommBank Account 185 in the name of Company 23, no customer due diligence was carried out and no SMR ever lodged in relation to CommBank Account 185 in spite of the very large amount of cash being withdrawn on a regular basis.

CommBank Account 185 in the name of Company 23 was closed on 6 November 2015.

CommBank Account 186 and CommBank Account 187 in the name of Person 139 remained open.

CommBank Account 188 in the name of Company 24, of which Person 139 was the sole director, remained open and was not closed until 14 October 2016.

By no later than 26 June 2017, CommBank suspected that activity on CommBank Account 184 could be related to terrorism financing, including cash deposits in Australia thought to have been made by Person 139. SMR 778565411 lodged on 26 June 2017.

On 5 July 2017, a high risk customer report was prepared for Person 138 – HRC-5924553A and High Risk Customer Report dated 5 July 2017 – noted the relationship with Person 139 and conducted a review of CommBank Account 186 and CommBank Account 187. This review noted multiple large cash withdrawals at branches and large transfers, but recommended that the customer relationship be retained.

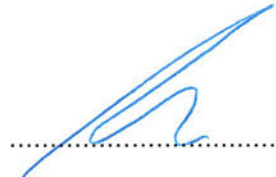
On 7 July 2017, CommBank confirmed that Person 139 was a high risk customer but determined to maintain the relationship with ongoing periodic reviews – HRC-5924553A.

On 16 October 2017, CommBank wrote to Person 139 to advise CommBank Account 186 and CommBank Account 187 would be closed on 26 October 2017 – see letter from CommBank to Person 139 dated 16 October 2017.

1406. By reason of the matters pleaded at paragraph 1405, CommBank contravened s 36(1) on and from 28 February 2014 with respect to Person 139.

And the Applicant claims the relief specified in the accompanying Amended Application.

Date: ~~3 August 2017~~ 14 December 2017



.....

Sonja Marsic
AGS Lawyer
for an on behalf of the Australian Government Solicitor
Lawyer for the Applicant

This pleading was prepared by, Sonja Marsic, lawyer.

.....

CERTIFICATE OF LAWYER

I, Sonja Marsic, certify to the Court that, in relation to the amended statement of claim filed on behalf of the Applicant, the factual and legal material available to me at present provides a proper basis for each allegation in the pleading.

Date: ~~3 August 2017~~ 14 December 2017



.....

Sonja Marsic
AGS Lawyer
for an on behalf of the Australian Government Solicitor
Lawyer for the Applicant

COLOUR KEY

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

COLOUR KEY FOR SCHEDULES A TO AAB

TRANSACTION TYPE	COLOUR
International Money Transfers (IMTs)	Red
Domestic Transfers	Purple
Cash Deposits made at Automatic Teller Machines (ATMs)	Green
Cash Deposits made at Branches	Orange
Other (including ATM withdrawals, electronic account credits and 'transfers out')	Blue

SCHEDULE A

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 1 – COMMBANK ACCOUNT 1

ITEM	DATE	TRANSACTION/S
1	19.01.2015	Automatic Teller Machine (ATM) deposit of \$9,350 at Market City B
2	19.01.2015	International Money Transfer (IMT) of \$9,320 to Offshore Account 1
3	21.01.2015	2 ATM deposits (\$9,250, \$9,650) at Market City C, 1 ATM deposit of \$9,450 at Haymarket A, 2 ATM deposits (\$9,450 x 2) at Broadway B – total deposits of \$47,250
4	21.01.2015	IMT of \$47,220 to Offshore Account 1
5	18.02.2015	4 ATM deposits (\$9,350, \$9,300 x 2, \$8,200) at Market City B, 1 ATM deposit of \$6,900 at Central Park B – total deposits of \$43,050
6	18.02.2015	IMT of \$43,028.40 to Offshore Account 1
7	01.03.2015	4 ATM deposits (\$9,800, \$9,850 x 2, \$9,900) totalling \$39,400 at Market City A
8	01.03.2015	1 ATM deposit of \$10,000 at Market City A
9	01.03.2015	IMT of \$49,380 to Offshore Account 1
10	18.03.2015	3 ATM deposits (\$9,800, \$9,650, \$9,850) totalling \$29,300 at Maroubra Jct A
11	18.03.2015	IMT of \$29,270 to Offshore Account 1
12	27.03.2015	5 ATM deposits (\$9,900 x 5) totalling \$49,500 at Kingsford A
13	27.03.2015	IMT of \$49,490 to Offshore Account 1
14	31.03.2015	5 ATM deposits (\$9,850, \$9,650, \$9,900 x 2, \$9,800) totalling \$49,100 at Haymarket A
15	31.03.2015	IMT of \$49,077 to Offshore Account 1
16	08.04.2015	6 ATM deposits (\$9,950 x 5, \$250) totalling \$50,000 at Paddington A
17	08.04.2015	IMT of \$49,978 to Offshore Account 1

ITEM	DATE	TRANSACTION/S
18	28.05.2015	10 ATM deposits (\$1,745, \$4,605, \$3,650, \$4,000, \$3,980, \$2,020, \$9,950 x 3, \$150) totalling \$50,000 at Market City B
19	28.05.2015	IMT of \$47,978 to Offshore Account 2
20	04.06.2015	6 ATM deposits (\$9,900 x 2, \$9,950 x 3, \$350) totalling \$50,000 at Paddington A
21	04.06.2015	IMT of \$49,978 to Offshore Account 1
22	05.06.2015	6 ATM deposits (\$9,950 x 5, \$250) totalling \$50,000 at Surry Hills B
23	05.06.2015	IMT of \$49,978 to Offshore Account 1
24	30.06.2015	5 ATM deposits (\$3,560, \$3,620, \$2,820, \$4,000, \$3,000) totalling \$17,000 at Haymarket A
25	30.06.2015	4 ATM deposits (\$3,960, \$9,150, \$9,820, \$9,950) totalling \$32,880 at Central Park B
26	30.06.2015	IMT of \$49,850 to Offshore Account 2

SCHEDULE B

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 2 – COMMBANK ACCOUNT 2

ITEM	DATE	TRANSACTION/S
1	15.12.2014	Cash deposit of \$9,000 at St Albans Branch
2	15.12.2014	International Money Transfer (IMT) of \$8,970 to Offshore Account 6
3	19.01.2015	Automatic Teller Machine (ATM) deposit of \$4,400 at Central Park B, ATM deposit of \$5,050 at Market City C – total deposits of \$9,450
4	19.01.2015	IMT of \$9,432 to Offshore Account 1
5	20.01.2015	ATM deposit of \$9,450 at Market City B
6	21.01.2015	IMT of \$9,430 to Offshore Account 1
7	27.01.2015	ATM deposit of \$9,350 at Central Park B
8	27.01.2015	IMT of \$9,320 to Offshore Account 1
9	30.01.2015	2 ATM deposits (\$7,990, \$4,690) at Central Park B, 2 ATM deposits (\$9,150, \$8,550) at Market City A, 3 ATM deposits (\$9,550, \$9,500, \$500) at Haymarket A – total deposits of \$49,930
10	30.01.2015	IMT of \$49,910 to Offshore Account 1
11	18.02.2015	5 ATM deposits (\$7,700, \$8,000, \$8,400, \$8,750, \$6,280) at Broadway B, 2 ATM deposits (\$8,520, \$2,350) at Broadway A – total deposits \$50,000
12	18.02.2015	IMT of \$49,971.83 to Offshore Account 1
13	24.02.2015	5 ATM deposits (\$9,850 x 2, \$9,450, \$7,850, \$3,000) totalling \$40,000 at Campsie D
14	24.02.2015	IMT of \$39,970 to Offshore Account 2
15	10.03.2015	2 ATM deposits (\$9,900, \$9,850) at Central Park B, 2 ATM deposits (\$9,750, \$9,800) at Broadway B – total deposits of \$39,300
16	10.03.2015	ATM deposit of \$10,000 at Central Park B
17	10.03.2015	IMT of \$49,297.81 to Offshore Account 2

ITEM	DATE	TRANSACTION/S
18	22.03.2015	4 ATM deposits (\$9,850 x 2, \$9,700, \$9,900) totalling \$39,300 at Broadway A
19	22.03.2015	IMT of \$39,275.27 to Offshore Account 1
20	26.03.2015	2 ATM deposits (\$9,800, \$9,400) at Bondi Junct A, 3 ATM deposits (\$9,700, \$9,550, \$9,650) at Haymarket C – total deposits of \$48,100
21	26.03.2015	IMT of \$48,075 to Offshore Account 2
22	27.03.2015	5 ATM deposits (\$9,900 x 5) totalling \$49,500 at Mascot A
23	27.03.2015	IMT of \$49,480 to Offshore Account 1
24	31.03.2015	5 ATM deposits (\$9,900 x 2, \$9,850, \$9,750, \$9,550) totalling \$48,950 at Maroubra Jct A
25	31.03.2015	IMT of \$48,930 to Offshore Account 1
26	07.04.2015	3 ATM deposits (\$5,740, \$3,320, \$3,475) at Market City C, 2 ATM deposits (\$5,205, \$2,200) at Haymarket A, 2 ATM deposits (\$4,000, \$5,770) at Market City C, 2 ATM deposits (\$4,000, \$5,580) at Paddington A, ATM deposit of \$630 at Central Park A – total deposits of \$39,920
27	07.04.2015	ATM deposit of \$10,000 at Central Park A
28	07.04.2015	IMT of \$49,900 to Offshore Account 1
29	09.04.2015	IMT of \$49,575 to Offshore Account 1
30	10.04.2015	4 ATM deposits (\$9,800, \$9,950 x 2, \$9,900) totalling \$39,600 at Market City A
31	10.04.2015	ATM deposit of \$10,000 at Market City A
32	10.04.2015	3 ATM deposits (\$9,950 x 2, \$9,900) totalling \$29,800 at Broadway A
33	10.04.2015	IMT of \$29,775 to Offshore Account 1
34	12.04.2015	2 ATM deposits (\$9,900, \$9,950) at Central Park B, 4 ATM deposits (\$9,800, \$9,900, \$9,950, \$400) at Broadway A – total deposits of \$49,900
35	12.04.2015	IMT of \$49,872 to Offshore Account 1
36	13.04.2015	7 ATM deposits (\$9,950 x 3, \$3,000, \$7,100, \$9,800, \$250) totalling \$50,000 at Broadway B
37	13.04.2015	IMT of \$49,978 to Offshore Account 1
38	07.05.2015	IMT of \$49,978 to Offshore Account 1
39	08.05.2015	6 ATM deposits (\$9,900, \$9,650, \$9,950, \$9,850, \$9,310, \$1,340) totalling \$50,000 at Paddington A
40	19.05.2015	6 ATM deposits (\$9,900, \$9,950 x 3, \$8,850, \$2,260) totalling \$50,860 at Paddington B
41	19.05.2015	IMT of \$49,844 to Offshore Account 1
42	28.05.2015	ATM deposit of \$2,500 at MP Leichardt A
43	28.05.2015	IMT of \$2,478 to Offshore Account 4
44	28.05.2015	3 ATM deposits (\$9,800, \$9,400, \$8,500) totalling \$27,700 at Central Park A
45	29.05.2015	3 ATM deposits (\$9,900, \$9,950, \$2,400) totalling \$22,250 at Haymarket C

ITEM	DATE	TRANSACTION/S
46	29.05.2015	IMT of \$49,924 to Offshore Account 1
47	01.06.2015	2 ATM deposits (\$9,950 x 2) at Surry Hills A, 4 ATM deposits (\$9,950 x 3, \$250) at Surry Hills B - total deposits of \$50,000
48	01.06.2015	IMT of \$49,978 to Offshore Account 2
49	02.06.2015	2 ATM deposits (\$9,500 x 2) at Market City C, 2 ATM deposits (\$9,950 x 2) at Broadway B, 1 ATM deposit of \$7,900 at Broadway A – total deposits of \$46,800
50	02.06.2015	IMT of \$46,778 to Offshore Account 2
51	04.06.2015	6 ATM deposits (\$9,900, \$9,950 x 4, \$300) totalling \$50,000 at Broadway A
52	04.06.2015	IMT of \$49,978 to Offshore Account 1
53	05.06.2015	3 ATM deposits (\$9,950 x 2, \$9,800) at Broadway B, 3 ATM deposits (\$9,950, \$9,900, \$450) at Broadway A - total deposits of \$50,000
54	05.06.2015	IMT of \$49,978 to Offshore Account 1
55	11.06.2015	6 ATM deposits (\$9,950 x 4, \$9,800, \$400) totalling \$50,000 at Broadway A
56	11.06.2015	IMT of \$49,978 to Offshore Account 1
57	12.06.2015	3 ATM deposits (\$9,900, \$9,950, \$9,850) at Central Park A, 3 ATM deposits (\$9,250, \$9,950, \$800) at Broadway B – total deposits of \$49,700
58	12.06.2015	IMT of \$49,680 to Offshore Account 1
59	13.06.2015	6 ATM deposits (\$9,950, \$9,900, \$9,700, \$9,250, \$8,600, \$2,600) totalling \$50,000 at Ashfield B
60	14.06.2015	IMT of \$49,978 to Offshore Account 2
61	18.06.2015	3 ATM deposits (\$9,900, \$9,950 x 2) totalling \$29,800 at Central Park B
62	18.06.2015	2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Central Park B
63	18.06.2015	IMT of \$600 to Offshore Account 3
64	18.06.2015	IMT of \$47,914 to Offshore Account 2
65	21.06.2015	7 ATM deposits (\$9,950 x 4, \$6,200, \$3,900, \$100) totalling \$50,000 at Haymarket A
66	21.06.2015	IMT of \$49,978 to Offshore Account 2
67	29.06.2015	6 ATM deposits (\$4,000 x 4, \$3,420, \$2,500) at Surry Hills B, 5 ATM deposits (\$4,000, \$3,940, \$9,900, \$9,950, \$290) at 300 Elizabeth A - total deposits of \$50,000
68	29.06.2015	IMT of \$49,978 to Offshore Account 2
69	30.06.2015	3 ATM deposits (\$9,950 x 3) at Mascot A, 4 ATM deposits (\$4,000 x 2, \$9,450, \$2,700) at Eastgardens B – total deposits of \$50,000
70	30.06.2015	IMT of \$49,978 to Offshore Account 2

SCHEDULE C

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 3 – COMMBANK ACCOUNT 3

ITEM	DATE	TRANSACTION/S
1	15.12.2014	Cash deposit of \$9,000 at St Albans Branch
2	15.12.2014	International Money Transfer (IMT) of \$8,970 to Offshore Account 12
3	17.12.2014	Cash deposit of \$3,480 at Annandale Branch
4	17.12.2014	Transfer of \$1,743.27 to Domestic Account 6
5	17.12.2014	Transfer of \$1,733.94 to Domestic Account 7
6	18.12.2014	Cash deposit of \$1,745 at Petersham Branch
7	31.12.2014	Automatic Teller Machine (ATM) withdrawal of \$1,750 at Central Park C
8	05.01.2015	2 cash deposits (\$5,000 x 2) totalling \$10,000 at Kogarah Branch
9	06.01.2015	IMT of \$9,970 to Offshore Account 12
10	19.01.2015	ATM deposit of \$9,650 at Haymarket A
11	19.01.2015	IMT of \$9,638.50 to Offshore Account 1
12	21.01.2015	ATM deposit of \$9,450 at Central Park A
13	21.01.2015	IMT of \$9,420 to Offshore Account 1
14	27.01.2015	ATM deposit of \$10,000 at Central Park B
15	27.01.2015	IMT of \$9,970 to Offshore Account 1
16	28.01.2015	2 ATM deposits (\$9,250, \$7,250) at Central Park A, 1 ATM deposits of \$9,550 at Market City C – total deposits of \$26,050
17	28.01.2015	ATM deposit of \$10,000 at Market City C
18	28.01.2015	IMT of \$45,789 to Offshore Account 1
19	29.01.2016	ATM deposit of \$9,750 at Broadway B

ITEM	DATE	TRANSACTION/S
20	10.02.2015	Cash deposit of \$8,000 at Canley Heights branch
21	10.02.2015	IMT of \$7,970 to Offshore Account 12
22	18.02.2015	6 ATM deposits (\$9,700, \$8,900, \$8,700, \$8,950, \$8,250, \$5,400) totalling \$49,900 at Central Park B
23	18.02.2015	IMT of \$49,880.65 to Offshore Account 1
24	02.03.2015	5 ATM deposits (\$9,850 x 3, \$9,900, \$9,800) totalling \$49,250 at Market City B
25	02.03.2015	IMT of \$49,230 to Offshore Account 1
26	18.03.2015	5 ATM deposits (\$9,800, \$9,850, \$9,900, \$9,725, \$9,750) totalling \$49,025 at Maroubra Junction A
27	18.03.2015	IMT of \$49,010.10 to Offshore Account 1
28	26.03.2015	6 ATM deposits (\$9,900 x 2, \$9,750, \$150, \$7,300, \$2,550) at Broadway A, 1 ATM deposit \$9,950 at Broadway B – total deposits of \$49,500
29	26.03.2015	IMT of \$49,470 to Offshore Account 1
30	29.03.2015	4 ATM deposits (\$9,800, \$9,900, \$9,900, \$9,900) at Central Park A, 1 ATM deposit of \$9,750 at Central Park B – total deposits of \$49,250
31	29.03.2015	IMT of \$49,230 to Offshore Account 1
32	31.03.2015	5 ATM deposits (\$9,800, \$9,850 x 3, \$9,900) totalling \$49,250 at Paddington A
33	31.03.2015	IMT of \$49,230 to Offshore Account 1
34	01.04.2015	IMT of \$49,480 to Offshore Account 1
35	02.04.2015	5 ATM deposits (\$9,900 x 5) totalling \$49,500 at Broadway B
36	07.04.2015	IMT of \$49,978 to Offshore Account 1
37	08.04.2015	3 ATM deposits (\$9,950 x 3) at Paddington A and 3 ATM deposits (\$9,950 x 2, \$250) at Paddington B – total deposits of \$50,000
38	09.04.2015	IMT of \$49,678 to Offshore Account 1
39	10.04.2015	5 ATM deposits (\$9,950 x 5) totalling \$49,750 at Market City B
40	12.04.2015	2 ATM deposits (\$9,850, \$9,950) at Broadway B, 3 ATM deposits (\$9,950, \$300, \$9,950) at Market City B - total deposits of \$40,000
41	12.04.2015	ATM deposit of \$10,000 at Market City B
42	12.04.2015	IMT of \$49,978 to Offshore Account 1
43	13.04.2015	6 ATM deposits (\$9,950 x 4, \$9,900, \$300) totalling \$50,000 at Burwood A
44	13.04.2015	IMT of \$49,978 to Offshore Account 1
45	19.05.2015	6 ATM deposits (\$8,800, \$9,550 x 2, \$9,750, \$8,470, \$2,950) totalling \$49,070 at Ashfield B
46	19.05.2015	IMT of \$49,040 to Offshore Account 1
47	28.05.2015	ATM deposit of \$2,900 at Elizabeth A
48	28.05.2015	IMT of \$1,400 to Offshore Account 2

ITEM	DATE	TRANSACTION/S
49	28.05.2015	IMT of \$1,450 to Offshore Account 4
50	29.05.2015	6 ATM deposits (\$9,130, \$9,900, \$8,700, \$9,950, \$9,900, \$2,170) totalling \$49,750 at Broadway A
51	29.05.2015	IMT of \$49,738 to Offshore Account 1
52	02.06.2015	6 ATM deposits (\$9,950 x 3, \$8,350, \$9,850, \$1,950) totalling \$50,000 at Surry Hills A
53	02.06.2015	IMT of \$49,978 to Offshore Account 2
54	04.06.2015	3 ATM deposits (\$9,950 x 3) at Surry Hills A, 3 ATM deposits (\$9,950, \$9,900, \$300) at Elizabeth A – total deposits of \$50,000
55	04.06.2015	IMT of \$49,978 to Offshore Account 1
56	05.06.2015	8 ATM deposits (\$9,950 x 3, \$4,000, \$3,940, \$2,210, \$3,500, \$6,500) totalling \$50,000 at Broadway B
57	05.06.2015	IMT of \$49,978 to Offshore Account 1
58	11.06.2015	6 ATM deposits (\$9,450, \$9,900, \$9,950, \$8,600, \$9,600, \$2,200) totalling \$49,700 at Market City A
59	11.06.2015	IMT of \$49,678 to Offshore Account 1
60	12.06.2015	6 ATM deposits (\$9,950 x 3, \$9,850, \$7,600, \$2,700) totalling \$50,000 at Paddington A
61	12.06.2015	IMT of \$49,978 to Offshore Account 1
62	15.06.2015	5 ATM deposits (\$9,900, \$9,950 x 2, \$9,850, \$300) totalling \$39,950 at Market City B
63	15.06.2015	ATM deposit of \$10,000 at Market City B
64	15.06.2015	IMT of \$49,928 to Offshore Account 1
65	17.06.2015	ATM deposit of \$2,000 at Paddington A
66	18.06.2015	IMT of \$600 to Offshore Account 3
67	18.06.2015	IMT of \$600 to Offshore Account 7
68	18.06.2015	IMT of \$730 to Offshore Account 8
69	29.06.2015	1 ATM deposit of \$9,950 at Market City C, 4 ATM deposits (\$9,950 x 4) at Haymarket A – total deposits of \$49,750
70	29.06.2015	IMT of \$49,754 to Offshore Account 2
71	30.06.2015	6 ATM deposits (\$9,850, \$9,950 x 3, \$9,300, \$1,000) totalling \$50,000 at Neutral Bay B
72	30.06.2015	IMT of \$49,978 to Offshore Account 2

SCHEDULE D

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 4 – COMMBANK ACCOUNT 4

ITEM	DATE	TRANSACTION/S
1	16.12.2014	Cash deposit of \$9,000 at St Albans branch
2	16.12.2014	International Money Transfer (IMT) of \$8,970 to Offshore Account 9
3	24.12.2014	1 Automatic Teller Machine (ATM) deposit of \$3,950 at Central Park B, 1 ATM deposit of \$4,700 at Central Park A – total deposits of \$8,650
4	24.12.2014	IMT of \$8,612 to Offshore Account 10
5	19.01.2015	ATM deposit of \$9,250 at Broadway B
6	19.01.2015	IMT of \$9,241.50 to Offshore Account 1
7	21.01.2015	1 ATM deposit of \$9,450 at Central Park B
8	21.01.2015	IMT of \$9,425 to Offshore Account 19
9	27.01.2015	2 ATM deposits (\$9,950, \$8,900) at Central Park B, 1 ATM deposit of \$9,900 at Market City C – total deposits of \$28,750
10	27.01.2015	IMT of \$28,730 to Offshore Account 1
11	17.02.2015	2 ATM deposits (\$7,740, \$6,800) at Central Park B, 1 ATM deposit of \$4,700 at Market City B – total deposits of \$19,240
12	17.02.2015	IMT of \$19,200 to Offshore Account 1
13	18.02.2015	4 ATM deposits (\$8,700, \$7,700, \$9,100, \$4,500) totalling \$30,000 at Ashfield A
14	18.02.2015	ATM deposit of \$10,000 at Ashfield A
15	18.02.2015	IMT of \$40,000 to Offshore Account 1
16	26.02.2015	5 ATM deposits (\$7,540, \$4,000, \$3,090, \$4,350, \$7,690) at Central Park B, 2 ATM deposits (\$8,070, \$7,010) at Market City B – total deposits of \$41,750
17	26.02.2015	IMT of \$41,722.50 to Offshore Account 1
18	02.03.2015	1 ATM deposit of \$9,900 at Central Park B, 4 ATM deposits (\$9,750, \$9,850 x 2, \$9,900) at Broadway B – total deposits of \$49,250

ITEM	DATE	TRANSACTION/S
19	02.03.2015	IMT of \$49,230 to Offshore Account 1
20	17.03.2015	IMT of \$49,030 to Offshore Account 1
21	18.03.2015	5 ATM deposits (\$9,850 x 3, \$9,750 x 2) totalling \$49,050 at Broadway A
22	24.03.2015	Cash deposit of \$9,000 at Moorabbin Branch
23	25.03.2015	ATM deposit of \$8,050 at Chadstone Ct A
24	25.03.2015	Cash deposit of \$950 at Chadstone Centre Branch
25	25.03.2015	Cash deposit of \$3,000 at Moorabbin Branch
26	26.03.2015	3 ATM deposits (\$9,900, \$9,580, \$8,920) totalling \$28,400 at Mascot A
27	26.03.2015	IMT of \$20,170 to Offshore Account 9
28	26.03.2015	IMT of \$29,187.83 to Offshore Account 1
29	29.03.2015	2 ATM deposits (\$9,650, \$9,900) at Market City A, 2 ATM deposits (\$9,900, \$9,800) at Market City B – total deposits of \$39,250
30	29.03.2015	IMT of \$49,026 to Offshore Account 1
31	30.03.2015	Cash deposit of \$9,000 at Chadstone Centre Branch
32	30.03.2015	1 ATM deposit of \$9,800 at Broadway B, 1 ATM deposit of \$9,000 at Springvale A – total deposits of \$18,800
33	30.03.2015	IMT of \$17,970 to Offshore Account 1
34	31.03.2015	1 ATM deposit of \$9,900 at Bondi Junction A, 4 ATM deposits (\$9,900 x 3, \$9,850) at Paddington A – total deposits of \$49,450
35	31.03.2015	IMT of \$49,432 to Offshore Account 1
36	01.04.2015	5 ATM deposits (\$9,800, \$9,900 x 4) totalling \$49,400 at Central Park B
37	01.04.2015	IMT of \$49,380 to Offshore Account 1
38	07.04.2015	4 ATM deposits (\$9,950 x 4) at Market City B, 2 ATM deposits (\$9,950, \$250) at Market City A – total deposits of \$50,000
39	07.04.2015	IMT of \$49,970 to Offshore Account 1
40	08.04.2015	2 ATM deposits (\$9,850, \$9,950) at Central Park A, ATM deposit of \$9,950 at Central Park B - total deposits of \$29,750
41	08.04.2015	IMT of \$29,740 to Offshore Account 1
42	12.04.2015	IMT of \$49,870 to Offshore Account 1
43	13.04.2015	6 ATM deposits (\$9,650, \$9,850 x 2, \$9,600, \$9,950, \$1,000) totalling \$49,900 at Paddington B
44	07.05.2015	IMT of \$49,700 to Offshore Account 1
45	08.05.2015	4 ATM deposits (\$3,940, \$5,930, \$8,650, \$4,390) at Broadway B, 2 ATM deposits (\$5,220, \$150) at Broadway A – total deposits of \$28,280
46	08.05.2015	2 ATM deposits (\$10,420, \$11,020) totalling \$21,440 at Broadway B
47	17.05.2015	1 ATM deposit of \$9,850 at Broadway B, 2 ATM deposits (\$9,950, \$9,850) at Bondi Junction A, 3 ATM deposits (\$9,750, \$7,350, \$3,200) at Maroubra Junction A – total deposits of \$49,950

ITEM	DATE	TRANSACTION/S
48	17.05.2015	IMT of \$49,930 to Offshore Account 1
49	18.05.2015	2 ATM deposits (\$9,950 x 2) at Central Park B, 1 ATM deposit of \$9,950 at Central Park A – total deposits of \$29,850
50	18.05.2015	IMT of \$46,930 to Offshore Account 1
51	19.05.2015	2 ATM deposits (\$8,500, \$8,600) totalling \$17,100 at Central Park B
52	28.05.2015	ATM deposit of \$2,500 at Leichardt A
53	28.05.2015	IMT of \$1,278 to Offshore Account 2
54	28.05.2015	IMT of \$1,178 to Offshore Account 4
55	29.05.2015	6 ATM deposits (\$9,900 x 2, \$9,950 x 3, \$250) totalling \$49,900 at Paddington B
56	29.05.2015	IMT of \$49,878 to Offshore Account 1
57	02.06.2015	3 ATM deposits (\$9,950 x 3) totalling \$29,850 at Central Park B
58	02.06.2015	IMT of \$29,830 to Offshore Account 4
59	04.06.2015	6 ATM deposits (\$9,950, \$9,800, \$9,850 x 3, \$700) totalling \$50,000 at Surry Hills A
60	04.06.2015	IMT of \$49,870 to Offshore Account 1
61	05.06.2015	8 ATM deposits (\$4,000, \$3,620, \$2,380, \$9,800, \$9,950 x 2 \$9,900, \$400) totalling \$50,000 at Paddington B
62	05.06.2015	IMT of \$49,978 to Offshore Account 1
63	11.06.2015	3 ATM deposits (\$9,950, \$9,800, \$9,900) at Haymarket B, 3 ATM deposits (\$9,950 x 2, \$300) at Market City C – total deposits of \$49,850
64	11.06.2015	IMT of \$49,928 to Offshore Account 1
65	12.06.2015	6 ATM deposits (\$9,950 x 5, \$250) totalling \$50,000 at Paddington A
66	12.06.2015	IMT of \$49,978 to Offshore Account 1
67	13.06.2015	6 ATM deposits (\$9,950 x 4, \$9,900, \$250) totalling \$49,950 at Haymarket A
68	14.06.2015	IMT of \$49,930 to Offshore Account 2
69	19.06.2015	5 ATM deposits (\$9,950 x 3, \$8,750, \$1,550) at Broadway A, 1 ATM deposit of \$9,850 at Broadway B – total deposits of \$50,000
70	19.06.2015	IMT of \$49,978 to Offshore Account 2
71	29.06.2015	4 ATM deposits (\$9,900, \$9,550, \$9,950 x 2) at Market City C, 2 ATM deposits (\$9,850, \$800) at Haymarket A – total deposits of \$50,000
72	29.06.2015	IMT of \$49,978 to Offshore Account 2
73	30.06.2015	3 ATM deposits (\$9,950 x 3) at Broadway A, 2 ATM deposits (\$9,650, \$500) at Broadway B – total deposits of \$40,000
74	30.06.2015	ATM deposit of \$10,000 at Broadway A
75	30.06.2015	IMT of \$49,978 to Offshore Account 2

SCHEDULE E

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 5 – COMMBANK ACCOUNT 5

ITEM	DATE	TRANSACTION/S
1	19.01.2015	NSW - 1 Automatic Teller Machine (ATM) deposit of \$4,750 at Market City A, 1 ATM deposit of \$4,600 at Broadway B – total deposits of \$9,350
2	20.01.2015	International Money Transfer (IMT) of \$9,324.80 to Offshore Account 19
3	29.01.2015	NSW - 1 ATM deposit of \$9,750 at Market City B, 2 ATM deposits (\$9,600, \$1,300) at Haymarket B – total deposits of \$20,650
4	29.01.2015	NSW – 1 ATM deposit of \$10,000 at Market City B
5	29.01.2015	IMT of \$30,620 to Offshore Account 1
6	18.02.2015	Cash deposit of \$9,000 at Annandale Branch
7	18.02.2015	Cash deposit of \$9,000 at Broadway Branch
8	18.02.2015	IMT of \$9,000 to Offshore Account 1
9	18.02.2015	NSW - 5 ATM deposits (\$5,100, \$3,900, \$8,950, \$4,050, \$8,000) totalling \$48,000 at Burwood A
10	18.02.2015	IMT of \$47,983.15 to Offshore Account 1
11	10.03.2015	NSW - 6 ATM deposits (\$9,400, \$9,850, \$9,950, \$9,900, \$9,750, \$150) totalling \$49,000 at MP Leichardt A
12	10.03.2015	IMT of \$48,981.26 to Offshore Account 1
13	25.03.2015	NSW - 7 ATM deposits (\$9,800, \$7,870, \$2,050, \$9,950, \$9,500, \$450, \$4,950) totalling \$44,570 at Campsie D
14	25.03.2015	IMT of \$44,550 to Offshore Account 1
15	30.03.2015	NSW - 2 ATM deposits (\$9,700, \$8,530) at Broadway B, 2 ATM deposits (\$9,900, \$9,700) at Broadway A – total deposits of \$37,830
16	30.03.2015	NSW - ATM deposit of \$10,950 at Broadway B
17	30.03.2015	IMT of \$48,750 to Offshore Account 1

ITEM	DATE	TRANSACTION/S
18	31.03.2015	NSW - 3 ATM deposits (\$9,850, \$9,600, \$9,950) at Market City A, 2 ATM deposits (\$9,900 x 2) at Market City C – total deposits of \$49,200
19	31.03.2015	IMT of \$49,170 to Offshore Account 1
20	01.04.2015	IMT of \$26,630 to Offshore Account 1
21	02.04.2015	NSW - 3 ATM deposits (\$9,850, \$9,900, \$6,890) totalling \$26,640 at Paddington B
22	07.04.2015	NSW - 6 ATM deposits (\$9,900, \$9,950 x 3, \$8,800, \$450) totalling \$49,000 at Ashfield A
23	07.04.2015	IMT of \$48,981.26 to Offshore Account 1
24	08.04.2015	NSW - 5 ATM deposits (\$9,950 x 3, \$9,730, \$9,900) totalling \$49,480 at Broadway A
25	08.04.2015	IMT of \$49,450 to Offshore Account 1
26	18.05.2015	IMT of \$49,970 to Offshore Account 1
27	19.05.2015	NSW - 3 ATM deposits (\$9,950 x 2, \$9,900) at Haymarket B, 3 ATM deposits (\$9,800, \$7,450, \$2,950) at Ashfield B – total deposits of \$50,000
28	28.05.2015	NSW - ATM deposit of \$2,100 at 300 Elizabeth A
29	28.05.2015	IMT of \$1,000 to Offshore Account 2
30	28.05.2015	IMT of \$1,050 to Offshore Account 4
31	29.05.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,900, \$9,400, \$850) totalling \$50,000 at Paddington A
32	29.05.2015	IMT of \$49,970 to Offshore Account 1
33	02.06.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,900 x 2, \$350) totalling \$50,000 at Market City B
34	02.06.2015	IMT of \$49,978 to Offshore Account 2
35	04.06.2015	NSW - 2 ATM deposits (\$9,950 x 2) totalling \$19,900 at Central Park B
36	04.06.2015	IMT of \$19,900 to Offshore Account 19
37	04.06.2015	NSW - 3 ATM deposits (\$9,950, \$9,950, \$9,950) totalling \$29,850 at Central Park A
38	04.06.2015	IMT of \$29,830 to Offshore Account 1
39	11.06.2015	NSW - 3 ATM deposits (\$20,000, \$14,900, \$15,100) totalling \$50,000 at Central Park A
40	11.06.2015	IMT of \$49,978 to Offshore Account 2
41	21.06.2015	NSW - 2 ATM deposits (\$9,900, \$9,680) at 300 Elizabeth A, 2 ATM deposits (\$9,850, \$9,950) at Paddington B, 2 ATM deposits (\$9,900, \$570) at Paddington A – total deposits of \$49,850
42	21.06.2015	IMT of \$49,827 to Offshore Account 2
43	23.06.2015	NSW - 2 ATM deposits (\$9,950, \$9,850) at Broadway A, 3 ATM deposits (\$9,900, \$9,950 x 2) at Broadway B – total deposits of \$49,600
44	23.06.2015	IMT of \$49,570 to Offshore Account 2
45	29.06.2015	NSW - 9 ATM deposits (\$4,000 x 9) at Paddington A, 4 ATM deposits (\$4,000 x 2, \$3,840, \$2,160) at Paddington B – total deposits of \$50,000

ITEM	DATE	TRANSACTION/S
46	29.06.2015	IMT of \$49,978 to Offshore Account 2
47	30.06.2015	NSW - 7 ATM deposits (\$9,890, \$3,750, \$6,250, \$9,950 x 3, \$200) totalling \$49,940 at Mascot A
48	30.06.2015	IMT of \$49,926 to Offshore Account 2

SCHEDULE F

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 6 – COMMBANK ACCOUNT 6

ITEM	DATE	TRANSACTION/S
1	04.02.2015	Cash deposit of \$1,000 at Annandale Branch
2	04.02.2015	International Money Transfer (IMT) of \$950 to Offshore Account 1
3	10.03.2015	NSW - 1 Automatic Teller Machine (ATM) deposit of \$9,950 at Broadway B, 4 ATM deposits (\$9,900 x 4) at Market City A – total deposits of \$49,550
4	10.03.2015	IMT of \$49,551.42 to Offshore Account 1
5	17.03.2015	NSW - 4 ATM deposits (\$9,900, \$9,800, \$9,850 x 2) at Market City A, 1 ATM deposit of \$9,900 at Market City B – total deposits of \$49,300
6	17.03.2015	IMT of \$49,273.39 to Offshore Account 1
7	25.03.2015	NSW - 4 ATM deposits (\$9,900 x 2, \$8,000, \$1,900) totalling \$29,700 at Broadway B
8	25.03.2015	IMT of \$49,470 to Offshore Account 1
9	26.03.2015	NSW – 3 ATM deposits (\$8,100, \$1,900, \$9,800) at Broadway B – total deposits \$19,800
10	28.03.2015	NSW – 1 ATM deposit of \$9,900 at Market City A
11	29.03.2015	NSW - 6 ATM deposits (\$9,900 x 2, \$6,280, \$5,610, \$5,270, \$2,590) totalling \$49,450 at Market City A
12	29.03.2015	IMT of \$49,440.17 to Offshore Account 1
13	31.03.2015	NSW - 1 ATM deposit of \$9,950 at Mascot A, 3 ATM deposits (\$9,750, \$9,800, \$9,950) at Kingsford A –total deposits of \$39,450
14	31.03.2015	1 ATM deposit of \$10,000 at Kingsford A
15	31.03.2015	IMT of \$49,422.85 to Offshore Account 1
16	01.04.2015	NSW - 1 ATM deposit of \$8,940 at Market City A, 2 ATM deposits (\$9,800, \$8,200) at Market City C – total deposits of \$26,940
17	01.04.2015	NSW – 1 ATM deposit of \$13,500 at Market City A

ITEM	DATE	TRANSACTION/S
18	01.04.2015	IMT of \$40,420 to Offshore Account 1
19	07.04.2015	IMT of \$49,978 to Offshore Account 1
20	08.04.2015	NSW - 6 ATM deposits (\$9,950 x 4, \$9,700, \$500) totalling \$50,000 at Haymarket A
21	08.04.2015	NSW - 6 ATM deposits (\$9,720, \$9,950 x 2, \$9,370, \$5,700, \$4,790) totalling \$49,480 at Market City A
22	08.04.2015	IMT of \$49,460 to Offshore Account 1
23	12.04.2015	NSW - 3 ATM deposits (\$9,850, \$9,800, \$9,950) at Haymarket A, 3 ATM deposits (\$9,850, \$7,350, \$3,250) at Market City B – total deposits of \$50,050
24	12.04.2015	IMT of \$49,978 to Offshore Account 1
25	13.04.2015	NSW - 6 ATM deposits (\$9,950 x 5, \$250) totalling \$50,000 at Market City B
26	13.04.2015	IMT of \$49,978 to Offshore Account 1
27	16.04.2015	NSW - 2 ATM deposits (\$9,800, \$9,900) at Central Park B, 2 ATM deposits (\$9,640, \$9,800) at Market City B – total deposits of \$39,140
28	16.04.2015	NSW – 1 ATM deposit of \$10,860 at Market City B
29	16.04.2015	IMT of \$49,978 to Offshore Account 1
30	19.05.2015	NSW - 5 ATM deposits of (\$9,950 x 4, \$9,900) totalling \$49,700 at Paddington B
31	19.05.2015	IMT of \$49,720 to Offshore Account 1
32	27.05.2015	NSW - 4 ATM deposits (\$9,850, \$9,950, \$9,800, \$9,650) at Broadway A, 2 ATM deposits (\$7,500, \$3,250) at Broadway B – total deposits of \$50,000
33	27.05.2015	IMT of \$49,978 to Offshore Account 1
34	04.06.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,900, \$9,800, \$450) totalling \$50,000 at Paddington A
35	04.06.2015	IMT of \$49,978 to Offshore Account 1
36	05.06.2015	NSW - 6 ATM deposits (\$9,900, \$9,950 x 3, \$4,650, \$5,600) totalling \$50,000 at Surry Hills A
37	05.06.2015	IMT of \$48,978 to Offshore Account 1
38	05.06.2015	IMT of \$978 to Offshore Account 2
39	11.06.2015	NSW - 9 ATM deposits (\$5,830, \$3,900, \$9,950, \$9,250, \$400, \$9,400, \$9,000, \$1,700, \$570) totalling \$50,000 at Ashfield A
40	11.06.2015	IMT of \$49,978 to Offshore Account 2
41	17.06.2015	ATM deposit of \$2,000 at Surry Hills A
42	21.06.2015	NSW - 5 ATM deposits (\$9,850, \$5,250, \$4,900, \$9,950, \$5,350) at 300 Elizabeth A, 2 ATM deposits (\$9,800, \$4,900) at Haymarket A – total deposits of \$50,000
43	21.06.2015	ATM withdrawal of \$2,000 at Glebe
44	22.06.2015	ATM withdrawal of \$2,000 at Chinatown A
45	23.06.2015	ATM withdrawal of \$2,000 at Market City 3
46	24.06.2015	ATM withdrawal of \$2,000 at Glebe

ITEM	DATE	TRANSACTION/S
47	25.06.2015	ATM withdrawal of \$2,000 at Glebe
48	25.06.2015	ATM withdrawal of \$2,000 at Broadway Lodge
49	27.06.2015	ATM withdrawal of \$2,000 at Market City C
50	28.06.2015	ATM withdrawal of \$2,000 at Market City B
51	29.06.2015	ATM withdrawal of \$2,000 at Glebe
52	30.06.2015	ATM withdrawal of \$2,000 at Crows Nest A

SCHEDULE G

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 7 – COMMBANK ACCOUNT 7

ITEM	DATE	TRANSACTION/S
1	27.02.2015	2 cash deposits (\$9,000 x 2) totalling \$18,000 at Chadstone Centre Branch
2	28.02.2015	International Money Transfer (IMT) of \$17,976 to Offshore Account 2
3	12.03.2015	NSW - 3 Automatic Teller Machine (ATM) deposits (\$9,650, \$9,850, \$9,700) at Market City B, 1 ATM deposit of \$9,900 at Haymarket B, 1 ATM deposit of \$6,400 at Market City C – total deposits of \$45,500
4	12.03.2015	IMT of \$45,475 to Offshore Account 2
5	18.03.2015	NSW - 5 ATM deposits (\$9,900 x 2, \$9,850 x 2, \$9,800) totalling \$49,300 at Mascot A
6	18.03.2015	IMT of \$49,271.73 to Offshore Account 2
7	26.03.2015	NSW - 6 ATM deposits (\$9,850, \$9,950, \$7,835, \$8,100, \$9,165, \$4,600) totalling \$49,500 at Maroubra Jct A
8	26.03.2015	IMT of \$49,483 to Offshore Account 2
9	28.03.2015	IMT of \$49,426 to Offshore Account 2
10	29.03.2015	NSW - 5 ATM deposits (\$9,900 x 4, \$9,850) totalling \$49,450 at Broadway A
11	31.03.2015	IMT of \$49,130 to Offshore Account 2
12	01.04.2015	NSW - 5 ATM deposits (\$9,800 x 2, \$9,750, \$9,900 x 2) totalling \$49,150 at Market City A
13	07.04.2015	NSW - 5 ATM deposits (\$9,950 x 3, \$9,900, \$9,850) totalling \$49,600 at Central Park B
14	07.04.2015	IMT of \$49,583 to Offshore Account 2
15	13.04.2015	Cash deposit of \$1,000 at Ashfield Branch
16	14.04.2015	NSW - 6 ATM deposits (\$9,800, \$9,600, \$9,700, \$9,850 x 2, \$200) totalling \$49,000 at Broadway A

ITEM	DATE	TRANSACTION/S
17	14.04.2015	IMT of \$49,978 to Offshore Account 2
18	15.04.2015	NSW - 6 ATM deposits (\$9,900 x 2, \$9,600, \$9,650, \$9,950, \$1,000) totalling \$50,000 at Market City C
19	15.04.2015	IMT of \$49,978 to Offshore Account 2
20	19.04.2015	IMT of \$49,978 to Offshore Account 2
21	20.04.2015	NSW - 6 ATM deposits (\$9,900, \$9,950 x 2, \$9,850, \$9,750, \$600) totalling \$50,000 at Paddington B
22	04.05.2015	NSW - 6 ATM deposits (\$9,750, \$9,800, \$9,150, \$9,850, \$9,950, \$1,400) totalling \$49,900 at Market City A
23	04.05.2015	IMT of \$49,868 to Offshore Account 2
24	07.05.2015	NSW - 7 ATM deposits (\$9,950, \$7,700, \$8,800, \$9,900, \$8,550, \$4,900, \$200) totalling \$50,000 at Burwood A
25	07.05.2015	IMT of \$49,978 to Offshore Account 2
26	17.05.2015	NSW - 4 ATM deposits (\$8,500, \$8,650, \$6,500, \$6,350) totalling \$30,000 at Maroubra Jct A
27	17.05.2015	NSW - 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Maroubra Jct A
28	17.05.2015	IMT of \$49,978 to Offshore Account 2
29	18.05.2015	IMT of \$49,978 to Offshore Account 2
30	19.05.2015	NSW - 6 ATM deposits (\$9,950, x 5, \$250) totalling \$50,000 at Market City B
31	25.05.2015	NSW - 1 ATM deposit of \$9,950 at Market City B, 4 ATM deposits (\$9,950, \$9,900 x 2, \$350) at Paddington A, 1 ATM deposit of \$9,950 at Paddington B – total deposits of \$50,000
32	25.05.2015	IMT of \$49,978 to Offshore Account 2
33	27.05.2015	NSW - 6 ATM deposits (\$9,950 x 4, \$9,850, \$350) totalling \$50,000 at Burwood A
34	27.05.2015	IMT of \$49,978 to Offshore Account 2
35	28.05.2015	NSW - 11 ATM deposits (\$2,925, \$2,345, \$4,730, \$2,010, \$3,250, \$4,720, \$8,260, \$1,760, \$9,950, \$9,750, \$300) totalling \$50,000 at Broadway B
36	28.05.2015	IMT of \$49,978 to Offshore Account 2
37	04.06.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,900 x 2, \$400) totalling \$50,050 at Burwood A
38	04.06.2015	IMT of \$49,978 to Offshore Account 2
39	11.06.2015	NSW - 6 ATM deposits (\$9,900, \$9,950 x 2, \$9,850, \$9,800, \$550) totalling \$50,000 at Ashfield B
40	11.06.2015	IMT of \$49,978 to Offshore Account 2
41	16.06.2015	NSW - 5 ATM deposits (\$9,900 x 2, \$9,850 x 2, \$450) totalling \$39,950 at Paddington A
42	16.06.2015	NSW – 1 ATM deposit of \$10,000 at Paddington A
43	16.06.2015	IMT of \$49,978 to Offshore Account 2
44	17.06.2015	NSW - ATM deposit of \$2,000 at Paddington A

ITEM	DATE	TRANSACTION/S
45	18.06.2015	IMT of \$600 to Offshore Account 3
46	18.06.2015	IMT of \$600 to Offshore Account 7
47	21.06.2015	NSW - 2 ATM deposits (\$3,800, \$3,960) at Paddington B, 5 ATM deposits (\$2,240, \$3,860, \$5,940, \$9,900, \$9,950 x 2) at Paddington A, 1 ATM deposit of \$400 at 300 Elizabeth A – total deposits of \$50,000
48	21.06.2015	ATM withdrawal of \$2,000 at Annandale B
49	22.06.2015	ATM withdrawal of \$2,000 at Chinatown B
50	23.06.2015	ATM withdrawal of \$2,000 at Glebe
51	24.06.2015	ATM withdrawal of \$2,000 at Glebe
52	25.06.2015	1 ATM withdrawal of \$2,000 Chinatown B, 1 ATM withdrawal of \$2,000 at Broadway Lodge – total withdrawals of \$4,000
53	27.06.2015	ATM withdrawal of \$2,000 at Market City 3
54	28.06.2015	ATM withdrawal of \$2,000 at Chinatown B
55	29.06.2015	ATM withdrawal of \$2,000 at Glebe
56	30.06.2015	ATM withdrawal of \$2,000 at Mosman B

SCHEDULE H

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 8 – COMMBANK ACCOUNT 8

ITEM	DATE	TRANSACTION/S
1	04.02.2015	Cash deposit of \$1,000 at Annandale Branch
2	04.02.2015	International Money Transfer (IMT) of \$750 to Offshore Account 1
3	20.02.2015	NSW - 3 Automatic Teller Machine (ATM) deposits (\$4,000, \$7,980, \$7,000) totalling \$18,980 at Central Park B
4	20.02.2015	IMT of \$18,977 to Offshore Account 1
5	24.02.2015	NSW - 6 ATM deposits (\$9,800, \$9,500, \$9,300, \$9,200, \$9,700, \$2,500) totalling \$50,000 at Burwood A
6	24.02.2015	IMT of \$49,970 to Offshore Account 2
7	03.03.2015	NSW - 3 ATM deposits (\$9,600, \$9,500, \$9,400) totalling \$28,500 at Market City B
8	03.03.2015	IMT of \$28,490 to Offshore Account 2
9	18.03.2015	NSW - 5 ATM deposits (\$9,850 x 3, \$9,900, \$9,800) totalling \$49,250 at Kingsford A
10	18.03.2015	IMT of \$49,230 to Offshore Account 2
11	25.03.2015	NSW - 5 ATM deposits (\$9,900, \$9,850, \$9,800, \$9,950, \$8,750) totalling \$48,250 at Broadway A
12	25.03.2015	IMT of \$48,230 to Offshore Account 2
13	30.03.2015	NSW - 6 ATM deposits (\$8,500, \$9,900 x 2, \$9,850, \$9,450) at Central Park A, 1 ATM deposit of \$1,800 at Central Park B – total deposits of \$49,400
14	30.03.2015	IMT of \$49,375 to Offshore Account 1
15	31.03.2015	NSW - 5 ATM deposits (\$9,900 x 3, \$9,850, \$9,800) totalling \$49,350 at Kingsford A
16	31.03.2015	IMT of \$49,330 to Offshore Account 1

ITEM	DATE	TRANSACTION/S
17	07.04.2015	IMT of \$49,978 to Offshore Account 1
18	08.04.2015	NSW - 6 ATM deposits (\$9,950 x 4, \$8,000, \$2,200) totalling \$50,000 at Market City A
19	08.04.2015	NSW - 2 ATM deposits (\$9,910, \$9,950) totalling \$19,860 at Market City B
20	08.04.2015	NSW - 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Market City B
21	08.04.2015	IMT of \$49,830 to Offshore Account 2
22	12.04.2015	IMT of \$49,928 to Offshore Account 1
23	13.04.2015	NSW - 6 ATM deposits (\$9,950 x2, \$9,900 x 2, \$9,750, \$500) totalling \$49,950 at Paddington A
24	13.04.2015	NSW - 7 ATM deposits (\$9,800, \$9,950 x 3, \$9,750, \$550, \$50) totalling \$50,000 at MP Leichardt A
25	13.04.2015	IMT of \$49,978 to Offshore Account 1
26	15.04.2015	NSW - 1 ATM deposit (\$9,900) at Market City A, 6 ATM deposits (\$9,905, \$9,900, \$7,450, \$2,760, \$3,710, \$6,310) at Market City B – total deposits of \$49,935
27	15.04.2015	IMT of \$49,920 to Offshore Account 2
28	16.05.2015	NSW - 7 ATM deposits (\$9,600, \$9,950, \$9,850 x 2, \$9,250, \$1,300, \$200) totalling \$50,000 at Ashfield A
29	16.05.2015	IMT of \$49,970 to Offshore Account 2
30	18.05.2015	NSW - 11 ATM deposits (\$7,600, \$2,400, \$4,000 x 5, \$8,230, \$1,720, \$6,500, \$3,550) totalling \$50,000 at Paddington A
31	18.05.2015	IMT of \$49,970 to Offshore Account 2
32	19.05.2015	NSW - 8 ATM deposits (\$9,750, \$8,650, \$9,240, \$8,860, \$6,530, \$6,000, \$750, \$50) totalling \$49,830 at Ashfield A
33	19.05.2015	IMT of \$49,820 to Offshore Account 1
34	24.05.2015	NSW - 6 ATM deposits (\$9,950, \$4,300, \$8,800, \$9,100, \$9,850, \$8,000) totalling \$50,000 at 300 Elizabeth A
35	24.05.2015	IMT of \$49,970 to Offshore Account 2
36	27.05.2015	NSW - 2 ATM deposits (\$9,950, \$9,850) at Broadway B, 4 ATM deposits (\$9,900, \$9,750, \$9,800, \$700) at Central Park A –total deposits of \$49,950
37	27.05.2015	IMT of \$49,930 to Offshore Account 2
38	28.05.2015	NSW - 8 ATM deposits (\$9,000, \$980, \$8,950, \$9,650, \$1,370, \$9,050, \$9,400, \$1,600) totalling \$50,000 at Paddington B
39	28.05.2015	IMT of \$49,978 to Offshore Account 2
40	01.06.2015	NSW - 6 ATM deposits (\$9,900 x 2, \$9,150, \$9,950, \$8,470, \$2,530) totalling \$49,900 at Paddington A
41	01.06.2015	IMT of \$49,878 to Offshore Account 2
42	02.06.2015	NSW - 6 ATM deposits (\$9,050, \$9,200, \$1,650, \$7,420, \$7,880, \$4,750) totalling \$39,950 at Ashfield B
43	02.06.2015	NSW - 1 ATM deposit of \$10,000 at Ashfield B

ITEM	DATE	TRANSACTION/S
44	02.06.2015	IMT of \$49,933 to Offshore Account 2
45	04.06.2015	NSW - 5 ATM deposits (\$9,950, \$9,750, \$9,900, \$9,500, \$9,850) totalling \$48,950 at MP Leichardt A
46	04.06.2015	IMT of \$48,928 to Offshore Account 1
47	04.06.2015	NSW - 1 ATM deposit of \$1,000 at Strathfield A
48	12.06.2015	NSW - 7 ATM deposits (\$3,000, \$9,000, \$6,800, \$5,350, \$5,050, \$9,900, \$9,700) totalling \$48,800 at Burwood A
49	12.06.2015	IMT of \$49,778 to Offshore Account 2
50	12.06.2015	NSW - 2 ATM deposits (\$9,950, \$9,900) at Broadway A, 4 ATM deposits (\$9,900, \$9,950, \$9,750, \$550) at Broadway B – total deposits of \$50,000
51	13.06.2015	IMT of \$49,978 to Offshore Account 2
52	15.06.2015	NSW - 1 ATM deposit of \$9,950 at Central Park A
53	15.06.2015	NSW - 3 ATM deposits (\$10,000 x 3) at Central Park A, 1 ATM deposit of \$10,000 at Central Park B – total deposits of \$40,000
54	15.06.2015	IMT of \$49,928 to Offshore Account 2
55	17.06.2015	NSW - 2 ATM deposits (\$9,950, \$9,900) at Central Park A, 4 ATM deposits (\$9,350, \$9,420, \$8,600, \$2730) at Central Park B – total deposits of \$49,950
56	17.06.2015	IMT of \$1,000 to Offshore Account 7
57	17.06.2015	IMT of \$1,000 to Offshore Account 3
58	17.06.2015	IMT of \$46,900 to Offshore Account 2
59	29.06.2015	NSW - 4 ATM deposits (\$9,950, \$9,900, \$9,850 x 2) totalling \$39,550 at Northbridge A
60	29.06.2015	NSW - 1 ATM deposit of \$10,000 at Northbridge A
61	29.06.2015	IMT of \$49,978 to Offshore Account 2
62	30.06.2015	NSW - 2 ATM deposits (\$9,200, \$9,950) at Central Park A, 2 ATM deposits (\$9,950, \$9,850) at Central Park B – total deposits of \$38,950
63	30.06.2015	NSW - 1 ATM deposit of \$10,000 at Central Park A
64	30.06.2015	IMT of \$49,330 to Offshore Account 2

SCHEDULE I

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 9 – COMMBANK ACCOUNT 9

ITEM	DATE	TRANSACTION/S
1	26.03.2015	Cash deposit of \$1,000 at Ashfield Branch
2	26.03.2015	International Money Transfer (IMT) of \$969 to Offshore Account 2
3	27.03.2015	Cash deposit of \$800 at Annandale Branch
4	27.03.2015	IMT of \$770 to Offshore Account 1
5	30.03.2015	IMT of \$49,480 to Offshore Account 2
6	31.03.2015	2 Automatic Teller Machine (ATM) deposits (\$9,900, \$9,700) at Market City C, 5 ATM deposits (\$9,900, \$5,150, \$6,130, \$7,180, \$1,540) at Broadway B – total deposits of \$49,500
7	31.03.2015	5 ATM deposits (\$9,900 x 4, \$9,850) totalling \$49,450 at Central Park B
8	31.03.2015	IMT of \$49,435 to Offshore Account 2
9	08.04.2015	7 ATM deposits (\$9,150, \$850, \$9,950 x 3, \$9,900, \$250) totalling \$50,000 at Bondi Jct A
10	08.04.2015	IMT of \$49,978 to Offshore Account 1
11	09.04.2015	IMT of \$49,978 to Offshore Account 1
12	10.04.2015	4 ATM deposits (\$9,950, \$9,800, \$9,850, \$9,900) at Haymarket B, 7 ATM deposits (\$8,800, \$1,700, \$9,950 x 2, \$9,850 x 2, \$9,900) at Haymarket A – total deposits of \$99,500
13	10.04.2015	IMT of \$49,478 to Offshore Account 1
14	12.04.2015	IMT of \$49,878 to Offshore Account 1
15	13.04.2015	1 ATM deposit of \$9,950 at Bondi Junction A, 5 ATM deposits (\$9,950, \$9,800, \$9,850 x 2, \$500) at Kingsford A – total deposits of \$49,900
16	13.04.2015	4 ATM deposits (\$9,950, \$9,900, \$9,800, \$9,700) at Vict Ave B, 1 ATM deposit of \$9,900 at Vict Ave A – total deposits of \$49,250
17	13.04.2015	IMT of \$49,235 to Offshore Account 1

ITEM	DATE	TRANSACTION/S
18	16.04.2015	ATM deposit of \$500 at Broadway B
19	20.04.2015	ATM deposit of \$50 at Central Park B
20	20.04.2015	IMT of \$500 to Offshore Account 11
21	16.05.2015	IMT of \$49,940 to Offshore Account 2
22	17.05.2015	8 ATM deposits (\$4,000, \$6,000, \$9,850, \$4,630, \$5,460, \$9,600, \$5,900, \$4,500) totalling \$49,950 at Broadway A
23	18.05.2015	6 ATM deposits (\$9,900 x 2, \$9,950, \$9,280, \$7,580, \$3,250) totalling \$49,860 at 300 Elizabeth A
24	18.05.2015	IMT of \$49,837 to Offshore Account 2
25	20.05.2015	6 ATM deposits (\$9,900 x 2, \$9,950, \$9,850, \$5,200, \$2,250) at Burwood A, 2 ATM deposits (\$2,650, \$300) at Ashfield A – total deposits of \$50,000
26	20.05.2015	IMT of \$49,970 to Offshore Account 2
27	24.05.2015	1 ATM deposit of \$9,750 at Ashfield B, 2 deposits (\$9,850, \$9,900) at Ashfield A, 2 ATM deposits (\$8,300, \$2,200) at Elizabeth A – total deposits of \$40,000
28	24.05.2015	ATM deposit of \$10,000 at Ashfield B
29	24.05.2015	IMT of \$49,970 to Offshore Account 2
30	26.05.2015	6 ATM deposits (\$9,800, \$9,850 x 2, \$9,950, \$6,000, \$4,500) totalling \$49,950 at Market City B
31	25.05.2015	IMT of \$49,950 to Offshore Account 2
32	27.05.2015	6 ATM deposits (\$9,950 x 3, \$9,800, \$9,900, \$450) totalling \$50,000 at Five Dock A
33	27.05.2015	IMT of \$49,970 to Offshore Account 2
34	28.05.2015	1 ATM deposit of \$9,900 at Broadway B, 5 ATM deposits (\$9,950 x 2, \$9,900 x 2, \$300) at Central Park A – total deposits of \$49,900
35	28.05.2015	IMT of \$49,870 to Offshore Account 2
36	31.05.2015	3 ATM deposits (\$9,950 x 3) at Broadway A and 2 ATM deposits (\$9,900, \$9,850) at Broadway B totalling \$49,600
37	31.05.2015	IMT of \$49,580 to Offshore Account 2
38	01.06.2015	2 ATM deposits (\$9,750, \$9,700) at Haymarket C, 2 ATM deposits (\$9,500, \$7,350) at Market City C, 2 ATM deposits (\$7,960, \$5,490) at Haymarket A – total deposits of \$49,750
39	01.06.2015	IMT of \$49,730 to Offshore Account 2
40	02.06.2015	6 ATM deposits (\$9,950 x 5, \$250) totalling \$50,000 at Paddington A
41	02.06.2015	IMT of \$49,978 to Offshore Account 2
42	04.06.2015	5 ATM deposits (\$9,950 x 4, \$9,750) totalling \$49,550 at Central Park B
43	04.06.2015	IMT of \$49,530 to Offshore Account 2
44	11.06.2015	8 ATM deposits (\$8,300, \$6,350, \$9,350, \$9,850, \$9,400, \$5,800, \$600, \$100) totalling \$49,750 at Leichardt A

ITEM	DATE	TRANSACTION/S
45	11.06.2015	IMT of \$49,730 to Offshore Account 2
46	13.06.2015	2 ATM deposits (\$9,950 x 2) at Haymarket A, 3 ATM deposits (\$9,950, \$9,900, \$9,600) at Market City C – total deposits of \$49,350
47	14.06.2015	IMT of \$49,330 to Offshore Account 2
48	18.06.2015	3 ATM deposits (\$9,950 x 2, \$9,900) at Central Park A, 1 ATM deposit of \$9,950 at Central Park B – total deposits of \$39,750
49	19.06.2015	IMT of \$39,730 to Offshore Account 1
50	19.06.2015	Cash deposit of \$9,950 at Central Park Branch
51	19.06.2015	IMT of \$9,926 to Offshore Account 1
52	21.06.2015	6 ATM deposits (\$9,950 x 4, \$9,850, \$350) totalling \$50,000 at Elizabeth A
53	21.06.2015	IMT of \$49,978 to Offshore Account 2
54	23.06.2015	ATM deposit of \$9,850 at Macquarie Centre, 2 ATM deposits (\$9,950, \$9,550) at Market City C, 3 ATM deposits (\$9,900, \$9,950, \$800) at Haymarket A – total deposits of \$50,000
55	23.06.2015	IMT of \$49,978 to Offshore Account 2
56	29.06.2015	5 ATM deposits (\$9,900 x 2, \$9,950 x 3) totalling \$49,650 at Northbridge B
57	29.06.2015	IMT of \$49,630 to Offshore Account 2
58	30.06.2015	2 ATM deposits (\$9,900, \$9,800) at Northbridge A, ATM deposit of \$9,950 at Northbridge B, 2 ATM deposits (\$9,950, \$400) at Central Park A – total deposits of \$40,000
59	30.06.2015	ATM deposit of \$10,000 at Central Park A
60	30.06.2015	IMT of \$49,978 to Offshore Account 2

SCHEDULE J

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 10 – COMMBANK ACCOUNT 10

ITEM	DATE	TRANSACTION/S
1	04.03.2015	Cash deposit of \$1,039.70 at Ashfield Branch
2	05.03.2015	International Money Transfer (IMT) of \$1,000 to Offshore Account 2
3	17.03.2015	NSW - 2 Automatic Teller Machine (ATM) deposits (\$9,850 x 2) totalling \$19,700 at Central Park B
4	17.03.2015	IMT of \$19,690 to Offshore Account 2
5	31.03.2015	NSW - 2 ATM deposits (\$9,900, \$9,950) totalling \$19,850 at Haymarket B
6	31.03.2015	IMT of \$19,830 to Offshore Account 2
7	30.04.2015	VIC - ATM deposit of \$9,000 at Springvale A
8	30.04.2015	Cash deposit of \$9,000 at Endeavour Hills Branch
9	30.04.2015	IMT of \$17,970 to Offshore Account 2
10	17.06.2015	NSW - ATM deposit of \$2,000 at Paddington A
11	30.06.2015	NSW - 5 ATM deposits (\$9,900 x 2, \$9,850, \$9,950 x 2) totalling \$49,550 at Northbridge B
12	30.06.2015	IMT of \$49,527 to Offshore Account 2

SCHEDULE K

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 11 – COMMBANK ACCOUNT 11

ITEM	DATE	TRANSACTION/S
1	04.03.2015	Cash deposit of \$1,000 at Ashfield Branch
2	05.03.2015	International Money Transfer (IMT) of \$970 to Offshore Account 2
3	26.03.2015	IMT of \$49,478 to Offshore Account 2
4	27.03.2015	NSW - 6 Automatic Teller Machine (ATM) deposits (\$9,850 x 2, \$9,950, \$9,900 x 2, \$50) totalling \$49,500 at Broadway A
5	31.03.2015	IMT of \$49,740 to Offshore Account 2
6	01.04.2015	NSW - 6 ATM deposits (\$9,850 x 2, \$9,900 x 2, \$9,660, \$600) totalling \$49,760 at Market City B
7	01.04.2015	NSW - 6 ATM deposits (\$9,850, \$9,900 x 2, \$9,650, \$8,830, \$1,270) totalling \$49,400 at Market City A
8	01.04.2015	IMT of \$49,380 to Offshore Account 2
9	07.04.2015	NSW - 6 ATM deposits (\$9,950 x 4, \$9,800, \$400) totalling \$50,000 at Leichardt A
10	07.04.2015	IMT of \$49,970 to Offshore Account 2
11	08.04.2015	NSW - 6 ATM deposits (\$9,950 x 4, \$9,850, \$350) totalling \$50,000 at Broadway B
12	08.04.2015	IMT of \$49,970 to Offshore Account 2
13	13.04.2015	Cash deposit of \$1,000 at Ashfield Branch
14	14.04.2015	IMT of \$49,970 to Offshore Account 2
15	15.04.2015	NSW - 5 ATM deposits (\$9,900 x 2, \$9,950 x 2, \$9,300) totalling \$49,000 at Haymarket C
16	15.04.2015	NSW - 7 ATM deposits (\$7,200, \$8,100, \$5,420, \$8,930, \$9,990, \$7,350, \$3,010) totalling \$50,000 at Haymarket B
17	15.04.2015	IMT of \$49,978 to Offshore Account 2

ITEM	DATE	TRANSACTION/S
18	04.05.2015	NSW - 7 ATM deposits (\$1,350, \$6,950, \$8,600, \$8,550, \$8,150, \$8,100, \$4,500) at Central Park B and a deposit of \$3,600 at Central Park A – total deposits of \$49,800
19	04.05.2015	IMT of \$49,820 to Offshore Account 2
20	07.05.2015	IMT of \$49,928 to Offshore Account 2
21	08.05.2015	NSW - 7 ATM deposits (\$9,750, \$9,720, \$8,800, \$9,960, \$5,870, \$5,350, \$500) totalling \$49,950 at Haymarket C
22	16.05.2015	NSW - 8 ATM deposits (\$9,900, \$9,750, \$9,950 x 2, \$9,700, \$350, \$200, \$50) totalling \$49,850 at Ashfield A
23	16.05.2015	IMT of \$49,820 to Offshore Account 2
24	18.05.2015	NSW - 6 ATM deposits (\$9,950 x 2, \$9,850, \$6,930, \$5,090, \$3,170) totalling \$44,940 at Haymarket C
25	18.05.2015	IMT of \$44,920 to Offshore Account 2
26	20.05.2015	NSW - 6 ATM deposits (\$9,950 x 2, \$9,850 x 2, \$9,900, \$500) totalling \$50,000 at MP Leichardt A
27	20.05.2015	IMT of \$49,978 to Offshore Account 2
28	24.05.2015	NSW - 6 ATM deposits (\$9,095, \$9,950 x 2, \$9,850, \$9,750, \$1,350) totalling \$49,945 at Paddington B
29	24.05.2015	IMT of \$49,928 to Offshore Account 2
30	25.05.2015	NSW - 6 ATM deposits (\$9,900 x 2, \$9,950 x 3, \$350) totalling \$50,000 at Central Park B
31	25.05.2015	IMT of \$49,978 to Offshore Account 2
32	27.05.2015	NSW - 5 ATM deposits (\$9,950 x 4, \$9,900) totalling \$49,700 at Broadway A
33	27.05.2015	IMT of \$49,678 to Offshore Account 2
34	28.05.2015	NSW - 7 ATM deposits (\$9,850, \$9,900, \$9,950 x 2, \$9,450, \$700, \$100) totalling \$49,900 at Leichardt A
35	28.05.2015	IMT of \$49,878 to Offshore Account 2
36	01.06.2015	NSW - 1 ATM deposit of \$9,950 at Ashfield B, 5 ATM deposits (\$9,950, \$7,700, \$8,330, \$7,400, \$6,650) at Burwood A – total deposits of \$49,980
37	01.06.2015	IMT of \$49,958 to Offshore Account 2
38	02.06.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,900 x 2, \$350) totalling \$50,000 at Paddington B
39	02.06.2015	IMT of \$49,978 to Offshore Account 2
40	11.06.2015	NSW - 6 ATM deposits (\$9,850, \$8,800, \$9,500, \$9,000, \$9,450, \$3,300) totalling \$49,900 at Ashfield B
41	11.06.2015	IMT of \$49,870 to Offshore Account 2
42	16.06.2015	NSW - 6 ATM deposits (\$9,800, \$9,950 x 3, \$9,650, \$600) totalling \$49,900 at Paddington A
43	16.06.2015	IMT of \$49,883 to Offshore Account 2
44	17.06.2015	NSW - 4 ATM deposits (\$9,900, \$9,950 x 2, \$9,850) totalling \$39,650 at Central Park A

ITEM	DATE	TRANSACTION/S
45	17.06.2015	NSW – ATM deposit of \$10,000 at Central Park A
46	17.06.2015	IMT of \$658 to Offshore Account 3
47	17.06.2015	IMT of \$46,950 to Offshore Account 2
48	29.06.2015	NSW - 5 ATM deposits (\$9,950 x 2, \$9,750, \$9,900 x 2) totalling \$49,450 at Northbridge B
49	29.06.2015	IMT of \$49,978 to Offshore Account 2
50	30.06.2015	NSW - 6 ATM deposits (\$9,950 x 4, \$9,400, \$800) totalling \$50,000 at Northbridge B
51	30.06.2015	IMT of \$49,978 to Offshore Account 2

SCHEDULE L

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 12 – COMMBANK ACCOUNT 12

ITEM	DATE	TRANSACTION/S
1	04.03.2015	Cash deposit of \$975.30 at Ashfield Branch
2	05.03.2015	International Money Transfer (IMT) of \$950 to Offshore Account 2
3	26.03.2015	IMT of \$49,480 to Offshore Account 2
4	27.03.2015	NSW - 6 ATM deposits (\$8,770, \$1,130, \$9,900 x 4) totalling \$49,500 at Broadway B
5	01.04.2015	NSW - 5 ATM deposits (\$9,900 x 4, \$9,750) totalling \$49,350 at Broadway A
6	01.04.2015	IMT of \$49,320 to Offshore Account 2
7	01.04.2015	NSW - 6 ATM deposits (\$9,900 x 2, \$7,280, \$6,520, \$7,400, \$9,000) totalling \$50,000 at Central Park B
8	01.04.2015	NSW - ATM deposit of \$10,000 at Central Park B
9	01.04.2015	IMT of \$49,970 to Offshore Account 2
10	02.04.2015	IMT of \$9,980 to Offshore Account 2
11	07.04.2015	NSW - 5 ATM deposits (\$9,850, \$9,950 x 2, \$9,900, \$9,750) totalling \$49,400 at Market City A
12	07.04.2015	IMT of \$49,390 to Offshore Account 2
13	08.04.2015	NSW - 6 ATM deposits (\$9,950 x 4, \$9,850, \$350) totalling \$50,000 at Market City C
14	08.04.2015	IMT of \$49,970 to Offshore Account 2
15	13.04.2015	Cash deposit of \$1,000 at Ashfield Branch
16	14.04.2015	NSW - 5 ATM deposits (\$9,950, \$9,600, \$9,850 x 2, \$9,750) totalling \$50,000 at Broadway B
17	14.04.2015	IMT of \$49,970 to Offshore Account 2

ITEM	DATE	TRANSACTION/S
18	15.04.2015	NSW - 7 ATM deposits (\$8,290, \$3,920, \$7,740, \$7,850, \$8,050, \$9,300, \$4,850) totalling \$50,000 at Paddington B
19	15.04.2015	IMT of \$49,978 to Offshore Account 2
20	19.04.2015	NSW - 6 ATM deposits (\$7,850, \$9,790, \$9,750, \$9,710, \$9,850, \$3,050) totalling \$50,000 at Broadway A
21	19.04.2015	IMT of \$49,978 to Offshore Account 2
22	04.05.2015	NSW - 6 ATM deposits (\$8,900, \$8,800, \$9,400, \$9,500, \$8,550, \$4,850) totalling \$50,000 at Central Park A
23	04.05.2015	IMT of \$49,978 to Offshore Account 2
24	07.05.2015	NSW - 3 ATM deposits (\$9,900 x 2, \$9,850) at Broadway A and 3 ATM deposits (\$9,900 x 2, \$450) at Broadway B – total deposits of \$49,900
25	07.05.2015	IMT of \$49,878 to Offshore Account 2
26	12.05.2015	NSW - 2 ATM deposits (\$9,310, \$9,950) at Central Park A, 5 ATM deposits (\$9,950, \$4,000, \$3,740, \$6,200, \$7,450) at Central Park B – total deposits of \$50,000
27	12.05.2015	IMT of \$49,978 to Offshore Account 2
28	16.05.2015	NSW - 2 ATM deposits (\$9,950, \$9,900) at Haymarket C, 3 ATM deposits (\$9,950 x 3) at Haymarket A – total deposits of \$49,700
29	16.05.2015	IMT of \$49,670 to Offshore Account 2
30	18.05.2015	NSW - 6 ATM deposits (\$9,900, \$9,950, \$9,750, \$9,700, \$7,270, \$3,410) totalling \$49,980 at Market City A
31	18.05.2015	IMT of \$49,960 to Offshore Account 2
32	21.05.2015	NSW - 2 ATM deposits (\$9,750, \$9,900) at Market City B, 4 ATM deposits (\$9,950 x 3, \$500) at Victoria Ave A – total deposits of \$50,000
33	21.05.2015	IMT of \$49,978 to Offshore Account 2
34	23.05.2015	NSW - 2 ATM deposits (\$9,750, \$9,850) at Central Park A, 4 ATM deposits (\$9,950 x 3, \$55) at Central Park B – total deposits of \$50,000
35	23.05.2015	IMT of \$49,978 to Offshore Account 2
36	25.05.2015	6 ATM deposits (\$9,250, \$9,900 x 3, \$9,800, \$1,100) totalling \$49,850 at 300 Elizabeth A
37	25.05.2015	IMT of \$49,830 to Offshore Account 2
38	27.05.2015	NSW - 3 ATM deposits (\$9,950 x 3) at Paddington B, 3 ATM deposits (\$9,950 x 2, \$250) at Central Park B – total deposits of \$50,000
39	27.05.2015	IMT of \$49,978 to Offshore Account 2
40	28.05.2015	NSW - 7 ATM deposits (\$9,950, \$9,050, \$9,300, \$9,000 x 2, \$2,700, \$1,000) totalling \$50,000 at Surry Hills A
41	28.05.2015	IMT of \$49,978 to Offshore Account 2
42	31.05.2015	NSW – 2 ATM deposits (\$9,900, \$9,950) totalling \$29,850 at Broadway B
43	31.05.2015	NSW – 1 ATM deposit of \$10,000 at Broadway B
44	31.05.2015	IMT of \$49,630 to Offshore Account 2
45	01.06.2015	NSW – 1 ATM deposit of \$9,950 at Broadway B, 1 ATM deposit of \$9,850 at Market City A – total deposits of \$19,800

ITEM	DATE	TRANSACTION/S
46	01.06.2015	NSW - 6 ATM deposits (\$9,800, \$9,850, \$8,820, \$9,300, \$9,700, \$2,530) totalling \$50,000 at Ashfield B
47	01.06.2015	IMT of \$49,978 to Offshore Account 2
48	02.06.2015	NSW - 5 ATM deposits (\$9,950, \$9,900, \$9,800, \$8,350, \$2,000) totalling \$40,000 at Burwood A
49	02.06.2015	NSW - ATM deposit of \$10,000 at Burwood A
50	02.06.2015	IMT of \$49,978 to Offshore Account 2
51	11.06.2015	NSW - 4 ATM deposits (\$9,950 x 2, \$9,670, \$9,600) totalling \$39,170 at Leichardt A
52	11.06.2015	NSW - ATM deposit of \$10,000 at Leichardt A
53	11.06.2015	IMT of \$49,148 to Offshore Account 2
54	13.06.2015	NSW - 3 ATM deposits (\$9,950, \$9,900 x 2) at Elizabeth A, 1 ATM deposit of \$9,750 at Haymarket C – total deposits of \$39,500
55	13.06.2015	NSW – 1 ATM deposit of \$10,200 at Haymarket A
56	14.06.2015	IMT of \$49,680 to Offshore Account 2
57	19.06.2015	NSW - 6 ATM deposits (\$9,800, \$9,150, \$9,800, \$8,400, \$7,050, \$5,550) totalling \$49,750 at Ashfield B
58	19.06.2015	IMT of \$49,730 to Offshore Account 2

SCHEDULE M

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 13 – COMMBANK ACCOUNT 13

ITEM	DATE	TRANSACTION/S
1	26.03.2015	Cash deposit of \$1,000 at Ashfield Branch
2	26.03.2015	International Money Transfer (IMT) of \$970 to Offshore Account 2
3	27.03.2015	Cash deposit of \$900 at Annandale Branch
4	27.03.2015	IMT of \$880 to Offshore Account 1
5	04.05.2015	6 Automatic Teller Machine (ATM) deposits (\$9,950 x 3, \$9,800, \$9,850, \$450) totalling \$49,950 at Central Park A
6	04.05.2015	IMT of \$49,928 to Offshore Account 1
7	07.05.2015	5 ATM deposits (\$9,900 x 2, \$9,850 x 2, \$9,950) totalling \$49,450 at Broadway B
8	07.05.2015	IMT of \$49,420 to Offshore Account 2
9	17.05.2015	4 ATM deposits (\$9,900 x 2, \$9,950, \$8,150) at Ashfield A, 2 ATM deposits (\$9,900, \$2,150) at Ashfield B – total deposits of \$49,950
10	17.05.2015	IMT of \$49,930 to Offshore Account 2
11	18.05.2015	IMT of \$9,930 to Offshore Account 1
12	19.05.2015	ATM deposit of \$9,950 at Broadway A
13	19.05.2015	Cash deposit of \$9,950 at Broadway Branch
14	19.05.2015	2 ATM deposits (\$8,900, \$8,950) at MP Leichardt A, 2 ATM deposits (\$6,100, \$5,950) at Central Park A – total deposits of \$29,900
15	19.05.2015	IMT of \$39,820 to Offshore Account 2
16	24.05.2015	2 ATM deposits (\$9,850, \$9,600) at Central Park B, 4 ATM deposits (\$9,950 x 2, \$9,900, \$650) at Paddington B – total deposits of \$49,900
17	24.05.2015	IMT of \$49,870 to Offshore Account 2
18	27.05.2015	6 ATM deposits (\$9,950 x 3, \$9,900, \$9,650, \$600) totalling \$40,000 at

ITEM	DATE	TRANSACTION/S
		Ashfield B
19	27.05.2015	IMT of \$49,978 to Offshore Account 2
20	28.05.2015	3 ATM deposits (\$9,950 x 3) at Broadway A, 3 ATM deposits (\$9,950 x 2, \$250) at Broadway B - total deposits of \$50,000
21	28.05.2015	IMT of \$49,978 to Offshore Account 1
22	01.06.2015	2 ATM deposits (\$9,950 x 2) at Broadway B, 5 ATM deposits (\$9,900, \$8,600, \$8,650, \$2,710, \$240) at MP Leichardt A – total deposits of \$50,000
23	01.06.2015	IMT of \$49,978 to Offshore Account 2
24	02.06.2015	3 ATM deposits (\$9,850, \$9,950, \$9,600) at Burwood A, 2 ATM deposits (\$8,350, \$2,150) at Strathfield A – total deposits of \$39,900
25	2.06.2015	1 ATM deposit of \$10,000 at Strathfield A
26	02.06.2015	IMT of \$49,888 to Offshore Account 2
27	10.06.2015	1 ATM deposit of \$9,950 at Central Park A, 3 ATM deposits (\$9,950 x 2, \$9,900) at Central Park B - total deposits of \$39,750
28	10.06.2015	IMT of \$49,630 to Offshore Account 2
29	12.06.2015	5 ATM deposits (\$9,750, \$9,950, \$9,500, \$9,700, \$900) totalling \$39,800 at Elizabeth A
30	12.06.2015	ATM deposit of \$10,000 at Elizabeth A
31	12.06.2015	IMT of \$49,770 to Offshore Account 1
32	17.06.2015	ATM deposit of \$2,000 at Paddington A
33	21.06.2015	ATM withdrawal of \$720 at Glebe

SCHEDULE N

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 14 – COMMBANK ACCOUNT 14

ITEM	DATE	TRANSACTION/S
1	26.03.2015	Cash deposit of \$1,000 at Ashfield Branch
2	26.03.2015	International Money Transfer (IMT) of \$968 to Offshore Account 2
3	27.03.2015	2 cash deposits (\$800, \$100) totalling \$900 at Annandale Branch
4	27.03.2015	IMT of \$880 to Offshore Account 1
5	30.03.2015	NSW - 4 Automatic Teller Machine (ATM) deposits (\$9,850, \$9,700 x 2, \$9,900) totalling \$39,150 at Central Park B
6	30.03.2015	NSW - ATM deposit of \$10,250 at Central Park B
7	30.03.2015	IMT of \$49,380 to Offshore Account 2
8	01.04.2015	IMT of \$49,320 to Offshore Account 2
9	02.04.2015	NSW - 5 ATM deposits (\$9,900 x 4, \$9,750) totalling \$49,350 at Broadway A
10	07.04.2015	NSW - 1 ATM deposit of \$9,950 at Broadway A, 1 ATM deposit of \$3,000 at Broadway B, 7 ATM deposits (\$7,050, \$8,600, \$1,400, \$3,600, \$6,400, \$750, \$9,250) at Paddington A – total deposits of \$50,000
11	07.04.2015	IMT of \$49,970 to Offshore Account 1
12	08.04.2015	NSW - 6 ATM deposits (\$9,800, \$9,980, \$9,730, \$9,950 x 2, \$550) totalling \$49,960 at Haymarket B
13	08.04.2015	IMT of \$49,960 to Offshore Account 2
14	09.04.2015	IMT of \$49,970 to Offshore Account 1
15	10.04.2015	NSW - 6 ATM deposits (\$9,950 x 2, \$9,850 x 2, \$9,900, \$500) totalling \$50,000 at Haymarket C
16	10.04.2015	NSW - 6 ATM deposits (\$9,950 x 2, \$9,750, \$9,650, \$9,750, \$450) totalling \$49,500 at Market City A
17	10.04.2015	IMT of \$49,470 to Offshore Account 1

ITEM	DATE	TRANSACTION/S
18	12.04.2015	IMT of \$49,970 to Offshore Account 1
19	13.04.2015	NSW - 4 ATM deposits (\$9,950 x 2, \$9,850, \$9,900) at Paddington A, 2 ATM deposits (\$9,900, \$450) at Paddington B – total deposits of \$50,000
20	13.04.2015	NSW - 6 ATM deposits (\$9,950 x 5, \$250) totalling \$50,000 at Paddington A
21	13.04.2015	IMT of \$49,970 to Offshore Account 1
22	14.04.2015	NSW - 2 ATM deposits (\$9,900, \$9,700) at Market City B, 2 ATM deposits (\$9,650, \$9,950) at Haymarket A, 2 ATM deposits (\$9,700, \$1,100) at Market City C – total deposits of \$50,000
23	14.04.2015	IMT of \$49,978 to Offshore Account 2
24	15.04.2015	NSW - 6 ATM deposits (\$9,950 x 2, \$8,300, \$9,900, \$9,700, \$2,170) totalling \$49,970 at Burwood A
25	15.04.2015	IMT of \$49,970 to Offshore Account 1
26	19.04.2015	NSW – 1 ATM deposit of \$8,010 at Broadway B
27	19.04.2015	IMT of \$49,920 to Offshore Account 2
28	20.04.2015	NSW - 5 ATM deposits (\$9,800, \$9,480, \$9,980, \$8,440, \$4,225) totalling \$49,935 at Broadway B
29	20.04.2015	NSW - 2 ATM deposits (\$8,650, \$8,600) at Central Park A, 4 ATM deposits (\$7,480, \$9,900, \$9,260, \$6,110) at Market City A – total deposits of \$50,000
30	20.04.2015	IMT of \$49,978 to Offshore Account 2
31	16.05.2015	NSW - 1 ATM deposit of \$9,900 at Market City C, 7 ATM deposits (\$9,950 x 2, \$4,030, \$5,970, \$4,570, \$4,160, \$1,400) at Haymarket A – total deposits of \$49,930
32	16.05.2015	IMT of \$49,900 to Offshore Account 2
33	18.05.2015	NSW - 12 ATM deposits (\$3,090, \$6,910, \$3,160, \$6,700 x 2, \$5,150, \$4,720, \$6,220, \$3,850, \$3,400, \$50 x 2) totalling \$50,000 at Market City A
34	18.05.2015	IMT of \$49,978 to Offshore Account 2
35	20.05.2015	IMT of \$49,688 to Offshore Account 2
36	21.05.2015	NSW - 3 ATM deposits (\$9,600, \$9,750 x 2) at Market City C, 3 ATM deposits (\$9,700, \$9,650, \$1,250) at Market City A – total deposits of \$49,700
37	24.05.2015	NSW - 6 ATM deposits (\$9,450, \$9,750, \$9,300, \$9,750, \$9,800, \$1,800) totalling \$49,850 at Paddington A
38	24.05.2015	IMT of \$49,820 to Offshore Account 2
39	27.05.2015	NSW - 6 ATM deposits (\$9,950 x 5, \$250) totalling \$50,000 at Campsie D
40	27.05.2015	IMT of \$49,978 to Offshore Account 2
41	28.05.2015	NSW - 5 ATM deposits (\$9,950 x 2, \$9,500, \$9,900, \$8,000) at Leichardt A, 1 ATM deposit of \$2,700 at Ashfield B – total deposits \$50,000
42	28.05.2015	IMT of \$49,978 to Offshore Account 2
43	01.06.2015	NSW - 3 ATM deposits (\$9,850, \$9,950, \$200) at Broadway B, 3 ATM deposits (\$9,450, \$6,530, \$3,790) at Leichardt A, 1 ATM deposit of \$9,600 at Ashfield B – total deposits of \$49,370

ITEM	DATE	TRANSACTION/S
44	01.06.2015	IMT of \$49,349 to Offshore Account 2
45	02.06.2015	NSW - 7 ATM deposits (\$3,800, \$6,200, \$9,950 x 3, \$9,900, \$250) totalling \$50,000 at Broadway B
46	02.06.2015	IMT of \$49,978 to Offshore Account 2
47	04.06.2015	NSW - 6 ATM deposits (\$9,850 x 2, \$9,950, \$9,900, \$9,700, \$750) totalling \$50,000 at Market City C
48	04.06.2015	IMT of \$49,970 to Offshore Account 1
49	05.06.2015	NSW - 7 ATM deposits (\$9,900 x 2, \$9,950 x 2, \$4,000 x 2, \$2,300) totalling \$50,000 at Paddington B
50	05.06.2015	IMT of \$49,978 to Offshore Account 1
51	11.06.2015	NSW - 7 ATM deposits (\$9,300, \$9,050, \$9,950, \$9,250, \$9,400, \$2,550, \$300) totalling \$49,800 at Ashfield A
52	11.06.2015	IMT of \$49,776 to Offshore Account 2
53	13.06.2015	NSW - 6 ATM deposits (\$9,950, \$9,850, \$9,650, \$9,850, \$9,950, \$500) totalling \$49,750 at Northbridge B
54	13.06.2015	IMT of \$49,740 to Offshore Account 2
55	15.06.2015	NSW - 2 ATM deposits (\$9,950 x 2) totalling \$19,900 at Central Park B
56	15.06.2015	NSW - 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Central Park B
57	15.06.2015	IMT of \$49,870 to Offshore Account 2
58	17.06.2015	NSW - 1 ATM deposit of \$2,000 at Paddington A
59	19.06.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,750, \$9,900, \$500) totalling \$50,000 at Broadway B
60	21.06.2015	IMT of \$46,580 to Offshore Account 2
61	22.06.2015	NSW - 4 ATM deposits (\$9,950 x 4) at Broadway B, 2 ATM deposits (\$9,900, \$300) at Ashfield B – total deposits of \$50,000
62	22.06.2015	IMT of \$49,978 to Offshore Account 3
63	29.06.2015	NSW - 6 ATM deposits (\$9,900, \$9,950 x 4, \$300) totalling \$50,000 at Elizabeth A
64	29.06.2015	IMT of \$49,978 to Offshore Account 2

SCHEDULE O

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 15 – COMMBANK ACCOUNT 15

ITEM	DATE	TRANSACTION/S
1	27.03.2015	Cash deposit of \$900 at Annandale Branch
2	27.03.2015	International Money Transfer (IMT) of \$870 to Offshore Account 1
3	15.04.2015	Cash deposit of \$1,000 at Burwood Branch
4	16.04.2015	IMT of \$970 to Offshore Account 5
5	27.04.2015	NSW - 1 Automatic Teller Machine (ATM) deposit of \$9,950 at Central Park A, 5 ATM deposits (\$9,900 x 2, \$9,850, \$5,700, \$4,600) at Broadway B – total deposits of \$49,900
6	27.04.2015	IMT of \$49,880 to Offshore Account 5
7	04.05.2015	NSW - 5 ATM deposits (\$9,700, \$9,900 x 2, \$9,750, \$3,820) totalling \$43,070 at Burwood A
8	04.05.2015	IMT of \$43,050 to Offshore Account 5
9	19.05.2015	NSW - 1 ATM deposit (\$9,850) at Market City C, 5 ATM deposits (\$9,950, \$9,900 x 2, \$9,950, \$1,200) at Haymarket A – total deposits of \$49,850
10	19.05.2015	IMT of \$49,830 to Offshore Account 1
11	27.05.2015	NSW - 7 ATM deposits (\$7,170, \$2,790, \$9,600, \$9,700, \$9,750, \$9,745, \$1,145) totalling \$49,900 at Strathfield A
12	27.05.2015	IMT of \$49,870 to Offshore Account 5
13	29.05.2015	NSW - 5 ATM deposits (\$9,950 x 5) totalling \$49,750 at Broadway A
14	29.05.2015	IMT of \$49,740 to Offshore Account 1
15	02.06.2015	NSW - 3 ATM deposits (\$9,850, \$8,700, \$1,450) at Ashfield B, 4 ATM deposits (\$9,950, \$9,400, \$8,350, \$2,300) at Burwood A – total deposits of \$50,000
16	02.06.2015	IMT of \$49,000 to Offshore Account 1
17	02.06.2015	IMT of \$950 to Offshore Account 4

ITEM	DATE	TRANSACTION/S
18	04.06.2015	NSW - 3 ATM deposits (\$9,950, \$9,800, \$9,600) at Broadway A, 3 ATM deposits (\$9,950, \$9,850, \$750) at Broadway B – total deposits of \$49,900
19	04.06.2015	IMT of \$49,880 to Offshore Account 1
20	11.06.2015	NSW - 5 ATM deposits (\$9,950 x 5) totalling \$49,750 at Broadway B
21	11.06.2015	IMT of \$49,730 to Offshore Account 1
22	17.06.2015	NSW - 1 ATM deposit of \$2,000 at Surry Hills A
23	21.06.2015	NSW - 6 ATM deposits (\$9,600, \$9,900 x 2, \$9,750, \$700) totalling \$39,850 at MP Leichardt A
24	21.06.2015	NSW – 1 ATM deposit of \$10,000 at MP Leichardt A
25	21.06.2015	IMT of \$1,000 to Offshore Account 8
26	21.06.2015	IMT of \$47,400 to Offshore Account 2
27	29.06.2015	NSW - 2 ATM deposits (\$9,650, \$9,950) at Haymarket B, 4 ATM deposits (\$9,950, \$9,750, \$9,900, \$800) at Haymarket C – total deposits of \$50,000
28	29.06.2015	IMT of \$49,870 to Offshore Account 2
29	30.06.2015	NSW - 6 ATM deposits (\$9,250, \$9,800, \$9,800, \$9,900, \$8,450, \$2,800) totalling \$50,000 at Ashfield A
30	30.06.2015	IMT of \$49,978 to Offshore Account 2

SCHEDULE P

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 17 – COMMBANK ACCOUNT 17

ITEM	DATE	TRANSACTION/S
1	15.04.2015	Cash deposit of \$1,000 at Burwood Branch
2	16.04.2015	International Money Transfer (IMT) of \$970 to Offshore Account 5
3	30.04.2015	Cash deposit of \$9,000 at Chadstone Centre Branch
4	30.04.2015	4 Automatic Teller Machine (ATM) deposits (\$8,830, \$9,900, \$9,950, \$9,800) totalling \$47,480 at Central Park A
5	30.04.2015	IMT of \$47,460 to Offshore Account 5
6	01.05.2015	Cash deposit of \$9,000 at Mitcham Branch
7	04.05.2015	Cash deposit of \$9,000 at Springvale Branch
8	04.05.2015	Cash deposit of \$9,000 at Cranbourne Branch
9	04.05.2015	IMT of \$26,980 to Offshore Account 5
10	07.05.2015	IMT of \$49,820 to Offshore Account 5
11	08.05.2015	NSW - 6 ATM deposits (\$9,950 x 2, \$9,750, \$9,650, \$9,900, \$650) totalling \$49,850 at Market City A
12	08.05.2015	Cash deposit of \$9,000 at Mitcham Branch
13	16.05.2015	NSW - 4 ATM deposits (\$9,800, \$9,900, \$9,950 x 2) at Market City A, 1 ATM deposit of \$750 at Market City C – total deposits of \$49,350
14	16.05.2015	IMT of \$49,330 to Offshore Account 5
15	18.05.2015	NSW - 1 ATM deposit of \$9,850 at Central Park A, 5 ATM deposits (\$9,950 x 2, \$9,750, \$9,900, \$450) at Central Park B – total deposits of \$49,850
16	18.05.2015	IMT of \$49,830 to Offshore Account 5
17	20.05.2015	NSW - 7 ATM deposits (\$9,300, \$9,950, \$8,950, \$9,700, \$9,350, \$2,600, \$130) totalling \$49,980 at Ashfield A
18	20.05.2015	IMT of \$49,960 to Offshore Account 5

ITEM	DATE	TRANSACTION/S
19	24.05.2015	NSW - 6 ATM deposits (\$9,850, \$9,800, \$8,850, \$8,050, \$1,100, \$250) totalling \$37,900 at Ashfield A
20	24.05.2015	ATM deposit of \$12,000 at Ashfield A
21	24.05.2015	IMT of \$49,860 to Offshore Account 5
22	27.05.2015	IMT of \$49,860 to Offshore Account 5
23	28.05.2015	NSW - 8 ATM deposits (\$9,750, \$5,290, \$5,840, \$8,470, \$7,240, \$4,470, \$5,460, \$3,360) totalling \$49,880 at Market City A
24	29.05.2015	VIC - ATM deposit of \$8,000 at Keysborough A
25	31.05.2015	IMT of \$47,645 to Offshore Account 5
26	01.06.2015	NSW - 2 ATM deposits (\$9,950 x 2) at Market City B, 2 ATM deposits (\$9,800, \$9,950) at Market City A – total deposits of \$39,650
27	02.06.2015	ATM deposit of \$9,950 at Central Park A
28	02.06.2015	IMT of \$4,933 to Offshore Account 2
29	02.06.2015	IMT of \$4,970 to Offshore Account 4
30	07.06.2015	VIC - ATM deposit of \$8,300 at Springvale A
31	10.06.2015	NSW - 4 ATM deposits (\$9,950 x 4) totalling \$39,800 at Broadway A
32	10.06.2015	IMT of \$48,078 to Offshore Account 2
33	13.06.2015	NSW - 6 ATM deposits (\$9,950 x 2, \$9,850, \$9,900 x 2, \$200) totalling \$49,750 at Northbridge A
34	13.06.2015	IMT of \$49,730 to Offshore Account 2
35	15.06.2015	VIC - ATM deposit of \$9,000 at Keysborough B
36	17.06.2015	NSW - ATM deposit of \$2,000 at Surry Hills A
37	19.06.2015	IMT of \$600 to Offshore Account 3
38	19.06.2015	IMT of \$1,000 to Offshore Account 7
39	19.06.2015	Cash deposit of \$9,000 at Haymarket Branch
40	19.06.2015	IMT of \$9,000 to Offshore Account 2
41	29.06.2015	NSW - 2 ATM deposits (\$9,900, \$9,950) at Broadway B, 3 ATM deposits (\$9,900, \$9,950, \$300) at MP Leichardt A – total deposits of \$40,000
42	29.06.2015	IMT of \$49,170 to Offshore Account 2
43	30.06.2015	NSW - 6 ATM deposits (\$9,850 x 2, \$9,900, \$9,950 x 2, \$500) totalling \$50,000 at WF Eastgardens A
44	30.06.2015	IMT of \$49,978 to Offshore Account 2

SCHEDULE Q

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

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OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 18 – COMMBANK ACCOUNT 18

ITEM	DATE	TRANSACTION/S
1	15.04.2015	Cash deposit of \$1,000 at Burwood Branch
2	16.04.2015	International Money Transfer (IMT) of \$970 to Offshore Account 5
3	04.05.2015	VIC - 2 Automatic Teller Machine (ATM) deposits (\$9,000 x 2) totalling \$18,000 at Chadstone Ct A
4	04.05.2015	IMT of \$17,980 to Offshore Account 5
5	07.05.2015	IMT of \$49,870 to Offshore Account 5
6	08.05.2015	NSW - 6 ATM deposits (\$9,950, \$9,900 x 2, \$9,800, \$9,750, \$600) totalling \$49,900 at Haymarket A
7	16.05.2015	NSW - 5 ATM deposits (\$9,950 x 5) totalling \$49,750 at Market City B
8	16.05.2015	IMT of \$49,730 to Offshore Account 5
9	18.05.2015	IMT of \$49,970 to Offshore Account 5
10	19.05.2015	NSW – 1 ATM deposit (\$9,950) at Paddington A, 5 ATM deposits (\$9,950 x 2, \$9,900, \$7,450, \$2,800) at Paddington B – total deposits of \$50,000
11	20.05.2015	NSW - 6 ATM deposits (\$9,950 x 5, \$250) totalling \$50,000 at Ashfield B
12	20.05.2015	IMT of \$49,970 to Offshore Account 5
13	25.05.2015	NSW - 6 ATM deposits (\$9,950, \$5,470, \$6,400, \$7,900, \$9,900, \$5,200) at Haymarket C and 1 ATM deposit of \$5,180 at Haymarket B – total deposits of \$50,000
14	25.05.2015	IMT of \$49,970 to Offshore Account 5
15	27.05.2015	NSW - 6 ATM deposits (\$9,800, \$9,950 x 3, \$9,850, \$500) totalling \$50,000 at MP Leichardt A
16	27.05.2015	IMT of \$49,978 to Offshore Account 5
17	29.05.2015	VIC - 1 ATM deposit of \$9,000 at Keysborough A

ITEM	DATE	TRANSACTION/S
18	31.05.2015	IMT of \$49,000 to Offshore Account 5
19	01.06.2015	NSW - 5 ATM deposits (\$9,950 x 2, \$8,500, \$9,850, \$1,750) totalling \$40,000 at Market City A
20	02.06.2015	NSW - 1 ATM deposit of \$9,950 at Central Park A
21	02.06.2015	IMT of \$4,942 to Offshore Account 2
22	02.06.2015	IMT of \$4,700 to Offshore Account 4
23	10.06.2015	NSW - 5 ATM deposits (\$9,900 x 3, \$9,950 x 2,) totalling \$49,600 at Central Park A
24	10.06.2015	IMT of \$49,850 to Offshore Account 2
25	13.06.2015	VIC - ATM deposit of \$8,000 at Keysborough B
26	14.06.2015	NSW - 3 ATM deposits (\$9,950 x 2, \$9,850) totalling \$29,750 at Central Park B
27	14.06.2015	NSW - ATM deposit of \$10,000 at Central Park B
28	14.06.2015	IMT of \$47,726 to Offshore Account 2
29	15.06.2015	VIC - 1 ATM deposit of \$8,500 at Keysborough B
30	16.06.2015	NSW - 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Central Park A
31	16.06.2015	IMT of \$48,470 to Offshore Account 2
32	17.06.2015	NSW - ATM deposit of \$2,000 at Paddington A
33	19.06.2015	IMT of \$600 to Offshore Account 3
34	19.06.2015	IMT of \$600 to Offshore Account 8
35	19.06.2015	Cash deposit of \$4,000 at Chinatown Branch
36	21.06.2015	NSW - 2 ATM deposits (\$9,950, \$9,750) at Market City C, 3 ATM deposits (\$9,700, \$9,950, \$5,750) at Market City A – total deposits of \$45,100
37	21.06.2015	IMT of \$49,090 to Offshore Account 2
38	29.06.2015	NSW - 6 ATM deposits (\$9,950, \$9,850 x 2, \$9,800, \$9,750, \$800) totalling \$50,000 at Ashfield B
39	29.06.2015	IMT of \$49,978 to Offshore Account 2
40	30.06.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,750, \$9,850, \$500) totalling \$49,950 at Broadway B
41	30.06.2015	IMT of \$49,950 to Offshore Account 2

SCHEDULE R

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

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OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 19 – COMMBANK ACCOUNT 19

ITEM	DATE	TRANSACTION/S
1	28.05.2015	Automatic Teller Machine (ATM) deposit of \$800 at Market City B
2	28.05.2015	International Money Transfer (IMT) of \$770 to Offshore Account 2
3	01.06.2015	NSW - 3 ATM deposits (\$9,900 x 2, \$9,850) at 300 Elizabeth A, 3 ATM deposits (\$9,950, \$9,850, \$550) at Market City C – total deposits of \$50,000
4	01.06.2015	IMT of \$49,978 to Offshore Account 2
5	13.06.2015	NSW - 3 ATM deposits (\$9,900 x 2, \$9,950) at Northbridge A, 2 ATM deposits (\$9,900, \$9,950) at Northbridge B – total deposits of \$49,600
6	13.06.2015	IMT of \$49,570 to Offshore Account 2
7	17.06.2015	ATM deposit of \$2,000 at Paddington A
8	19.06.2015	IMT of \$600 to Offshore Account 3
9	19.06.2015	IMT of \$600 to Offshore Account 7
10	29.06.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,850, \$9,900, \$400) totalling \$50,000 at Broadway B
11	29.06.2015	IMT of \$49,978 to Offshore Account 2
12	30.06.2015	NSW - 7 ATM deposits (\$2,240, \$4,000, \$3,760, \$9,900, \$9,850, \$9,250, \$9,950) at MP Leichardt A, 1 ATM deposit of \$1,050 at Mascot A – total deposits of \$50,000
13	30.06.2015	IMT of \$49,978 to Offshore Account 2

SCHEDULE S

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 20 – COMMBANK ACCOUNT 20

ITEM	DATE	TRANSACTION/S
1	30.06.2015	NSW - Automatic Teller Machine (ATM) deposit of \$2,000 at Central Park B
2	30.06.2015	International Money Transfer (IMT) of \$1,970 to Offshore Account 8
3	06.07.2015	NSW - 1 ATM deposit of \$9,950 at Market City A, 2 ATM deposits (\$9,950, \$9,900) at Market City C, 1 ATM deposit of \$9,950 at Central Park A, 2 ATM deposits (\$9,900, \$350) at Central Park B – total deposits of \$50,000
4	06.07.2015	IMT of \$49,978 to Offshore Account 8
5	07.07.2015	NSW - 6 ATM deposits (\$9,850, \$9,950 x 4, \$350) totalling \$50,000 at Paddington A
6	07.07.2015	IMT of \$49,978 to Offshore Account 8
7	10.07.2015	NSW - 1 ATM deposit of \$9,900 at Central Park B, 2 ATM deposits (\$9,950 x 2) at Market City A, 2 ATM deposits (\$9,950 x 2) at Haymarket A – total deposits of \$49,700
8	10.07.2015	IMT of \$49,678 to Offshore Account 8
9	13.07.2015	NSW - 1 ATM deposit of \$9,950 at Central Park B, 3 ATM deposits (\$9,950 x 2, \$9,900) at Haymarket B – total deposits of \$39,750
10	13.07.2015	NSW – 1 ATM deposit of \$10,000 at Haymarket B
11	13.07.2015	IMT of \$49,730 to Offshore Account 8
12	14.07.2015	NSW - 5 ATM deposits (\$9,950 x 4, \$9,900) totalling \$49,700 at Bondi Junction A
13	14.07.2015	IMT of \$49,648 to Offshore Account 8
14	15.07.2015	NSW - 6 ATM deposits (\$9,950, \$9,300, \$9,350, \$9,650, \$8,200, \$3,500) totalling \$49,950 at Broadway B
15	15.07.2015	IMT of \$49,958 to Offshore Account 8
16	16.07.2015	NSW - 2 ATM deposits (\$9,850 x 2) at Market City C and 2 deposits

ITEM	DATE	TRANSACTION/S
		(\$9,950, \$9,900) at Haymarket C – total deposits of \$39,550
17	16.07.2015	IMT of \$39,530 to Offshore Account 8
18	27.07.2015	NSW - 6 ATM deposits (\$9,850 x 2, \$9,950 x 2, \$5,400, \$4,900) totalling \$49,900 at Broadway B
19	28.07.2015	IMT of \$49,878 to Offshore Account 8
20	04.08.2015	NSW - 4 ATM deposits (\$9,950 x 2, \$9,900 x 2) at Paddington A, 2 ATM deposits (\$9,900, \$400) at Paddington B – total deposits of \$50,000
21	04.08.2015	IMT of \$49,978 to Offshore Account 8
22	07.08.2015	NSW - 5 ATM deposits (\$9,900 x 2, \$9,800, \$9,950, \$9,650) totalling \$49,200 at Market City B
23	07.08.2015	IMT of \$49,170 to Offshore Account 8
24	10.08.2015	NSW - 6 ATM deposits (\$9,850 x 2, \$9,900 x 3, \$600) totalling \$50,000 at Surry Hills A
25	10.08.2015	IMT of \$49,978 to Offshore Account 8
26	19.08.2015	NSW - 5 ATM deposits (\$9,900, \$9,850 x 2, \$9,700, \$9,950) totalling \$49,250 at Broadway A
27	19.08.2015	IMT of \$49,230 to Offshore Account 8
28	20.08.2015	NSW - 2 ATM deposits (\$9,900 x 2) at Market City C, 3 ATM deposits (\$9,950 x 2, \$9,900) at Market City A – total deposits of \$49,600
29	20.08.2015	IMT of \$49,580 to Offshore Account 8
30	21.08.2015	NSW - 3 ATM deposits (\$9,800, \$9,950 x 2) at Ashfield B, 2 ATM deposits (\$9,950 x 2) at Burwood A – total deposits of \$49,600
31	21.08.2015	IMT of \$49,580 to Offshore Account 8
32	23.08.2015	NSW - 3 ATM deposits (\$9,950 x 2, \$9,900) at Broadway A, 1 ATM deposit of \$9,950 at Market City A – total deposits of \$39,750
33	23.08.2015	IMT of \$49,230 to Offshore Account 8
34	24.08.2015	1 ATM deposit of \$800 at Market City A, 2 ATM deposits (\$4,950, \$3,750) at Market City B – total deposits of \$9,500
35	24.08.2015	NSW - 3 ATM deposits (\$9,850, \$9,950 x 2) at Market City B, 2 ATM deposits (\$9,900, \$9,950) at Market City A – total deposits of \$49,600
36	24.08.2015	IMT of \$49,580 to Offshore Account 8

SCHEDULE T

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 21 – COMMBANK ACCOUNT 21

ITEM	DATE	TRANSACTION/S
1	10.07.2015	NSW - Automatic Teller Machine (ATM) deposit of \$4,050 at Haymarket A
2	10.07.2015	International Money Transfer (IMT) of \$4,020 to Offshore Account 8
3	14.07.2015	NSW - 5 ATM deposits (\$9,950, \$9,900, \$9,950, \$9,800, \$9,950) totalling \$49,550 at Central Park B
4	14.07.2015	IMT of \$49,530 to Offshore Account 8
5	15.07.2015	NSW - 4 ATM deposits (\$9,900, \$9,950 x 2, \$9,850) totalling \$39,650 at Market City B
6	15.07.2015	IMT of \$39,626 to Offshore Account 8
7	21.07.2015	NSW - 4 ATM deposits (\$9,950 x 4) totalling \$39,800 at Broadway B
8	21.07.2015	IMT of \$49,430 to Offshore Account 8
9	26.07.2015	NSW - 3 ATM deposits (\$9,950 x 2, \$9,900) at Surry Hills A, 3 ATM deposits (\$9,850, \$9,950, \$400) at Elizabeth A – total deposits of \$50,000
10	27.07.2015	IMT of \$49,978 to Offshore Account 8
11	27.07.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,900, \$9,700, \$550) totalling \$50,000 at Surry Hills A
12	28.07.2015	IMT of \$49,978 to Offshore Account 8
13	04.08.2015	NSW - 6 ATM deposits (\$9,750 x 2, \$9,950 x 2, \$7,000, \$2,600) totalling \$49,000 at Paddington A
14	04.08.2015	IMT of \$48,978 to Offshore Account 8
15	07.08.2015	NSW - 6 ATM deposits (\$9,800, \$9,850, \$9,950 x 2, \$9,750, \$650) totalling \$49,950 at Market City B
16	07.08.2015	IMT of \$49,920 to Offshore Account 8
17	10.08.2015	NSW - 6 ATM deposits (\$9,900, \$9,950 x 2, \$9,850 x 2, \$450) at Paddington A, 1 ATM deposit of \$50 at Broadway B – total deposits of

ITEM	DATE	TRANSACTION/S
		\$50,000
18	10.08.2015	IMT of \$49,978 to Offshore Account 8
19	19.08.2015	NSW - 4 ATM deposits (\$9,900 x 2, \$9,950 x 2) at Surry Hills B, 2 ATM deposits (\$9,950, \$350) at Surry Hills A – total deposits of \$50,000
20	19.08.2015	IMT of \$49,978 to Offshore Account 8
21	20.08.2015	NSW - 6 ATM deposits (\$9,850, \$9,950 x 2, \$9,900 x 2, \$350) totalling \$49,900 at Surry Hills A
22	20.08.2015	IMT of \$49,880 to Offshore Account 8
23	21.08.2015	NSW - 6 ATM deposits (\$9,950, \$9,900, \$9,950, \$9,950, \$9,950, \$300) totalling \$50,000 at Campsie D
24	21.08.2015	IMT of \$49,978 to Offshore Account 8
25	24.08.2015	NSW - 1 ATM deposit of \$9,950 at Mascot A, 5 ATM deposits (\$9,900, \$9,950 x 3, \$300) at WF Eastgardens A – total deposits of \$50,000

SCHEDULE U

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 22 – COMMBANK ACCOUNT 22

ITEM	DATE	TRANSACTION/S
1	10.07.2015	Automatic Teller Machine (ATM) deposit of \$1,100 at Central Park B
2	10.07.2015	International Money Transfer (IMT) of \$1,070 to Offshore Account 13
3	14.07.2015	3 ATM deposits (\$9,950 x 2, \$9,900) at Market City C, 3 ATM deposits (\$9,950 x 2, \$300) at Market City B – total deposits of \$50,000
4	14.07.2015	IMT of \$49,978 to Offshore Account 13
5	07.08.2015	8 ATM deposits (\$4,000 x 2, \$2,000, \$9,900 x 2, \$9,950 x 2, \$300) totalling \$50,000 at Paddington A
6	07.08.2015	IMT of \$49,978 to Offshore Account 13
7	10.08.2015	4 ATM deposits (\$4,000 x 2, \$3,960, \$7,140) totalling \$19,100 at Broadway B
8	10.08.2015	IMT of \$19,080 to Offshore Account 13
9	19.08.2015	5 ATM deposits (\$9,650, \$9,950 x 3, \$9,900) totalling \$49,400 at Broadway B
10	19.08.2015	IMT of \$49,370 to Offshore Account 13
11	20.08.2015	6 ATM deposits (\$9,890, \$9,950 x 2, \$9,800, \$9,900, \$510) totalling \$50,000 at MP Leichardt A
12	20.08.2015	IMT of \$49,978 to Offshore Account 13
13	24.08.2015	6 ATM deposits (\$9,850, \$9,800 x 2, \$9,950 x 2, \$400) totalling \$49,750 at Ashfield B
14	24.08.2015	IMT of \$49,740 to Offshore Account 13

SCHEDULE V

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 23 – COMMBANK ACCOUNT 23

ITEM	DATE	TRANSACTION/S
1	28.07.2015	Automatic Teller Machine (ATM) deposit of \$1,400 at Market City C
2	28.07.2015	International Money Transfer (IMT) of \$1,370 to Offshore Account 8
3	04.08.2015	IMT of \$49,978 to Offshore Account 8
4	05.08.2015	NSW - 6 ATM deposits (\$9,900 x 2, \$9,850, \$9,250, \$9,950, \$1,200) totalling \$50,050 at Ashfield A
5	07.08.2015	NSW - 6 ATM deposits (\$9,880, \$9,250, \$9,550, \$9,950, \$7,750, \$3,460) totalling \$49,840 at Ashfield B
6	07.08.2015	IMT of \$49,870 to Offshore Account 8
7	10.08.2015	NSW - 5 ATM deposits (\$9,950 x 3, \$9,900 x 2) totalling \$49,650 at Broadway B
8	10.08.2015	IMT of \$49,620 to Offshore Account 8
9	19.08.2015	NSW - 5 ATM deposits (\$9,950 x 2, \$9,900 x 2, \$9,850) at Paddington A, 1 ATM deposit of \$450 at Paddington B – total deposits of \$50,000
10	19.08.2015	IMT of \$49,978 to Offshore Account 8
11	20.08.2015	NSW - 5 ATM deposits (\$9,950 x 3, \$9,850, \$9,900) at Paddington A, 1 ATM deposit of \$400 at Surry Hills A – total deposits of \$50,000
12	20.08.2015	IMT of \$49,978 to Offshore Account 8
13	21.08.2015	NSW - 6 ATM deposits (\$9,950 x 4, \$9,900, \$300) totalling \$50,000 at Strathfield A
14	21.08.2015	IMT of \$49,978 to Offshore Account 8

SCHEDULE W

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 24 – COMMBANK ACCOUNT 24

ITEM	DATE	TRANSACTION/S
1	10.07.2015	NSW - Automatic Teller Machine (ATM) deposit of \$1,050 at Burwood A
2	10.07.2015	International Money Transfer (IMT) of \$1,020 to Offshore Account 4
3	14.07.2015	NSW - ATM deposit of \$950 at Paddington A
4	15.07.2015	IMT of \$930 to Offshore Account 13
5	21.07.2015	NSW - 3 ATM deposits (\$2,280, \$3,960, \$3,700) at Broadway A, 5 ATM deposits (\$3,990, \$9,950 x 2, \$9,850, \$6,320) at Broadway B – total deposits of \$50,000
6	21.07.2015	IMT of \$49,978 to Offshore Account 13
7	27.07.2015	NSW - 5 ATM deposits (\$9,500, \$9,950 x 2, \$9,750, \$9,450) at Broadway B, 1 ATM deposit of \$1,450 at Broadway A – total deposits of \$50,050
8	27.07.2015	IMT of \$49,978 to Offshore Account 13
9	07.08.2015	NSW - 2 ATM deposits (\$9,950, \$9,900) at Market City C, 4 ATM deposits (\$9,900 x 2, \$9,950, \$250) at Surry Hills A – total deposits of \$49,850
10	07.08.2015	IMT of \$49,878 to Offshore Account 13
11	19.08.2015	IMT of \$49,520 to Offshore Account 13
12	20.08.2015	NSW - 5 ATM deposits (\$9,950 x 3, \$9,800, \$9,900) totalling \$49,550 at Ashfield A
13	20.08.2015	NSW - 5 ATM deposits (\$9,950 x 4, \$9,900) totalling \$49,700 at Broadway B
14	20.08.2015	IMT of \$49,680 to Offshore Account 13
15	21.08.2015	NSW - 4 ATM deposits (\$9,850 x 2, \$9,950, \$9,900) totalling \$39,550 at Broadway B
16	21.08.2015	NSW – 1 ATM deposit of \$10,000 at Broadway B
17	21.08.2015	IMT of \$49,530 to Offshore Account 13

ITEM	DATE	TRANSACTION/S
18	23.08.2015	IMT of \$49,630 to Offshore Account 13
19	24.08.2015	NSW - 4 ATM deposits (\$9,950 x 3, \$9,900) at Paddington A, 1 ATM deposit of \$9,900 at Paddington B – total deposits of \$49,650
20	24.08.2015	NSW - 5 ATM deposits (\$9,600 x 3, \$9,700, \$9,950) totalling \$48,450 at Ashfield B
21	24.08.2015	IMT of \$48,430 to Offshore Account 13

SCHEDULE X

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 25 – COMMBANK ACCOUNT 25

ITEM	DATE	TRANSACTION/S
1	22.07.2015	Automatic Teller Machine (ATM) deposit of \$940 at Market City B
2	22.07.2015	International Money Transfer (IMT) of \$913 to Offshore Account 8
3	26.07.2015	7 ATM deposits (\$9,800 x 2, \$9,950, \$9,900 x 2, \$600, \$50) totalling \$50,000 at Paddington B
4	26.07.2015	IMT of \$49,978 to Offshore Account 8
5	27.07.2015	6 ATM deposits (\$9,950 x 3, \$9,850 x 2, \$450) totalling \$50,000 at Broadway B
6	28.07.2015	IMT of \$49,978 to Offshore Account 8
7	04.08.2015	7 ATM deposits (\$9,800, \$9,900 x 2, \$9,700, \$9,850, \$800, \$50) totalling \$50,000 at 300 Elizabeth A
8	04.08.2015	IMT of \$49,978 to Offshore Account 8
9	07.08.2015	3 ATM deposits (\$9,850 x 2, \$9,950) at Market City B, 2 ATM deposits (\$9,950 x 2) at Haymarket C, 1 ATM deposit of \$500 at Haymarket B – total deposits of \$50,050
10	07.08.2015	IMT of \$49,978 to Offshore Account 8
11	10.08.2015	5 ATM deposits (\$9,950 x 4, \$9,900) totalling \$49,700 at Broadway B
12	10.08.2015	IMT of \$49,730 to Offshore Account 8
13	19.08.2015	4 ATM deposits (\$9,950 x 2, \$9,900 x 2) at Surry Hills A, 2 ATM deposits (\$9,950, \$350) at Surry Hills B – total deposits of \$50,000
14	19.08.2015	IMT of \$49,978 to Offshore Account 8
15	20.08.2015	6 ATM deposits (\$9,850 x 3, \$9,800, \$9,900, \$750) totalling \$49,730 at Paddington A
16	20.08.2015	IMT of \$49,978 to Offshore Account 8
17	21.08.2015	6 ATM deposits (\$9,950 x 4, \$9,800, \$400) totalling \$50,000 at Burwood A
18	21.08.2015	IMT of \$49,978 to Offshore Account 8

SCHEDULE Y

FEDERAL COURT OF AUSTRALIA

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TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 26 – COMMBANK ACCOUNT 26

ITEM	DATE	TRANSACTION/S
1	10.07.2015	NSW - Automatic Teller Machine (ATM) deposit of \$1,600 at Central Park B
2	14.07.2015	NSW - ATM deposit of \$1,000 at Paddington A
3	15.07.2015	IMT of \$972 to Offshore Account 8
4	24.07.2015	NSW - 2 ATM deposits (\$7,490, \$4,830) at Haymarket A, 2 ATM deposits (\$7,950, \$5,600) at Broadway B, 2 ATM deposits (\$4,300, \$7,100) at Market City C, 1 ATM deposit of \$9,900 at Market City B – total deposits of \$47,170
5	24.07.2015	IMT of \$48,750 to Offshore Account 8
6	26.07.2015	NSW - 5 ATM deposits (\$3,880, \$4,000, \$2,960, \$3,940, \$9,800) at Elizabeth A, 3 ATM deposits (\$9,900 x 2, \$5,470) at Paddington A – total deposits of \$49,850
7	27.07.2015	IMT of \$49,830 to Offshore Account 8
8	27.07.2015	NSW - 6 ATM deposits (\$9,850 x 2, \$9,800, \$9,900, \$9,950, \$650) totalling \$50,000 at Broadway B
9	28.07.2015	IMT of \$49,978 to Offshore Account 8
10	04.08.2015	NSW - 5 ATM deposits (\$9,600 x 2, \$9,850 x 2, \$9,900) at Ashfield B – total deposits of \$48,800
11	04.08.2015	IMT of \$49,678 to Offshore Account 8
12	05.08.2015	NSW – 2 ATM deposits (\$9,900, \$9,600) at Ashfield B, 1 ATM deposit of \$900 at Ashfield A – total deposits \$20,400
13	07.08.2015	NSW - 5 ATM deposits (\$9,850 x 2, \$9,950, \$9,800, \$450) totalling \$39,900 at Ashfield B
14	07.08.2015	IMT of \$39,870 to Offshore Account 8
15	10.08.2015	NSW - 5 ATM deposits (\$9,950 x 4, \$9,700) totalling \$49,500 at Ashfield B

ITEM	DATE	TRANSACTION/S
16	10.08.2015	IMT of \$49,480 to Offshore Account 8
17	19.08.2015	NSW - 6 ATM deposits (\$9,900, \$9,950 x 2, \$9,800, \$9,850, \$550) totalling \$50,000 at Paddington A
18	19.08.2015	IMT of \$49,978 to Offshore Account 8
19	20.08.2015	NSW - 5 ATM deposits (\$4,000 x 3, \$6,000, \$2,000) at Broadway B, 4 deposits (\$9,900, \$9,950, \$9,750, \$400) at Broadway A – total deposits of \$50,000
20	20.08.2015	IMT of \$49,978 to Offshore Account 8
21	21.08.2015	NSW - 6 ATM deposits (\$9,950 x 5, \$250) totalling \$50,000 at Five Dock A
22	21.08.2015	IMT of \$49,978 to Offshore Account 8

SCHEDULE Z

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 27 – COMMBANK ACCOUNT 27

ITEM	DATE	TRANSACTION/S
1	22.07.2015	NSW - Automatic Teller Machine (ATM) deposit of \$1,380 at Market City B
2	22.07.2015	International Money Transfer (IMT) of \$1,350 to Offshore Account 8
3	26.07.2015	NSW - 3 ATM deposits (\$9,500, \$9,950, \$550) totalling \$20,000 at Surry Hills A
4	27.07.2015	NSW - 4 ATM deposits (\$9,800, \$9,950, \$9,600, \$650) totalling \$30,000 at Paddington A
5	27.07.2015	IMT of \$49,978 to Offshore Account 8
6	04.08.2015	NSW - 4 ATM deposits (\$9,800 x 2, \$9,700, \$750) at Ashfield B – total deposits of \$30,050
7	04.08.2015	NSW – 1 ATM deposit of \$10,000 at Ashfield B
8	04.08.2015	IMT of \$49,978 to Offshore Account 8
9	05.08.2015	NSW - 1 ATM deposit of \$9,950 at Ashfield A
10	07.08.2015	NSW - 5 ATM deposits (\$9,950 x 5) totalling \$49,750 at Broadway B
11	07.08.2015	IMT of \$49,720 to Offshore Account 8
12	10.08.2015	NSW - 5 ATM deposits (\$9,800 x 2, \$9,950, \$9,900 x 2) totalling \$49,350 at Broadway A
13	10.08.2015	IMT of \$49,330 to Offshore Account 8
14	19.08.2015	NSW - 6 ATM deposits (\$9,900 x 2, \$9,850 x 2, \$9,950, \$550) totalling \$50,000 at Surry Hills A
15	19.08.2015	IMT of \$49,978 to Offshore Account 8
16	20.08.2015	NSW - 6 ATM deposits (\$9,950 x 3, \$9,900, \$9,850, \$400) totalling \$50,000 at Broadway A
17	20.08.2015	IMT of \$49,978 to Offshore Account 8

ITEM	DATE	TRANSACTION/S
18	21.08.2015	NSW - 6 ATM deposits (\$9,900 x 2, \$9,950 x 3, \$350) totalling \$50,000 at Campsie D
19	21.08.2015	IMT of \$49,978 to Offshore Account 8
20	24.08.2015	NSW - ATM deposit of \$9,950 at Eastgardens A

SCHEDULE AA

FEDERAL COURT OF AUSTRALIA

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Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 28 – COMMBANK ACCOUNT 28

ITEM	DATE	TRANSACTION/S
1	22.07.2015	NSW - Automatic Teller Machine (ATM) deposit of \$1,020 at Bondi Junction A
2	22.07.2015	International Money Transfer (IMT) of \$990 to Offshore Account 13
3	26.07.2015	NSW - 8 ATM deposits (\$9,900 x 3, \$9,950, \$9,800, \$400, \$100, \$50) totalling \$50,000 at Paddington B
4	26.07.2015	IMT of \$49,978 to Offshore Account 13
5	07.08.2015	NSW - 4 ATM deposits (\$9,800 x 2, \$9,900, \$9,950) at Paddington A, 2 ATM deposits (\$9,950, \$600) at Paddington B - total deposits of \$50,000
6	07.08.2015	IMT of \$49,978 to Offshore Account 13
7	10.08.2015	NSW - 1 ATM deposit of \$9,950 at Market City B, 2 ATM deposits (\$9,950, \$9,900) at Haymarket B, 2 ATM deposits (\$9,850, \$9,950) at Market City A – total deposits of \$49,600
8	10.08.2015	IMT of \$49,570 to Offshore Account 13
9	19.08.2015	IMT of \$49,430 to Offshore Account 13
10	20.08.2015	NSW - 4 ATM deposits (\$9,900 x 2, \$9,950, \$9,800) at Ashfield A, 1 ATM deposit of \$9,900 at Burwood A – total deposits of \$49,450
11	20.08.2015	NSW - 4 ATM deposits (\$9,950 x 2, \$7,550, \$6,500) totalling \$33,950 at Broadway A
12	20.08.2015	IMT of \$33,940 to Offshore Account 13
13	21.08.2015	NSW - 5 ATM deposits (\$9,950 x 2, \$9,900, \$9,850 x 2) totalling \$49,500 at Burwood A
14	21.08.2015	IMT of \$49,470 to Offshore Account 13
15	23.08.2015	IMT of \$49,680 to Offshore Account 13
16	24.08.2015	NSW - 5 ATM deposits (\$9,950 x 4, \$9,900) totalling \$49,700 at Paddington B

ITEM	DATE	TRANSACTION/S
17	24.08.2015	NSW - 5 ATM deposits (\$9,950 x 3, \$9,900, \$9,850) totalling \$49,600 at Elizabeth A
18	24.08.2015	IMT of \$49,570 to Offshore Account 13

SCHEDULE AB

FEDERAL COURT OF AUSTRALIA

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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 29 – COMMBANK ACCOUNT 29

ITEM	DATE	TRANSACTION/S
1	11.06.2015	Cash deposit of \$5 at Ivanhoe branch
2	09.07.2015	NSW - Automatic Teller Machine (ATM) deposit of \$850 at Central Park A
3	09.07.2015	International Money Transfer (IMT) of \$820 to Offshore Account 13
4	14.07.2015	NSW - 2 ATM deposits (\$9,850, \$9,900) at Haymarket C, 4 ATM deposits (\$9,950 x 3, \$300) at Market City B – total deposits of \$49,900
5	14.07.2015	IMT of \$49,880 to Offshore Account 13
6	15.07.2015	NSW - 5 ATM deposits (\$9,050, \$8,750, \$9,200, \$8,850, \$4,150) totalling \$40,000 at Ashfield B
7	15.07.2015	ATM deposit of \$10,000 at Ashfield B
8	15.07.2015	IMT of \$49,978 to Offshore Account 13
9	16.07.2015	NSW - 7 ATM deposits (\$9,750, \$9,400, \$9,900, \$9,800, \$4,000 x 2, \$3,110) totalling \$49,960 at Broadway B
10	16.07.2015	IMT of \$49,940 to Offshore Account 13
11	26.07.2015	NSW - 7 ATM deposits (\$9,950, \$4,000, \$1,000, \$9,900, \$9,800, \$9,850, \$5,500) totalling \$50,000 at Surry Hills A
12	27.07.2015	IMT of \$49,978 to Offshore Account 13
13	28.07.2015	NSW - 2 ATM deposits (\$9,950, \$5,350) at Central Park B, 4 ATM deposits (\$4,580, \$9,900, \$9,150, \$3,600) at Market City C – total deposits of \$42,530
14	28.07.2015	IMT of \$42,500 to Offshore Account 13
15	05.08.2015	NSW - 1 ATM deposit of \$5,200 at Central Park B, 1 ATM deposit of \$5,405 at Central Park A - total deposits of \$10,605
16	05.08.2015	IMT of \$10,590 to Offshore Account 13
17	07.08.2015	NSW - 5 ATM deposits (\$9,850 x 2, \$9,900 x 3) totalling \$49,400 at

ITEM	DATE	TRANSACTION/S
		Haymarket B
18	07.08.2015	IMT of \$49,380 to Offshore Account 13
19	10.08.2015	NSW - 6 ATM deposits (\$9,900 x 4, \$9,800, \$600) totalling \$50,000 at Surry Hills A
20	10.08.2015	IMT of \$49,978 to Offshore Account 13
21	19.08.2015	NSW - 5 ATM deposits (\$9,950 x 3, \$9,800, \$9,850) totalling \$49,500 at Broadway B
22	19.08.2015	IMT of \$49,480 to Offshore Account 13
23	20.08.2015	NSW - 6 ATM deposits (\$9,900 x 3, \$9,800, \$9,950, \$550) totalling \$50,000 at Ashfield B
24	20.08.2015	IMT of \$49,978 to Offshore Account 13
25	21.08.2015	NSW - 2 ATM deposits (\$9,900, \$9,950) at Broadway B, 3 ATM deposits (\$9,900 x 2, \$9,850) at Ashfield B – total deposits of \$49,500
26	21.08.2015	IMT of \$49,480 to Offshore Account 13
27	23.08.2015	IMT of \$49,530 to Offshore Account 13
28	24.08.2015	NSW - 5 ATM deposits (\$9,900 x 2, \$9,950 x 2, \$9,850) totalling \$49,550 at Paddington A
29	24.08.2015	NSW - 5 ATM deposits (\$9,550, \$9,400, \$9,950, \$9,800, \$9,950) totalling \$48,650 at Ashfield B
30	24.08.2015	IMT of \$48,620 to Offshore Account 13

SCHEDULE AC

FEDERAL COURT OF AUSTRALIA

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TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 30 – COMMBANK ACCOUNT 30

ITEM	DATE	TRANSACTION/S
1	13.07.2015	Cash deposit of \$600 at Summer Hill branch
2	14.07.2015	International Money Transfer (IMT) of \$570 to Offshore Account 8
3	07.08.2015	4 ATM deposits (\$9,950 x 2, \$9,900, \$9,850) at Market City C, 1 ATM deposit of \$9,950 at Market City B – total deposits of \$49,600
4	07.08.2015	IMT of \$49,570 to Offshore Account 8
5	10.08.2015	5 ATM deposits (\$9,950 x 2, \$9,900 x 2, \$9,750) at Paddington A, 1 ATM deposit of \$550 at Paddington B - total deposits of \$50,000
6	10.08.2015	IMT of \$49,978 to Offshore Account 8
7	19.08.2015	6 ATM deposits (\$9,950 x 3, \$9,900 x 2, \$350) totalling \$50,000 at Surry Hills A
8	19.08.2015	IMT of \$49,978 to Offshore Account 8
9	20.08.2015	7 ATM deposits (\$3,820, \$3,960, \$4,000 x 3, \$9,850, \$9,900) at Broadway A, 2 ATM deposits (\$9,900, \$570) at Broadway B – total deposits of \$50,000
10	20.08.2015	IMT of \$49,978 to Offshore Account 8
11	21.08.2015	7 ATM deposits (\$9,950 x 3, \$9,850, \$9,900, \$350, \$50) totalling \$50,000 at Five Dock A
12	21.08.2015	IMT of \$49,978 to Offshore Account 8

SCHEDULE AD

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN
123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 31 – COMMBANK ACCOUNT 31

ITEM	DATE	TRANSACTION/S
1	19.06.14	Cash deposit of \$100 at Haymarket branch
2	20.06.14	Domestic transfer of \$50 to CommBank Account 115
3	25.06.14	ATM withdrawal of \$50 at Ashfield C
4	25.06.14	Domestic transfer of \$50 from CommBank Account 115
5	26.06.14	Domestic transfer of \$3 to Domestic Account 1
6	26.06.14	Automatic Teller Machine (ATM) withdrawal of \$40 at Auburn C
7	26.06.14	NSW – 1 ATM deposit of \$10 at Auburn D
8	30.06.14	NSW – 3 ATM deposits (\$10,000 x 3) at 116 Burwood A, 3 ATM deposits (\$10,000 x 3) at Burwood A – total deposits of \$60,000
9	30.06.14	Domestic transfer of \$60,000 to Domestic Account 1
10	02.07.14	NSW – 2 ATM deposits (\$9,500, \$8,500) at Burwood A, 1 ATM deposit of \$9,500 at Ashfield A, 2 ATM deposits (\$8,950, \$6,550) at Strathfield A – total deposits of \$43,000
11	02.07.14	Cash deposit of \$29,445 at Flemington Mkts branch
12	02.07.14	Domestic transfer of \$72,445 to Domestic Account 1
13	04.07.14	NSW – 4 ATM deposits (\$7,050, \$8,000, \$7,200, \$7,850) at Burwood A, 2 ATM deposits (\$8,050, \$6,900) at Strathfield A – total deposits of \$45,050
14	04.07.14	Cash deposit of \$19,070 at Ashfield branch
15	04.07.14	Domestic transfer of \$64,120 to Domestic Account 1
16	22.07.14	NSW – 1 ATM deposit of \$10,000 at Cabramatta H
17	22.07.14	Domestic transfer of \$5,000 to CommBank Account 115
18	23.07.14	NSW – 1 ATM deposit of \$40 at Burwood A

ITEM	DATE	TRANSACTION/S
19	23.07.14	Domestic transfer of \$5,000 from CommBank Account 115
20	23.07.14	Domestic transfer of \$10,000 to Domestic Account 1
21	23.07.14	Domestic transfer of \$10,000 to Domestic Account 1
22	23.07.14	Cash deposit of \$10,000 at Cabramatta branch
23	15.08.14	NSW – 3 ATM deposits (\$10,000 x 2, \$10,300) totalling \$30,300 at Burwood A
24	15.08.14	Cash deposit of \$31,600 at Ashfield branch
25	15.08.14	Domestic transfer of \$61,630 to Domestic Account 1
26	01.09.14	Qld – 3 ATM deposits (\$10,000 x 3) at Queen St B, 2 ATM deposits (\$10,000 x 2) at King George A – total deposits of \$50,000
27	01.09.14	Qld – 2 ATM deposits (\$6,300, \$3,700) at Queen St B, 1 ATM deposit of \$6,220 at King George A – total deposits of \$16,220
28	02.09.14	Domestic transfer of \$66,220 to Domestic Account 1
29	02.09.14	Qld – 2 ATM deposits (\$9,950, \$50) at Albert St A, 1 ATM deposit of \$7,850 at Hamilton A – total deposits of \$17,850
30	02.09.14	Qld – 1 ATM deposit of \$10,000 at Albert St A
31	02.09.14	Domestic transfer of \$27,850 to Domestic Account 1
32	11.09.14	Cash deposit of \$41,850 at Ashfield branch
33	11.09.14	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Burwood A
34	11.09.14	NSW – 2 ATM deposits (\$9,850, \$150) totalling \$10,000 at Burwood A
35	11.09.14	NSW - 2 ATM deposits (\$9,300, \$9,850) totalling \$19,150 at Strathfield A
36	11.09.14	Domestic transfer of \$91,000 to Domestic Account 1
37	11.09.14	NSW – 1 ATM deposit of \$10,000 at WF Hurstville A
38	12.09.14	Domestic transfer of \$10,000 to Domestic Account 1
39	26.09.14	NSW – 5 ATM deposits (\$8,350, \$9,900, \$8,450, \$1,800, \$2,100) totalling \$30,600 at Ashfield A
40	26.09.14	Domestic transfer of \$30,600 to Domestic Account 1
41	29.09.14	Cash deposit of \$19,460 at Ashfield branch
42	29.09.14	NSW – 1 ATM deposit of \$50 at Ashfield A
43	29.09.14	Domestic transfer of \$19,510 to Domestic Account 1
44	05.10.14	NSW – 3 ATM deposits (\$9,000, \$5,240, \$8,400) totalling \$22,640 at Strathfield A
45	05.10.14	NSW – 1 ATM deposit of \$10,000 at Strathfield A
46	06.10.14	Domestic transfer of \$32,640 to Domestic Account 1
47	08.10.14	NSW – 3 ATM deposits (\$8,300, \$8,050 x 2) at Burwood A, 2 ATM deposits (\$7,980, \$50) at 116 Burwood A – total deposits of \$32,430
48	08.10.14	NSW – 1 ATM deposit of \$10,000 at 116 Burwood A
49	08.10.14	Domestic transfer of \$42,430 to Domestic Account 1

ITEM	DATE	TRANSACTION/S
50	09.10.14	NSW – 2 ATM deposits (\$9,050, \$950) totalling \$10,000 at Strathfield A
51	09.10.14	NSW – 1 ATM deposit of \$10,000 at Strathfield A, 2 ATM deposits (\$10,000 x 2) at Ashfield A – total deposits of \$30,000
52	10.10.14	Domestic transfer of \$40,000 to Domestic Account 1
53	14.10.14	NSW – 3 ATM deposits (\$10,000 x 3) at Kogarah A, 1 ATM deposit of \$10,000 at Rockdale A, 2 ATM deposits (\$10,000 x 2) at Strathfield A – total deposits of \$60,000
54	14.10.14	NSW – 2 ATM deposits (\$7,850, \$6,450) at Rockdale A, 1 ATM deposit of \$3,550 at Strathfield A – total deposits of \$17,850
55	14.10.14	Domestic transfer of \$77,850 to Domestic Account 1
56	18.10.14	NSW – 3 ATM deposits (\$10,000 x 3) at Surry Hills A, 3 ATM deposits (\$10,000 x 3) at Elizabeth A, 2 ATM deposits (\$10,000 x 2) at Haymarket B – total deposits of \$80,000
57	19.10.14	Domestic transfer of \$17 to CommBank Account 115
58	20.10.14	Domestic transfer of \$80,000 to Domestic Account 1
59	20.10.14	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Rockdale A
60	20.10.14	NSW – 2 ATM deposits (\$5,000 x 2) totalling \$10,000 at Hurstville A
61	21.10.14	Domestic transfer of \$30,000 to Domestic Account 2
62	22.10.14	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at 300 Elizabeth A
63	22.10.14	NSW – 2 ATM deposits (\$5,000 x 2) totalling \$10,000 at 300 Elizabeth A
64	22.10.14	Domestic transfer of \$30,000 to Domestic Account 1
65	19.12.14	NSW – 1 ATM deposit of \$700 at Ashfield A
66	02.01.15	NSW – 1 ATM deposit of \$800 at Burwood A
67	08.01.2015	NSW – ATM withdrawal of \$40 at Rhodes

SCHEDULE AE

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 32 – COMMBANK ACCOUNT 32

ITEM	DATE	TRANSACTION/S
1	16.07.14	NSW – Cash deposit of \$100 at Burwood Road branch
2	22.07.14	Domestic transfer of \$10 to CommBank Account 87
3	28.07.14	VIC - 7 Automatic Teller Machine (ATM) deposits (\$5,450, \$4,550, \$5,950, \$6,400, \$4,650, \$6,950, \$7,900) at Bourke C, 1 ATM deposit of \$5,150 at Lonsdale St B – total deposits of \$47,000
4	28.07.14	Domestic transfer of \$2 to Domestic Account 1
5	29.07.14	Domestic transfer of \$47,000 to Domestic Account 1
6	15.08.14	NSW – 3 ATM deposits (\$9,900, \$5,200, \$4,900) at George & Mkt D – total deposits of \$20,000
7	15.08.14	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at George & Mkt D
8	15.08.14	Domestic transfer of \$50,000 to Domestic Account 1
9	1.09.14	VIC – 2 ATM deposits (\$8,050, \$5,000) totalling \$13,050 at Collins Sq A
10	1.09.14	VIC – 5 ATM deposits (\$10,000 x 5) totalling \$50,000 at Collins Sq A
11	1.09.14	Domestic transfer of \$63,050 to Domestic Account 1
12	10.09.14	NSW – 5 ATM deposits (\$5,000 x 2, \$7,050, \$7,900, \$5,050) at Strathfield A, 4 ATM deposits (\$8,250, \$7,200, \$7,800, \$6,750) at Burwood A, 4 ATM deposits (\$6,700, \$6,600, \$8,300, \$700) at Ashfield A – total deposits of \$82,300
13	10.09.14	NSW – Cash deposit of \$7,700 at Ashfield branch
14	10.09.14	Domestic transfer of \$90,000 to Domestic Account 1
15	16.09.14	VIC – 4 ATM deposits (\$8,400, \$6,600, \$8,250, \$6,750) at Bourke B, 5 ATM deposits (\$8,500, \$7,250, \$7,750, \$6,500, \$7,910) at Lonsdale St A – total deposits of \$67,910
16	16.09.14	VIC – 1 ATM deposit of \$50 at Lonsdale St A

ITEM	DATE	TRANSACTION/S
17	16.09.14	Domestic transfer of \$67,960 to Domestic Account 1
18	17.09.14	VIC – 3 ATM deposits (\$7,950, \$5,000, \$7,050) at Swanston A, 3 ATM deposits (\$7,300, \$7,700, \$5,000) at Flin & Elizabeth A – total deposits of \$40,000
19	17.09.14	Domestic transfer of \$40,000 to Domestic Account 1
20	26.09.14	NSW – Cash deposit of \$30,000 at Ashfield branch
21	26.09.14	Domestic transfer of \$30,000 to Domestic Account 1
22	2.10.14	VIC – ATM deposit of \$1,000 at Collins Sq A
23	7.10.14	VIC – Cash deposit of \$2,590 at Eastern Melbourne branch
24	7.10.14	VIC – 1 ATM deposit of \$5,000 at Eastern Melbourne A, 4 ATM deposits (\$7,300, \$8,700, \$8,500, \$5,500) at Bourke B, 3 ATM deposits (\$7,950, \$7,700, \$4,350) at Flin & Elizabeth A – total deposits of \$55,000
25	7.10.14	VIC – 1 ATM deposit of \$10,000 at Eastern Melbourne A, 3 ATM deposits (\$10,000 x 3) at Lonsdale St B – total deposits of \$40,000
26	7.10.14	Domestic transfer of \$97,590 to Domestic Account 1
27	11.10.14	NSW – 2 ATM deposits (\$10,000 x 2) at Kogarah A, 1 ATM deposit of \$10,000 at Rockdale A, 1 ATM deposit of \$10,000 at Haymarket A – total deposits of \$40,000
28	13.10.14	Domestic transfer of \$40,000 to Domestic Account 1
29	13.10.14	NSW – 1 ATM deposit of \$7,850 at Surry Hills A
30	13.10.14	NSW – 1 ATM deposit of \$10,000 at Surry Hills A, 2 ATM deposits (\$10,000 x 2) at Surry Hills B, 3 ATM deposits (\$10,000 x 3) at Elizabeth A – total deposits of \$60,000
31	14.10.14	Domestic Transfer of \$67,850 to Domestic Account 1
32	18.10.14	NSW – 3 ATM deposits (\$10,000 x 3) at Kogarah A, 1 ATM deposit of \$10,000 at Surry Hills A, 1 ATM deposit of \$10,000 at Surry Hills B, 2 ATM deposits (\$10,000 x 2) at Elizabeth A – total deposits of \$70,000
33	18.10.14	NSW – 1 ATM deposit of \$9,650 at Surry Hills B
34	18.10.14	NSW – 1 ATM deposit of \$350 at Elizabeth A
35	20.10.14	Domestic transfer of \$80,000 to Domestic Account 1
36	20.10.14	NSW – 3 ATM deposits (\$10,000 x 3) at Kogarah A – total deposits of \$30,000
37	21.10.14	Domestic transfer of \$30,000 to Domestic Account 2
38	21.10.14	NSW – 2 ATM deposits (\$10,000 x 2) at Rockdale A – total deposits of \$20,000
39	22.10.14	Domestic transfer of \$20,000 to Domestic Account 1
40	10.12.14	NSW – 4 ATM deposits (\$9,150 x 2, \$9,100, \$7,100) at Rockdale A – total deposits of \$34,500
41	11.12.14	NSW – 5 ATM deposits (\$9,400, \$7,400, \$7,500, \$5,700, \$6,030) totalling \$36,030 at Rockdale A
42	12.12.14	Domestic transfer of \$34,500 to Domestic Account 3

ITEM	DATE	TRANSACTION/S
43	12.12.14	Domestic transfer of \$35,972 to CommBank Account 34
44	17.12.14	Domestic transfer of \$59 to CommBank Account 87
45	17.12.14	NSW – 3 ATM deposits (\$8,650, \$7,700, \$3,650) at Campsie D, 2 ATM deposits (\$7,700, \$6,000) at Kogarah A, 1 ATM deposit of \$6,300 at Hurstville A – total deposits of \$40,000
46	21.12.14	NSW – 4 ATM deposits (\$8,800 x 2, \$7,500, \$9,900) at Burwood A, 5 ATM deposits (\$9,100, \$9,200, \$8,200, \$7,700, \$5,800) at Parramatta D – total deposits of \$75,000
47	17.12.14	Domestic transfer of \$40,000 to CommBank Account 33
48	22.12.14	Domestic transfer of \$75,000 CommBank Account 33
49	14.01.15	NSW – Cash deposit of \$3,000 at Rockdale branch
50	15.01.15	NSW – ATM withdrawal of \$1,000 at Ashfield Mall 2

SCHEDULE AF

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN
123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 33 – COMMBANK ACCOUNT 35

ITEM	DATE	TRANSACTION/S
1	23.09.14	NSW – Automatic Teller Machine (ATM) deposit of \$50 at Haymarket A
2	25.09.14	Domestic transfer of \$3 to Domestic Account 1
3	26.09.14	NSW – 3 ATM deposits (\$10,000 x 3) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Lakemba A, 1 ATM deposit of \$10,000 at Burwood A, 1 ATM deposit of \$10,000 at 116 Burwood A – total deposits of \$70,000
4	26.09.14	Domestic transfer of \$70,000 to Domestic Account 1
5	6.10.14	VIC – 2 ATM deposits (\$10,000 x 2) at Bourke A, 3 ATM deposits (\$10,000 x 3) at Collins Square A – total deposits of \$50,000
6	6.10.14	VIC – 1 ATM deposit of \$9,800 at Collins Square A
7	6.10.14	Domestic transfer of \$59,800 to Domestic Account 1
8	7.10.14	VIC – 4 ATM deposits (\$8,300, \$5,000 x 2, \$5,650) totalling \$23,950 at Bourke B
9	7.10.14	VIC – 1 ATM deposit of \$10,000 at Bourke B
10	8.10.14	Domestic transfer of \$33,950 to Domestic Account 1
11	9.10.14	NSW – 2 ATM deposits (\$5,840, \$7,550) totalling \$13,390 at Ashfield A
12	9.10.14	NSW – 1 ATM deposit of \$10,000 at Ashfield A
13	10.10.14	NSW – 1 ATM deposit of \$650 at Ashfield A
14	10.10.14	Domestic transfer of \$24,040 to Domestic Account 1
15	11.10.14	VIC – 1 ATM deposit of \$2,500 at Bourke A
16	11.10.14	VIC – 1 ATM deposit of \$10,000 at Bourke A
17	12.10.14	VIC – 1 ATM deposit of \$8,800 at Bourke C
18	12.10.14	VIC – 2 ATM deposits (\$10,000 x 2) at Bourke C, 1 ATM deposit of \$10,000 at

ITEM	DATE	TRANSACTION/S
		Bourke A, 3 ATM deposits (\$10,000 x 3) at Collins Square A – total deposits of \$60,000
19	13.10.14	Domestic transfer of \$81,300 to Domestic Account 1
20	15.10.14	VIC – 1 ATM deposit of \$6,500 at Bourke A
21	19.10.14	NSW – 2 ATM deposits (\$7,550, \$2,550) at Ashfield A, 1 ATM deposit of \$9,950 at Parramatta A, 3 ATM deposits (\$9,550, \$5,600, \$4,850) at Parramatta D – total deposits of \$40,050
22	19.10.14	NSW – 2 ATM deposits (\$10,000 x 2) at Ashfield A, 1 ATM deposit of \$10,000 at Parramatta D, 1 ATM deposit of \$10,000 at Parramatta A – total deposits of \$40,000
23	20.10.14	Domestic transfer of \$80,050 to Domestic Account 1
24	20.10.14	NSW – 1 ATM deposit of \$3,500 at Hurstville A
25	20.10.14	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Hurstville A
26	21.10.14	NSW – 2 ATM deposits (\$8,490, \$9,390) totalling \$17,880 at Kogarah A
27	21.10.14	Domestic transfer of \$40,000 to Domestic Account 2
28	22.10.14	Domestic transfer of \$17,880 to Domestic Account 1
29	5.11.14	NSW – 3 ATM deposits (\$10,000 x 3) at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Rockdale A – total deposits of \$50,000
30	7.11.14	Domestic transfer of \$50,000 to Domestic Account 2
31	14.11.14	NSW – 1 ATM deposit of \$10,000 at Kogarah A
32	14.11.14	Domestic transfer of \$10,000 to Domestic Account 4
33	1.12.14	NSW – 2 ATM deposits (\$8,600, \$9,350) at Kogarah A, 1 ATM deposit of \$9,000 at Rockdale A, 1 ATM deposit of \$7,120 at Kogarah A – total deposits of \$34,070
34	1.12.14	Domestic transfer of \$34,072 to CommBank Account 36

SCHEDULE AG**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN**123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 34 – COMMBANK ACCOUNT 37

ITEM	DATE	TRANSACTION/S
1	20.03.14	NSW - 3 Automatic Teller Machine (ATM) deposits (\$10,000 x 3) at Auburn D, 6 ATM deposits (\$10,000 x 4, \$4,000, \$3,700) at Burwood A – total deposits of \$77,700
2	20.03.14	Domestic transfer of \$77,700 to Domestic Account 1
3	24.03.14	Cash deposit of \$310 at Eastwood branch
4	31.03.14	Cash deposit of \$310 at Eastwood branch
5	11.04.14	NSW – 1 ATM deposit of \$310 at Burwood A
6	17.04.14	Cash deposit of \$350 at Eastwood branch
7	23.04.14	NSW – 1 ATM deposit of \$100 at Burwood A
8	30.04.14	NSW - 4 ATM deposits (\$8,500, \$9,800, \$330, \$500) totalling \$19,130 at Cabramatta H
9	30.04.14	NSW - 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Cabramatta H
10	01.05.14	Domestic transfer of \$58,720 to Domestic Account 1
11	7.05.14	Cash deposit of \$120 at Eastwood branch
12	11.05.14	NSW - 2 ATM deposits (\$5,400, \$5,000) totalling \$10,400 at Auburn D
13	11.05.14	NSW - 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Auburn D
14	12.05.14	Domestic transfer of \$40,400 to Domestic Account 1
15	15.05.14	NSW - ATM deposit of \$300 at Burwood A
16	15.05.14	NSW - ATM deposit of \$8,900 at Burwood A
17	15.05.14	NSW - 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Burwood A
18	16.05.14	Domestic transfer of \$38,820 to Domestic Account 1
19	22.05.14	NSW - ATM deposit of \$310 at Burwood A

ITEM	DATE	TRANSACTION/S
20	13.06.14	NSW - 3 ATM deposits (\$9,700, \$9,900, \$5,000) totalling \$24,600 at Burwood A
21	13.06.14	NSW - 2 ATM deposits (\$10,000 x 2) at Burwood A – total deposits of \$20,000
22	13.06.14	Domestic transfer of \$44,600 to Domestic Account 1
23	16.06.14	Cash deposit of \$320 at Burwood branch
24	16.06.14	Cash deposit of \$23,000 at Chinatown branch
25	16.06.14	NSW – 1 ATM deposit of \$10,000 at Haymarket A, 3 ATM deposits (\$10,000 x 3) at Ashfield A – total deposits of \$40,000
26	16.06.14	Domestic transfer of \$63,000 to Domestic Account 1
27	17.06.14	Cash deposit of \$25,000 at Parramatta branch
28	17.06.14	Cash deposit of \$30,000 at Burwood Road branch
29	17.06.14	Cash deposit of \$20,000 at Burwood branch
30	17.06.14	Domestic transfer of \$75,000 to Domestic Account 1
31	18.06.14	VIC – 1 ATM deposit of \$10,000 at Collins Sq A, 1 ATM deposit of \$9,900 at Swanston A, 3 ATM deposits (\$9,950, \$5,300, \$4,700) at Flin & Eliz A – total deposits of \$39,850
32	18.06.14	VIC – 1 ATM deposit of \$10,000 at Swanston A
33	18.06.14	VIC - Cash deposit of \$20,150 at Swanston branch
34	18.06.14	Domestic transfer of \$70,000 to Domestic Account 1
35	19.06.14	VIC - 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Bourke A
36	20.06.14	VIC – Cash deposit of \$29,950 at Western Melbourne branch
37	20.06.14	Domestic transfer of \$50,000 to Domestic Account 1
38	23.06.14	NSW - ATM deposit of \$400 at Burwood A
39	24.06.14	Cash deposit of \$32,475 at Eastwood branch
40	24.06.14	Cash deposit of \$30,000 at Parramatta branch
41	24.06.14	Domestic transfer of \$62,475 to Domestic Account 1
42	30.06.14	NSW - 5 ATM deposits (\$5,810, \$4,750, \$5,250, \$4,450, \$5,550) totalling \$25,810 at Burwood A
43	30.06.14	Domestic transfer of \$25,510 to Domestic Account 1
44	4.07.14	1 ATM deposit of \$100 at Bourke C
45	7.07.14	Cash deposit of \$5,000 at Richmond North branch
46	7.07.14	Cash deposit of \$7,500 at Collingwood branch
47	7.07.14	Domestic transfer of \$12,103 to Domestic Account 1
48	8.07.14	3 ATM deposits (\$6,000, \$9,000 x 2) totalling \$24,000 at Burwood A
49	8.07.14	Domestic transfer of \$24,025 to Domestic Account 1
50	12.07.14	VIC – 1 ATM deposit of \$1,500 at Collins Sq A

ITEM	DATE	TRANSACTION/S
51	13.07.14	NSW - ATM withdrawal of \$1,000 at Eastwood B
52	13.07.14	NSW – ATM withdrawal of \$500 at Eastwood C
53	13.07.14	VIC – 1 ATM deposit of \$2,000 at Bourke C
54	14.07.14	NSW – ATM withdrawal of \$2,000 at Burwood A
55	16.07.14	NSW – ATM withdrawal of \$150 at Burwood 1
56	16.07.14	VIC – Cash deposit of \$7,500 at Highpoint branch
57	16.07.14	VIC – Cash deposit of \$7,500 at Footscray branch
58	16.07.14	Domestic transfer of \$11,164 to Domestic Account 1
59	16.07.14	Domestic transfer of \$985 to Domestic Account 1
60	16.07.14	NSW – ATM withdrawal of \$1,850 at Ashfield Mall
61	17.07.14	NSW – ATM withdrawal of \$1,000 at Eastwood B
62	18.07.14	Cash deposit of \$300 at Flemington Mkts branch
63	21.07.14	NSW – ATM withdrawal of \$100 at Burwood B
64	21.07.14	NSW – Cash withdrawal of \$10,000 at Hurstville branch
65	21.07.14	VIC – Cash deposit of \$5,000 at Footscray branch
66	21.07.14	VIC – Cash deposit of \$5,000 at Footscray branch
67	23.07.14	NSW – Cash deposit of \$26,000 at Ashfield branch
68	23.07.14	Domestic transfer of \$26,000 to Domestic Account 1
69	25.07.14	NSW – ATM deposit of \$300 at Burwood A
70	28.07.14	VIC – Cash deposit of \$9,000 at Footscray branch
71	28.07.14	VIC – Cash deposit of \$3,000 at Footscray branch
72	28.07.14	VIC – Cash deposit of \$8,000 at Western Melbourne branch
73	28.07.14	Domestic transfer of \$19,600 to Domestic Account 1
74	28.07.14	NSW – ATM withdrawal of \$400 at Ashfield Mall
75	31.07.14	NSW – Cash deposit of \$50.40 at Auburn branch
76	1.08.14	NSW – ATM deposit of \$200 at Hurstville A
77	8.08.14	NSW – ATM deposit of \$260 at Hurstville A
78	11.08.14	NSW – ATM deposit of \$500 at Hurstville A
79	11.08.14	VIC - ATM withdrawal of \$500 at Bourke E
80	14.08.14	NSW - Cash deposit of \$270 at Hurstville branch
81	14.08.14	VIC - Cash deposit of \$4,950 at Highpoint branch
82	14.08.14	Domestic transfer of \$4,950 to Domestic Account 1
83	21.08.14	VIC - ATM deposit of \$270 at Eastern Melbourne A

ITEM	DATE	TRANSACTION/S
84	24.08.14	VIC – ATM deposit of \$1,500 at Collins Square A
85	25.08.14	NSW – ATM withdrawal of \$1,500 at Ashfield Mall
86	27.08.14	VIC – ATM deposit of \$1,500 at Bourke A
87	27.08.14	NSW - ATM deposit of \$8,100 at Burwood A
88	28.08.14	Domestic transfer of \$9,700 to Domestic Account 1
89	28.08.14	NSW - ATM deposit of \$570 at Hurstville A
90	29.08.14	VIC - ATM deposit of \$5,000 at Highpoint branch
91	29.08.14	Domestic transfer of \$4,850 to Domestic Account 1
92	29.08.14	NSW - ATM deposit of \$1,940 at Ashfield A
93	29.08.14	Domestic transfer of \$1,940 to Domestic Account 1
94	4.09.14	NSW - ATM deposit of \$270 at Hurstville A
95	5.09.14	VIC – ATM deposit of \$2,000 at Bourke A, 3 ATM deposits (\$6,720, \$4,150, \$5,850) at Burwood A – total deposits of \$18,720
96	5.09.14	Domestic transfer of \$18,720 to Domestic Account 1
97	9.09.14	NSW – Cash deposit of \$20,000 at Burwood Road branch
98	9.09.14	NSW – Cash deposit of \$45,795 at Ashfield branch
99	9.09.14	Domestic transfer of \$65,795 to Domestic Account 1
100	10.09.14	VIC – 2 cash deposits (\$5,100, \$5,000) totalling \$10,100 at Springvale branch
101	10.09.14	2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Burwood A
102	10.09.14	Domestic transfer of \$29,790 to Domestic Account 1
103	11.09.14	VIC – 2 cash deposits (\$9,000 x 2) totalling \$18,000 at Springvale branch
104	11.09.14	NSW - ATM withdrawal of \$2,000 at Hurstville A
105	12.09.14	Domestic transfer of \$9,700 to Domestic Account 1
106	12.09.14	VIC - withdrawal of \$5,000 at Flemington Mkts branch
107	16.09.14	Cash deposit of \$2,000 at Central branch
108	16.09.14	NSW – ATM withdrawal of \$2,000 at Carlton
109	17.09.14	VIC – cash deposit of \$20,100 at Bourke Melbourne branch
110	17.09.14	NSW – withdrawal of \$20,000 at Ashfield branch
111	17.09.14	NSW – ATM withdrawal of \$730 at Carlton
112	20.09.14	VIC - 3 ATM deposits (\$9,900, \$5,100, \$9,300) at 385 Bourke A, 1 ATM deposit of \$5,700 at Bourke B – total deposits of \$30,000
113	22.09.14	Domestic transfer of \$14,550 to Domestic Account 1
114	20.09.14	NSW – Withdrawal of \$15,000 at Hurstville branch
115	22.09.14	NSW – 2 ATM deposits (\$6,450, \$3,250) totalling \$9,700 at Burwood A

ITEM	DATE	TRANSACTION/S
116	22.09.14	Domestic transfer of \$9,600 to Domestic Account 1
117	22.09.14	VIC – ATM deposit of \$900 at Bourke B
118	23.09.14	NSW – ATM withdrawal of \$1,000 at Ashfield Mall
119	25.09.14	VIC – 3 ATM deposits (\$7,150, \$6,850, \$5,000) totalling \$19,000 at Eastern Melbourne A
120	25.09.14	NSW – ATM withdrawal of \$2,000 at Campsie A
121	25.09.14	NSW – Withdrawal of \$17,000 at Hurstville branch
122	25.09.14	VIC – ATM deposit of \$600 at Bourke C
123	26.09.14	NSW - Cash deposit of \$30,000 at Burwood branch
124	26.09.14	Domestic transfer of \$30,000 to Domestic Account 1
125	26.09.14	NSW – Cash deposit of \$20,000 at Burwood Road branch
126	26.09.14	Domestic transfer of \$20,000 to Domestic Account 1
127	28.09.14	VIC – ATM deposit of \$3,400 at Bourke C
128	28.09.14	NSW – ATM withdrawal of \$2,000 at Carlton
129	29.09.14	NSW – Cash deposit of \$28,410 at Ashfield branch
130	29.09.14	Domestic transfer of \$30,150 to Domestic Account 1
131	1.10.14	VIC - 4 ATM deposits (\$5,000 x 2, \$7,800, \$2,200) at Chadstone Ct A, 2 ATM deposits (\$6,500, \$4,950) at Bourke A – total deposits of \$31,450
132	1.10.14	VIC – 1 ATM deposit of \$50 at Bourke A
133	2.10.14	Domestic transfer of \$20,000 to Domestic Account 1
134	2.10.14	NSW - Withdrawal of \$11,000 at Hurstville branch

SCHEDULE AH

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 35 - COMMBANK ACCOUNT 38

ITEM	DATE	TRANSACTION/S
1	16.09.14	NSW - Cash deposit of \$5,130 at Ashfield branch
2	16.09.14	NSW - Cash deposit of \$200 at Ashfield branch
3	16.09.14	Domestic transfer of \$5,330 to Domestic Account 1
4	16.09.14	NSW - 4 Automatic Teller Machine (ATM) deposits (\$6,000, \$8,900, \$4,160, \$9,000) at Auburn D, 1 ATM deposit of \$8,800 at Burwood A – total deposits of \$36,860
5	17.09.14	Domestic transfer of \$36,860 to Domestic Account 1
6	17.09.14	NSW - Cash deposit of \$9,000 at Burwood branch
7	17.09.14	NSW - Withdrawal of \$1,000 at Carlton
8	18.09.14	NSW - Withdrawal of \$4,000 at Ashfield branch
9	18.09.14	NSW - ATM deposit of \$100 at Ashfield A
10	18.09.14	Domestic transfer of \$4,120 to Domestic Account 1
11	22.09.14	NSW - Cash deposit of \$30,000 at Burwood branch, cash deposit of \$33,050 at Ashfield branch – total deposits of \$63,050
12	22.09.14	Domestic transfer of \$63,050 to Domestic Account 1
13	24.09.14	NSW - Cash deposit of \$27,000 at Strathfield branch
14	24.09.14	Domestic transfer of \$27,000 to Domestic Account 1
15	26.09.14	NSW - Cash deposit of \$30,000 at Kogarah branch
16	26.09.14	Domestic transfer of \$30,000 to Domestic Account 1
17	03.10.14	NSW - ATM deposit of \$8,950 at Haymarket A, 4 ATM deposits (\$9,000, \$8,750, \$4,050, \$8,1000) at Haymarket C – total deposits of \$38,850

ITEM	DATE	TRANSACTION/S
18	04.10.14	NSW - 4 ATM deposits (\$6,900, \$6,350, \$6,650, \$100) totalling \$20,000 at Haymarket A
19	06.10.14	VIC – 4 ATM deposits (\$2,950, \$8,950 x 2, \$9,150) totalling \$30,000 at Bourke A
20	06.10.14	2 domestic transfers (\$38,850, \$20,000) totalling \$58,850 to Domestic Account 3
21	06.10.14	Cash deposit of \$30,000 at Collins St Melb branch, cash deposit of \$30,000 at Western Melb branch – total deposits of \$60,000
22	06.10.14	Domestic Transfer of \$90,000 to Domestic Account 1
23	11.10.14	NSW - 3 ATM deposits (\$10,000 x 3) at Rockdale A, 3 ATM deposits (\$10,000 x 3) at Lakemba A – total deposits of \$60,000
24	12.10.14	NSW - ATM deposit of \$10,000 at Surry Hills B
25	12.10.14	NSW - 2 ATM deposits (\$4,150, \$5,850) totalling \$10,000 at Surry Hills B
26	12.10.14	Domestic transfer of \$80,000 to Domestic Account 1
27	18.10.14	NSW - ATM deposits (\$4,950, \$4,050, \$9,000, \$4,500 x 2) at Rockdale A, 1 ATM deposit of \$8,100 at Surry Hills A, 2 ATM deposits (\$9,000 x 2) at Surry Hills B, 1 ATM deposit of \$8,950 at Haymarket B, 1 ATM deposit of \$9,000 at Kogarah A – total deposits of \$71,050
28	19.10.14	NSW - ATM deposit of \$9,150 at Ashfield A
29	19.10.14	Domestic transfer of \$80,200 to Domestic Account 1
30	20.10.14	NSW - 2 ATM deposits (\$7,500, \$8,000) at George & Mkt D, 3 ATM deposits (\$5,000, \$7,000, \$2,500) at Surry Hills B – total deposits of \$30,000
31	21.10.14	Domestic transfer of \$30,000 to Domestic Account 1
32	22.10.14	NSW - 4 ATM deposits (\$7,100 x 2, \$7,900 x 2) totalling \$30,000 at 300 Elizabeth A
33	22.10.14	Domestic transfer of \$30,000 to Domestic Account 1
34	28.10.14	NSW - 3 ATM deposits (\$9,000, \$3,000, \$8,950) at Kogarah A, 4 ATM deposits (\$9,000 x 2, \$2,100, \$8,950) at Rockdale A – total deposits of \$50,000
35	28.10.14	NSW - ATM deposit of \$10,000 at Rockdale A
36	30.10.14	Cash withdrawal of \$8,000 from Campsie branch, cash withdrawal of \$7,000 from Rockdale branch – total withdrawals of \$15,000
37	01.11.14	Cash withdrawal of \$40,000 from Westfield Hurstville branch
38	03.11.14	Cash withdrawal of \$2,000 from Kogarah branch
39	05.11.14	NSW - ATM deposit of \$7,950 at Kogarah A, 2 ATM deposits (\$8,450, \$8,000) at Rockdale A, ATM deposit of \$8,550 at Ashfield A – total deposits of \$32,950
40	05.11.14	NSW - ATM deposit of \$10,000 at Kogarah A
41	07.11.14	Domestic transfer of \$45,950 to Domestic Account 2

SCHEDULE AI

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 36 – COMMBANK ACCOUNT

39

ITEM	DATE	TRANSACTION/S
1	26.09.14	NSW – 3 Automatic Teller Machine (ATM) deposits (\$10,000 x 3) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Lakemba A – total deposits of \$50,000
2	26.09.14	Domestic transfer of \$50,000 to Domestic Account 1
3	6.10.14	VIC – 4 ATM deposits (\$9,000, \$8,950, \$7,150, \$6,800) at Collins A, 1 ATM deposits of \$8,100 at Flin & Eliz A, 3 ATM deposits (\$7,350, \$8,130, \$4,100) at Eastern Melbourne A – total deposits of \$59,580
4	6.10.14	VIC – 1 ATM deposit of \$10,000 at Flin & Eliz A
5	6.10.14	Domestic transfer of \$69,580 to Domestic Account 1
6	9.10.14	NSW – 3 ATM deposits (\$9,800, \$9,350, \$850) at Strathfield A, 1 ATM deposit of \$9,450 at Ashfield A – total deposits of \$29,450
7	9.10.14	ATM deposit of \$10,000 at 116 Burwood A
8	10.10.14	Domestic transfer of \$39,450 to Domestic Account 1
9	12.10.14	VIC - 5 ATM deposits (\$8,000 x 2, \$5,000, \$9,000, \$8,800) at Bourke B, 2 ATM deposits (\$9,470, \$5,000) at Bourke C – total deposits of \$53,270
10	13.10.14	VIC - 3 ATM deposits (\$8,500, \$6,500, \$8,900) at Collins A, 3 ATM deposits (\$6,100, \$8,750, \$6,250) at Flin & Eliz A, 1 ATM deposit of \$5,050 at 385 Bourke B – total deposits of \$50,050
11	13.10.14	Domestic transfer of \$53,270 to Domestic Account 1
12	14.10.14	VIC – 3 ATM deposits (\$8,800, \$7,750, \$7,700) at 385 Bourke A, 2 ATM deposits (\$5,000, \$5,750) at Lonsdale St B, 1 ATM deposit of \$3,000 at 385 Bourke B – total deposits of \$38,000

ITEM	DATE	TRANSACTION/S
13	14.10.14	VIC – ATM deposit of \$10,000 at 385 Bourke A
14	14.10.14	Domestic transfer of \$50,050 to Domestic Account 1
15	15.10.14	Domestic transfer of \$48,000 to Domestic Account 1
16	19.10.14	NSW – 3 ATM deposits (\$10,000 x 3) at Ashfield A, 3 ATM deposits (\$10,000 x 3) at WF Parramatta D – total deposits of \$60,000
17	20.10.14	NSW – Cash deposit of \$20,050 at Ashfield branch
18	20.10.14	Domestic transfer of \$80,050 to Domestic Account 1
19	20.10.14	NSW – ATM deposit of \$9,950 at 300 Elizabeth A, ATM deposit of \$50 at Kogarah A - total deposits of \$10,000
20	20.10.14	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at 300 Elizabeth A
21	21.10.14	NSW – ATM deposit of \$6,040 at Kogarah A
22	21.10.14	Domestic transfer of \$10,655.25 to Domestic Account 2
23	22.10.14	Domestic transfer of \$25,385 to Domestic Account 1
24	5.11.14	NSW – 4 ATM deposits (\$9,500, \$8,700, \$8,800, \$9,000) at Kogarah A, 2 ATM deposits (\$6,900, \$7,100) at Rockdale A – total deposits of \$50,000
25	7.11.14	Domestic transfer of \$50,000 to Domestic Account 2
26	20.11.14	NSW – 5 ATM deposits (\$8,200, \$6,100, \$5,700, \$3,750, \$6,250) totalling \$30,000 at Rockdale A
27	20.11.14	NSW – 1 ATM deposit of \$10,000 at Rockdale A
28	20.11.14	Domestic transfer of \$40,000 to CommBank Account 88
29	3.12.14	NSW – 3 ATM deposits (\$9,200 x 2, \$8,600) at Rockdale A, 2 ATM deposits (\$9,300, \$3,700) at Kogarah A – total deposits of \$40,000
30	3.12.14	Domestic transfer of \$40,000 to CommBank Account 40

SCHEDULE AJ

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 37 – COMMBANK ACCOUNT

41

ITEM	DATE	TRANSACTION/S
1	17.10.2014	Cash deposit of \$100 at Haymarket branch
2	17.10.2014	Domestic transfer of \$50 to CommBank Account 89
3	30.10.2014	NSW – Automatic Teller Machine (ATM) deposit of \$250 to Rockdale A
4	31.10.2014	NSW – Withdrawal of \$300 from Carlton Shops
5	2.11.2014	NSW – ATM deposit of \$10,000 at WF Parramatta D
6	2.11.2014	WA – Withdrawal of \$1,000 from Hay St Mall B
7	7.11.2014	NSW - ATM deposit of \$50 at Kogarah A
8	7.11.2014	Domestic transfer of \$9,050 to Domestic Account 2
9	15.11.2014	NSW – ATM deposit of \$310 at Ashfield A
10	21.11.2014	ATM deposit of \$1,690 at Bull Creek
11	1.12.2014	ATM deposit of \$620 at Bull Creek
12	10.12.2014	WA - Withdrawal of \$500 at Mandurah A
13	11.12.2014	Cash deposit of \$2,000 at Flemington Markets branch
14	14.12.2014	NSW - Withdrawal of \$1,850 at Ashfield A
15	17.12.2014	3 ATM deposits (\$9,100, \$7,800, \$3,100) at Campsie D, 4 ATM deposits (\$7,400, \$8,600, \$8,000, \$6,000) at Hurstville A – total deposits of \$50,000

ITEM	DATE	TRANSACTION/S
16	17.12.2014	Domestic transfer of \$50,400 to CommBank Account 33
17	22.12.2014	NSW - 5 ATM deposits (\$9,500, \$8,700, \$9,500, \$7,450, \$4,850) at Rockdale A, 5 ATM deposits (\$9,300, \$7,500, \$9,100, \$9,000, \$9,500) at Hurstville A, 1 ATM deposit of \$5,600 at Ashfield A – total deposits of \$84,400
18	22.12.2014	Domestic transfer of \$90,000 to CommBank Account 42

SCHEDULE AK

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

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OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 38 – COMMBANK ACCOUNT

43

ITEM	DATE	TRANSACTION/S
1	8.01.2015	NSW – 4 Automatic Teller Machine (ATM) deposits (\$6,600, \$3,400, \$4,360, \$5,640) totalling \$20,000 at Burwood A
2	8.01.2015	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Burwood A
3	8.01.2015	Domestic transfer of \$50,000 to Domestic Account 3
4	9.02.2015	NSW – 1 ATM deposit of \$7,300 at Kogarah A, 2 ATM deposits (\$4,840, \$5,100) at Burwood A – total deposits of \$17,240
5	9.02.2015	NSW – 1 ATM deposit of \$10,000 at Kogarah A, 1 ATM deposit of \$10,000 at Burwood A – total deposits of \$20,000
6	9.02.2015	NSW – cash deposit of \$10,000 at Rockdale branch
7	9.02.2015	Domestic transfer of \$47,240 to Domestic Account 9
8	9.02.2015	NSW – cash deposit of \$2,700 at Kogarah branch
9	9.02.2015	NSW - Withdrawal of \$2,000 at Ashfield Mall 2
10	10.02.2015	NSW – Withdrawal of \$700 at W/F Burwood 1
11	16.02.2015	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Kogarah A
12	16.02.2015	Domestic transfer of \$50,000 to CommBank Account 92
13	17.02.2015	NSW – ATM deposit of \$9,900 at Rockdale A, ATM deposit of \$100 at Kogarah A – total deposits of \$10,000
14	17.02.2015	NSW – ATM deposit of \$10,000 at Rockdale A, 3 ATM deposits (\$10,000 x 3) at Kogarah A – total deposits of \$40,000
15	17.02.2015	Domestic transfer of \$50,000 to CommBank Account 92

SCHEDULE AL**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN**123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 39 – COMMBANK ACCOUNT 44

ITEM	DATE	TRANSACTION/S
1	31.08.15	Cash deposit of \$50 at Auburn branch
2	11.09.15	7 ATM deposits (\$8,950, \$7,550, \$7,500, \$6,600, \$8,150, \$8,450, \$6,800) totalling \$54,000 at Burwood A
3	11.09.15	Domestic transfer of \$54,000 to CommBank Account 33
4	14.09.15	6 ATM deposits (\$9,900, \$9,050, \$9,850, \$9,300, \$9,700, \$2,200) totalling \$50,000 at Burwood A
5	14.09.15	Domestic transfer of \$49,900 to Domestic Account 5
6	20.09.15	3 ATM deposits (\$7,900 x 2, \$5,400) at Ashfield B, 3 ATM deposits (\$6,200, \$7,800, \$6,000) at Rockdale A – total deposits of \$41,200
7	21.09.15	Domestic transfer of \$41,300 to Domestic Account 5
8	23.09.15	3 ATM deposits (\$7,450, \$7,000, \$5,550) at Kingsgrove A, 3 ATM deposits (\$8,600, \$7,650, \$5,750) at Lakemba B – total deposits of \$42,000
9	23.09.15	Domestic transfer of \$38,460 to CommBank Account 93
10	25.09.15	4 ATM deposits (\$8,200, \$5,800, \$6,450, \$9,550) totalling \$30,000 at Eastwood B
11	26.09.15	4 ATM deposits (\$7,200, \$8,350, \$6,650, \$7,800) totalling \$30,000 at Bankstown Ct B
12	28.09.15	3 ATM deposits (\$7,550, \$6,900, \$9,350) at Merrylands D, 1 ATM deposit of \$6,200 at Auburn D – total deposits of \$30,000
13	28.09.15	Domestic transfer of \$93,541 to Domestic Account 5
14	11.10.15	4 ATM deposits (\$8,700, \$8,000, \$7,100, \$6,200) B totalling \$30,000 at Ashfield
15	12.10.15	2 ATM deposits (\$7,150, \$6,850) totalling \$14,000 at Parramatta A
16	12.10.15	Domestic transfer of \$44,015 to Domestic Account 5
17	15.10.15	2 ATM deposits (\$5,200, \$4,800) at Burwood A totalling \$10,000

ITEM	DATE	TRANSACTION/S
18	16.10.15	2 ATM deposits (\$6,300, \$3,700) at Strathfield A totalling \$10,000
19	18.10.15	2 ATM deposits (\$8,700, \$8,300) at Granville A totalling \$17,000
20	19.10.15	Domestic transfer of \$37,000 to CommBank Account 33
21	30.10.15	Cash deposit of \$41,630 at Ashfield branch
22	30.10.15	Cash deposit of \$200 at Ashfield branch
23	30.10.15	2 ATM deposits (\$6,910, \$1,260) totalling \$8,170 at Ashfield A
24	02.11.15	2 ATM deposits (\$6,150, \$3,850) totalling \$10,000 at Rockdale A
25	02.11.15	Domestic transfer of \$20,000 to CommBank Account 94
26	02.11.15	Domestic transfer of \$40,000 to CommBank Account 95
27	04.11.15	ATM deposit of \$500 at Auburn E
28	04.11.15	ATM withdrawal of \$500 at Auburn Shops
29	21.11.15	ATM withdrawal of \$20 at Campsie A

SCHEDULE AM**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN**123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 41 – COMMBANK ACCOUNT 45

ITEM	DATE	TRANSACTION/S
1	06.10.15	Cash deposit of \$50 at Granville branch
2	09.10.15	4 ATM deposits (\$8,950, \$8,500, \$7,300, \$5,250) totalling \$30,000 at Bankstown D
3	09.10.15	Cash deposit of \$30,000 at Bankstown branch
4	09.10.15	Domestic transfer of \$52,807 to CommBank Account 46
5	11.10.15	3 ATM deposits (\$8,100, \$9,250, \$2,650) totalling \$20,000 at Kingsgrove A
6	13.10.15	3 ATM deposits (\$8,800, \$7,650, \$3,550) totalling \$20,000 at Ashfield B
7	13.10.15	Domestic transfer of \$47,193 to Domestic Account 5
8	18.10.15	2 ATM deposits (\$4,800, \$5,200) totalling \$10,000 at Granville A
9	19.10.15	4 ATM deposits (\$7,550, \$9,900, \$8,250, \$8,300) totalling \$34,000 at Parramatta E
10	19.10.15	Domestic transfer of \$43,590 to CommBank Account 33
11	21.10.15	2 ATM deposits (\$8,950, \$9,050) totalling \$18,000 at Wentworthville A
12	22.10.15	3 ATM deposits (\$8,250, \$7,900, \$3,850) totalling \$20,000 at North Ryde A
13	24.10.15	4 ATM deposits (\$9,050, \$7,650, \$7,000, \$6,300) totalling \$30,000 at Lindfield
14	25.10.15	3 ATM deposits (\$8,150, \$6,350, \$5,500) totalling \$20,000 at Ashfield B
15	26.10.15	Domestic transfer of \$88,416 to CommBank Account 33
16	28.10.15	3 ATM deposits (\$5,650, \$7,500, \$6,850) totalling \$20,000 at Ashfield A
17	29.10.15	Domestic transfer of \$19,500 to Domestic Account 8

ITEM	DATE	TRANSACTION/S
18	13.11.15	4 ATM deposits (\$8,950, \$9,100, \$7,450, \$8,050) at Auburn E, 2 ATM deposits (\$6,350, \$5,100) at Auburn F, 5 ATM deposits (\$8,550, \$9,600, \$7,650, \$9,550, \$4,650) at Merrylands D – total deposits of \$85,000
19	13.11.15	Domestic transfer of \$85,514 to Domestic Account 5
20	28.11.15	5 ATM deposits (\$9,100, \$8,500, \$7,400, \$7,400, \$7,600) at Lakemba B, 5 ATM deposits (\$8,400, \$8,200, \$9,300, \$8,100, \$6,000) at Bankstown Ct A – total deposits of \$80,000
21	30.11.15	Domestic transfer of \$80,000 to CommBank Account 90

SCHEDULE AN

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN
123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 42 – COMMBANK ACCOUNT 47

ITEM	DATE	TRANSACTION/S
1	25.09.15	Cash deposit of \$50 at Ermington branch
2	07.10.15	6 ATM deposits (\$9,100, \$7,450, \$7,800, \$7,650, \$5,300, \$2,700) totalling \$40,000 at Campsie D
3	08.10.15	Domestic transfer of \$40,009 to Domestic Account 5
4	13.10.15	5 ATM deposits (\$6,750, \$8,600, \$8,300, \$4,550, \$4,300) at Ashfield A totalling \$32,500
5	13.10.15	Domestic transfer of \$32,505 to Domestic Account 5
6	14.10.15	2 ATM deposits (\$2,900, \$7,100) at Campsie A totalling \$10,000
7	18.10.15	3 ATM deposits (\$8,200, \$6,500, \$5,300) at Burwood A totalling \$20,000
8	19.10.15	2 ATM deposits (\$6,850, \$5,985) at Granville A totalling \$12,835
9	19.10.15	Domestic transfer of \$42,840 to CommBank Account 33
10	04.11.15	Cash deposit of \$50,000 at Auburn branch
11	05.11.15	7 ATM deposits (\$9,450, \$8,750, \$8,350, \$7,400, \$5,850, \$5,200, \$50) at WF Parramatta D totalling \$45,050
12	05.11.15	Domestic transfer of \$95,050 to CommBank Account 48

SCHEDULE AO**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN**123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 43 – COMMBANK ACCOUNT 49

ITEM	DATE	TRANSACTION/S
1	12.10.15	ATM deposit of \$50 at SL Merryland A
2	15.10.15	2 ATM deposits (\$5,400, \$4,600) at Ashfield B totalling \$10,000
3	16.10.15	4 ATM deposits (\$8,950, \$8,350, \$7,650, \$8,600) at Strathfield A totalling \$33,550
4	16.10.15	Domestic transfer of \$31,780 to CommBank Account 96
5	18.10.15	2 ATM deposits (\$6,450, \$3,550) at Ashfield A totalling \$10,000
6	19.10.15	Domestic transfer of \$21,780 to CommBank Account 33
7	20.10.15	3 ATM deposits (\$8,300, \$6,750, \$4,950) at 116 Burwood A totalling \$20,000
8	21.10.15	2 ATM deposits (\$8,300, \$3,455) at Pendle Hill A totalling \$11,755
9	22.10.15	2 ATM deposits (\$4,650, \$5,350) at North Ryde A totalling \$10,000
10	24.10.15	4 ATM deposits (\$8,700, \$7,400, \$7,450, \$6,450) at Eastwood A totalling \$30,000
11	25.10.15	4 ATM deposits (\$8,250, \$7,600, \$4,100, \$50) at Ashfield A totalling \$20,000
12	27.10.15	Domestic transfer of \$91,755 to Domestic Account 5
13	03.11.15	7 ATM deposits (\$8,800, \$6,850, \$9,050, \$6,750, \$8,400, \$7,900, \$2,250) at Eastwood B totalling \$50,000
14	04.11.15	5 ATM deposits (\$9,350, \$7,030, \$7,800, \$6,700, \$5,450) at Auburn F, 1 ATM deposit (\$50) at Auburn D – total deposits of \$36,380
15	05.11.15	Domestic transfer of \$86,000 to CommBank Account 48
16	13.11.15	5 ATM deposits (\$9,450, \$8,550, \$7,850, \$7,950, \$7,200) at Auburn F, 6 ATM deposits (\$9,450, \$8,550, \$7,800, \$8,850, \$8,350, \$7,000) at Granville A – total deposits of \$91,000

ITEM	DATE	TRANSACTION/S
17	13.11.15	Domestic transfer of \$91,370 to Domestic Account 10
18	30.11.15	5 ATM deposits (\$9,450, \$8,450, \$7,400, \$7,450, \$7,250) at Auburn F, 5 ATM deposits (\$9,150, \$8,200, \$7,000, 7,700, \$7,950) at Granville A – total deposits of \$80,000
19	30.11.15	Domestic transfer of \$80,009 to CommBank Account 91

SCHEDULE AP

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 1 – COMMBANK ACCOUNT 50

ITEM	DATE	TRANSACTION/S
1	26.11.2014	Vic – Automatic Teller Machine (ATM) deposit of \$1,750 at Chadstone Ct A
2	26.11.2014	Vic – 5 ATM deposits (\$10,000, x 5) totalling \$50,000 at Chadstone Ct A
3	26.11.2014	International Money Transfer (IMT) of \$30,000 to Offshore Account 14
4	26.11.2014	IMT of \$20,000 to Offshore Account 15
5	27.11.2014	Vic – 2 ATM deposits (\$9,950, \$50) totalling \$10,000 at Chadstone Ct A
6	27.11.2014	Vic – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Chadstone Ct A
7	27.11.2014	IMT of \$50,000 to Offshore Account 18
8	28.11.2014	Vic – 2 ATM deposits (\$9,750 x 2) at Lonsdale St B, 7 ATM deposits (\$9,950 x 2, \$9,900 x 2, \$9,850 x 2, \$9,920) at Bourke C – total deposits of \$88,820
9	28.11.2014	Vic – 2 ATM deposits (\$10,000, \$10,000) at Lonsdale St B, 1 ATM deposit of \$10,000 at Bourke C – total deposits of \$30,000
10	28.11.2014	IMT of \$50,000 to Offshore Account 14
11	29.11.2014	IMT of \$50,000 to Offshore Account 15
12	29.11.2014	Vic – 1 ATM deposit of \$9,900 at Chadstone Ct A
13	29.11.2014	Vic – 6 ATM deposits (\$10,000 x 6) totalling \$60,000 at Chadstone Ct A
14	30.11.2014	IMT of \$50,000 to Offshore Account 18
15	01.12.2014	Vic – 2 ATM deposits (\$9,950, \$9,900) totalling \$19,850 at Chadstone Ct A
16	01.12.2014	Vic – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Chadstone Ct A

ITEM	DATE	TRANSACTION/S
17	01.12.2014	IMT of \$50,000 to Offshore Account 15
18	02.12.2014	Vic – 1 ATM deposit of \$3,740 at Clayton D
19	02.12.2014	Vic – 3 ATM deposits (\$10,000 x 2, \$10,900) totalling \$30,900 at Clayton D
20	02.12.2014	IMT of \$50,000 to Offshore Account 18
21	02.12.2014	Vic – 3 ATM deposits (\$3,200, \$6,980, \$4,950) totalling \$15,130 at Clayton D
22	03.12.2014	Vic – 2 ATM deposits (\$4,000, \$6,030) totalling \$10,030 at Box Hill A
23	03.12.2014	IMT of \$50,000 to Offshore Account 18
24	04.12.2014	Vic – 3 ATM deposits (\$9,852, \$9,900, \$9,850) totalling \$29,602 at Lonsdale St B
25	04.12.2014	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Lonsdale St B
26	04.12.2014	IMT of \$50,000 to Offshore Account 18
27	05.12.2014	Vic - 4 ATM deposits (\$9,950, \$9,850, \$7,500, \$9,950) totalling \$37,250 at Clayton D
28	05.12.2014	Vic – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Clayton D
29	05.12.2014	IMT of \$50,000 to Offshore Account 18
30	06.12.2014	Vic – 1 ATM deposit of \$9,950 at Lonsdale St B
31	06.12.2014	Vic – 5 ATM deposits (\$10,000, x 5) totalling \$50,000 at Lonsdale St B
32	06.12.2014	IMT of \$50,000 to Offshore Account 18
33	07.12.2014	Vic – 2 ATM deposits (\$9,950, \$9,600) totalling \$19,550 at Chadstone Ct A
34	07.12.2014	IMT of \$45,000 to Offshore Account 18
35	08.12.2014	Vic – 2 ATM deposits (\$9,950, \$9,950) totalling \$19,900 at Clayton D
36	08.12.2014	Vic – 1 ATM deposit of \$10,000 at Clayton D
37	09.12.2014	Vic – 3 ATM deposits (\$10,000, \$11,800, \$12,290) totalling \$34,090 at Clayton D
38	09.12.2014	IMT of \$50,000 to Offshore Account 18
39	10.12.2014	Vic – 1 ATM deposit of \$9,950 at Chadstone Ct A
40	10.12.2014	Vic – 1 ATM deposit of \$10,000 at Chadstone Ct A, 3 ATM deposits (\$10,000 x 3) at Lonsdale St B – total deposits of \$40,000
41	10.12.2014	IMT of \$50,000 to Offshore Account 18
42	11.12.2014	Vic – 3 ATM deposits (\$9,950 x 2, \$1,100) totalling \$21,000 at Lonsdale St A
43	11.12.2014	Vic – 1 ATM deposit of \$10,000 at Lonsdale St A
44	11.12.2014	Account credit of \$20,000 from CommBank Account 99
45	11.12.2014	Vic – ATM deposit of \$9,700 at Clayton D
46	11.12.2014	Vic – 1 ATM deposit of \$10,000 at Chadstone Ct A, 2 ATM deposits

ITEM	DATE	TRANSACTION/S
		(\$10,000, x 2) at Clayton D – total deposits of \$30,000
47	12.12.2014	IMT of \$50,000 to Offshore Account 18
48	12.12.2014	Vic – 1 ATM deposit of \$9,850 at Lonsdale St B
49	12.12.2014	Vic – 2 ATM deposits (\$10,000, x 2) totalling \$20,000 at Lonsdale St B
50	12.12.2014	Vic – 4 ATM deposits (\$4,250, \$7,000, \$9,750, \$4,150) totalling \$25,150 at Chadstone Ct A
51	13.12.2014	Vic – 1 ATM deposit (\$9,950) at Box Hill A, 2 ATM deposits (\$9,900, \$7,200) at Box Hill B - total deposits of \$27,050
52	13.12.2014	Vic – 1 ATM deposit of \$10,000 at Box Hill B
53	13.12.2014	IMT of \$50,000 to Offshore Account 18
54	13.12.2014	Vic – 1 ATM deposit of \$5,000 at North Balwyn A
55	13.12.2014	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at North Balwyn A
56	14.12.2014	IMT of \$50,000 to Offshore Account 18
57	15.12.2014	IMT of \$50,000 to Offshore Account 18
58	15.12.2014	Vic – 1 ATM deposit of \$1,000 at Lonsdale St B, 1 ATM deposit of \$9,950 at Clayton D – total deposits of \$10,950
59	15.12.2014	Vic – 3 ATM deposits (\$10,000, x 3) at Lonsdale St B, 2 ATM deposits (\$10,000 x 2) at Clayton D – total deposits of \$50,000
60	16.12.2014	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Lonsdale St A
61	16.12.2014	IMT of \$50,000 to Offshore Account 18
62	16.12.2014	Vic – 1 ATM deposit of \$4,000 at Clayton D
63	16.12.2014	Vic – 1 ATM deposit of \$10,000 at Lonsdale St A, 3 ATM deposits (\$10,000, \$10,000, \$11,500) at Clayton D – total deposits of \$41,500
64	17.12.2014	IMT of \$50,000 to Offshore Account 18
65	17.12.2014	Vic – 2 ATM deposits (\$15,600, \$14,400) totalling \$30,000 at Glen Waverley C
66	18.12.2014	Vic – 2 ATM deposits (\$9,900, \$6,100) totalling \$16,000 at Glen Waverley C
67	18.12.2014	Vic – 1 ATM deposit of \$19,800 at Glen Waverley C
68	18.12.2014	IMT of \$50,000 to Offshore Account 18
69	18.12.2014	Vic – 1 ATM deposit of \$9,800 at Box Hill B
70	18.12.2014	Vic – 1 ATM deposit of \$10,200 at Box Hill B
71	19.12.2014	IMT of \$50,000 to Offshore Account 18
72	19.12.2014	Vic – 3 ATM deposits (\$9,250, \$7,420, \$3,330) at Lonsdale St B, 2 ATM deposits (\$9,750, \$6,450) at Bourke B – total deposits of \$36,200
73	19.12.2014	Vic – 1 ATM deposit of \$10,000 at Lonsdale St B, 2 ATM deposits (\$10,000 x 2) at Bourke B – total deposits of \$30,000

ITEM	DATE	TRANSACTION/S
74	20.12.2014	IMT of \$50,000 to Offshore Account 18
75	20.12.2014	Vic – 4 ATM deposits (\$8,850, \$9,000, \$9,950, \$2,200) totalling \$30,000 at Clayton D
76	20.12.2014	Vic – 1 ATM deposit of \$10,000 at Clayton D
77	21.12.2014	IMT of \$50,000 to Offshore Account 18
78	22.12.2014	Account credit of \$30,000 from CommBank Account 99
79	22.12.2014	Vic – 2 ATM deposits (\$9,750, \$300) totalling \$10,050 at Lonsdale St B
80	22.12.2014	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Lonsdale St B
81	22.12.2014	IMT of \$50,000 to Offshore Account 18
82	22.12.2014	Vic – 3 ATM deposits (\$20,000 x 3) totalling \$60,000 at Glen Waverley C
83	23.12.2014	IMT of \$50,000 to Offshore Account 18
84	23.12.2014	Vic – 2 ATM deposits (\$9,900, \$7,240) at Lonsdale St A, 2 ATM deposits (\$9,950 x 2) at Glen Waverley C – total deposits of \$37,040
85	23.12.2014	Vic – 1 ATM deposit of \$10,000 at Lonsdale St A, 1 ATM deposit of \$10,000 at Glen Waverley C – total deposits of \$20,000
86	24.12.2014	Vic – 4 ATM deposits (\$10,000 x 2, \$10,050, \$10,100) totalling \$40,150 at Bourke B
87	24.12.2014	IMT of \$50,000 to Offshore Account 18
88	24.12.2014	Vic – 2 ATM deposits (\$9,950, \$9,650) at Box Hill A, 2 ATM deposits (\$9,850, \$9,600) at Glen Waverley C, 1 ATM deposit of \$9,950 at Bourke B – total deposits of \$49,000
89	24.12.2014	Vic – 1 ATM deposit of \$20,000 at Box Hill A, 2 ATM deposits (\$10,000 x 2) at Glen Waverley C, 2 ATM deposits (\$10,000 x 2) at Bourke B – total deposits of \$60,000
90	25.12.2014	Vic – 2 ATM deposits (\$9,950, \$100) totalling \$10,050 at Bourke B
91	25.12.2014	IMT of \$50,000 to Offshore Account 18
92	26.12.2014	IMT of \$50,000 to Offshore Account 18
93	27.12.2014	IMT of \$50,000 to Offshore Account 18
94	28.12.2014	IMT of \$50,000 to Offshore Account 18
95	29.12.2014	Vic – 1 ATM deposit of \$9,950 at Lonsdale St B, 2 ATM deposits (\$9,950 x 2) at Bourke C – total deposits of \$29,850
96	29.12.2014	Vic – 2 ATM deposits (\$10,000, x 2) at Lonsdale St B, 2 ATM deposits (\$10,000 x 2) at Bourke C – total deposits of \$40,000
97	29.12.2014	IMT of \$50,000 to Offshore Account 18
98	29.12.2014	Vic – ATM deposit of \$9,500 at Glen Waverley C
99	29.12.2014	Vic – 3 ATM deposits (\$10,500, \$20,000 x 2) totalling \$50,500 at Glen Waverley C
100	30.12.2014	IMT of \$50,000 to Offshore Account 18
101	30.12.2014	Vic – 1 ATM deposit of \$9,950 at Clayton D, 2 ATM deposits (\$9,700,

ITEM	DATE	TRANSACTION/S
		\$9,950) at Glen Waverley C, 2 ATM deposits (\$9,950, \$6,000) at Box Hill B – total deposits of \$45,550
102	30.12.2014	Vic – 7 ATM deposits (\$10,000 x 7) at Clayton D, 2 ATM deposits (\$10,000 x 2) at Glen Waverley C, 4 ATM deposits (\$10,000 x 4) at Box Hill B – total deposits of \$130,000
103	31.12.2014	Vic – 1 ATM deposit of \$9,950 at Chadstone Ct A
104	31.12.2014	Vic – 1 ATM deposit of \$10,000 at Chadstone Ct A
105	31.12.2014	IMT of \$50,000 to Offshore Account 18
106	01.01.2015	IMT of \$50,000 to Offshore Account 18
107	02.01.2015	IMT of \$50,000 to Offshore Account 18
108	03.01.2015	IMT of \$50,000 to Offshore Account 18
109	05.01.2015	IMT of \$50,000 to Offshore Account 18
110	05.01.2015	Vic – 2 ATM deposits (\$9,900, \$9,950) at Clayton D, 1 ATM deposit of \$9,950 at Glen Waverley C – total deposits of \$29,800
111	05.01.2015	Vic – 3 ATM deposits (\$10,000 x 2, \$10,100) at Clayton D, 2 ATM deposits (\$10,000 x 2) at Glen Waverley C – total deposits of \$50,100
112	06.01.2015	Vic – 2 ATM deposits (\$6,280, \$3,700) totalling \$9,980 at Lonsdale St A
113	06.01.2015	Vic – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Lonsdale St A
114	06.01.2015	IMT of \$50,000 to Offshore Account 18
115	06.01.2015	Vic – 2 ATM deposits (\$9,900, \$9,950) at Glen Waverley C, 2 ATM deposits (\$9,900, \$9,850) at Clayton D – total deposits of \$39,600
116	06.01.2015	Vic – 1 ATM deposit of \$10,000 at Glen Waverley C, 3 ATM deposits (\$10,000 x 2, \$11,750) at Clayton D – total deposits of \$41,750
117	07.01.2015	Vic - 2 ATM deposits (\$9,950, \$200) totalling \$10,150 at Box Hill B
118	07.01.2015	Vic - 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Box Hill A
119	07.01.2015	IMT of \$50,000 to Offshore Account 18
120	08.01.2015	Vic – 1 ATM deposit of \$9,900 at Clayton D
121	08.01.2015	Vic – 5 ATM deposits (\$10,000 x 5) totalling \$50,000 at Clayton D
122	08.01.2015	Vic – 4 ATM deposits (\$9,500 x 3, \$3,450) totalling \$32,850 at Box Hill B
123	08.01.2015	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Box Hill B
124	08.01.2015	IMT of \$50,000 to Offshore Account 18
125	08.01.2015	Vic – 2 ATM deposits (\$1,250, \$9,900) totalling \$11,150 at Box Hill A
126	08.01.2015	Vic – 1 ATM deposit of \$16,850 at Box Hill A
127	09.01.2015	Vic – 3 ATM deposits (\$7,360, \$7,330, \$5,325) totalling \$20,015 at Glen Waverley C
128	09.01.2015	Vic – ATM deposit of \$10,000 at Glen Waverley C
129	09.01.2015	IMT of \$50,000 to Offshore Account 18

ITEM	DATE	TRANSACTION/S
130	09.01.2015	Vic – 5 ATM deposits (\$9,800, \$9,950 x 3, \$405) totalling \$40,055 at Toorak A
131	09.01.2015	Vic – 1 ATM deposit of \$19,900 at Glen Waverley C, 1 ATM deposit of \$10,000 at Toorak A – total deposits of \$29,900
132	10.01.2015	IMT of \$50,000 to Offshore Account 18
133	10.01.2015	Vic – 2 ATM deposits (\$9,800, \$240) totalling \$10,040 at Clayton D
134	10.01.2015	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Clayton D
135	11.01.2015	IMT of \$50,000 to Offshore Account 18
136	12.01.2015	Vic – 1 ATM deposit of \$9,950 at Lonsdale St B, 2 ATM deposits (\$9,950, \$9,900) at Bourke B – total deposits of \$29,800
137	12.01.2015	Vic – 1 ATM deposit of \$10,000 at Lonsdale St B, 1 ATM deposit of \$10,000 at Bourke B – total deposits of \$20,000
138	12.01.2015	IMT of \$50,000 to Offshore Account 18
139	12.01.2015	Vic – 4 ATM deposits (\$10,000 x 3, \$11,000) at Bourke B and 1 ATM deposit of \$10,000 at Bourke C – total deposits of \$51,000
140	13.01.2015	Vic – 1 ATM deposit of \$9,800 at Glen Waverley C
141	13.01.2015	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Glen Waverley C
142	13.01.2015	IMT of \$50,000 to Offshore Account 18
143	13.01.2015	Vic – 1 ATM deposit of \$9,950 at Bourke C, 3 ATM deposits (\$8,800, \$9,900, \$7,180) at Glen Waverley C, 1 ATM deposit of \$9,950 at Clayton D – total deposits of \$45,780
144	13.01.2015	Vic – 3 ATM deposits (\$10,000 x 3) at Bourke C, 2 ATM deposits (\$10,370, \$10,000) at Glen Waverley C, 2 ATM deposits (\$10,000 x 2) at Clayton D – total deposits of \$70,370
145	14.01.2015	Vic – 2 ATM deposits (\$9,950, \$4,850) totalling \$14,800 at Box Hill B
146	14.01.2015	Vic – 2 ATM deposits (\$19,100, \$10,000) totalling \$29,100 at Box Hill B
147	14.01.2015	IMT of \$50,000 to Offshore Account 18
148	14.01.2015	Vic – 1 ATM deposit of \$8,450 at Bourke C
149	14.01.2015	Vic – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Bourke C
150	15.01.2015	IMT of \$50,000 to Offshore Account 18
151	15.01.2015	IMT of \$200,000 to Offshore Account 18
152	15.01.2015	Vic – 3 ATM deposits (\$9,900, \$9,950, \$9,900) at Bourke C, 1 ATM deposit of \$9,100 at Lonsdale St B, 3 ATM deposits (\$9,850, \$9,750, \$5,550) at Glen Waverley C – total deposits of \$64,000
153	15.01.2015	Vic – 4 ATM deposits (\$10,000 x 4) at Bourke C, 3 ATM deposits (\$10,000, \$10,200, \$13,900) at Lonsdale St B, 3 ATM deposits (\$10,000 x 3) at Glen Waverley C – total deposits of \$104,100
154	16.01.2015	Vic – 3 ATM deposits (\$10,000, \$19,500, \$10,500) totalling \$40,000 at Bourke A
155	16.01.2015	IMT of \$50,000 to Offshore Account 18

ITEM	DATE	TRANSACTION/S
156	16.01.2015	Vic – 4 ATM deposits (\$9,950 x 3, \$9,650) at Bourke B, 4 ATM deposits (\$9,950, \$9,900 x 2, \$3,000) at Box Hill A – total deposits of \$72,250
157	16.01.2015	Vic – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Bourke B
158	17.01.2015	Vic – 4 ATM deposits (\$9,850, \$9,950 x 2, \$9,850) at Glen Waverley C, 1 ATM deposit of \$9,950 at Lonsdale St B – total deposits of \$49,550
159	17.01.2015	Vic – 2 ATM deposits (\$10,000 x 2) at Glen Waverley C, 4 ATM deposits (\$10,000 x 4) at Lonsdale St B – total deposits of \$60,000
160	19.01.2015	IMT of \$151,120 to Offshore Account 18
161	19.01.2015	Vic – 6 ATM deposits (\$9,950 x 4, \$3,950, \$9,900) totalling \$53,650 at Clayton D
162	19.01.2015	Vic – 5 ATM deposits (\$10,000 x 5) totalling \$50,000 at Clayton D
163	19.01.2015	IMT of \$310,000 to Offshore Account 18
164	19.01.2015	Vic – 1 ATM deposit of \$9,950 at Glen Waverley, 5 ATM deposits (\$9,450, \$8,180, \$9,950 x 2, \$2,220) at Bourke B – total deposits of \$49,700
165	19.01.2015	Vic – 2 ATM deposits (\$10,000 x 2) at Glen Waverley C, 1 ATM deposit of \$10,000 at Bourke B – total deposits of \$30,000
166	20.01.2015	Vic – 8 ATM deposits (\$10,000 x 6, \$20,000, \$10,950) totalling \$90,950 at Clayton D
167	20.01.2015	IMT of \$292,500 to Offshore Account 18
168	20.01.2015	Vic – 4 ATM deposits (\$9,950 x 2, \$3,640, \$4,940) at Box Hill A, 4 ATM deposits (\$9,850, \$9,950 x 2, \$5,000) at Glen Waverley C – total deposits of \$63,230
169	20.01.2015	Vic – 3 ATM deposits (\$10,000 x 3) at Box Hill A, 1 ATM deposit of \$10,000 at Glen Waverley C – total deposits of \$40,000
170	21.01.2015	Vic – 1 ATM deposit of \$9,950 at Bourke C
171	21.01.2015	Vic – 3 ATM deposits (\$10,000 x 2, \$20,000) totalling \$40,000 at Bourke C
172	21.01.2015	IMT of \$166,050 to Offshore Account 18
173	21.01.2015	Vic – 1 ATM deposit of \$9,900 at Glen Waverley C, 2 ATM deposits (\$9,950 x 2) at Clayton D, 2 ATM deposits (\$7,000, \$6,180) at Lonsdale St B – total deposits of \$42,980
174	21.01.2015	Vic – 5 ATM deposits (\$10,000 x 5) at Box Hill A, 2 ATM deposits (\$10,000 x 2) at Glen Waverley C, 1 ATM deposit of \$10,000 at Clayton D, 1 ATM deposit of \$10,000 at Lonsdale St B – total deposits of \$90,000
175	22.01.2015	IMT of \$135,000 to Offshore Account 18
176	22.01.2015	Vic – 1 ATM deposit of \$9,950 at Box Hill B, 2 ATM deposits (\$9,950, \$6,500) at Bourke B, 5 ATM deposits (\$9,950 x 2, \$9,750, \$9,800, \$550) at Glen Waverley C – total deposits of \$66,400
177	22.01.2015	Vic – 2 ATM deposits (\$10,000 x 2) at Box Hill A, 2 ATM deposits (\$10,000 x 2) at Box Hill B, 6 ATM deposits (\$10,000 x 6) at Bourke B, 2 ATM deposits (\$10,000 x 2) at Glen Waverley C – total deposits of \$120,000

ITEM	DATE	TRANSACTION/S
178	23.01.2015	Vic – 4 ATM deposits (\$9,200, \$9,900 x 2, \$9,950) totalling \$38,950 at Clayton D
179	23.01.2015	Vic – 3 ATM deposits (\$10,000 x 2, \$11,050) totalling \$31,050 at Clayton D
180	23.01.2015	IMT of \$243,000 to Offshore Account 18
181	23.01.2015	Vic – 1 ATM deposit of \$9,950 at Lonsdale St B, 6 ATM deposits (\$9,950 x 3, \$7,600, \$5,940, \$4,000) at Bourke B – total deposits of \$57,340
182	23.01.2015	Vic – 1 ATM deposit of \$10,000 at Lonsdale St B, 2 ATM deposits (\$10,000 x 2) at Bourke B – total deposits of \$30,000
183	24.01.2015	Vic – 1 ATM deposit of \$2,240 at Glen Waverley C, 2 ATM deposits (\$9,950 x 2) at Box Hill A, 1 ATM deposit of \$9,900 at Box Hill B – total deposits of \$32,040
184	24.01.2015	Vic – 5 ATM deposits (\$10,000 x 5) at Glen Waverley C, 1 ATM deposit of \$10,000 at Box Hill A, 1 ATM deposit of \$10,000 at Box Hill B – total deposits of \$70,000
185	26.01.2015	Vic – 1 ATM deposit of \$6,500 at Toorak A, 3 ATM deposits (\$9,700, \$9,950, \$9,900) at Toorak B - total deposits of \$36,050
186	26.01.2015	Vic – 3 ATM deposits (\$10,000 x 3) at Toorak A, 1 ATM deposit of \$10,000 at Toorak B – total deposits of \$40,000
187	27.01.2015	Vic – 4 ATM deposits (\$9,700, \$9,850, \$9,200, \$1,250) totalling \$30,000 at Clayton D
188	27.01.2015	Vic – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Clayton D
189	27.01.2015	IMT of \$324,000 to Offshore Account 18
190	27.01.2015	Vic – 3 ATM deposits (\$9,850, \$9,950, \$5,650) totalling \$25,450 at Bourke B
191	27.01.2015	Vic – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Bourke B
192	28.01.2015	Vic – 4 ATM deposits (\$9,950 x 3, \$9,850) at Clayton D, 3 ATM deposits (\$9,850 x 2, \$9,950) at Glen Waverley C – total deposits of \$69,350
193	28.01.2015	Vic – 1 ATM deposit of \$10,000 at Clayton D, 1 ATM deposit of \$10,000 at Glen Waverley C – total deposits of \$20,000
194	29.01.2015	Vic – 3 ATM deposits (\$9,950, \$9,900, \$5,800) at Clayton D, 3 ATM deposits (\$9,750, \$9,850, \$3,900) at Box Hill B – total deposits of \$25,650
195	29.01.2015	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Clayton D
196	30.01.2015	Account credit of \$99,087.99 from Offshore Account 18
197	30.01.2015	Vic – 2 ATM deposits (\$9,950 x 2) totalling \$19,900 at Clayton D
198	30.01.2015	Vic – 1 ATM deposit of \$10,000 at Clayton D
199	01.02.2015	Vic – 3 ATM deposits (\$9,950 x 3) totalling \$29,850 at Bourke C
200	01.02.2015	Vic – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Bourke C
201	02.02.2015	IMT of \$400,000 to Offshore Account 18
202	02.02.2015	Vic – 4 ATM deposits (\$9,950, \$8,250, \$2,750, \$9,850) at Clayton D, 2 ATM deposits (\$9,850, \$3,350) at Box Hill A – total deposits of

ITEM	DATE	TRANSACTION/S
		\$44,000
203	02.02.2015	Vic – 6 ATM deposits (\$10,000 x 6) at Clayton D, 4 ATM deposits (\$10,000 x 4) at Box Hill A – total deposits of \$100,000
204	03.02.2015	IMT of \$152,300 to Offshore Account 18
205	03.02.2015	Vic – 1 ATM deposit of \$9,900 at Bourke B, 3 ATM deposits (\$9,000, \$9,800, \$9,800) at Bourke C, 4 ATM deposits (\$8,260, \$8,650, \$2,820, \$2,600) at Lonsdale St B, 2 ATM deposits (\$9,950, \$6,010) at Glen Waverley C – total deposits of \$76,790
206	03.02.2015	Vic - 4 ATM deposits (\$10,000 x 4) at Bourke B, 5 ATM deposits (\$10,000 x 5) at Bourke C, 2 ATM deposits (\$10,000 x 2) at Glen Waverley C – total deposits of \$110,000
207	04.02.2015	IMT of \$199,750 to Offshore Account 18
208	04.02.2015	Vic – 2 ATM deposits (\$3,475, \$9,900) at Bourke C, 1 ATM deposit of \$9,950 at Melb Central A, 4 ATM deposits (\$9,900, \$9,950, \$6,250, \$3,650) at Lonsdale St B, 3 ATM deposits (\$9,800, \$3,000, \$1,000) at Clayton D – total deposits of \$66,875
209	04.02.2015	Vic – 1 ATM deposit of \$10,000 at Bourke C, 4 ATM deposits (\$10,000 x 3, \$10,050) at Melb Central A, 2 ATM deposits (\$10,000 x 2) at Lonsdale St B, 2 ATM deposits (\$10,000 x 2) at Clayton D – total deposits of \$90,000
210	05.02.2015	Vic – 1 ATM deposit of \$9,850 at Glen Waverley C, 3 ATM deposits (\$9,850, \$9,950, \$6,650) at Bourke C, 2 ATM deposits (\$9,950 x 2) at Lonsdale St B – total deposits of \$56,200
211	05.02.2015	Vic – 2 ATM deposits (\$10,200, \$10,100) at Glen Waverley C, 4 ATM deposits (\$10,000 x 4) at Bourke C, 1 ATM deposit of \$10,000 at Lonsdale St B – total deposits of \$70,300
212	06.02.2015	Vic – 4 ATM deposits (\$9,950 x 4) at Clayton D, 2 ATM deposits (\$9,850, \$9,950) at Box Hill B – total deposits of \$59,600
213	06.02.2015	Vic – 2 ATM deposits (\$10,000 x 2) at Clayton D, 2 ATM deposits (\$10,000, \$10,350) at Box Hill B – total deposits of \$40,350
214	09.02.2015	Vic – 1 ATM deposit of \$9,950 at Bourke C
215	09.02.2015	Vic – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Bourke C
216	10.02.2015	IMT of \$426,000 to Offshore Account 18
217	11.02.2015	Vic – 4 ATM deposits (\$9,950 x 3, \$9,900) at Clayton D, 4 ATM deposits (\$9,900, \$9,700, \$9,950, \$350) at Box Hill B, 4 ATM deposits (\$9,950, \$4,780, \$5,970, \$5,100) at Glen Waverley C – total deposits of \$95,450
218	11.02.2015	Vic – 3 ATM deposits (\$10,000 x 3) at Clayton D, 3 ATM deposits (\$10,000 x 3) at Box Hill B, 2 ATM deposits (\$10,000 x 2) at Glen Waverley C – total deposits of \$80,000
219	12.02.2015	Vic – 3 ATM deposits (\$9,670, \$9,950, \$9,700) at Clayton D, 5 ATM deposits (\$2,430, \$9,800, \$7,200, \$3,835, \$6,160) at Box Hill B – total deposits of \$58,745
220	12.02.2015	Vic – 4 ATM deposits (\$10,000 x 4) at Clayton D, 1 ATM deposit of \$10,000 at Box Hill B – total deposits of \$50,000
221	13.02.2015	IMT of \$285,000 to Offshore Account 18

ITEM	DATE	TRANSACTION/S
222	13.02.2015	Vic – 3 ATM deposits (\$9,950 x 2, \$9,990) totalling \$29,890 at Bourke B
223	13.02.2015	Vic – 1 ATM deposit of \$10,000 at Bourke B
224	16.02.2015	Vic – Cash deposit of \$281,300 at Springvale Branch
225	16.02.2015	Vic – 4 ATM deposits (\$9,950, \$9,850, \$9,900 x 2) at Clayton D, 4 ATM deposits (\$9,950 x 2, \$9,700, \$9,850) at Box Hill A – total deposits of \$79,050
226	16.02.2015	Vic – 3 ATM deposits (\$10,000 x 3) at Clayton D, 3 ATM deposits (\$10,000 x 3) at Box Hill A – total deposits of \$60,000
227	17.02.2015	Vic – 5 ATM deposits (\$9,850, \$9,950, \$9,900, \$9,610, \$4,400) totalling \$43,710 at Clayton D
228	17.02.2015	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Clayton D
229	17.02.2015	IMT of \$523,000 to Offshore Account 18
230	17.02.2015	Vic – 8 ATM deposits (\$9,500, \$9,450, \$6,520, \$7,680, \$9,550, \$9,950, \$9,800, \$3,420) at Glen Waverley C, 1 ATM deposit of \$2,000 at Bourke C – total deposits of \$67,870
231	17.02.2015	Vic – 3 ATM deposits (\$10,000 x 3) at Glen Waverley C, 3 ATM deposits (\$10,000 x 3) at Bourke C – total deposits of \$60,000
232	18.02.2015	IMT of \$120,200 to Offshore Account 18
233	18.02.2015	Vic – 2 ATM deposits (\$9,900, \$8,700) at Glen Waverley C, 6 ATM deposits (\$9,800 x 2, \$9,950, \$9,580, \$9,900, \$1,070) at Clayton D, 4 ATM deposits (\$9,900 x 2, \$9,900, \$150) at Bourke A – total deposits of \$98,650
234	18.02.2015	Vic – 4 ATM deposits (\$10,000 x 4) at Glen Waverley C, 1 ATM deposit of \$10,000 at Clayton D, 3 ATM deposits (\$10,000 x 3) at Bourke A – total deposits of \$80,000
235	19.02.2015	Vic – 1 ATM deposit (\$8,160) at Box Hill B, 4 ATM deposits (\$9,450, \$9,750, \$9,550, \$2,600) at Box Hill A – total deposits of \$39,510
236	19.02.2015	Vic – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Box Hill A
237	20.02.2015	Vic – 2 ATM deposits (\$9,950, \$9,930) at Bourke St A, 2 ATM deposits (\$9,950, \$460) at Bourke St B, 4 ATM deposits (\$9,950 x 2, \$9,850, \$250) at Clayton D, 1 ATM deposit of \$6,300 at Box Hill A – total deposits of \$66,590
238	20.02.2015	Vic – 1 ATM deposit of \$10,000 at Bourke St A, 3 ATM deposits (\$12,030, \$11,660, \$11,460) at Bourke St B, 5 ATM deposits (\$10,000 x 5) at Clayton D, 2 ATM deposits (\$10,900, \$12,850) at Box Hill A – total deposits of \$118,900
239	21.02.2015	Vic – 4 ATM deposits (\$9,850, \$9,800, \$9,900, \$500) at Glen Waverley C, 3 ATM deposits (\$9,900, \$9,950, \$200) at Box Hill A, 5 ATM deposits (\$9,800 x 2, \$9,950 x 2, \$350) at Lonsdale St B – total deposits of \$89,950
240	21.02.2015	Vic – 2 ATM deposits (\$10,000 x 2) at Glen Waverley C, 3 ATM deposits (\$10,000 x 3) at Box Hill A, 2 ATM deposits (\$10,000 x 2) at Lonsdale St B – total deposits of \$70,000
241	23.02.2015	NSW – Cash deposit of \$532,500 at Chatswood Branch
242	23.02.2015	NSW – Withdrawal of \$1,080,000 at Chatswood Branch [deposited on same day to CommBank Account 97 in branch]

ITEM	DATE	TRANSACTION/S
243	23.02.2015	Vic – Cash deposit of \$100,000 at Springvale Branch
244	23.02.2015	Vic – 5 ATM deposits (\$10,700, \$10,000 x 4) totalling \$50,700 at Box Hill A
245	24.02.2015	IMT of \$15,000 to Offshore Account 15
246	24.02.2015	IMT of \$9,800 to Offshore Account 17
247	24.02.2015	IMT of \$10,000 to Offshore Account 16
248	24.02.2015	Vic – 3 ATM deposits (\$9,950, \$9,600, \$8,450) at Lonsdale St B, 4 ATM deposits (\$9,700, \$9,760, \$9,900, \$640) at Glen Waverley C – total deposits of \$58,000
249	24.02.2015	Vic – 5 ATM deposits (\$10,000 x 5) at Lonsdale St B, 2 ATM deposits (\$10,000 x 2) at Glen Waverley C – total deposits of \$70,000
250	25.02.2015	IMT of \$249,000 to Offshore Account 18
251	25.02.2015	Account credit of \$1,000,000 from CommBank Account 97
252	25.02.2015	IMT of \$750,000 to Offshore Account 18
253	25.02.2015	Vic – 3 ATM deposits (\$9,950 x 2, \$100) totalling \$20,000 at Clayton D
254	25.02.2015	Vic – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Clayton D
255	26.02.2015	Domestic transfer of \$100,000 to CommBank Account 97
256	26.02.2015	IMT of \$150,000 to Offshore Account 18
257	26.02.2015	Vic – 4 ATM deposits (\$8,950, \$9,950, \$100, \$9,000) at Bentleigh B, 5 ATM deposits (\$9,950, \$9,900 x 3, \$350) at Bourke B – total deposits of \$68,000
258	26.02.2015	Vic – 6 ATM deposits (\$10,000 x 6) at Bentleigh B, 1 ATM deposit of \$10,000 at Bourke B – total deposits of \$70,000
259	27.02.2015	Account credit of \$150,000 from CommBank Account 97
260	27.02.2015	IMT of \$332,000 to Offshore Account 18
261	27.02.2015	Vic – ATM deposit of \$9,950 at Lonsdale St B
262	27.02.2015	Vic – 3 ATM deposits (\$10,000 x 3) at Bourke C, 3 ATM deposits (\$10,000 x 2, \$10,050) at Lonsdale St B – total deposits of \$60,050
263	27.02.2015	Vic – 5 ATM deposits (\$9,900 x 2, \$9,800, \$3,280, \$6,870) totalling \$39,750 at Glen Waverley C
264	27.02.2015	Vic – 2 ATM deposits (\$10,100, \$10,000) totalling \$20,100 at Glen Waverley C
265	28.02.2015	Vic – 1 ATM deposit of \$9,900 at Glen Waverley C, 5 ATM deposits (\$9,800, \$9,950 x 2, \$150, \$9,850) at Springvale A, 4 ATM deposits (\$9,900 x 2, \$9,650, \$4,330) at Clayton D, 1 ATM deposit of \$9,000 at Richmond Sth A – total deposits of \$92,380
266	28.02.2015	Vic – 4 ATM deposits (\$10,000 x 4) at Glen Waverley C, 6 ATM deposits (\$10,000 x 6) at Springvale A, 3 ATM deposits (\$10,000 x 3) at Clayton D – total deposits of \$130,000
267	02.03.2015	IMT of \$315,000 to Offshore Account 18
268	02.03.2015	Vic - 2 cash deposits (\$100,000, \$154,000) totalling \$254,000 at Springvale Branch

ITEM	DATE	TRANSACTION/S
269	02.03.2015	NSW – 10 ATM deposits (\$9,800 x 2, \$9,850 x 3, \$9,700, \$9,550, \$9,750, \$9,500, \$9,700) at Chatswood Ch A, 7 ATM deposits (\$9,750, \$9,750, \$9,550, \$9,900, \$9,750, \$6,350, \$250) at Chatswood Ch B – total deposits of \$152,650
270	02.03.2015	NSW – 5 ATM deposits (\$10,000, \$10,000, \$10,000, \$10,000, \$10,000) at Chatswood Ch A, 1 ATM deposit of \$10,000 at Chatswood Ch B – total deposits of \$60,000
271	02.03.2015	Vic – 3 ATM deposits (\$9,950 x 2, \$9,750) totalling \$29,650 at Clayton D
272	02.03.2015	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Clayton D
273	03.03.2015	Domestic transfer of \$30,000 to CommBank Account 97
274	03.03.2015	IMT of \$500,900 to Offshore Account 18
275	03.03.2015	Vic – ATM deposit of \$1,000 at Glen Waverley C
276	03.03.2015	Vic – 5 ATM deposits (\$10,000 x 5) totalling \$50,000 at Glen Waverley C
277	03.03.2015	Vic – 2 cash deposits (\$100,000, \$165,000) totalling \$265,000 at Springvale Branch
278	03.03.2015	Vic - 3 ATM deposits (\$9,950 x 2, \$9,650) totalling \$29,550 at Clayton D
279	03.03.2015	Vic - 4 ATM deposits (\$10,000 x 3, \$10,450) totalling \$40,450 at Clayton D
280	04.03.2015	IMT of \$388,000 to Offshore Account 18
281	04.03.2015	Vic – 2 cash deposits (\$118,000, \$120,000) totalling \$138,000 at Springvale Branch
282	04.03.2015	Vic – 3 ATM deposits (\$8,050, \$1,950, \$9,900) at Glen Waverley C, 3 ATM deposits (\$7,000, \$9,650, \$3,230) at Box Hill B – total deposits of \$39,780
283	04.03.2015	Vic – 2 ATM deposits (\$10,000, x 2) at Glen Waverley C, 2 ATM deposits (\$10,000, \$10,100) at Box Hill B – total deposits of \$40,100
284	05.03.2015	IMT of \$312,000 to Offshore Account 18
285	05.03.2015	Vic – Cash deposit of \$100,000 at Springvale Branch
286	05.03.2015	Vic – 2 ATM deposits (\$9,800, \$100) at Bourke C, 3 ATM deposits (\$5,000, \$8,900, \$100) at Lonsdale St B, 4 ATM deposits (\$9,700, \$9,900, \$8,600, \$1,500) at Glen Waverley C – total deposits of \$53,600
287	05.03.2015	Vic – 4 ATM deposits (\$10,000 x 3, \$10,100) at Bourke C, 2 ATM deposits (\$18,700, \$16,300) at Lonsdale St B – total deposits of \$75,100
288	06.03.2015	Domestic transfer of \$100,000 to CommBank Account 97
289	06.03.2015	IMT of \$128,000 to Offshore Account 18
290	06.03.2015	Vic – 2 cash deposits (\$125,000, \$125,000) totalling \$250,000 at Springvale Branch
291	06.03.2015	Vic – 5 ATM deposits (\$9,850 x 2, \$9,100, \$9,950, \$1,200) totalling \$39,950 at Glen Waverley C
292	06.03.2015	Vic – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Glen

ITEM	DATE	TRANSACTION/S
		Waverley C
293	07.03.2015	Vic – 2 ATM deposits (\$9,950, \$5,050) totalling \$15,000 at Clayton D
294	07.03.2015	Vic – 4 ATM deposits (\$10,000 x 4) at Bourke B, 1 ATM deposit of \$10,000 at Clayton D – total deposits of \$50,000
295	09.03.2015	IMT of \$308,000 to Offshore Account 18
296	10.03.2015	Account credit of \$160,000 from CommBank Account 97
297	10.03.2015	IMT of \$225,000 to Offshore Account 18
298	10.03.2015	NSW – 16 ATM deposits (\$9,750, \$9,350, \$9,700, \$9,900, \$9,600, \$9,200, \$9,450, \$9,800, \$9,900, \$9,750, \$9,500, \$9,950, \$9,350, \$9,900, \$6,100, \$2,100) at Chatswood Ch B, 2 ATM deposits (\$9,750, \$9,900) at Chatswood Ch A – total deposits of \$162,950
299	10.03.2015	NSW – 4 ATM deposits (\$10,000 x 4) at Chatswood Ch B, 1 ATM deposit of \$10,000 at Chatswood Ch A – total deposits of \$50,000
300	10.03.2015	Vic – 2 cash deposits (\$152,000, \$150,000) totalling \$302,000 at Springvale Branch
301	10.03.2015	Vic – 1 ATM deposit of \$850 at Clayton D, 1 ATM deposit of \$2,800 at Glen Waverley C, 2 ATM deposits (\$9,900, \$100) at Box Hill A – total deposits of \$13,650
302	10.03.2015	Vic – 5 ATM deposits (\$10,050, \$10,950, \$19,400, \$10,600, \$19,150) at Clayton D, 3 ATM deposits (\$19,900, \$17,300, \$10,000) at Glen Waverley C, 3 ATM deposits (\$20,000 x 3) at Box Hill A – total deposits of \$177,350
303	10.03.2015	Domestic transfer of \$707,000 to CommBank Account 98
304	11.03.2015	Vic – 2 cash deposits (\$170,000, \$258,000) totalling \$428,000 at Springvale Branch
305	11.03.2015	IMT of \$428,000 to Offshore Account 18
306	11.03.2015	Vic – ATM deposit of \$9,950 at Bourke C
307	11.03.2015	Vic – 8 ATM deposits (\$10,000 x 6, \$19,900, \$10,100) at Clayton D, 5 ATM deposits (\$20,000 x 2, \$10,000 x 3) at Bourke C – total deposits of \$160,000
308	12.03.2015	Account credit of \$350,000 from CommBank Account 98
309	12.03.2015	IMT of \$510,500 to Offshore Account 18
310	12.03.2015	Vic – 2 cash deposits (\$110,000, \$130,950) totalling \$240,950 at Springvale Branch
311	13.03.2015	Account credit of \$257,000 from CommBank Account 98
312	13.03.2015	IMT of \$27,500 to Offshore Account 17
313	13.03.2015	IMT of \$472,000 to Offshore Account 18
314	13.03.2015	Account credit of \$10,000 from CommBank Account 98
315	13.03.2015	Vic – 2 cash deposits (\$150,000, \$185,000) totalling \$335,000 at Springvale Branch
316	13.03.2015	Vic – 5 ATM deposits (\$10,000 x 5) totalling \$50,000 at Glen Waverley C

ITEM	DATE	TRANSACTION/S
317	16.03.2015	IMT of \$352,000 to Offshore Account 18
318	16.03.2015	Vic – Cash deposit of \$150,000 at Springvale Branch
319	16.03.2015	Vic – 8 ATM deposits (\$9,800, \$9,950 x 2, \$9,850, \$7,900, \$2,320, \$8,350, \$1,630) at Clayton D, 1 ATM deposit of \$9,850 at Box Hill A – total deposits of \$69,600
320	16.03.2015	Vic – 1 ATM deposit of \$10,000 at Box Hill B
321	17.03.2015	Vic – 3 ATM deposits (\$9,900 x 2, \$1,450) at Clayton D – total deposits of \$21,250
322	17.03.2015	Vic – 3 ATM deposits (\$19,000, \$10,050, \$19,700) at Clayton D – total deposits of \$48,750
323	17.03.2015	Vic – 5 ATM deposits (\$9,900, \$9,750 x 2, \$9,950, \$450) at Bourke C, 1 ATM deposit of \$200 at Bourke H, 2 ATM deposits (\$9,950 x 2) at Box Hill B – total deposits of \$59,900
324	17.03.2015	Vic – 3 ATM deposits (\$10,000 x 3) at Bourke C, 2 ATM deposits (\$10,000 x 2) at Box Hill B – total deposits of \$50,000
325	18.03.2015	IMT of \$318,000 to Offshore Account 16
326	18.03.2015	IMT of \$88,000 to Offshore Account 17
327	18.03.2015	Vic – 8 ATM deposits (\$9,650, \$9,600, \$9,950, \$9,900 x 2, \$2,630, \$6,600, \$3,820) at Clayton D, 1 ATM deposit of \$9,950 at Glen Waverley C – total deposits of \$72,000
328	18.03.2015	Vic – 1 ATM deposit of \$10,000 at Clayton D, 3 ATM deposits (\$10,000 x 3) at Glen Waverley C – total deposits of \$40,000
329	19.03.2015	Vic – 2 ATM deposits (\$9,650, \$9,000) totalling \$18,650 at Glen Waverley C
330	19.03.2015	Vic – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Glen Waverley C
331	19.03.2015	Vic – Cash deposit of \$50,000 at Springvale Branch
332	19.03.2015	Vic – ATM deposit of \$850 at Springvale A
333	19.03.2015	IMT of \$176,000 to Offshore Account 17
334	19.03.2015	Vic – 6 ATM deposits (\$9,350 x 2, \$9,750, \$9,950, \$9,850, \$550) at Clayton D, 2 ATM deposits (\$9,950, \$400) at Box Hill B, 1 ATM deposit of \$50 at Glen Waverley C – total deposits of \$59,200
335	19.03.2015	Vic – 1 ATM deposit of \$10,000 at Clayton D, 4 ATM deposits (\$10,000 x 3, \$10,300) at Box Hill B – total deposits of \$50,300
336	20.03.2015	Vic – Cash deposit of \$49,950 at Springvale Branch
337	20.03.2015	Vic – 6 ATM deposits (\$50, \$9,950 x 3, \$9,900, \$250) at Springvale A, 7 ATM deposits (\$9,900 x 3, \$9,950 x 2, \$9,750, \$6,050) at Clayton D, 3 ATM deposits (\$9,550, \$9,700, \$700) at Glen Waverley C – total deposits of \$125,400
338	20.03.2015	Vic – 2 ATM deposits (\$10,000 x 2) at Springvale A, 2 ATM deposits (\$10,000 x 2) at Clayton D, 1 ATM deposit of \$10,000 at Glen Waverley C – total deposits of \$50,000
339	24.03.2015	IMT of \$350,000 to Offshore Account 16
340	24.03.2015	Vic – 2 cash deposits (\$150,000, \$110,000) totalling \$260,000 at Springvale Branch

ITEM	DATE	TRANSACTION/S
341	24.03.2015	Vic – 1 ATM deposit of \$7,100 at Springvale A
342	25.03.2015	Vic – Cash deposit of \$213,800 at Springvale Branch
343	26.03.2015	IMT of \$310,000 to Offshore Account 16
344	26.03.2015	IMT of \$152,000 to Offshore Account 17
345	30.03.2015	Vic – 2 cash deposits (\$337,600, \$62,440) totalling \$400,040 at Springvale Branch
346	30.03.2015	Vic – 1 ATM deposit of \$9,950 at Clayton D
347	30.03.2015	Vic – 2 ATM deposits (\$10,000, \$10,050) totalling \$20,050 at Clayton D
348	31.03.2015	IMT of \$423,590 to Offshore Account 17
349	31.03.2015	Vic – Cash deposit of \$387,650 at Springvale Branch
350	31.03.2015	Vic – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Springvale A
351	01.04.2015	IMT of \$310,150 to Offshore Account 17
352	01.04.2015	Vic – Cash deposit of \$213,600 at Springvale Branch
353	08.04.2015	IMT of \$335,000 to Offshore Account 17
354	13.04.2015	Vic – Cash deposit of \$202,250 at Springvale Branch
355	20.04.2015	IMT of \$175,000 to Offshore Account 16
356	24.04.2015	Vic – Cash deposit of \$212,700 at Springvale Branch
357	27.04.2015	IMT of \$148,000 to Offshore Account 16
358	27.04.2015	IMT of \$65,000 to Offshore Account 17
359	27.04.2015	Vic – Cash deposit of \$214,000 at Springvale Branch
360	28.04.2015	IMT of \$180,000 to Offshore Account 17
361	29.04.2015	Account credit of \$90,000 from CommBank Account 98
362	29.04.2015	IMT of \$129,000 to Offshore Account 16
363	29.04.2015	Vic – 2 cash deposits (\$221,000, \$174,900) totalling \$ 395,900 at Springvale Branch
364	04.05.2015	IMT of \$100,000 to Offshore Account 17
365	04.05.2015	IMT of \$230,000 to Offshore Account 16
366	04.05.2015	Vic – Cash deposit of \$267,500 at Springvale Branch
367	08.05.2015	IMT of \$100,000 to Offshore Account 17
368	08.05.2015	IMT of \$185,000 to Offshore Account 16
369	15.05.2015	Account credit of \$2,230 from CommBank Account 99
370	15.05.2015	Vic – Cash deposit of \$159,000 at Springvale Branch
371	19.05.2015	IMT of \$150,000 to Offshore Account 17
372	01.06.2015	NSW – 1 ATM deposit of \$10,000 at Chatswood A

ITEM	DATE	TRANSACTION/S
373	04.06.2015	NSW – 1 ATM deposit of \$5,000 at Chatswood B
374	04.06.2015	NSW – 1 ATM deposit of \$11,000 at Chatswood B
375	10.06.2015	Vic – Cash deposit of \$318,600 at Springvale Branch
376	12.06.2015	IMT of \$300,000 to Offshore Account 16
377	12.06.2015	Vic – Cash deposit of \$321,000 at Springvale Branch
378	15.06.2015	IMT of \$300,000 to Offshore Account 17
379	15.06.2015	Vic – Cash deposit of \$192,600 at Springvale Branch
380	16.06.2015	Vic – Cash deposit of \$181,900 at Springvale Branch
381	17.06.2015	IMT of \$370,000 to Offshore Account 16
382	19.06.2015	Vic – Cash deposit of \$160,500 at Springvale Branch
383	22.06.2015	IMT of \$160,000 to Offshore Account 16
384	22.06.2015	Vic – Cash deposit of \$353,100 at Springvale Branch
385	23.06.2015	IMT of \$350,000 to Offshore Account 16
386	23.06.2015	Vic – Cash deposit of \$160,180 at Springvale branch
387	25.06.2015	IMT of \$160,000 to Offshore Account 17
388	25.06.2015	Vic – Cash deposit of \$209,800 at Springvale Branch
389	29.06.2015	IMT of \$100,000 to Offshore Account 17
390	29.06.2015	IMT of \$120,000 to Offshore Account 16
391	29.06.2015	Vic – Cash deposit of \$264,250 at Springvale Branch
392	30.06.2015	Vic – Cash deposit of \$421,150 at Springvale Branch
393	30.06.2015	IMT of \$350,000 to Offshore Account 16
394	30.06.2015	Vic – Cash deposit of \$3,149.25 at Springvale Branch
395	07.07.2015	NSW – Cash deposit of \$129,800 at Chatswood Branch
396	07.07.2015	IMT of \$300,000 to Offshore Account 16
397	08.07.2015	IMT of \$100,000 to Offshore Account 16
398	08.07.2015	IMT of \$60,000 to Offshore Account 17
399	08.07.2015	Vic – 2 cash deposits (\$332,000, \$200,000) totalling \$532,000 at Springvale Branch
400	08.07.2015	Domestic transfer of \$530,000 to CommBank Account 98
401	10.07.2015	Account credit of \$530,000 from CommBank Account 98
402	10.07.2015	IMT of \$200,000 to Offshore Account 17
403	10.07.2015	Vic – Cash deposit of \$267,450 at Springvale Branch
404	10.07.2015	IMT of \$400,000 to Offshore Account 16

ITEM	DATE	TRANSACTION/S
405	10.07.2015	Domestic transfer of \$200,000 to CommBank Account 98
406	10.07.2015	Vic – Cash deposit of \$266,550 at Springvale Branch
407	10.07.2015	Domestic transfer of \$250,000 to CommBank Account 98
408	13.07.2015	Account credit of \$400,000 from CommBank Account 98
409	13.07.2015	IMT of \$150,000 to Offshore Account 16
410	13.07.2015	IMT of \$250,000 to Offshore Account 17
411	13.07.2015	Vic – Cash deposit of \$375,600 at Springvale Branch
412	16.07.2015	IMT of \$300,000 to Offshore Account 16
413	17.07.2015	Vic – Cash deposit of \$154,050 at Springvale Branch
414	20.07.2015	IMT of \$200,000 to Offshore Account 16
415	20.07.2015	Vic – Cash deposit of \$316,150 at Springvale Branch
416	21.07.2015	Vic – Cash deposit of \$138,930 at Springvale Branch
417	23.07.2015	IMT of \$300,000 to Offshore Account 16
418	23.07.2015	IMT of \$150,000 to Offshore Account 17
419	24.07.2015	Vic – Cash deposit of \$321,000 at Springvale Branch
420	24.07.2015	NSW – Cash deposit of \$318,000 at Chatswood Branch
421	24.07.2015	Domestic transfer of \$650,000 to CommBank Account 98
422	27.07.2015	Account credit of \$600,000 from CommBank Account 98
423	27.07.2015	NSW – Cash deposit of \$211,950 at Chatswood Branch
424	27.07.2015	IMT of \$400,000 to Offshore Account 16
425	27.07.2015	IMT of \$210,000 to Offshore Account 17
426	28.07.2015	Vic – Cash deposit of \$300,470 at Springvale Branch
427	28.07.2015	IMT of \$200,000 to Offshore Account 16
428	30.07.2015	IMT of \$200,000 to Offshore Account 16
429	30.07.2015	IMT of \$100,000 to Offshore Account 17
430	31.07.2015	Account credit of \$100,000 from CommBank Account 98
431	31.07.2015	Vic – Cash deposit of \$530,000 at Springvale Branch
432	31.07.2015	NSW – Cash deposit of \$527,900 at Chatswood Branch
433	31.07.2015	Domestic transfer of \$50 to Domestic Account 11
434	31.07.2015	IMT of \$525,000 to Offshore Account 16
435	31.07.2015	IMT of \$100,000 to Offshore Account 17
436	03.08.2015	NSW – 3 cash deposits (\$155,000, \$158,400, \$216,500) totalling \$529,900 at Chatswood Branch

ITEM	DATE	TRANSACTION/S
437	03.08.2015	Domestic transfer of \$50 to Domestic Account 11
438	03.08.2015	Domestic transfer of \$50 to Domestic Account 11
439	03.08.2015	IMT of \$500,000 to Offshore Account 16
440	04.08.2015	NSW – 2 cash deposits (\$144,000, \$120,800) totalling \$264,800 at Chatswood Branch
441	04.08.2015	IMT of \$220,000 to Offshore Account 17
442	04.08.2015	IMT of \$310,000 to Offshore Account 16
443	07.08.2015	Vic – Cash deposit of \$423,000 at Springvale Branch
444	07.08.2015	IMT of \$150,000 to Offshore Account 17
445	07.08.2015	IMT of \$280,000 to Offshore Account 16
446	07.08.2015	IMT of \$180,000 to Offshore Account 16
447	07.08.2015	NSW – 3 cash deposits (\$268,600, \$165,200, \$96,400) totalling \$530,200 at Chatswood Branch
448	10.08.2015	IMT of \$200,000 to Offshore Account 17
449	10.08.2015	IMT of \$350,000 to Offshore Account 16
450	10.08.2015	Vic – Cash deposit of \$214,000 at Springvale Branch
451	10.08.2015	NSW – 3 cash deposits (\$118,800, \$249,900, \$161,300) totalling \$530,000 at Chatswood Branch
452	10.08.2015	Domestic transfer of \$100 to Domestic Account 12
453	10.08.2015	Domestic transfer of \$50 to Domestic Account 13
454	11.08.2015	IMT of \$350,000 to Offshore Account 16
455	11.08.2015	IMT of \$300,000 to Offshore Account 17
456	11.08.2015	NSW – 3 cash deposits (\$222,600, \$174,600, \$130,900) totalling \$528,100 at Chatswood Branch
457	12.08.2015	IMT of \$350,000 to Offshore Account 16
458	13.08.2015	IMT of \$150,000 to Offshore Account 16
459	13.08.2015	IMT of \$150,000 to Offshore Account 17
460	13.08.2015	Vic – Cash deposit of \$107,000 at Springvale Branch
461	13.08.2015	NSW – 2 Cash deposits (\$188,000, \$129,150) totalling \$317,150 at Chatswood Branch
462	19.08.2015	IMT of \$150,000 to Offshore Account 17
463	19.08.2015	IMT of \$200,000 to Offshore Account 16
464	20.08.2015	Vic – Cash deposit of \$106,000 at Springvale Branch
465	21.08.2015	Vic – 3 cash deposits (\$119,350, \$143,950, \$109,550) totalling \$372,850 at Springvale Branch
466	26.08.2015	IMT of \$150,000 to Offshore Account 17
467	26.08.2015	IMT of \$350,000 to Offshore Account 16

ITEM	DATE	TRANSACTION/S
468	26.08.2015	Vic – 3 cash deposits (\$206,030, \$100,160, \$175,010) totalling \$481,200 at Springvale Branch
469	03.09.2015	Debit of \$524,735.36 marked 'AFSA'

SCHEDULE AQ

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 2 – COMMBANK ACCOUNT 51

ITEM	DATE	TRANSACTION/S
1	16.02.2015	NSW – Cash deposit of \$7,400 at Campsie Branch
2	18.02.2015	Domestic transfer of \$7,358 to Domestic Account 14
3	25.02.2015	NSW – Cash deposit of \$9,000 at Hurstville Branch
4	25.02.2015	NSW – 3 Automatic Teller Machine (ATM) deposits (\$9,500, \$450, \$50) totalling \$10,000 at Burwood A
5	26.02.2015	NSW – ATM deposit of \$9,900 at World Square C
6	26.02.2015	NSW – ATM deposit of \$10,100 at World Square C
7	26.02.2015	Domestic transfer of \$38,500 to Domestic Account 14
8	26.02.2015	NSW – 2 ATM deposits (\$9,700, \$9,900) totalling \$19,600 at Norwest B
9	27.02.2015	NSW – ATM deposit of \$9,900 at Market City A
10	27.02.2015	NSW – ATM deposit of \$10,000 at Market City A
11	27.02.2015	Domestic transfer of \$40,000 to Domestic Account 25
12	28.02.2015	NSW – 2 ATM deposits (\$9,950 x 2) totalling \$19,900 at Chatswood Ch A
13	01.03.2015	NSW – ATM deposit of \$10,000 at Norwest B
14	02.03.2015	Domestic transfer of \$29,920 to Domestic Account 14
15	02.03.2015	NSW – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Chatswood A
16	02.03.2015	Domestic transfer of \$20,000 to Domestic Account 14
17	03.03.2015	Domestic transfer of \$20,000 to Domestic Account 14
18	03.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood B
19	04.03.2015	Domestic transfer of \$20,000 to Domestic Account 14

ITEM	DATE	TRANSACTION/S
20	04.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood A
21	04.03.2015	Domestic transfer of \$20,000 to Domestic Account 26
22	05.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood A
23	05.03.2015	Domestic transfer of \$20,000 to Domestic Account 26
24	05.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at World Square D
25	05.03.2015	Domestic transfer of \$20,000 to Domestic Account 26
26	07.03.2015	NSW – 4 ATM deposits (\$9,950, \$9,800, \$6,850, \$9,220) at World Square C, 2 ATM deposits (\$9,950 x 2) at Chatswood A – total deposits of \$55,720
27	07.03.2015	NSW – 1 ATM deposit of \$10,000 at World Square C, 1 ATM deposit of \$10,000 at Chatswood A – total deposits of \$20,000
28	08.03.2015	NSW – 2 ATM deposits (\$9,950, \$5,000) totalling \$14,950 at Chatswood Ch A
29	08.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood Ch A
30	09.03.2015	Domestic transfer of \$43,873 to Domestic Account 25
31	09.03.2015	Domestic transfer of \$31,850 to Domestic Account 27
32	09.03.2015	Domestic transfer of \$34,900 to Domestic Account 26
33	09.03.2015	NSW – ATM deposit of \$9,650 at Chatswood Ch B
34	09.03.2015	NSW – 1 ATM deposit of \$10,000 at Chatswood Ch A, 2 ATM deposits (\$10,000 x 2) at Chatswood B – total deposits of \$30,000
35	09.03.2015	Domestic transfer of \$30,000 to Domestic Account 26
36	10.03.2015	NSW – ATM deposit of \$3,480 at World Square C
37	10.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at World Square C
38	10.03.2015	Domestic transfer of \$33,000 to Domestic Account 26
39	10.03.2015	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Chatswood A
40	11.03.2015	Domestic transfer of \$30,000 to Domestic Account 26
41	11.03.2015	NSW – 2 ATM deposits (\$4,950, \$9,950) totalling \$14,900 at Chatswood A
42	12.03.2015	Domestic transfer of \$15,000 to Domestic Account 26
43	12.03.2015	Domestic transfer of \$6,000 to Domestic Account 26
44	23.03.2015	NSW – 2 ATM deposits (\$9,550, \$9,950) totalling \$19,500 at World Square D
45	23.03.2015	NSW – ATM deposit of \$10,000 at World Square D
46	23.03.2015	NSW – Cash deposit of \$5,200 at Ashfield Branch
47	23.03.2015	Domestic transfer of \$35,000 to Domestic Account 14
48	23.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood B
49	23.03.2015	Domestic transfer of \$5,200 to CommBank Account 100
50	24.03.2015	Domestic transfer of \$14,000 to Domestic Account 26

ITEM	DATE	TRANSACTION/S
51	24.03.2015	NSW – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Chatswood A
52	24.03.2015	Domestic transfer of \$32,207 to Domestic Account 28
53	25.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood A
54	25.03.2015	Domestic transfer of \$16,818 to Domestic Account 29
55	25.03.2015	NSW – 2 ATM deposits (\$9,900, \$9,900) totalling \$19,800 at Bridge St C
56	25.03.2015	Domestic transfer of \$30,000 to Domestic Account 14
57	26.03.2015	NSW – Cash deposit of \$8,250 at Chatswood Branch
58	26.03.2015	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Vict Ave B
59	26.03.2015	Domestic transfer of \$34,800 to Domestic Account 14
60	27.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Chatswood A, 1 ATM deposit of \$10,000 at Chatswood B – total deposits of \$30,000
61	27.03.2015	Domestic transfer of \$2,650 to CommBank Account 117
62	30.03.2015	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Vict Ave B
63	30.03.2015	Domestic transfer of \$21,000 to Domestic Account 71
64	30.03.2015	Domestic transfer of \$20 to Domestic Account 71
65	31.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood A
66	31.03.2015	Domestic transfer of \$37,900 to CommBank Account 118
67	31.03.2015	NSW – ATM deposit of \$5,000 at Chatswood A
68	31.03.2015	Domestic transfer of \$15,000 to Domestic Account 72
69	31.03.2015	Domestic transfer of \$13,450 to Domestic Account 73
70	01.04.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood A
71	02.04.2015	NSW – ATM deposit of \$9,900 at Vict Ave B
72	02.04.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Chatswood Ch B, 2 ATM deposits (\$10,000 x 2) at Vict Ave B – total deposits of \$40,000
73	02.04.2015	Domestic transfer of \$63,000 to Domestic Account 74
74	03.04.2015	NSW – 3 ATM deposits (\$9,900, \$9,750 x 2) totalling \$29,400 at Norwest B
75	04.04.2015	NSW – 1 ATM deposit of \$9,600 at Market City A, 1 ATM deposit of \$9,250 at World Square C, 4 ATM deposits (\$9,600 x 2, \$9,350, \$6,300) at Norwest B – total deposits of \$53,700
76	04.04.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Market City A
77	05.04.2015	NSW – 2 ATM deposits (\$9,800 x 2) totalling \$19,600 at George & Mkt D
78	05.04.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at George & Mkt D
79	06.04.2015	NSW – 2 ATM deposits (\$9,650, \$9,950) totalling \$19,600 at Chatswood Ch B
80	06.04.2015	NSW – ATM deposit of \$10,000 at Chatswood Ch B
81	07.04.2015	Domestic transfer of \$36,000 to Domestic Account 75

ITEM	DATE	TRANSACTION/S
82	07.04.2015	Domestic transfer of \$65,000 to Domestic Account 76
83	07.04.2015	Domestic transfer of \$60,000 to Domestic Account 76
84	09.04.2015	Domestic transfer of \$18,000 to Domestic Account 77
85	01.06.2015	NSW – ATM deposit of \$9,950 at World Square C
86	01.06.2015	NSW – ATM deposit of \$13,350 at World Square C
87	02.06.2015	Domestic transfer of \$23,341.25 to Domestic Account 60
88	07.07.2015	NSW – 3 ATM deposits (\$20,000 x 2, \$10,000) totalling \$50,000 at Norwest B
89	08.07.2015	Domestic transfer of \$15,061 to Domestic Account 78
90	08.07.2015	Domestic transfer of \$34,980 to Domestic Account 79
91	09.07.2015	Account credit of \$34,980 labelled 'Return Account Closed [holder of Domestic Account 79] pay2'
92	10.07.2015	Domestic transfer of \$34,980 to CommBank Account 116
93	28.07.2015	NSW – Cash deposit of \$7,000 at Hurstville Branch
94	29.07.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood B
95	29.07.2015	Domestic transfer of \$25,695.50 to Domestic Account 32
96	29.07.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Vict Ave B
97	30.07.2015	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Vict Ave B
98	31.07.2015	Domestic transfer of \$48,323 to Domestic Account 80
99	31.07.2015	Domestic transfer of \$8 to Domestic Account 80
100	01.08.2015	Domestic transfer of \$20 to CommBank Account 52
101	04.08.2015	NSW – 2 ATM deposits (\$20,000 x 2) totalling \$40,000 at Artarmon A
102	04.08.2015	NSW – 2 ATM deposits (\$20,000 x 2) totalling \$40,000 at World Square D
103	04.08.2015	Domestic transfer of \$85,900 to CommBank Account 116
104	05.08.2015	NSW – 5 ATM deposits (\$20,000 x 3, \$10,000, \$15,000) totalling \$85,000 at Artarmon B
105	05.08.2015	NSW – ATM deposit of \$5,000 at Norwest B
106	06.08.2015	Domestic transfer of \$85,000 to Domestic Account 15
107	06.08.2015	NSW – 2 ATM deposits (\$15,000, \$10,000) at Eastwood A, 3 ATM deposits (\$20,000, \$15,000, \$10,000) at Eastwood B – total deposits of \$70,000
108	07.08.2015	Domestic transfer of \$75,000 to Domestic Account 15

SCHEDULE AR

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 3 – COMMBANK ACCOUNT 52

ITEM	DATE	TRANSACTION/S
1	16.02.2015	NSW – Cash deposit of \$7,500 at Ashfield Branch
2	17.02.2015	NSW – 5 Automatic Teller Machines (ATM) deposits (\$10,000 x 5) totalling \$50,000 at Bridge St C
3	17.02.2015	Domestic transfer of \$50,000 to Domestic Account 38
4	18.02.2015	Domestic transfer of \$7,482 to Domestic Account 14
5	25.02.2015	NSW – 2 ATM deposits (\$9,900, \$1,450) totalling \$11,350 at Strathfield A
6	26.02.2015	NSW – 2 ATM deposits (\$10,000 x 2) at World Square D, 2 ATM deposits (\$10,000 x 2) at Norwest B – total deposits of \$40,000
7	26.02.2015	Domestic transfer of \$51,200 to Domestic Account 14
8	26.02.2015	NSW – ATM deposit of \$3,700 at Ashfield A
9	27.02.2015	NSW – ATM deposit of \$9,950 at Ashfield A
10	27.02.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Chatswood A, 2 ATM deposits (\$10,000 x 2) at Ashfield A – total deposits of \$40,000
11	02.03.2015	Domestic transfer of \$53,800 to Domestic Account 39
12	02.03.2015	NSW – ATM deposit of \$6,950 at Hurstville A
13	02.03.2015	NSW – 1 ATM deposit of \$10,000 at Burwood A, 1 ATM deposit of \$10,000 at Campsie D, 1 ATM deposit of \$10,000 at Hurstville A, 1 ATM deposit of \$10,000 at Mortdale A, 2 ATM deposits (\$10,000 x 2) at Chatswood A – total deposits of \$60,000
14	02.03.2015	Domestic transfer of \$46,930 to Domestic Account 14
15	02.03.2015	NSW – Cash deposit of \$3,050 at Kingsgrove Branch
16	03.03.2015	Domestic transfer of \$23,063 to Domestic Account 14
17	03.03.2015	NSW – 2 ATM deposits (\$9,340, \$660) at Burwood A, 2 ATM deposits (\$9,850, \$9,500) at Dulwich Hill A – total deposits of \$29,350

ITEM	DATE	TRANSACTION/S
18	03.03.2015	NSW – 1 ATM deposit of \$10,000 at Burwood A, 2 ATM deposits (\$10,000 x 2) at Five Dock A – total deposits of \$30,000
19	03.03.2015	NSW – Cash deposit of \$10,000 at Central Branch
20	03.03.2015	Domestic transfer of \$50,020 to CommBank Account 100
21	03.03.2015	NSW – 1 ATM deposit of \$10,000 at World Square C, 1 ATM deposit of \$10,000 at World Square D – total deposits of \$20,000
22	03.03.2015	Domestic transfer of \$29,980 to Domestic Account 26
23	03.03.2015	Account credit of \$9,000 from CommBank Account 52
24	04.03.2015	NSW – 1 ATM deposit of \$8,700 at Dulwich Hill A
25	04.03.2015	NSW – 3 ATM deposits (\$10,000 x 3) at Dulwich Hill A, 2 ATM deposits (\$10,000 x 2) at Chatswood A – total deposits of \$50,000
26	04.03.2015	Domestic transfer of \$40,000 to Domestic Account 14
27	04.03.2015	Domestic transfer of \$17,050 to CommBank Account 100
28	05.03.2015	Domestic transfer of \$20,000 to Domestic Account 26
29	06.03.2015	NSW – 1 ATM deposit of \$9,950 at Ashfield A
30	06.03.2015	NSW – 4 ATM deposits (\$10,000 x 4) at Ashfield A, 3 ATM deposits (\$10,000 x 3) at Burwood A, 1 ATM deposit of \$10,000 at Strathfield A, 1 ATM deposit of \$10,000 at Ashfield A – total deposits of \$90,000
31	08.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Ashfield A
32	09.03.2015	Domestic transfer of \$99,950 to Domestic Account 25
33	09.03.2015	NSW – 1 ATM deposit of \$9,500 at Chatswood Ch A
34	09.03.2015	NSW – 1 ATM deposit of \$10,000 at Chatswood Ch A
35	09.03.2015	Domestic transfer of \$39,500 to Domestic Account 26
36	09.03.2015	NSW - 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Ashfield A
37	09.03.2015	Domestic transfer of \$30,000 to CommBank Account 100
38	09.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at World Square D
39	10.03.2015	Domestic transfer of \$20,000 to Domestic Account 26
40	11.03.2015	NSW – Cash deposit of \$5,000 at Parramatta Branch
41	11.03.2015	NSW – 3 ATM deposits (\$9,850, \$9,050, \$8,320) totalling \$27,220 at Burwood A
42	11.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Burwood A
43	12.03.2015	Domestic transfer of \$50,000 to Domestic Account 26
44	16.03.2015	Domestic transfer of \$2,000 to Domestic Account 26
45	19.03.2015	NSW – ATM deposit of \$10,000 at Ashfield A
46	19.03.2015	Domestic transfer of \$19,400 to CommBank Account 100
47	22.03.2015	NSW – 1 ATM deposit of \$10,000 at Ashfield A

ITEM	DATE	TRANSACTION/S
48	23.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Burwood A
49	23.03.2015	Domestic transfer of \$30,000 to Domestic Account 29
50	23.03.2015	NSW – 1 ATM deposit of \$9,000 at Burwood A
51	23.03.2015	Domestic transfer of \$9,000 to CommBank Account 100
52	24.03.2015	NSW – 1 ATM deposit of \$8,050 at Ashfield A
53	25.03.2015	NSW – 5 ATM deposits (\$10,000 x 5) totalling \$50,000 at Ashfield A
54	26.03.2015	Domestic transfer of \$53,000 to Domestic Account 14
55	26.03.2015	NSW – 1 ATM deposit of \$10,000 at Ashfield A, 1 ATM deposit of \$10,000 at Chatswood A, 2 ATM deposits (\$10,000 x 2) at Haymarket B, 1 ATM deposit of \$10,000 at Market City A, 1 ATM deposit of \$20,000 at Market City B – total deposits of \$70,000
56	26.03.2015	NSW – 1 ATM deposit of \$450 at Ashfield A
57	26.03.2015	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Ashfield A
58	27.03.2015	Domestic transfer of \$64,687 to Domestic Account 40
59	27.03.2015	NSW – 2 ATM deposits (\$9,700, \$300) totalling \$10,000 at Ashfield A
60	27.03.2015	NSW – 1 ATM deposit of \$10,000 at Ashfield A, 2 ATM deposits (\$10,000 x 2) at Burwood A, 1 ATM deposit of \$10,000 at Strathfield A – total deposits of \$40,000
61	27.03.2015	Domestic transfer of \$45,816 to CommBank Account 118
62	27.03.2015	Domestic transfer of \$29,658 to CommBank Account 118
63	29.03.2015	NSW – 3 ATM deposits (\$6,750, \$9,820, \$180) totalling \$16,750 at Ashfield A
64	29.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Ashfield A, 3 ATM deposits (\$10,000 x 3) at Burwood A – total deposits of \$50,000
65	30.03.2015	Domestic transfer of \$34,066 to CommBank Account 118
66	30.03.2015	Domestic transfer of \$44,008 to CommBank Account 118
67	31.03.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Ashfield A, 2 ATM deposits (\$10,000 x 2) at Campsie D – total deposits of \$40,000
68	01.04.2015	Domestic transfer of \$33,000 to Domestic Account 40
69	01.04.2015	NSW – 1 ATM deposit of \$8,700 at Strathfield A
70	01.04.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Strathfield A
71	01.04.2015	Domestic transfer of \$39,170 to CommBank Account 100
72	01.04.2015	NSW – ATM deposit of \$9,950 to Burwood A
73	01.04.2015	NSW – ATM deposit of \$10,000 at Burwood A
74	02.04.2015	Domestic transfer of \$16,000 to Domestic Account 41
75	07.04.2015	Domestic transfer of \$14,000 to Domestic Account 40
76	07.04.2015	NSW – ATM deposit of \$2,750 at Market City B

ITEM	DATE	TRANSACTION/S
77	27.04.2015	WA – 1 ATM deposit of \$9,950 at South Perth A, 1 ATM deposit of \$9,750 at Joondalup A, 2 ATM deposits (\$850, \$8,000) at South Perth B – total deposits of \$28,550
78	27.04.2015	WA – 1 ATM deposit of \$10,000 at Belmont A, 1 ATM deposit of \$10,000 at Kardinya A, 1 ATM deposit of \$10,000 at Bassendean A, 1 ATM deposit of \$10,000 at Girrawheen A, 1 ATM deposit of \$10,000 at South Perth B – total deposits of \$50,000
79	28.04.2015	Domestic transfer of \$78,500 to Domestic Account 42
80	28.04.2015	WA – Cash deposit of \$12,000 at Mount Hawthorn Branch
81	28.04.2015	WA – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Innaloo A
82	28.04.2015	WA – Cash deposit of \$30,000 at Warwick Branch
83	28.04.2015	WA – Cash deposit of \$30,000 at Joondalup Branch
84	28.04.2015	WA – ATM deposit of \$8,000 at Girrawheen A
85	29.04.2015	Domestic transfer of \$50,000 to Domestic Account 43
86	29.04.2015	Domestic transfer of \$49,946 to Domestic Account 16
87	30.04.2015	WA – Cash deposit of \$30,000 at Maylands Branch
88	01.05.2015	Domestic transfer of \$10,000 to Domestic Account 44
89	01.05.2015	Domestic transfer of \$19,950 to Domestic Account 16
90	01.05.2015	WA – ATM deposit of \$9,900 at South Perth A
91	01.05.2015	WA – ATM deposit of \$10,000 at South Perth A
92	01.05.2015	WA – Cash deposit of \$30,000 at Belmont Branch
93	01.05.2015	WA – Cash deposit of \$10,100 at Cannington Branch
94	02.05.2015	WA – 1 ATM deposit of \$9,950 at Cannington A, 2 ATM deposits (\$6,190, \$2,910) at Kardinya A – total deposits of \$19,050
95	02.05.2015	WA – 2 ATM deposits (\$10,000 x 2) at South Perth B, 2 ATM deposits (\$10,000 x 2) at Belmont A, 1 ATM deposit of \$10,000 at Cannington A, 1 ATM deposit of \$10,000 at Kardinya A – total deposits of \$60,000
96	04.05.2015	Domestic transfer of \$59,931 to Domestic Account 16
97	04.05.2015	Domestic transfer of \$78,964 to Domestic Account 16
98	05.05.2015	NSW – 1 ATM deposit of \$9,900 at Mortdale A
99	05.05.2015	NSW – 1 ATM deposit of \$10,000 at Mortdale A, 2 ATM deposits (\$10,000 x 2) at Bankstown D – total deposits of \$30,000
100	05.05.2015	Domestic transfer of \$39,840 to Domestic Account 16
101	06.05.2015	NSW – 2 ATM deposits (\$9,700, \$9,900) at Lakemba A, 2 ATM deposits (\$9,300, \$9,800) at Campsie D, 1 ATM deposit of \$9,950 at Ashfield A, 1 ATM deposit of \$9,950 at Leichardt A – total deposits of \$58,600
102	06.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Roselands A, 1 ATM deposit of \$10,000 at Ashfield A – total deposits of \$30,000
103	06.05.2015	Domestic transfer of \$88,563 to Domestic Account 16

ITEM	DATE	TRANSACTION/S
104	11.05.2015	NSW – 1 ATM deposit of \$9,400 at Hurstville A, 1 ATM deposit of \$9,800 at Lakemba A – total deposits of \$19,200
105	11.05.2014	NSW – 1 ATM deposit of \$10,000 at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Roselands A, 1 ATM deposit of \$10,000 at Lakemba A, 2 ATM deposits (\$10,000 x 2) at Campsie D – total deposits of \$60,000
106	12.05.2015	Domestic transfer of \$25,611 to Domestic Account 45
107	12.05.2015	Domestic transfer of \$14,389 to Domestic Account 46
108	12.05.2015	Domestic transfer of \$39,200 to Domestic Account 16
109	12.05.2015	NSW – 1 ATM deposit of \$4,650 at Burwood A, 1 ATM deposit of \$9,950 at World Square C, 1 ATM deposit of \$9,800 at Market City A, 1 ATM deposit of \$250 at Market City B – total deposits of \$24,650
110	12.05.2015	NSW – 3 ATM deposits (\$10,000 x 3) at Burwood A, 1 ATM deposit of \$10,000 at World Square C, 1 ATM deposit of \$10,000 at Market City A – total deposits of \$50,000
111	13.05.2015	Domestic transfer of \$74,646 to Domestic Account 16
112	13.05.2015	NSW – 1 ATM deposit of \$9,400 at Vict Ave A, 1 ATM deposit of \$7,500 at Walker St A – total deposits of \$16,900
113	13.05.2015	NSW – 1 ATM deposit of \$10,000 at Vict Ave A, 2 ATM deposits (\$10,000 x 2) at Artarmon B, 2 ATM deposits (\$10,000 x 2) at Lane Cove A, 1 ATM deposit of \$10,000 at Walker St A – total deposits of \$60,000
114	14.05.2015	Domestic transfer of \$76,890 to Domestic Account 16
115	14.05.2015	NSW – 1 ATM deposit of \$9,950 at Mordial A
116	14.05.2015	NSW – 1 ATM deposit of \$10,000 at Mordial A, 2 ATM deposits (\$10,000 x 2) at Riverwood A, 2 ATM deposits (\$10,000 x 2) at Caringbah A, 2 ATM deposits (\$10,000 x 2) at Cronulla A – total deposits of \$70,000
117	15.05.2015	Domestic transfer of \$79,937 to Domestic Account 16
118	15.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Parramatta A, 2 ATM deposits (\$10,000 x 2) at Merrylands D – total deposits of \$40,000
119	18.05.2015	Domestic transfer of \$40,000 to Domestic Account 16
120	18.05.2015	WA – Cash deposit of \$30,000 at Mount Lawley Branch
121	18.05.2015	WA – Cash deposit of \$30,000 at Maylands Branch
122	18.05.2015	WA – 2 ATM deposits (\$10,000 x 2) at Bassendean B, 1 ATM deposit of \$10,000 at Morley C, 2 ATM deposits (\$10,000 x 2) at Girrawheen A, 2 ATM deposits (\$10,000 x 2) at Innaloo A – total deposits of \$70,000
123	18.05.2015	WA – Cash deposit of \$30,000 at Mirrabooka Branch
124	18.05.2015	WA – Cash deposit of \$30,000 at Warwick Branch
125	19.05.2015	Domestic transfer of \$100,000 to Domestic Account 16
126	19.05.2015	Domestic transfer of \$89,988 to Domestic Account 16
127	20.05.2015	WA – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at South Perth B
128	20.05.2015	WA – Cash deposit of \$30,000 at Victoria Park Branch
129	20.05.2015	WA – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Belmont A

ITEM	DATE	TRANSACTION/S
130	20.05.2015	Domestic transfer of \$20,000 to Domestic Account 47
131	20.05.2015	Domestic transfer of \$20,000 to Domestic Account 48
132	21.05.2015	Domestic transfer of \$30,000 to Domestic Account 49
133	21.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Mortdale A, 2 ATM deposits (\$10,000 x 2) at Caringbah A, 2 ATM deposits (\$10,000 x 2) at Cronulla A – total deposits of \$60,000
134	21.05.2015	Domestic transfer of \$30,216 to Domestic Account 49
135	21.05.2015	Domestic transfer of \$27,798 to Domestic Account 50
136	21.05.2015	Domestic transfer of \$140 to CommBank Account 102
137	22.05.2015	Domestic transfer of \$1,846 to Domestic Account 17
138	24.05.2015	NSW – 1 ATM deposit of \$9,950 at Five Dock A
139	24.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Lakemba A, 1 ATM deposit of \$10,000 at Burwood A, 1 ATM deposit of \$10,000 at Five Dock A, 2 ATM deposits (\$10,000 x 2) at Ashfield A – total deposits of \$60,000
140	25.05.2015	Domestic transfer of \$69,900 to Domestic Account 16
141	25.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Vict Ave B, 2 ATM deposits (\$10,000 x 2) at Artarmon B – total deposits of \$40,000
142	25.05.2015	Domestic transfer of \$15,000 to Domestic Account 48
143	25.05.2015	Domestic transfer of \$20,000 to Domestic Account 51
144	25.05.2015	Domestic transfer of \$5,000 to Domestic Account 52
145	28.05.2015	WA – 2 ATM deposits (\$10,000 x 2) at South Perth A and 2 ATM deposits (\$10,000 x 2) at South Perth B – total deposits of \$40,000
146	28.05.2015	Domestic transfer of \$40,000 to Domestic Account 53
147	28.05.2015	WA – Cash deposit of \$30,000 at Victoria Park Branch
148	28.05.2015	WA – 1 ATM deposit of \$9,950 at Cannington A, 1 ATM deposit of \$1,050 at South Perth A – total deposits of \$11,000
149	29.05.2015	Domestic transfer of \$41,000 to Domestic Account 16
150	03.06.2015	NSW – Cash deposit of \$30,000 at Belmore Branch
151	03.06.2015	NSW – 1 ATM deposit of \$10,000 at Burwood A, 2 ATM deposits (\$10,000 x 2) at Market City B – total deposits of \$30,000
152	03.06.2015	NSW – Cash deposit of \$30,000 at Burwood Branch
153	04.06.2015	Domestic transfer of \$90,000 to Domestic Account 16
154	04.06.2015	NSW – 2 ATM deposits (\$9,950, \$50) totalling \$10,000 at Chatswood Ch B
155	04.06.2015	NSW – 2 cash deposits (\$10,000 x 2) at Padstow B, 2 ATM deposits (\$10,000 x 2) at Chatswood Ch A – total deposits of \$40,000
156	05.06.2015	Domestic transfer of \$50,000 to Domestic Account 45
157	07.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Mortdale A, 1 ATM deposit of \$10,000 at Riverwood A – total deposits of \$50,000

ITEM	DATE	TRANSACTION/S
158	08.06.2015	Domestic transfer of \$10,000 to CommBank Account 105
159	08.06.2015	Domestic transfer of \$15,000 to CommBank Account 106
160	08.06.2015	Domestic transfer of \$25,000 to Domestic Account 17
161	08.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Marrickville M A, 2 ATM deposits (\$10,000 x 2) at Marrickville M B, 2 ATM deposits (\$10,000 x 2) at Mascot A, 1 ATM deposit of \$10,000 at Kingsford A – total deposits of \$70,000
162	09.06.2015	Domestic transfer of \$50,000 to Domestic Account 16
163	10.06.2015	Domestic transfer of \$20,000 to Domestic Account 16
164	18.06.2015	NSW – 1 ATM deposit of \$8,500 at Mortdale A
165	18.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Rockdale A, 2 ATM deposits (\$10,000 x 2) at Kogarah A, 1 ATM deposit of \$10,000 at Mortdale A, 2 ATM deposits (\$11,000, \$10,000) at Caringbah A, 2 ATM deposits (\$10,000 x 2) at Riverwood A – total deposits of \$91,000
166	19.06.2015	Domestic transfer of \$85,290 to Domestic Account 54
167	19.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Eastgardens A, 2 ATM deposits (\$10,000 x 2) at Maroubra Junct A, 2 ATM deposits (\$10,000 x 2) at Hurstville A – total deposits of \$60,000
168	22.06.2015	Domestic transfer of \$60,000 to Domestic Account 5
169	22.06.2015	NSW – 2 ATM deposits (\$8,500, \$1,450) at Ashfield B, 2 ATM deposits (\$9,340, \$660) at Strathfield A – total deposits of \$19,950
170	22.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Bondi Junct A, 1 ATM deposit of \$10,000 at Ashfield B, 2 ATM deposits (\$10,000, \$10,050) at Burwood A, 1 ATM deposit of \$10,000 at Strathfield A, 2 ATM deposits (\$10,000 x 2) at Leichardt A, 2 ATM deposits (\$10,000 x 2) at Broadway A – total deposits of \$100,050
171	23.06.2015	Domestic transfer of \$100,000 to Domestic Account 5
172	24.06.2015	Domestic transfer of \$34,800 to Domestic Account 55
173	26.06.2015	NSW – IDM cash deposit of \$10,000 at Belmont Branch
174	28.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Eastgardens A, 2 ATM deposits (\$10,000 x 2) at Eastgardens B, 2 ATM deposits (\$20,000 x 2) at Maroubra Junct A, 2 ATM deposits (\$10,000 x 2) at Kingsford A – total deposits of \$100,000
175	30.06.2015	Domestic transfer of \$10,000 to Domestic Account 17
176	30.06.2015	Domestic transfer of \$75,000 to Domestic Account 5
177	01.07.2015	WA – Cash deposit of \$30,000 at East Perth Branch
178	01.07.2015	WA – Cash deposit of \$44,850 at Victoria Park Branch
179	01.07.2015	WA – 1 ATM deposit of \$9,900 at South Perth A, 1 ATM deposit of \$200 at South Perth B – total deposits of \$10,100
180	01.07.2015	WA – 4 ATM deposits (\$10,000 x 4) at South Perth B, 1 ATM deposit of \$10,000 at South Perth A – total deposits of \$50,000
181	02.07.2015	Domestic transfer of \$50,000 to Domestic Account 54
182	02.07.2015	Domestic transfer of \$49,850 to Domestic Account 5

ITEM	DATE	TRANSACTION/S
183	02.07.2015	WA - 2 cash deposits (\$15,000 x 2) totalling \$30,000 at Dianella Branch
184	02.07.2015	Domestic transfer of \$60,100 to Domestic Account 5
185	02.07.2015	WA – Cash deposit of \$30,000 at Mirrabooka branch
186	02.07.2015	Domestic transfer of \$19,628 to Domestic Account 56
187	03.07.2015	WA – Cash deposit of \$20,000 at Karrinyup Branch
188	08.07.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Hurstville A, 2 ATM deposits (\$19,855, \$10,000) at Riverwood A, 2 ATM deposits (\$10,000 x 2) at Roselands A, 2 ATM deposits (\$10,000 x 2) at Market City B, 1 ATM deposit of \$10,000 at Market City C – total deposits of \$99,855
189	08.07.2015	Domestic transfer of \$100,000 to Domestic Account 32
190	09.07.2015	Domestic transfer of \$42,276 to Domestic Account 30
191	09.07.2015	Domestic transfer of \$17,960 to Domestic Account 30

SCHEDULE AS**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN**123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 4 – COMMBANK ACCOUNT 53

ITEM	DATE	TRANSACTION/S
1	02.04.2015	NSW - Cash deposit of \$100 at Burwood Branch
2	27.04.2015	WA – 1 ATM deposit of \$9,800 at South Perth A, 1 ATM deposit of \$9,600 at Joondalup A – total deposits of \$19,400
3	27.04.2015	WA – 2 ATM deposits (\$10,000 x 2) at South Perth B, 1 ATM deposit of \$10,000 at Belmont A, 1 ATM deposit of \$10,000 at Kardinya A, 1 ATM deposit of \$10,000 at Bassendean A, 1 ATM deposit of \$10,000 at Girrawheen A – total deposits of \$60,000
4	28.04.2015	Domestic transfer of \$79,420 to Domestic Account 16
5	28.04.2015	WA – Cash deposit of \$20,000 at 150 St Georges Branch
6	28.04.2015	WA – Cash deposit of \$12,000 at Subiaco Branch
7	28.04.2015	WA - 1 ATM deposit of \$10,000 at Innaloo A
8	28.04.2015	WA – Cash deposit of \$30,000 at Karrinyup Branch
9	28.04.2015	WA – 2 ATM deposits (\$10,000, \$10,000) at Girrawheen A, 1 ATM deposit of \$10,000 at Morley C – total deposits of \$30,000
10	29.04.2015	Domestic transfer of \$97,760 to Domestic Account 16
11	29.04.2015	Domestic transfer of \$3,847 to Domestic Account 16
12	30.04.2015	WA – Cash deposit of \$30,000 at East Perth Branch
13	30.04.2015	WA – Cash deposit of \$30,000 at Morley Branch
14	30.04.2015	Domestic transfer of \$50,000 to Domestic Account 66
15	30.04.2015	Domestic – transfer of \$10,000 to Domestic Account 41
16	30.04.2015	WA – Cash deposit of \$30,000 at Dianella Branch
17	01.05.2015	Domestic transfer of \$29,698 to Domestic Account 44

ITEM	DATE	TRANSACTION/S
18	01.05.2015	WA – Cash deposit of \$29,000 at Victoria Park Branch
19	01.05.2015	WA – ATM deposit of \$9,950 at South Perth A, ATM deposit of \$9,950 at South Perth B – total deposits of \$19,900
20	01.05.2015	WA – ATM deposit of \$10,000 at South Perth A
21	01.05.2015	Domestic transfer of \$57,980 to Domestic Account 16
22	01.05.2015	WA – 2 ATM deposits (\$9,950, \$9,950) totalling \$19,900 at Cannington A
23	02.05.2015	WA – 1 ATM deposit of \$9,850 at Belmont A, 1 ATM deposit of \$9,750 at Cannington A – total deposits of \$19,600
24	02.05.2015	WA – 2 ATM deposits (\$10,000 x 2) at South Perth B, 1 ATM deposit of \$10,000 at Belmont A, 1 ATM deposit of \$10,250 at Cannington A, 1 ATM deposit of \$10,100 at Kardinya A – total deposits of \$50,350
25	04.05.2015	Domestic transfer of \$69,946 to Domestic Account 16
26	04.05.2015	Domestic transfer of \$20,890 to Domestic Account 16
27	05.05.2015	NSW – 1 ATM deposit of \$9,900 at Mortdale A
28	05.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Hurstville A, 1 ATM deposit of \$10,000 at Mortdale A, 1 ATM deposit of \$10,000 at Riverwood A, 2 ATM deposits (\$10,000 x 2) at Padstow A, 1 ATM deposit of \$20,000 at Bankstown D – total deposits of \$80,000
29	05.05.2015	Domestic transfer of \$89,763 to Domestic Account 16
30	06.05.2015	NSW – 1 ATM deposit of \$9,950 at Campsie D, 2 ATM deposits (\$9,950, \$3,650) at MP Leichardt A – total deposits of \$23,550
31	06.05.2015	NSW – 1 ATM deposit of \$10,000 at Roselands A, 2 ATM deposits (\$10,000 x 2) at Lakemba A, 1 ATM deposit of \$10,000 at Campsie D, 2 ATM deposits (\$10,000 x 2) at Ashfield A, 1 ATM deposit of \$10,000 at MP Leichardt A – total deposits of \$70,000
32	06.05.2015	Domestic transfer of \$93,465 to Domestic Account 16
33	07.05.2015	NSW – ATM deposit of \$9,950 at Rockdale A
34	07.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at WF Hurstville A, 2 ATM deposits (\$10,000 x 2) at Kogarah A, 1 ATM deposit of \$10,000 at Rockdale A, 2 ATM deposits (\$10,000, \$10,000) at Mascot A – total deposits of \$70,000
35	07.05.2015	Domestic transfer of \$79,900 to Domestic Account 45
36	07.05.2015	NSW – ATM deposit of \$8,000 at Maroubra Jct A
37	07.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Kingsford A, ATM deposit of \$10,000 at Maroubra Jct A – total deposits of \$30,000
38	08.05.2015	Domestic transfer of \$20,100 to Domestic Account 45
39	08.05.2015	Domestic transfer of \$17,900 to Domestic Account 45
40	11.05.2015	NSW – 1 ATM deposit of \$9,950 at WF Hurstville A, 1 ATM deposit of \$9,950 at Roselands A, 1 ATM deposit of \$9,950 at Lakemba A, 2 ATM deposits (\$9,850, \$9,950) at Campsie D – total deposits of \$49,650
41	11.05.2015	NSW – 1 ATM deposit of \$10,000 at WF Hurstville A, 1 ATM deposit of \$10,000 at Roselands A, 1 ATM deposit of \$10,000 at Lakemba A – total deposits of \$30,000

ITEM	DATE	TRANSACTION/S
42	11.05.2015	Domestic transfer of \$74,998 to Domestic Account 16
43	11.05.2015	NSW – ATM deposit of \$5,100 at MP Leichardt A
44	11.05.2015	NSW – ATM deposit of \$10,000 at MP Leichardt A
45	11.05.2015	Domestic transfer of \$19,645 to Domestic Account 16
46	12.05.2015	NSW – 1 ATM deposit of \$9,950 at 116 Burwood A, 1 ATM deposit of \$9,900 at World Square C, 1 ATM deposit of \$9,450 at Market City A – total deposits of \$29,300
47	12.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Burwood A, 1 ATM deposit of \$10,000 at World Square C – total deposits of \$30,000
48	13.05.2015	Domestic transfer of \$59,200 to Domestic Account 16
49	13.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at 342 Vict Ave A, 2 ATM deposits (\$10,000 x 2) at Artarmon B, 2 ATM deposits (\$10,000 x 2) at Lane Cove A, 2 ATM deposits (\$10,000 x 2) at Walker St A – total deposits of \$80,000
50	13.05.2015	Domestic transfer of \$79,867 to Domestic Account 16
51	14.05.2015	NSW – ATM deposit of \$9,900 at Mortdale A
52	14.05.2015	NSW – 1 ATM deposit of \$10,000 at Mortdale A, 2 ATM deposits (\$10,000 x 2) at Riverwood A – total deposits of \$30,000
53	14.05.2015	NSW – Cash deposit of \$9,000 at Menai Marketplace Branch
54	14.05.2015	NSW – Cash deposit of \$8,950 at Miranda Branch
55	14.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Caringbah A, 2 ATM deposits (\$10,000 x 2) at Cronulla A – total deposits of \$40,000
56	14.05.2015	Domestic transfer of \$97,795 to Domestic Account 16
57	15.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Parramatta A, 2 ATM deposits (\$10,000 x 2) at Merrylands D – total deposits of \$40,000
58	15.05.2015	Domestic transfer of \$39,895 to Domestic Account 16
59	18.05.2015	WA – 2 ATM deposits (\$10,000 x 2) at Bassendean B, 2 ATM deposits (\$10,000 x 2) at Morley C – total deposits of \$40,000
60	18.05.2015	WA – Cash deposit of \$30,000 at Dianella Branch
61	18.05.2015	WA – Cash deposit of \$30,000 at Malaga Branch
62	18.05.2015	WA – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Girrawheen A
63	18.05.2015	WA – Cash deposit of \$30,000 at Karrinyup Branch
64	18.05.2015	WA - 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Innaloo A
65	18.05.2015	Domestic transfer of \$99,850 to Domestic Account 16
66	18.05.2015	WA – Cash deposit of \$20,640 at Mount Hawthorn Branch
67	19.05.2015	Domestic transfer of \$87,150 to Domestic Account 16
68	20.05.2015	WA – 2 ATM deposits (\$10,000 x 2) at South Perth A, 2 ATM deposits (\$10,000 x 2) at South Perth B, 2 ATM deposits (\$10,000 x 2) at Belmont A – total deposits of \$60,000
69	20.05.2015	WA – Cash deposit of \$18,800 at East Perth Branch

ITEM	DATE	TRANSACTION/S
70	20.05.2015	Domestic transfer of \$78,727 to Domestic Account 16
71	21.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Caringbah A, 2 ATM deposits (\$10,000 x 2) at Cronulla A, 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Rockdale A – total deposits of \$80,000
72	22.05.2015	Domestic transfer of \$80,000 to Domestic Account 16
73	24.05.2015	NSW – 1 ATM deposit of \$8,900 at Lakemba A, 1 ATM deposit of \$9,950 at Five Dock A, 1 ATM deposit of \$5,000 at Ashfield A – total deposits of \$23,850
74	24.05.2015	NSW – 1 ATM deposits of \$10,000 at Lakemba A, 1 ATM deposit of \$10,000 at Burwood A, 1 ATM deposit of \$10,000 at Five Dock A, 1 ATM deposit of \$10,000 at Ashfield A – total deposits of \$40,000
75	25.05.2015	Domestic transfer of \$68,800 to Domestic Account 16
76	25.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at 342 Vict Ave B, 2 ATM deposits (\$10,000 x 2) at Artarmon B, 2 ATM deposits (\$10,000 x 2) at Lane Cove A, 1 ATM deposit of \$10,000 at North Ryde A – total deposits of \$70,000
77	25.05.2015	Domestic transfer of \$70,000 to Domestic Account 59
78	26.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at WF Hurstville A, 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Rockdale A – total deposits of \$60,000
79	26.05.2015	Domestic transfer of \$20,247 to Domestic Account 49
80	26.05.2015	Domestic transfer of \$39,780 to CommBank Account 107
81	26.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Dulwich Hill A
82	26.05.2015	Domestic transfer of \$20,000 to Domestic Account 16
83	27.05.2015	NSW – ATM deposit of \$9,950 at Burwood A
84	27.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Campsie D, 1 ATM deposit of \$20,000 at Burwood A – total deposits of \$40,000
85	28.05.2015	Domestic transfer of \$48,716 to Domestic Account 45
86	28.05.2015	WA – ATM deposit of \$9,000 at South Perth A
87	28.05.2015	WA – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at South Perth A
88	28.05.2015	WA – 1 ATM deposit of \$50 at Cannington A
89	28.05.2015	WA – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Cannington A
90	29.05.2015	Domestic transfer of \$38,976 to Domestic Account 16
91	29.05.2015	Domestic transfer of \$20,025 to Domestic Account 16
92	30.05.2015	NSW – 1 ATM deposit of \$9,900 at Mascot A, 1 ATM deposit of \$150 at WF Eastgrdns A – total deposits of \$10,050
93	30.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000, \$10,000) at Marr'ville M B, 1 ATM deposit of \$10,000 at Mascot A, 1 ATM deposit of \$10,000 at WF Eastgrdns A – total deposits of \$60,000
94	01.06.2015	Domestic transfer of \$69,979 to Domestic Account 16
95	02.06.2015	NSW – ATM deposits of \$9,950 at Guildford B, ATM deposit of \$50 at

ITEM	DATE	TRANSACTION/S
		Guildford A – total deposits of \$10,000
96	02.06.2015	NSW – 2 ATM deposits (\$20,000, \$10,000) at Padstow B, 2 ATM deposits (\$10,000, \$10,000) at Liverpool A, 2 ATM deposits (\$10,000, \$10,000) at Cabramatta G, 1 ATM deposit of \$10,000 at Cabramatta H, 1 ATM deposit of \$10,000 at Guildford B – total deposits of \$90,000
97	02.06.2015	Domestic transfer of \$99,950 to Domestic Account 16
98	03.06.2015	NSW – Cash deposit of \$30,000 at Lakemba Branch
99	03.06.2015	NSW – Cash deposit of \$30,000 at Campsie Branch
100	03.06.2015	NSW – ATM deposit of \$10,000 at 116 Burwood A
101	03.06.2015	NSW – Cash deposit of \$30,000 at 116 Burwood Road Branch
102	03.06.2015	Domestic transfer of \$99,947 to Domestic Account 16
103	03.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Market City C, 1 ATM deposit of \$10,000 at Market City B – total deposits of \$30,000
104	04.06.2015	Domestic transfer of \$29,987 to Domestic Account 16
105	04.06.2015	NSW – ATM deposit of \$10,000 at Padstow B
106	04.06.2015	NSW – Cash deposit of \$30,000 at Revesby Branch
107	04.06.2015	NSW – Cash deposit of \$30,000 at Riverwood Branch
108	04.06.2015	Domestic transfer of \$69,947 to Domestic Account 16
109	05.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Artarmon B, 2 ATM deposits (\$20,000, \$10,000) at Lane Cove A – total deposits of \$50,000
110	05.06.2015	Domestic transfer of \$50,000 to Domestic Account 45
111	05.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Epping A
112	07.06.2015	NSW – 1 ATM deposit of \$9,950 at Riverwood A, 1 ATM deposit of \$9,950 at Roselands A – total deposits of \$19,900
113	07.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at WF Hurstville A, 1 ATM deposit of \$10,000 at Riverwood A, 1 ATM deposit of \$10,000 at Roselands A, 2 ATM deposits (\$10,000 x 2) at Lakemba A – total deposits of \$60,000
114	08.06.2015	Domestic transfer of \$21,700 to Domestic Account 16
115	08.06.2015	Domestic transfer of \$79,850 to Domestic Account 17
116	08.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Marr'ville M A, 2 ATM deposits (\$10,000 x 2) at Marr'ville M B, 1 ATM deposit of \$10,000 at Mascot A, 2 ATM deposits (\$10,000 x 2) at Kingsford A, 2 ATM deposits (\$10,000 x 2) at Maroubra Jct A – total deposits of \$90,000
117	09.06.2015	Domestic transfer of \$89,847 to Domestic Account 16
118	09.06.2015	NSW – Cash deposit of \$40,000 at Mortdale Branch
119	10.06.2015	Domestic transfer of \$39,955 to Domestic Account 16
120	10.06.2015	NSW – 4 ATM deposits (\$10,000 x 4) totalling \$40,000 at Strathfield A
121	10.06.2015	NSW – Cash deposit of \$40,000 at Five Dock Branch
122	10.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Ashfield B

ITEM	DATE	TRANSACTION/S
123	11.06.2015	Domestic transfer of \$59,967 to Domestic Account 16
124	11.06.2015	Domestic transfer of \$40,140 to Domestic Account 16
125	11.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Roselands A
126	11.06.2015	NSW – Cash deposit of \$40,000 at Lidcombe Branch
127	11.06.2015	NSW – Cash deposit of \$40,000 at Auburn Branch
128	11.06.2015	Domestic transfer of \$59,860 to Domestic Account 16
129	12.06.2015	Domestic transfer of \$39,987 to Domestic Account 16
130	18.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Rockdale A, 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Mortdale A, 2 ATM deposits (\$10,000 x 2) at Caringbah A, 2 ATM deposits (\$20,000, \$10,000) at Cronulla A – total deposits of \$110,000
131	18.06.2015	Domestic transfer of \$99,000 to Domestic Account 54
132	19.06.2015	Domestic transfer of \$4,073 to Domestic Account 67
133	19.06.2015	Domestic transfer of \$6,927 to Domestic Account 17
134	21.06.2015	NSW – 1 ATM deposit of \$9,600 at Chatswood Ch A, 1 ATM deposit of \$5,400 at 342 Vict Ave B – total deposits of \$15,000
135	21.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Chatswood Ch B, 1 ATM deposit of \$10,000 at Chatswood Ch A, 2 ATM deposits (\$10,000 x 2) at 342 Vict Ave A 1 ATM deposit of \$10,000 at 342 Vict Ave B, 2 ATM deposits (\$10,000 x 2) at WF Hurstville A – total deposits of \$80,000
136	22.06.2015	Domestic transfer of \$94,820 to Domestic Account 5
137	26.06.2015	NSW – 1 ATM deposit of \$4,250 at Lakemba A, 1 ATM deposit of \$8,650 at Chatswood Ch B, 1 ATM deposit of \$1,460 at Rockdale A – total deposits of \$14,360
138	26.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Roselands A, 1 ATM deposit of \$10,000 at Lakemba A, 1 ATM deposit of \$10,000 at Chatswood Ch B, 2 ATM deposits (\$10,000 x 2) at WF Hurstville A, 2 ATM deposits (\$10,000 x 2) at Rockdale A – total deposits of \$80,000
139	29.06.2015	Domestic transfer of \$94,270 to Domestic Account 45
140	29.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at WF Hurstville A, 2 ATM deposits (\$10,000 x 2) at Campsie D, 2 ATM deposits (\$10,000 x 2) at Burwood A, 2 ATM deposits (\$10,000 x 2) at 116 Burwood A – total deposits of \$80,000
141	30.06.2015	Domestic transfer of \$79,667 to Domestic Account 5
142	30.06.2015	NSW – 1 ATM deposit of \$9,900 at Kingsgrove A, 2 ATM deposits (\$3,050, \$150) at Chatswood B – total deposits of \$13,100
143	30.06.2015	NSW – 1 ATM deposit of \$10,100 at Kingsgrove A, 2 ATM deposits (\$10,000 x 2) at Mortdale A, 2 ATM deposits (\$20,000, \$19,800) at Roselands A, 2 ATM deposits (\$10,000 x 2) at Lakemba A, 2 ATM deposits (\$10,000 x 2) at North Ryde A, 2 ATM deposits (\$10,000 x 2) Chatswood Ch A, 2 ATM deposits (\$10,000 x 2) at Chatswood Ch B, 2 ATM deposits (\$10,000 x 2) at 342 Vict Ave A, 2 ATM deposits (\$10,000 x 2) at Vict Ave B, 2 ATM deposits (\$10,000 x 2) at Chatswood A, 1 ATM deposit of \$10,000 at Chatswood B – total deposits of \$219,900
144	01.07.2015	Domestic transfer of \$99,620 to Domestic Account 5

ITEM	DATE	TRANSACTION/S
145	01.07.2015	Domestic transfer of \$99,825 to Domestic Account 5
146	01.07.2015	NSW – 2 ATM deposits (\$20,000, \$10,000) at Padstow A, 2 ATM deposits (\$10,000 x 2) at Padstow B, 2 ATM deposits (\$10,000 x 2) at Bankstown Ct C, 1 ATM deposit of \$10,000 at Bankstown Ct B, 2 ATM deposits (\$10,000 x 2) at Bankstown D – total deposits of \$100,000
147	02.07.2015	Domestic transfer of \$99,687 to Domestic Account 5
148	02.07.2015	NSW – 1 ATM deposit of \$9,950 at Town Hall A, 1 ATM deposit of \$5,000 at Broadway B – total deposits of \$14,950
149	02.07.2015	NSW - 2 ATM deposits (\$10,000 x 2) at Market City B, 2 ATM deposits (\$10,000 x 2) at Market City A, 1 ATM deposit of \$10,000 at Town Hall A, 2 ATM deposits (\$10,000 x 2) at Haymarket C, 2 ATM deposits (\$10,000 x 2) at Broadway A – total deposits of \$90,000
150	03.07.2015	Domestic transfer of \$99,865 to Domestic Account 5
151	03.07.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Kingsgrove A, 2 ATM deposits (\$10,000 x 2) at Campsie D, 2 ATM deposits (\$10,000 x 2) at Burwood A, 2 ATM deposits (\$10,000 x 2) at 116 Burwood A, 2 ATM deposits (\$10,000 x 2) at Strathfield A, 2 ATM deposits (\$10,000 x 2) at Macquarie Ctr N, 1 ATM deposit of \$10,000 at North Ryde A – total deposits of \$130,000
152	06.07.2015	Domestic transfer of \$99,817 to Domestic Account 5
153	06.07.2015	Domestic transfer of \$68,898 to Domestic Account 5
154	08.07.2015	NSW – 2 ATM deposits (\$10,000 x 2) at WF Hurstville A, 2 ATM deposits (\$20,000, \$19,900) at Riverwood A, 2 ATM deposits (\$10,000 x 2) at Roselands A, 2 ATM deposits (\$10,000 x 2) at Market City B – total deposits of \$99,900
155	08.07.2015	Domestic transfer of \$99,890 to Domestic Account 32
156	10.07.2015	WA – Cash deposit of \$40,000 at Dianella Branch
157	10.07.2015	WA – Cash deposit of \$40,000 at Morley Branch
158	10.07.2015	WA – Cash deposit of \$40,000 at Maylands Branch
159	13.07.2015	Domestic transfer of \$77,450 to Domestic Account 32
160	13.07.2015	Domestic transfer of \$42,380 to Domestic Account 5
161	15.07.2015	WA – 3 ATM deposits (\$9,730, \$250, \$20) totalling \$10,000 at South Perth B
162	15.07.2015	WA – 1 ATM deposit of \$10,000 at South Perth B
163	16.07.2015	WA – Cash deposit of \$40,000 at Cottesloe Branch
164	16.07.2015	WA – Cash deposit of \$40,000 at Fremantle Branch
165	17.07.2015	Domestic transfer of \$99,918 to Domestic Account 32
166	17.07.2015	WA – Cash deposit of \$39,950 at Floreat Forum Branch
167	17.07.2015	WA – Cash deposit of \$40,000 at Innaloo Branch
168	17.07.2015	WA – Cash deposit of \$40,000 at Karrinyup Branch
169	17.07.2015	WA – Cash deposit of \$40,000 at Warwick Branch

ITEM	DATE	TRANSACTION/S
170	17.07.2015	Domestic transfer of \$99,950 to Domestic Account 5
171	20.07.2015	Domestic transfer of \$59,838 to Domestic Account 5
172	20.07.2015	WA – Cash deposit of \$40,000 at Mount Lawley Branch
173	20.07.2015	WA – Cash deposit of \$40,000 at Mount Hawthorn Branch
174	20.07.2015	Domestic transfer of \$79,864 to Domestic Account 5
175	22.07.2015	NSW – Cash deposit of \$39,950 at Riverwood Branch
176	22.07.2015	NSW – 1 ATM deposit of \$10,000 at WF Hurstville A, 2 ATM deposits (\$10,000 x 2) at Kingsgrove A – total deposits of \$30,000
177	23.07.2015	Domestic transfer of \$69,878 to Domestic Account 5
178	23.07.2015	NSW – ATM deposit of \$9,950 at Engadine A
179	23.07.2015	NSW – 2 ATM deposits (\$20,000 x 2) at Rockdale A, 2 ATM deposits (\$10,000 x 2) at Caringbah A, 2 ATM deposits (\$10,000 x 2) at Cronulla A, 1 ATM deposit of \$10,050 at Engadine A – total deposits of \$90,050
180	23.07.2015	Domestic transfer of \$81,000 to Domestic Account 68
181	23.07.2015	Cash withdrawal of \$1,000 at WF Hurstville B
182	23.07.2015	Cash withdrawal of \$1,000 at Sth Hurstville
183	24.07.2015	Cash withdrawal of \$2,000 at Sth Hurstville
184	25.07.2015	Cash withdrawal of \$2,000 at WF Hurstville B
185	26.07.2015	Cash withdrawal of \$2,000 at WF Hurstville B
186	27.07.2015	Cash withdrawal of \$2,000 at WF Hurstville A
187	28.07.2015	Cash withdrawal of \$2,000 at WF Hurstville B
188	29.07.2015	Cash withdrawal of \$2,000 at Hurstville A
189	30.07.2015	Cash withdrawal of \$2,000 at Bondi Junct F
190	31.07.2015	Cash withdrawal of \$2,000 at Hurstville C
191	01.08.2015	Cash withdrawal of \$2,000 at WF Hurstville A
192	02.08.2016	Cash withdrawal of \$350 at Hurstville B

SCHEDULE AT

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 5 – COMMBANK ACCOUNT 54

ITEM	DATE	TRANSACTION/S
1	24.05.2015	NSW – ATM deposit of \$5,100 at Ashfield A
2	24.05.2015	NSW – 2 ATM deposits of \$10,000 at Roselands A, 1 ATM deposit of \$10,000 at Lakemba A – total deposits of \$30,000
3	25.05.2015	Domestic transfer of \$35,047 to Domestic Account 16
4	25.05.2015	NSW – ATM deposit of \$8,500 at Artarmon A
5	25.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Vict Ave B, 1 ATM deposit of \$10,000 at Artarmon A, 2 ATM deposits (\$10,000 x 2) at Lane Cove A – total deposits of \$50,000
6	25.05.2015	Domestic transfer of \$38,500 to Domestic Account 59
7	26.05.2015	Domestic transfer of \$20,000 to Domestic Account 17
8	26.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Rockdale A – total deposits of \$60,000
9	26.05.2015	Domestic transfer of \$25,470 to CommBank Account 107
10	26.05.2015	NSW – ATM deposit of \$8,000 at Marrickville M B
11	26.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Dulwich Hill A
12	26.05.2015	Domestic transfer of \$62,130 to Domestic Account 45
13	27.05.2015	NSW – ATM deposit of \$150 at Burwood A
14	27.05.2015	NSW – 2 ATM deposits (\$10,000, \$11,400) at Campsie D, 1 ATM deposit of \$20,000 at Burwood A – total deposits of \$41,400
15	28.05.2015	Domestic transfer of \$41,500 to Domestic Account 53
16	28.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Riverwood A, 2 ATM deposits (\$10,000 x 2) at Padstow B, 2 ATM deposits (\$10,000 x 2) at Bankstown D, 2 ATM deposits (\$10,000 x 2) at Bankstown Ct C – total deposits of \$80,000

ITEM	DATE	TRANSACTION/S
17	28.05.2015	Domestic transfer of \$79,850 to Domestic Account 16
18	28.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Vict Ave A
19	29.05.2015	Domestic transfer of \$20,000 to Domestic Account 16
20	29.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Vict Ave A, 2 ATM deposits (\$10,000 x 2) at Chatswood A, 2 ATM deposits (\$10,000, \$20,000) at 116 Burwood A, 2 ATM deposits (\$10,000 x 2) at Burwood A – total deposits of \$90,000
21	30.05.2015	NSW – ATM deposit of \$9,950 at Marrickville M A
22	30.05.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Marrickville M B, 1 ATM deposit of \$10,000 at Marrickville M A – total deposits of \$50,000
23	01.06.2015	Domestic transfer of \$89,864 to Domestic Account 16
24	01.06.2015	Domestic transfer of \$59,900 to Domestic Account 16
25	02.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Padstow B, 2 ATM deposits (\$10,000 x 2) at Liverpool A, 2 ATM deposits (\$20,000, \$10,000) at Cabramatta H – total deposits of \$70,000
26	02.06.2015	Domestic transfer of \$69,978 to Domestic Account 60
27	02.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Guildford B
28	03.06.2015	Domestic transfer of \$20,487 to Domestic Account 16
29	03.06.2015	NSW – Cash deposit of \$30,000 at Kingsgrove Branch
30	03.06.2015	NSW – ATM deposit of \$10,000 at Lakemba A
31	04.06.2015	Domestic transfer of \$39,972 to Domestic Account 16
32	04.06.2015	NSW – Cash deposit of \$30,000 at Hurstville A Branch
33	04.06.2015	NSW – Cash deposit of \$30,000 at Westfield Hurstville Branch
34	04.06.2015	NSW – ATM deposit of \$10,000 at Hurstville A
35	04.06.2015	NSW – Cash deposit of \$30,000 at Ramsgate Branch
36	04.06.2015	Domestic transfer of \$99,898 to Domestic Account 16
37	04.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Chatswood Ch B
38	05.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Artarmon B, 2 ATM deposits (\$10,000 x 2) at Lane Cove A, 2 ATM deposits (\$10,000 x 2) at Epping A, 2 ATM deposits (\$10,000 x 2) at North Ryde A – total deposits of \$80,000
39	08.06.2015	Domestic transfer of \$98,000 to Domestic Account 17
40	08.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Marrickville M A – total deposits of \$40,000
41	09.06.2015	Domestic transfer of \$39,860 to Domestic Account 16
42	09.06.2015	NSW – Cash deposit of \$40,000 at Oatley Branch
43	09.06.2015	NSW – Cash deposit of \$30,000 at Sth Hurstville Branch
44	09.06.2015	NSW – Cash deposit of \$30,000 at Sylvania Branch

ITEM	DATE	TRANSACTION/S
45	09.06.2015	Domestic transfer of \$98,967 to Domestic Account 16
46	10.06.2015	NSW – Cash deposit of \$40,000 at Riverwood Branch
47	10.06.2015	NSW – Cash deposit of \$40,000 at 116 Burwood Rd Branch
48	10.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Ashfield B
49	11.06.2015	Domestic transfer of \$99,876 to Domestic Account 16
50	11.06.2015	NSW – Cash deposit of \$40,000 at Roselands Branch
51	11.06.2015	NSW – 2 ATM deposits (\$9,370, \$630) totalling \$10,000 at Roselands A
52	11.06.2015	NSW – ATM deposit of \$10,000 at Roselands A
53	11.06.2015	NSW – Cash deposit of \$40,000 at Regents Park Branch
54	11.06.2015	Domestic transfer of \$99,862 to Domestic Account 16
55	12.06.2015	NSW – Cash deposit of \$40,000 at Lindfield Branch
56	12.06.2015	NSW – Cash deposit of \$30,000 at Westfield Hurstville Branch
57	12.06.2015	Domestic transfer of \$69,881 to Domestic Account 16
58	15.06.2015	Domestic transfer of \$4,000 to Domestic Account 16
59	19.06.2015	NSW – ATM deposit of \$9,950 at Kingsford A
60	19.06.2015	NSW – 2 ATM deposits (\$10,000, \$10,000) at Eastgardens A, 1 ATM deposit of \$10,000 at Kingsford A, 2 ATM deposits (\$10,000, \$10,000) at Hurstville A, 2 ATM deposits (\$10,000, \$10,000) at Roselands A, 2 ATM deposits at Maroubra Junction A (\$10,000, \$10,000) – total deposits of \$90,000
61	22.06.2015	Domestic transfer of \$99,950 to Domestic Account 5
62	21.06.2015	NSW – ATM deposit of \$9,900 at Vict Ave A
63	21.06.2015	NSW – 2 ATM deposits (\$10,000, \$10,000) at Chatswood Ch B, 2 ATM deposits (\$10,000, \$10,000) at Chatswood Ch A, 2 ATM deposits (\$10,000, \$10,000) at Vict Ave B, ATM deposit of \$10,000 at Vict Ave A, 2 ATM deposits (\$10,000, \$10,100) at Chatswood A, 1 ATM deposit of \$10,000 at Campsie D, 2 ATM deposits (\$10,000, \$10,000) at Riverwood A – total deposits of \$120,100
64	24.06.2015	Domestic transfer of \$100,000 to Domestic Account 54
65	25.06.2015	Domestic transfer of \$30,000 to Domestic Account 62
66	26.06.2015	NSW – 1 ATM deposit of \$10,000 at Mortdale A, 1 ATM deposit of \$10,000 at Riverwood A – total deposits of \$20,000
67	26.06.2015	NSW – Cash deposit of \$10,000 at Riverwood Branch
68	26.06.2015	NSW – 2 ATM deposits (\$4,000 x 2) at Roselands A, 1 ATM deposit of \$7,000 at Lakemba A – total deposits of \$15,000
69	26.06.2015	NSW – 1 ATM deposit of \$10,000 at Lakemba A, 2 ATM deposits (\$20,000, \$10,000) at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Rockdale A – total deposits of \$60,000
70	28.06.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Eastgardens A, 2 ATM deposits (\$10,000 x 2) at WF Eastgardens B, 2 ATM deposits (\$10,000 x 2) at Maroubra Jct A, 2 ATM

ITEM	DATE	TRANSACTION/S
		deposits (\$10,000 x 2) at Kingsford A – total deposits of \$100,000
71	29.06.2015	Domestic transfer of \$29,508 to Domestic Account 32
72	29.06.2015	Domestic transfer of \$70,492 to Domestic Account 45
73	30.06.2015	Domestic transfer of \$5,000 to Domestic Account 17
74	30.06.2015	Domestic transfer of \$75,000 to Domestic Account 5
75	01.07.2015	Domestic transfer of \$24,948 to Domestic Account 5
76	01.07.2015	WA – Cash deposit of \$40,000 at 150 St Georges Branch
77	01.07.2015	WA – Cash deposit of \$40,000 at Belmont Branch
78	02.07.2015	Domestic transfer of \$79,625 to Domestic Account 5
79	02.07.2015	WA – Cash deposit of \$30,000 at Morley Branch
80	02.07.2015	WA – Cash deposit of \$40,050 at Innaloo Branch
81	02.07.2015	WA – Cash deposit of \$40,000 at Mount Hawthorn Branch
82	03.07.2015	Domestic transfer of \$100,000 to Domestic Account 5
83	03.07.2015	WA – Cash deposit of \$40,000 at Malaga
84	03.07.2015	WA – Cash deposit of \$40,000 at Warwick Branch
85	06.07.2015	Domestic transfer of \$89,987 to Domestic Account 5
86	09.07.2015	NSW - 2 ATM deposits (\$9,950, \$9,970) at Haymarket A, 1 ATM deposit of \$1,515 at Haymarket B – total deposits of \$21,435
87	09.07.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Broadway A, 2 ATM deposits (\$10,000 x 2) at Broadway B – total deposits of \$40,000
88	10.07.2015	Domestic transfer of \$61,920 to Domestic Account 5
89	10.07.2015	WA – Cash deposit of \$30,000 at Mount Hawthorn Branch
90	10.07.2015	WA – Cash deposit of \$40,100 at Osborne Park Branch
91	10.07.2015	WA – Cash deposit of \$39,900 at Mirrabooka Branch
92	13.07.2015	Domestic transfer of \$100,000 to Domestic Account 5
93	13.07.2015	Domestic transfer of \$10,007 to Domestic Account 5
94	15.07.2015	WA – Cash deposit of \$39,950 at Victoria Park Branch
95	15.07.2015	WA – Cash deposit of \$40,000 at Cannington Branch
96	15.07.2015	WA – Cash deposit of \$40,000 at Riverton Branch
97	15.07.2015	WA – ATM deposit of \$50 at South Perth B
98	15.07.2015	WA – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at South Perth B
99	16.07.2015	Domestic transfer of \$100,000 to Domestic Account 32
100	16.07.2015	WA – Cash deposit of \$40,000 at West Perth Branch
101	16.07.2015	WA – Cash deposit of \$40,000 at Uni of WA Branch

ITEM	DATE	TRANSACTION/S
102	16.07.2015	Domestic transfer of \$100,000 to Domestic Account 32
103	16.07.2015	WA – Cash deposit of \$40,000 at Claremont Branch
104	17.07.2015	Domestic transfer of \$60,000 to Domestic Account 18
105	17.07.2015	WA – Cash deposit of \$40,000 at Girrawheen Branch
106	17.07.2015	WA – Cash deposit of \$40,140 at Madeley Kingsway Branch
107	20.07.2015	Domestic transfer of \$80,000 to Domestic Account 5
108	20.07.2015	WA – Cash deposit of \$40,000 at Osborne Park Branch
109	20.07.2015	WA – Cash deposit of \$30,000 at Dianella Branch
110	21.07.2015	Domestic transfer of \$69,886 to Domestic Account 5
111	21.07.2015	WA – Cash deposit of \$30,000 at Cannington Branch
112	22.07.2015	Domestic transfer of \$29,980 to Domestic Account 5
113	22.07.2015	NSW – Cash deposit of \$40,000 at Mortdale Branch
114	22.07.2015	NSW – 1 ATM deposit of \$10,000 at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Kingsgrove A – total deposits of \$30,000
115	23.07.2015	Domestic transfer of \$69,863 to Domestic Account 5
116	23.07.2015	2 ATM deposits (\$20,000, \$10,000) at Rockdale A, 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Caringbah A, 2 ATM deposits (\$10,000 x 2) at Cronulla A, 1 ATM deposit of \$10,000 at WF Hurstville A – total deposits of \$100,000
117	24.07.2015	Domestic transfer of \$99,982 to Domestic Account 5
118	31.07.2015	NSW – Cash deposit of \$40,000 at Mortdale Branch
119	31.07.2015	NSW – Cash deposit of \$30,000 at Sth Hurstville Branch
120	31.07.2015	NSW – Cash deposit of \$29,950 at Sylvania Branch
121	03.08.2015	Domestic transfer of \$99,950 to Domestic Account 57
122	06.08.2015	NSW – Cash deposit of \$40,000 at Kogarah Branch
123	06.08.2015	NSW – Cash deposit of \$30,000 at Rockdale Branch
124	06.08.2015	Domestic transfer of \$70,218 to Domestic Account 15
125	07.08.2015	WA – Cash deposit of \$35,050 at Fremantle Branch
126	07.08.2015	WA – ATM deposit of \$9,900 at Innaloo A
127	07.08.2015	WA – ATM deposit of \$10,000 at Innaloo A
128	08.08.2015	WA – ATM deposit of \$5,000 at Belmont A
129	08.08.2015	WA – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at South Perth A
130	08.08.2015	WA – 2 ATM deposits (\$9,950 x 2) totalling \$19,900 at M & F Perth D
131	08.08.2015	WA – 2 ATM deposits (\$10,000 x 2) at Cannington A, 4 ATM deposits (\$10,000 x 4) at St George B, 2 ATM deposits (\$10,000 x 2) at M & F Perth D – total deposits of \$80,000

ITEM	DATE	TRANSACTION/S
132	10.08.2015	Domestic transfer of \$55,150 to Domestic Account 57
133	10.08.2015	Domestic transfer of \$94,900 to Domestic Account 57
134	10.08.2015	Domestic transfer of \$30,000 to Domestic Account 57
135	20.08.2015	NSW – Cash deposit of \$40,000 at Hurstville Branch
136	20.08.2015	2 ATM deposits (\$10,000 x 2) at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Roselands A, 1 ATM deposit of \$10,000 at Kingsgrove A – total deposits of \$50,000
137	20.08.2015	Domestic transfer of \$89,879 to Domestic Account 5
138	24.08.2015	WA – Cash deposit of \$40,000 at Mount Lawley Branch
139	24.08.2015	WA – 3 ATM deposits (\$9,580, \$420, \$9,950) totalling \$19,950 at Kardinya A
140	24.08.2015	WA – 2 ATM deposits (\$10,000, \$10,050) totalling \$20,050 at Canning Vale
141	25.08.2015	Domestic transfer of \$79,899 to Domestic Account 5
142	25.08.2015	NSW – 2 ATM deposits (\$10,000, \$11,940) at Eastgardens A, 2 ATM deposits (\$10,000 x 2) at Maroubra Junct A, 1 ATM deposit of \$10,000 at Kingsford A – total deposits of \$51,940
143	26.08.2015	Domestic transfer of \$51,878 to Domestic Account 5
144	25.08.2015	NSW – Cash deposit of \$20,000 at Pagewood Branch
145	25.08.2015	NSW – Cash deposit of \$39,950 at Kingsgrove Branch
146	26.08.2015	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Rockdale A
147	26.08.2015	Domestic transfer of \$79,847 to Domestic Account 5
148	28.08.2015	NSW – Cash deposit of \$40,000 at Sylvania Branch
149	28.08.2015	NSW – Cash deposit of \$40,000 at Miranda Branch
150	31.08.2015	Domestic transfer of \$79,869 to Domestic Account 18
151	31.08.2015	NSW – 2 ATM deposits (\$20,000, \$18,800) at Riverwood A, 2 ATM deposits (\$10,000 x 2) at Roselands A – total deposits of \$58,800
152	31.08.2015	NSW – Cash deposit of \$1,200 at Roselands Branch
153	31.08.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Lakemba A, 2 ATM deposits (\$10,000 x 2) at Campsie D – total deposits of \$40,000
154	01.09.2015	Domestic transfer of \$99,902 to Domestic Account 5
155	03.09.2015	WA – Cash deposit of \$41,250 at Karawara Waterford Plaza Branch
156	03.09.2015	WA – Cash deposit of \$40,000 at Cannington Branch
157	03.09.2015	WA – Cash deposit of \$20,000 at Belmont Branch
158	03.09.2015	Domestic transfer of \$100,000 to Domestic Account 18
159	04.09.2015	NSW – 1 ATM deposit of \$10,000 at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Mortdale A, 2 ATM deposits (\$10,000 x 2) at Padstow A, 2 ATM deposits (\$10,000 x 2) at Padstow B, 2 ATM deposits (\$10,000 x 2) at Riverwood A, 2 ATM deposits (\$10,000 x 2) at Roselands A, 2 ATM deposits (\$10,000 x 2) at Kingsgrove A – total deposits of \$130,000

ITEM	DATE	TRANSACTION/S
160	04.09.2015	Domestic transfer of \$99,995 to Domestic Account 18
161	05.09.2015	NSW – 2 ATM deposits (\$20,000 x 2) at Campsie D, 2 ATM deposits (\$20,000, \$10,000) at Burwood A – total deposits of \$70,000
162	07.09.2015	Domestic transfer of \$29,950 to Domestic Account 18
163	07.09.2015	Domestic transfer of \$69,828 to Domestic Account 18
164	09.09.2015	NSW – Cash deposit of \$50,000 at Sylvania Branch
165	09.09.2015	NSW – 2 ATM deposits (\$20,000, \$10,000) at Chatswood Ch A, 2 ATM deposits (\$20,000, \$10,000) at Vict Ave B – total deposits of \$60,000
166	09.09.2015	Domestic transfer of \$98,987 to Domestic Account 5
167	10.09.2015	Domestic transfer of \$10,000 to Domestic Account 5
168	10.09.2015	NSW – Cash deposit of \$40,000 at Ramsgate Branch
169	10.09.2015	NSW – 2 ATM deposits (\$10,000 x 2) at 116 Burwood A, 2 ATM deposits (\$10,000 x 2) at Burwood A, 2 ATM deposits (\$10,000 x 2) at Campsie D – total deposits of \$60,000
170	11.09.2015	Domestic transfer of \$89,937 to Domestic Account 5
171	11.09.2015	NSW – Cash deposit of \$50,000 at Strathfield Branch
172	11.09.2015	Domestic transfer of \$59,827 to Domestic Account 5
173	11.09.2015	NSW – 1 ATM deposit of \$9,950 at Eastwood A
174	11.09.2015	NSW – 1 ATM deposit of \$20,000 at Eastwood A, 2 ATM deposits (\$10,050, \$10,000) at Eastwood B – total deposits of \$40,050
175	14.09.2015	Domestic transfer of \$49,596 to Domestic Account 5
176	14.09.2015	NSW – 2 ATM deposits (\$10,000, \$10,000) at Chatswood Ch B, 2 ATM deposits (\$10,000, \$10,000) at Chatswood A, 2 ATM deposits (\$10,000, \$10,000) at Chatswood B, 2 ATM deposits at Chatswood Ch A (\$10,000, \$10,000) – total deposits of \$80,000
177	14.09.2015	Domestic transfer of \$79,235 to Domestic Account 18
178	15.09.2015	NSW – Cash deposit of \$50,000 at Pagewood Branch
179	15.09.2015	NSW – 1 ATM deposit of \$9,900 at Kogarah A, 1 ATM deposit of \$9,900 at Market City A – total deposits of \$19,800
180	15.09.2015	NSW – 1 ATM deposit of \$10,000 at Kogarah A, 1 ATM deposit of \$10,100 at Market City A, 2 ATM deposits (\$10,000, \$10,000) at Market City C – total deposits of \$40,100
181	16.09.2015	Domestic transfer of \$98,115 to Domestic Account 5
182	16.09.2015	NSW – Cash deposit of \$49,800 at Mordial Branch
183	16.09.2015	Domestic transfer of \$58,985 to Domestic Account 5
184	17.09.2015	NSW – 2 ATM deposits (\$10,000, \$10,000) at Vict Ave A, 2 ATM deposits (\$10,000, \$10,000) at Vict Ave B, 2 ATM deposits (\$10,000, \$10,000) at Chatswood B – total deposits of \$60,000
185	18.09.2015	Domestic transfer of \$67,116 to Domestic Account 5
186	18.09.2015	NSW – Cash deposit of \$40,000 at Sylvania Branch

ITEM	DATE	TRANSACTION/S
187	21.09.2015	Domestic transfer of \$39,965 to Domestic Account 18
188	22.09.2015	WA – 2 ATM deposits (\$3,600, \$6,300) totalling \$9,900 at Cannington A
189	22.09.2015	WA – 2 ATM deposits (\$10,000, \$10,000) totalling \$20,000 at Kardinya A
190	23.09.2015	WA – Cash deposit of \$50,000 at Cottesloe Branch
191	23.09.2015	WA – Cash deposit of \$30,000 at Fremantle Branch
192	23.09.2015	Domestic transfer of \$96,750 to Domestic Account 5
193	24.09.2015	Domestic transfer of \$12,500 to Domestic Account 18
194	24.09.2015	NSW – 1 ATM deposit of \$9,800 at Roselands A, 1 ATM deposit of \$9,900 at Hurstville A – total deposits of \$19,700
195	24.09.2015	NSW – 2 ATM deposits (\$20,000, \$10,000) at Mortdale A, 1 ATM deposit of \$10,000 at Riverwood A, 1 ATM deposit of \$10,100 at Roselands A, 1 ATM deposit of \$10,000 at Hurstville A – total deposits of \$60,100
196	25.09.2015	Domestic transfer of \$79,685 to Domestic Account 18
197	25.09.2015	NSW – Cash deposit of \$50,000 at Hurstville Branch
198	25.09.2015	NSW – 2 ATM deposits (\$20,000 x 2) at Burwood A, 2 ATM deposits (\$10,000 x 2) at 116 Burwood A – total deposits of \$60,000
199	25.09.2015	Domestic transfer of \$99,869 to Domestic Account 5
200	28.09.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Vict Ave B, 2 ATM deposits (\$10,000 x 2) at Vict Ave A, 2 ATM deposits (\$10,000 x 2) at Chatswood Ch A, 1 ATM deposit of \$10,000 at Chatswood Ch B – total deposits of \$70,000
201	29.09.2015	Domestic transfer of \$80,000 to Domestic Account 18
202	29.09.2015	NSW – Cash deposit of \$50,000 at Chatswood Branch
203	29.09.2015	Domestic transfer of \$49,865 to Domestic Account 5
204	30.09.2015	NSW – ATM deposit of \$9,800 at Lakemba B
205	30.09.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Roselands A, 1 ATM deposit of \$10,000 at Lakemba B, 2 ATM deposits (\$10,100, \$10,000) at Hurstville A – total deposits of \$50,100
206	01.10.2015	Domestic transfer of \$59,287 to Domestic Account 5
207	01.10.2015	Domestic transfer of \$181 to CommBank Account 59
208	01.10.2015	WA – Cash deposit of \$59,750 at Mount Lawley Branch
209	01.10.2015	WA – Cash deposit of \$60,050 at Maylands Branch
210	02.10.2015	Domestic transfer of \$99,800 to Domestic Account 18
211	02.10.2015	WA – Cash deposit of \$50,000 at Victoria Park Branch
212	02.10.2015	Domestic transfer of \$71,510 to CommBank Account 108
213	02.10.2015	WA – Cash deposit of \$50,000 at Kardinya Branch
214	02.10.2015	Domestic transfer of \$28,490 to Domestic Account 5
215	05.10.2015	Domestic transfer of \$21,510 to Domestic Account 5

SCHEDULE AU

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 48 – COMMBANK ACCOUNT 55

ITEM	DATE	TRANSACTION/S
1	24.05.15	NSW - 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Roselands A
2	25.05.15	Domestic transfer of \$19,890 to Domestic Account 16
3	28.05.15	NSW - ATM deposit of \$9,900 at Riverwood A
4	28.05.15	NSW - ATM deposit of \$10,000 at Riverwood A, 2 ATM deposits (\$10,000 x 2) at Padstow B, 2 ATM deposits (\$10,000 x 2) at Bankstown D, 2 ATM deposits (\$10,000, \$10,050) at Victoria Avenue B, 1 ATM deposit of \$10,000 at Victoria Ave A – total deposits of \$80,050
5	29.05.15	Domestic transfer of \$90,017 to Domestic Account 16
6	29.05.15	NSW - 2 ATM deposits (\$10,000 x 2) at Victoria Avenue A, 2 ATM deposits (\$10,000 x 2) at Chatswood A, 1 ATM deposit of \$10,000 at Chatswood Ch A, 2 ATM deposits (\$10,000 x 2) at Burwood A, 1 ATM deposit of \$10,000 at Burwood A – total deposits of \$80,000
7	01.06.15	Domestic transfer of \$79,978 to Domestic Account 16
8	7.06.15	NSW - 2 ATM deposits (\$10,000 x 2) at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Mortdale A, 2 ATM deposits (\$10,000 x 2) at Riverwood A, 1 ATM deposit of \$10,000 at Roselands A – total deposits of \$70,000
9	7.05.15	NSW - ATM deposit of \$100 at Roselands A
10	8.06.15	Domestic transfer of \$70,076 to Domestic Account 16
11	1.07.15	WA - 4 ATM deposits (\$10,000 x 4) at South Perth B, 2 ATM deposits (\$10,000 x 2) at Belmont A – total deposits of \$60,000
12	2.07.15	Domestic transfer of \$19,969 to Domestic Account 5
13	3.07.15	Domestic transfer of \$39,987 to Domestic Account 5
14	6.10.15	Domestic transfer of \$125 to CommBank Account 59

SCHEDULE AV

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN
123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 6 – COMMBANK ACCOUNT 56

ITEM	DATE	TRANSACTION/S
1	8.07.15	NSW – 2 ATM deposits (\$19,500, \$10,000) at World Square D – total deposits of \$29,500
2	8.07.15	Domestic transfer of \$21,308 to CommBank Account 101
3	9.07.15	NSW – 3 ATM deposits (\$9,900, \$9,800, \$5,000) at Norwest B – total deposits of \$24,700
4	10.07.15	Domestic transfer of \$16,837 to Domestic Account 30
5	13.07.15	Domestic transfer of \$16,000 to CommBank Account 102
6	18.07.15	NSW – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Victoria Ave B
7	22.07.15	Domestic transfer of \$30,000 to CommBank Account 103
8	5.08.15	NSW – 4 ATM deposits (\$20,000 x 3, \$19,700) at Norwest B – total deposits of \$79,700
9	6.08.15	Domestic transfer of \$79,000 to Domestic Account 15
10	6.08.15	NSW – 4 ATM deposits (\$20,000 x 4) at Norwest B - total deposits of \$80,000
11	7.08.15	Domestic transfer of \$80,700 to Domestic Account 15
12	9.08.15	NSW – 3 ATM deposits (\$20,000 x 3) totalling \$60,000 at Norwest B
13	10.08.15	Domestic transfer of \$60,001 to Domestic Account 17
14	10.08.15	NSW – 3 ATM deposits (\$20,000 x 3, \$16,000) totalling \$76,000 at Norwest B
15	10.08.15	NSW – 1 ATM deposit of \$5,000 at Norwest B
16	11.08.15	Domestic transfer of \$81,000 to Domestic Account 15
17	11.08.15	NSW – 5 ATM deposits (\$20,000 x 3, \$10,000 x 2) totalling \$80,000 at Castle Towers B

ITEM	DATE	TRANSACTION/S
18	12.08.15	Domestic transfer of \$80,000 to Domestic Account 15
19	13.08.15	NSW – 1 ATM deposit of \$9,900 at World Square D
20	13.08.15	NSW – 4 ATM deposits (\$15,000 x 2, \$10,000,) totalling \$40,000 at World Square D
21	13.08.15	Domestic transfer of \$46,592 to Domestic Account 31
22	16.11.15	Withdrawal of \$1,000 from World Square ATM
23	27.12.15	Withdrawal of \$1,000 from Norwest B ATM
24	8.01.15	Withdrawal of \$1,000 from World Square ATM

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FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
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Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN
123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 7 – COMMBANK ACCOUNT 57

ITEM	DATE	TRANSACTION/S
1	29.07.2015	WA – Cash deposit of \$39,900 at Victoria Park Branch
2	29.07.2015	WA – Cash deposit of \$30,000 at Belmont Branch
3	05.08.2015	Domestic transfer of \$69,187 to CommBank Account 116
4	07.08.2015	WA – Cash deposit of \$40,000 at Mount Lawley Branch
5	07.08.2015	WA – Cash deposit of \$40,000 at Morley Branch
6	07.08.2015	WA – 2 Automatic Teller Machine (ATM) deposits (\$10,000 x 2) totalling \$20,000 at Innaloo A
7	08.08.2015	WA – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at South Perth A
8	8.08.2015	WA – 1 ATM deposit of \$5,000 at Belmont A
9	10.08.2015	Domestic transfer of \$100,000 to Domestic Account 57
10	11.08.2015	NSW – 4 ATM deposits (\$20,000 x 3, \$15,000) totalling \$75,000 at Castle Towers A
11	12.08.2015	Domestic transfer of \$100,000 to Domestic Account 15
12	20.08.2015	NSW – Cash deposit of \$40,000 at Mortdale Branch
13	20.08.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Hurstville A, 2 ATM deposits (\$10,000 x 2) at Roselands A, 1 ATM deposit of \$10,000 at Kingsgrove A – total deposits of \$50,000
14	21.08.2015	Domestic transfer of \$89,996 to Domestic Account 5
15	24.08.2015	WA – Cash deposit of \$29,880 at Morley Branch
16	24.08.2015	WA – 2 ATM deposits (\$10,000 x 2) at Kardinya A, 2 ATM deposits (\$10,000 x 2) at Canning Vale – total deposits of \$40,000
17	25.08.2015	Domestic transfer of \$69,881 to Domestic Account 5

ITEM	DATE	TRANSACTION/S
18	25.08.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Eastgardens A, 2 ATM deposits (\$10,000 x 2) at Maroubra Jct A, 2 ATM deposits (\$10,000 x 2) at Kingsford A – total deposits of \$60,000
19	26.08.2015	Domestic transfer of \$59,998 to Domestic Account 5
20	26.08.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Rockdale A, 1 ATM deposit of \$10,000 at Hurstville A – total deposits of \$30,000
21	26.08.2015	NSW – 2 ATM deposits (\$9,900, \$100) totalling \$10,000 at Hurstville A
22	27.08.2015	Domestic transfer of \$40,002 to Domestic Account 5
23	31.08.2015	NSW – 1 ATM deposit of \$9,950 at Roselands A, 2 ATM deposits (\$9,900, \$150) at Lakemba A – total deposits of \$20,000
24	31.08.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Riverwood A, 1 ATM deposit of \$10,000 at Roselands A – total deposits of \$30,000
25	01.09.2015	Domestic transfer of \$50,000 to Domestic Account 58
26	05.09.2015	NSW - 2 ATM deposits (\$10,000 x 2) at Campsie D, 1 ATM deposit of \$10,000 at 116 Burwood A – total deposits of \$30,000
27	08.09.2015	Domestic transfer of \$30,000 to Domestic Account 18
28	09.09.2015	NSW – Cash deposit of \$49,900 at Mortdale Branch
29	09.09.2015	NSW – 2 ATM deposits (\$20,000 x 2) at Chatswood Ch B, 2 ATM deposits (\$20,000, \$10,000) at 342 Vict Ave A – total deposits of \$70,000
30	10.09.2015	Domestic transfer of \$100,000 to Domestic Account 33
31	10.09.2015	NSW – 1 ATM deposit of \$9,950 at Burwood A, 1 ATM deposit of \$9,950 at Kingsgrove A – total deposits of \$19,900
32	10.09.2015	NSW – 1 ATM deposit of \$10,000 at 116 Burwood A, 2 ATM deposits (\$10,000 x 2) at Burwood A, 2 ATM deposits (\$10,000 x 2) at Campsie D, 1 ATM deposit of \$10,050 at Kingsgrove A – total deposits of \$60,050
33	11.09.2015	Domestic transfer of \$99,900 to Domestic Account 33
34	11.09.2015	NSW – Cash deposit of \$50,000 at Kingsgrove Branch
35	11.09.2015	NSW – 2 ATM deposits of (\$10,000 x 2) at Eastwood A, 2 ATM deposits (\$10,000 x 2) at Eastwood B – total deposits of \$40,000
36	14.09.2015	NSW – 1 ATM deposit of \$9,950 at Chatswood Ch A
37	14.09.2015	NSW – 1 ATM deposit of \$10,000 at Chatswood Ch A, 2 ATM deposits (\$10,000, \$10,050) at Chatswood A, 2 ATM deposits (\$10,000 x 2) at Chatswood Ch B, 1 ATM deposit of \$10,000 at Chatswood B – total deposits of \$60,050
38	15.09.2015	Domestic transfer of \$100,000 to Domestic Account 33
39	15.09.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Kogarah A, 2 ATM deposits (\$10,000 x 2) at Market City A – total deposits of \$40,000
40	15.09.2015	Domestic transfer of \$99,950 to Domestic Account 33
41	16.09.2015	NSW – Cash deposit of \$50,000 at Campsie Branch
42	17.09.2015	NSW – Cash deposit of \$46,000 at Miranda Branch
43	17.09.2015	NSW – 2 ATM deposits (\$10,000 x 2) at 342 Vict Ave A, 2 ATM deposits (\$10,000 x 2) at 342 Vict Ave B – total deposits of \$40,000

ITEM	DATE	TRANSACTION/S
44	18.09.2015	Domestic transfer of \$99,990 to Domestic Account 34
45	18.09.2015	Domestic transfer of \$1,980 to Domestic Account 70
46	21.09.2015	NSW – Cash deposit of \$50,000 at Hurstville Branch
47	22.09.2015	Domestic transfer of \$50,000 to Domestic Account 33
48	22.09.2015	WA – Cash deposit of \$50,000 at Victoria Park Branch
49	22.09.2015	WA – 2 ATM deposits (\$10,000 x 2) at Kardinya A, 2 ATM deposits (\$10,000 x 2) at Cannington A – total deposits of \$40,000
50	23.09.2015	Domestic transfer of \$90,000 to Domestic Account 34
51	23.09.2015	WA – Cash deposit of \$40,000 at Uni of WA Branch
52	23.09.2015	WA – Cash deposit of \$50,000 at Claremont Branch
53	24.09.2015	Domestic transfer of \$100,000 to Domestic Account 33
54	24.09.2015	NSW – 1 ATM deposit of \$9,900 at Roselands A
55	24.09.2015	NSW – 2 ATM deposits (\$20,000, \$10,000) at Mortdale A, 2 ATM deposits (\$10,000 x 2) at Riverwood A, 1 ATM deposit of \$10,100 at Roselands A – total deposits of \$60,100
56	25.09.2015	Domestic transfer of \$94,700 to Domestic Account 34
57	25.09.2015	NSW – Cash deposit of \$60,000 at Westfield Hurstville Branch
58	25.09.2015	NSW – 2 ATM deposits (\$20,000 x 2) totalling \$40,000 at Burwood A
59	28.09.2015	Domestic transfer of \$100,000 to Domestic Account 34
60	28.09.2015	NSW – 1 ATM deposit of \$9,950 at Vict Ave A, 2 ATM deposits (\$10,000, \$50) at Chatswood Ch A – total deposits of \$20,000
61	28.09.2015	NSW – 2 ATM deposits (\$10,000 x 2) at 342 Vict Ave B, 1 ATM deposit of \$10,000 at Vict Ave A – total deposits of \$30,000
62	29.09.2015	NSW – Cash deposit of \$50,000 at Vic Ave Chatswood Branch
63	29.09.2015	Domestic transfer of \$100,000 to Domestic Account 34
64	30.09.2015	NSW – Cash deposit of \$59,900 at Hurstville Branch
65	30.09.2015	NSW – Cash deposit of \$20,000 at Mortdale Branch
66	30.09.2015	NSW – 1 ATM deposit of \$9,750 at Roselands A, 1 ATM deposit of \$350 at Hurstville A – total deposits of \$10,100
67	30.09.2015	NSW – 1 ATM deposit of \$10,000 at Roselands A
68	01.10.2015	Domestic transfer of \$99,998 to Domestic Account 5
69	02.10.2015	WA – Cash deposit of \$60,000 at Cannington Branch
70	02.10.2015	WA – Cash deposit of \$50,000 at Canning Vale Branch
71	02.10.2015	Domestic transfer of \$59,998 to Domestic Account 5
72	07.10.2015	NSW – Cash deposit of \$60,000 at Ramsgate Branch
73	07.10.2015	NSW – Cash deposit of \$39,950 at Pagewood Branch

ITEM	DATE	TRANSACTION/S
74	07.10.2015	Domestic transfer of \$50,000 to Domestic Account 33
75	07.10.2015	Domestic transfer of \$50,000 to Domestic Account 5
76	08.10.2015	Domestic transfer of \$49,950 to Domestic Account 18
77	08.10.2015	NSW – Cash deposit of \$50,000 at Miranda Branch
78	08.10.2015	NSW – Cash deposit of \$50,000 at Cronulla Branch
79	09.10.2015	Domestic transfer of \$100,000 to Domestic Account 34
80	09.10.2015	WA – Cash deposit of \$60,000 at Mount Hawthorn Branch
81	09.10.2015	WA – 2 ATM deposits (\$10,000 x 2) at Kardinya A, 2 ATM deposits (\$10,000 x 2) at Belmont A – total deposits of \$40,000
82	12.10.2015	Domestic transfer of \$100,000 to Domestic Account 34
83	12.10.2015	WA – 2 ATM deposits (\$10,000 x 2) at South Perth B, 2 ATM deposits (\$10,000 x 2) at Belmont A – total deposits of \$40,000
84	13.10.2015	Domestic transfer of \$10,000 to Domestic Account 48
85	13.10.2015	Domestic transfer of \$30,000 to Domestic Account 33
86	13.10.2015	WA – Cash deposit of \$60,000 at Cannington Branch
87	14.10.2015	Domestic transfer of \$60,001 to Domestic Account 5
88	14.10.2015	WA – Cash deposit of \$50,000 at Fremantle Branch
89	15.10.2015	NSW – Cash deposit of \$33,300 at Mortdale Branch
90	15.10.2015	Domestic transfer of \$49,998 to Domestic Account 18
91	15.10.2015	NSW – 2 ATM deposits (\$10,000 x 2) at Market City C, 2 ATM deposits (\$10,000 x 2) at Market City B, 2 ATM deposits (\$10,000 x 2) at Haymarket B, 1 ATM deposit of \$10,000 at Haymarket A – total deposits of \$70,000
92	16.10.2015	NSW – Cash deposit of \$42,000 at Vic Ave Chatswood Branch
93	16.10.2015	NSW – Cash deposit of \$37,800 at Lane Cove Branch
94	16.10.2015	NSW – Cash deposit of \$30,000 at Lindfield Branch
95	16.10.2015	Domestic transfer of \$99,998 to Domestic Account 5
96	16.10.2015	NSW – 1 ATM deposit of \$9,950 at Hurstville A
97	16.10.2015	NSW – 1 ATM deposit of \$10,000 at Hurstville A, 1 ATM deposit of \$10,000 at Mortdale A – total deposits of \$20,000
98	19.10.2015	Domestic transfer of \$99,998 to Domestic Account 36
99	19.10.2015	Domestic transfer of \$43,050 to Domestic Account 36

SCHEDULE AX

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 8 – COMMBANK ACCOUNT 58

ITEM	DATE	TRANSACTION/S
1	15.10.15	Cash deposit of \$20,000 at Hurstville Branch
2	15.10.15	Domestic transfer of \$5,000 to Domestic Account 36
3	15.10.15	Cash deposit of \$42,000 at Kingsgrove Branch
4	15.10.15	Cash deposit of \$30,000 at Campsie Branch
5	15.10.15	Domestic transfer of \$86,892 to Domestic Account 5
6	15.10.15	NSW – 2 Automatic Teller Machine (ATM) deposits (\$10,000 x 2) at Market City C totalling \$20,000
7	15.10.15	NSW – 1 ATM deposit of \$5,000 at Haymarket B
8	16.10.15	Cash deposit of \$40,000 at Chatswood Branch
9	16.10.15	Cash deposit of \$38,000 at Macquarie Centre Branch
10	16.10.15	Domestic transfer of \$99,897 to Domestic Account 5
11	16.10.15	Cash deposit of \$28,000 at Top Ryde City Branch
12	16.10.15	NSW - 2 ATM deposits (\$10,000 x 2) at WF Hurstville A, 2 ATM deposits (\$10,000 x 2) at Riverwood A, 1 ATM deposit of \$10,000 at Roselands A – total deposits of \$50,000
13	16.10.15	NSW - ATM deposit of \$9,900 at Roselands A
14	17.10.15	Domestic transfer of \$50 to CommBank Account 63
15	19.10.15	Domestic transfer of \$92,987 to Domestic Account 5
16	19.10.15	Domestic transfer of \$150 to Domestic Account 21
17	19.10.15	Cash deposit of \$38,000 at Rockdale Branch
18	19.10.15	Cash deposit of \$37,500 at Leichardt Branch

ITEM	DATE	TRANSACTION/S
19	19.10.15	Domestic transfer of \$75,886 to Domestic Account 5
20	19.10.15	NSW – ATM deposit of \$9,450 at Kingsgrove A, ATM deposit of \$9,900 at Campsie D, ATM deposit of \$600 at Lakemba B – total deposits of \$19,950
21	19.10.15	NSW – ATM deposit of \$10,000 at Kingsgrove A, ATM deposit of \$20,000 at Campsie D – total deposits of \$30,000
22	20.10.15	Domestic transfer of \$24,100 to Domestic Account 21
23	20.10.15	Cash deposit of \$40,000 at Rhodes Branch
24	20.10.15	Cash deposit of \$38,500 at West Ryde Branch
25	20.10.15	Domestic transfer of \$99,998 to Domestic Account 5
26	20.10.15	NSW – 2 ATM deposits (\$20,000 x 2) at Kogarah A, 2 ATM deposits (\$20,000, \$10,000) at Rockdale A – total deposits of \$70,000
27	21.10.15	Domestic transfer of \$74,305 to Domestic Account 18
28	21.10.15	NSW – 2 ATM deposits (\$10,000 x 2) at Roselands A, 2 ATM deposits (\$10,000 x 2) at Riverwood A, 1 ATM deposit of \$10,000 at Padstow A – total deposits of \$50,000
29	21.10.15	NSW – 2 ATM deposits (\$5,770, \$9,040) at Padstow B, 1 ATM deposit of \$5,190, at Padstow A – total deposits of \$20,000
30	23.10.15	Domestic transfer of \$30,000 to Domestic Account 35
31	23.10.15	Domestic transfer of \$40,080 to Domestic Account 21
32	29.10.15	Cash deposit of \$39,950 at Burwood Branch
33	29.10.15	Cash deposit of \$40,000 at Strathfield Branch
34	29.10.15	NSW – ATM deposit of \$10,000 at Campsie D
35	29.10.15	Domestic transfer of \$89,947 to CommBank Account 63
36	01.11.15	NSW – ATM deposit of \$9,950 at WF Hurstville A, ATM deposit of \$9,900 at Caringbah A – total deposits of \$19,850
37	01.11.15	NSW – ATM deposit of \$10,000 at Hurstville A, 2 ATM deposits (\$10,000, \$10,050) at Kingsgrove A, ATM deposit of \$10,000 at Caringbah A – total deposits of \$40,050
38	02.11.15	Domestic transfer of \$59,875 to Domestic Account 21
39	02.11.15	Cash deposit of \$40,000 at Maroubra Junction Branch
40	03.11.15	Cash deposit of \$40,000 at Cronulla Branch
41	03.11.15	Cash deposit of \$38,000 at Westfield Hurstville Branch
42	04.11.15	Domestic transfer of \$100,000 to Domestic Account 21
43	10.11.15	Domestic transfer of \$18,007 to Domestic Account 34
44	11.11.15	Cash deposit of \$40,000 at South Hurstville Branch
45	11.11.15	Cash deposit of \$35,700 at Burwood Branch
46	11.11.15	Domestic transfer of \$75,698 to CommBank Account 103
47	12.11.15	Cash deposit of \$35,250 at Rhodes Branch

ITEM	DATE	TRANSACTION/S
48	12.11.15	Cash deposit of \$37,800 at Top Ryde City Branch
49	13.11.15	Domestic transfer of \$72,998 to Domestic Account 36
50	13.11.15	Cash deposit of \$40,000 at Leichardt Branch
51	13.11.15	Cash deposit of \$35,000 at Broadway Branch
52	16.11.15	Domestic transfer of \$75,017 to Domestic Account 18
53	16.11.15	Cash deposit of \$27,000 at Hurstville Branch
54	16.11.15	Cash deposit of \$23,000 at Kingsgrove Branch
55	17.11.15	Domestic transfer of \$49,850 to Domestic Account 36
56	17.11.15	Cash deposit of \$40,000 at Sylvania Branch
57	17.11.15	Cash deposit of \$39,000 at Caringbah Branch
58	17.11.15	Domestic transfer of \$79,065 to Domestic Account 21
59	18.11.15	Cash deposit of \$31,270 at Maroubra Junction Branch
60	19.11.15	Cash deposit of \$38,800 at Ramsgate Branch
61	19.11.15	Cash deposit of \$31,200 at Brighton Le Sands Branch
62	19.11.15	Cash deposit of \$20,000 at Rockdale Branch
63	20.11.15	Domestic transfer of \$100,000 to Domestic Account 36
64	20.11.15	Cash deposit of \$10,000 at Roselands Branch
65	22.11.15	Domestic transfer of \$150 to Domestic Account 109
66	25.11.15	Cash deposit of \$40,000 at South Hurstville Branch
67	25.11.15	Cash deposit of \$35,000 at Sylvania Branch
68	25.11.15	Domestic transfer of \$78,530 to Domestic Account 63
69	25.11.15	Domestic transfer of \$4,195 to Domestic Account 63
70	25.11.15	Cash deposit of \$20,000 at Hurstville Branch
71	25.11.15	Domestic transfer of \$5,995 to Domestic Account 110
72	26.11.15	Domestic transfer of \$22,000 to CommBank Account 111
73	30.11.15	Cash deposit of \$38,050 at Burwood Branch
74	30.11.15	Cash deposit of \$40,000 at Ashfield Branch
75	30.11.15	NSW – 2 ATM deposits (\$10,000 x 2) totalling \$25,000 at Epping A
76	30.11.15	NSW – 1 ATM deposit of \$5,000 at Eastwood B
77	01.12.15	Domestic transfer of \$100,000 to Domestic Account 34
78	01.12.15	Cash deposit of \$37,600 at Carlingford Branch
79	01.12.15	Cash deposit of \$40,000 at Chatswood Branch
80	02.12.15	Domestic transfer of \$350 to Domestic Account 22

ITEM	DATE	TRANSACTION/S
81	03.12.15	Domestic transfer of \$95,765 to Domestic Account 21
82	04.12.15	Cash deposit of \$30,000 at Ramsgate Branch
83	04.12.2015	Cash deposit of \$25,000 at Rockdale Branch
84	04.12.15	Domestic transfer of \$55,002 to Domestic Account 34
85	29.12.15	Cash deposit of \$25,000 at Kingsgrove Branch
86	29.12.15	Cash deposit of \$24,730 at Strathfield Branch
87	29.12.15	Domestic transfer of \$49,685 to Domestic Account 18
88	30.12.15	Cash deposit of \$25,000 at Rockdale Branch
89	30.12.15	Cash deposit of \$25,000 at Kogarah Branch
90	30.12.15	Cash deposit of \$25,000 at Hurstville Branch
91	30.12.15	Cash deposit of \$10,000 at M & F Perth Branch
92	30.12.15	NSW - 2 ATM deposits (\$4,000, \$1,000) at Campsie B totalling \$5,000
93	30.12.15	NSW - 2 ATM deposits (\$10,000 x 2) at Campsie B totalling \$20,000
94	30.12.15	Domestic transfer of \$99,978 to Domestic Account 18
95	05.01.16	Domestic transfer of \$10,035 to Domestic Account 36
96	06.01.16	Domestic transfer of \$50 to Domestic Account 23
97	07.01.16	Cash deposit of \$26,000 at Westfield Hurstville Branch
98	07.01.16	Cash deposit of \$26,000 at Hurstville Branch
99	07.01.16	Cash deposit of \$24,000 at Rockdale Branch
100	07.01.16	Cash deposit of \$24,000 at Kogarah Branch
101	07.01.16	Cash deposit of \$5,000 at East Perth Branch
102	07.01.16	Cash deposit of \$23,000 at Gympie Branch
103	07.01.16	Domestic transfer of \$99,800 to Domestic Account 18
104	08.01.16	Cash deposit of \$23,600 at Campsie Branch
105	08.01.16	Cash deposit of \$26,400 at Strathfield Branch
106	08.01.16	Domestic transfer of \$75,800 to Domestic Account 18
107	08.01.16	Cash deposit of \$14,840 at Barrack Perth Branch
108	08.01.16	Cash deposit of \$19,800 at East Perth Branch
109	08.01.16	Cash deposit of \$20,000 at St George's Branch
110	11.01.16	Domestic transfer of \$17,942 to Domestic Account 34
111	11.01.16	Domestic transfer of \$3,000 to CommBank Account 112
112	11.01.16	Domestic transfer of \$36,001 to Domestic Account 34
113	12.01.16	Cash deposit of \$23,000 at Marrickville Branch

ITEM	DATE	TRANSACTION/S
114	12.01.16	Cash deposit of \$25,500 at Campsie Branch
115	12.01.16	Cash deposit of \$27,000 at Lakemba Branch
116	12.01.16	Cash deposit of \$24,500 at Bankstown Branch
117	12.01.16	Domestic transfer of \$99,978 to Domestic Account 34
118	13.01.16	NSW – 2 ATM deposits (\$9,600, \$400) at Ashfield B, ATM deposit of \$9,000 at 116 Burwood A, ATM deposit of \$9,000 at Burwood A – total deposits of \$28,000
119	13.01.16	NSW - ATM deposit of \$10,000 at Ashfield A, ATM deposit of \$10,000 at Burwood A – total deposits of \$20,000
120	14.01.16	Domestic transfer of \$48,107 to Domestic Account 34
121	15.01.16	Cash deposit of \$23,000 at Rockdale Branch
122	15.01.16	Cash deposit of \$23,000 at Kogarah Branch
123	15.01.16	Cash deposit of \$22,000 at Hurstville Branch
124	15.01.16	Cash deposit of \$21,000 at Westfield Hurstville Branch
125	15.01.16	NSW - 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Broadway A
126	15.01.16	NSW - ATM deposit of \$1,000 at Broadway A
127	15.01.16	Domestic transfer of \$63,400 to Domestic Account 18
128	15.01.16	NSW - 2 ATM deposits (\$10,000 x 2) at Market City A, ATM deposit of \$10,000 at Haymarket C, ATM deposit of \$10,000 at Haymarket A – total deposits of \$40,000
129	18.01.16	Domestic transfer of \$86,518 to Domestic Account 37
130	22.01.16	Cash deposit of \$24,000 at Strathfield Branch
131	22.01.16	Cash deposit of \$24,000 at West Ryde Branch
132	22.01.16	Cash deposit of \$22,000 at Rhodes Branch
133	22.01.16	Domestic transfer of \$50,000 to Domestic Account 18
134	22.01.16	Domestic transfer of \$17,521 to Domestic Account 37
135	25.01.16	Cash deposit of \$20,000 at Kingsgrove Branch
136	25.01.16	Cash deposit of \$20,000 at Lakemba Branch
137	25.01.16	Cash deposit of \$25,000 at Campsie Branch
138	25.01.16	Domestic transfer of \$64,570 to Domestic Account 37
139	25.01.16	Domestic transfer of \$300 to Domestic Account 37
140	29.01.16	Cash deposit of \$26,000 at Revesby Branch
141	29.01.16	Cash deposit of \$26,000 at Hurstville Branch
142	29.01.16	Cash deposit of \$26,000 at Ashfield Branch
143	29.01.16	Cash deposit of \$26,000 at Strathfield Branch

ITEM	DATE	TRANSACTION/S
144	29.01.16	Cash deposit of \$26,000 at Burwood Branch
145	29.01.16	Domestic transfer of \$50,000 to Domestic Account 64
146	01.02.16	Domestic transfer of \$50,020 to Domestic Account 18
147	01.02.16	Domestic transfer of \$22,221.20 to Domestic Account 37
148	01.02.16	Domestic transfer of \$7,273.40 to Domestic Account 18
149	02.02.16	Cash deposit of \$25,000 at Town Hall Branch
150	02.02.16	Cash deposit of \$27,000 at Park & Castlereagh Branch
151	02.02.16	Cash deposit of \$28,000 at Wynyard Branch
152	02.02.16	Domestic transfer of \$80,000 to Domestic Account 64
153	10.02.16	Cash deposit of \$28,000 at Ashfield Branch
154	10.02.16	Cash deposit of \$23,000 at Burwood Branch
155	10.02.16	Cash deposit of \$27,000 at Burwood Road Branch
156	10.02.16	Cash deposit of \$22,000 at Strathfield Branch
157	10.02.16	Domestic transfer of \$50,020 to Domestic Account 18
158	11.02.16	Cash deposit of \$23,000 at Sutherland Branch
159	12.02.16	Domestic transfer of \$55,120 to Domestic Account 18
160	12.02.16	Cash deposit of \$24,000 at Town Hall Branch
161	12.02.16	Domestic transfer of \$45,020 to Domestic Account 18
162	16.02.16	Cash deposit of \$23,000 at Ashfield Branch
163	16.02.16	Cash deposit of \$28,000 at Burwood Branch
164	16.02.16	Cash deposit of \$22,000 at 116 Burwood Road Branch
165	16.02.16	Cash deposit of \$27,000 at Strathfield Branch
166	16.02.16	Cash deposit of \$20,000 at Broadway Branch
167	16.02.16	Domestic transfer of \$73,650 to Domestic Account 37
168	16.02.16	Domestic transfer of \$20,000 to Domestic Account 37
169	16.02.16	Domestic transfer of \$3,000 to CommBank Account 113
170	17.02.16	Cash deposit of \$27,000 at Vic Ave Chatswood Branch
171	17.02.16	Cash deposit of \$28,000 at Chatswood Branch
172	17.02.16	Cash deposit of \$25,000 at Wahroonga Branch
173	17.02.16	Domestic transfer of \$99,850 to Domestic Account 37
174	18.02.16	Cash deposit of \$22,000 at L & C Sts Syd Branch
175	18.02.16	Cash deposit of \$25,000 at Town Hall Branch
176	18.02.16	Cash deposit of \$23,000 at Park & Castlereagh Branch

ITEM	DATE	TRANSACTION/S
177	18.02.16	Domestic transfer of \$60,000 to Domestic Account 64
178	18.02.16	Domestic transfer of \$10,170 to Domestic Account 37
179	19.02.16	Cash deposit of \$29,000 at Centro Bankstown Branch
180	19.02.16	Cash deposit of \$29,000 at Bankstown Branch
181	22.02.16	Domestic transfer of \$61,200 to Domestic Account 37
182	22.02.16	Vic – ATM deposit of \$20,000 at Lonsdale St B, ATM deposit of \$20,000 at 385 Bourke C, ATM deposit of \$15,000 at Richmond Sth A, 2 ATM deposits (\$10,000 x 2) at South Yarra A, 2 ATM deposits (\$10,000 x 2) at Toorak B – total deposits of \$95,000
183	22.02.16	Vic – ATM deposit of \$5,000 at Richmond South A
184	23.02.16	Domestic transfer of \$39,580 to Domestic Account 64
185	23.02.16	Domestic transfer of \$60,080 to Domestic Account 37
186	24.02.16	Cash deposit of \$23,000 at 116 Burwood Road Branch
187	24.02.16	Domestic transfer of \$23,480 to Domestic Account 37
188	25.01.16	Cash deposit of \$22,000 at Chinatown Branch
189	25.01.16	Cash deposit of \$23,000 at Haymarket Branch
190	25.01.16	Cash deposit of \$24,000 at Broadway Branch
191	25.02.16	Domestic transfer of \$60,020 to Domestic Account 65
192	25.02.16	Domestic transfer of \$8,951 to Domestic Account 22

SCHEDULE AY

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN

123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 9 – COMMBANK ACCOUNT 59

ITEM	DATE	TRANSACTION/S
1	07.10.2015	NSW – Cash deposit of \$10,000 at Hurstville Branch
2	07.10.2015	Domestic transfer of \$10,028 to Domestic Account 5
3	07.10.2015	NSW – Cash deposit of \$49,950 at Maroubra Junction Branch
4	07.10.2015	Domestic transfer of \$49,896 to Domestic Account 5
5	08.10.2015	NSW – Cash deposit of \$60,000 at Mortdale Branch
6	08.10.2015	NSW – Cash deposit of \$50,000 at Sylvania Branch
7	08.10.2015	Domestic transfer of \$99,987 to Domestic Account 5
8	09.10.2015	WA – Cash deposit of \$60,000 at Mount Lawley Branch
9	09.10.2015	WA – Cash deposit of \$20,000 at Warwick Branch
10	09.10.2015	WA – 2 Automatic Teller Machine (ATM) deposits (\$10,000 x 2) totalling \$20,000 at Kardinya A
11	10.10.2015	Domestic transfer of \$127 to CommBank Account 58
12	12.10.2015	Domestic transfer of \$20,000 to Domestic Account 18
13	12.10.2015	Domestic transfer of \$90,005 to Domestic Account 5
14	12.10.2015	WA – 2 ATM deposits (\$10,000 x 2) at South Perth B, 2 ATM deposits (\$10,000 x 2) at Belmont A, 1 ATM deposit of \$10,000 at Cannington A – total deposits of \$50,000
15	12.10.2015	WA – 1 ATM deposit of \$9,950 at Cannington A
16	13.10.2015	Domestic transfer of \$59,897 to Domestic Account 5
17	13.10.2015	WA – cash deposit of \$60,000 at Victoria Park Branch
18	13.10.2015	Domestic transfer of \$59,926 to Domestic Account 5

ITEM	DATE	TRANSACTION/S
19	14.10.2015	WA – cash deposit of \$50,000 at Booragoon Branch
20	14.10.2015	WA – cash deposit of \$50,000 at Kardinya Branch
21	14.10.2015	Domestic transfer of \$99,863 to Domestic Account 5
22	15.10.2015	Domestic transfer of \$410 to CommBank Account 58
23	18.02.2016	NSW – Cash deposit of \$23,000 at North Syd Branch
24	18.02.2016	NSW – Cash deposit of \$27,000 at Crows Nest Branch
25	19.02.2016	Domestic transfer of \$49,000 to Domestic Account 34
26	19.02.2016	Domestic transfer of \$1,008 to Domestic Account 69

SCHEDULE AZ

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN
123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 10 – COMMBANK ACCOUNT 60

ITEM	DATE	TRANSACTION/S
1	01.07.2015	WA – 1 Automatic Teller Machine (ATM) deposit of \$9,900 at South Perth A, 2 ATM deposits (\$50, \$100) at Belmont A – total deposits of \$10,050
2	01.07.2015	WA – 1 ATM deposit of \$10,000 at South Perth A, 2 ATM deposits (\$10,000 x 2) at South Perth B, 2 ATM deposits (\$10,000 x 2) at Belmont A – total deposits of \$50,000
3	29.07.2015	ATM cash withdrawal of \$1,000 at 342 Vict Ave C
4	31.07.2015	ATM cash withdrawal of \$1,000 at Chatswood E
5	01.08.2015	ATM cash withdrawal of \$1,000 at Hurstville C
6	04.08.2015	ATM cash withdrawal of \$1,000 at World Square D
7	06.08.2015	ATM cash withdrawal of \$1,000 at Eastwood B
8	20.08.2015	ATM cash withdrawal of \$1,000 at World Square C
9	21.08.2015	ATM cash withdrawal of \$1,000 at Artarmon C
10	22.08.2015	ATM cash withdrawal of \$1,000 at Event Cinemas 1
11	25.08.2015	ATM cash withdrawal of \$900 at Westpac ATM

SCHEDULE AAA

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 11 – COMMBANK ACCOUNT 61

ITEM	DATE	TRANSACTION/S
1	12.10.2015	NSW – Cash deposit of \$1,000 at Burwood Branch
2	21.10.2015	Domestic transfer of \$1,000 to CommBank Account 62
3	26.10.2015	Domestic transfer of \$1,000 to another CommBank account [unknown]
4	14.12.2015	WA – Cash deposit of \$20,000 at Victoria Park Branch
5	14.12.2015	Domestic transfer of \$20,030 to Domestic Account 18
6	26.02.2016	Account credit of \$2,400
7	28.04.2016	Account credit of \$39,580
8	29.04.2016	Domestic transfer of \$42,020 to Domestic Account 19
9	29.04.2016	Account credit of \$50,000
10	30.04.2016	Domestic transfer of \$49,860 to Domestic Account 19
11	05.05.2016	Account credit of \$57,980
12	06.05.2016	Domestic transfer of \$57,659 to Domestic Account 19
13	18.05.2016	Account credit of \$36,040
14	19.05.2016	Domestic transfer of \$35,489 to Domestic Account 19
15	19.05.2016	Account credit of \$20,000
16	19.05.2016	Domestic transfer of \$20,100 to Domestic Account 19
17	26.05.2016	Account credit of \$45,960
18	27.05.2016	Domestic transfer of \$46,270 to Domestic Account 19
19	05.07.2016	Account credit of \$56,040

ITEM	DATE	TRANSACTION/S
20	06.07.2016	Domestic transfer of \$56,300 to Domestic Account 19
21	08.07.2016	2 account credits (\$22,890, \$23,940) totalling \$46,830
22	08.07.2016	Domestic transfer of \$47,000 to Domestic Account 19
23	11.07.2016	Domestic transfer of \$100 to Domestic Account 20
24	08.07.2016	8 account credits (\$15,000, \$10,000, \$23,940, \$45,280, \$13,680, \$22,680, \$13,680, \$44,040) totalling \$188,300
25	12.07.2016	Domestic transfer of \$98,700 to Domestic Account 20
26	12.07.2016	Domestic transfer of \$87,330 to Domestic Account 20
27	12.07.2016	3 account credits (\$9,958, \$26,105, \$75,150) totalling \$111,213
28	13.07.2016	Domestic transfer of \$95,800 to Domestic Account 20
29	14.07.2016	Domestic transfer of \$15,670 to Domestic Account 20
30	14.07.2016	Account credit of \$50,000
31	15.07.2016	Domestic transfer of \$51,475 to Domestic Account 20
32	18.07.2016	Account credit of \$64,920
33	19.07.2016	Domestic transfer of \$65,070 to Domestic Account 20
34	19.07.2016	Account credit of \$35,080
35	20.07.2016	Domestic transfer of \$35,400 to Domestic Account 20
36	27.07.2016	2 account credits (\$30,000, \$50,000) totalling \$80,000
37	28.07.2016	Domestic transfer of \$80,025 to Domestic Account 20
38	28.07.2016	Account credit of \$71,690
39	29.07.2016	Domestic transfer of \$71,300 to Domestic Account 20
40	29.07.2016	Account credit of \$50,525
41	29.07.2016	Domestic transfer of \$50,800 to Domestic Account 20
42	02.08.2016	Account credit of \$43,870
43	02.08.2016	Domestic transfer of \$44,000 to Domestic Account 20
44	02.08.2016	Account credit of \$40,165
45	03.08.2016	Domestic transfer of \$39,900 to Domestic Account 20
46	08.08.2016	Account credit of \$87,800
47	08.08.2016	Domestic transfer of \$88,000 to Domestic Account 20
48	19.08.2016	Account credit of \$42,800 Domestic Account 24
49	22.08.2016	Account credit of \$72,025 Domestic Account 24
50	24.08.2016	Account credit of \$48,125 Domestic Account 24
51	25.08.2016	Account credit of \$30,470 Domestic Account 24

ITEM	DATE	TRANSACTION/S
52	26.08.2016	Account credit of \$49,675 Domestic Account 24
53	30.08.2016	Account credit of \$42,875 Domestic Account 24
54	31.08.2016	3 account credits (\$68,745, \$59,765, \$53,697) totalling \$182,207 from Domestic Account 24

SCHEDULE AAB

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS PERSON 56 – COMMBANK ACCOUNT 64

ITEM	DATE	TRANSACTION/S
1	29.12.2016	1 cash deposit of \$100 at Box Hill branch
2	05.01.17	1 Automatic Teller Machine (ATM) deposit of \$5,000 at 191 Swanston E
3	05.01.17	11 ATM deposits (\$10,000 x 10, \$20,000) totalling \$120,000 at 191 Swanston E
4	06.01.17	Transfer out of \$125,000 at 191 Swanston St Melbourne branch
5	06.01.17	7 ATM deposits (5 x \$10,000, \$20,000, \$15,000) at 191 Swanston E – total deposits of \$85,000
6	07.01.17	Account credit of \$14,000 from CommBank Account 120
7	08.01.17	Account credit of \$10,000 from CommBank Account 121
8	08.01.17	4 ATM deposits (4 x \$10,000) at 191 Swanston E, 4 ATM deposits (4 x \$10,000) at 385 Bourke B, 2 ATM deposits (2 x \$15,000) at 385 Bourke C – total deposits of \$110,000
9	09.01.17	3 cash deposits (\$9,900, \$9,500, \$100) at Chester Hill branch, 1 cash deposit of \$500 at Revesby branch, 1 cash deposit of \$7,000 at Strathfield branch, 1 cash deposit of \$7,500 at 116 Burwood Rd branch, 1 cash deposit of \$5,500 at Belmore branch – total deposits of \$40,000
10	10.01.17	Account credit of \$100,000 from CommBank Account 122
11	10.01.17	1 cash deposit of \$5,500 at Westfield Hurstville branch, 1 cash deposit of \$4,500 at Hurstville branch – total deposits of \$10,000
12	11.01.17	Transfer out of \$369,000 at 191 Swanston St Melbourne branch

SCHEDULE AAC**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED**ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 12 – COMMBANK ACCOUNT 65

ITEM	DATE	TRANSACTION/S
1	27.10.14	1 cash deposit of \$7,560 at Elizabeth & Foveaux branch, 1 cash deposit of \$9,400 at Haymarket branch, 1 cash deposit of \$9,500 at Chinatown branch, 1 cash deposit of \$9,900 at L&C Sts branch, 1 cash deposit of \$9,950 at Park & Castlereagh branch, 1 cash deposit of \$9,800 at St James branch, 1 cash deposit of \$9,850 at George & Market branch, 1 cash deposit of \$9,250 at Auburn branch, 1 cash deposit of \$9,650 at Lakemba branch, 1 cash deposit of \$9,750 at Marrickville branch and 1 cash deposit of \$9,700 at Dulwich Hill branch – total deposits of \$104,310
2	28.10.14	1 cash deposit of \$9,700 at Auburn branch, 1 cash deposit of \$9,800 at Dulwich Hill branch, 1 cash deposit of \$9,950 at Marrickville branch, 1 cash deposit of \$9,850 at Newtown branch, 1 cash deposit of \$5,940 at Enmore branch, 1 cash deposit of \$9,900 at Elizabeth & Foveaux branch, 1 cash deposit of \$9,750 at Haymarket branch, 1 cash deposit of \$9,650 at Chinatown branch, 1 cash deposit of \$5,000 at L&C Sts branch, 1 cash deposit of \$9,300 at Park & Castlereagh Street branch, 1 cash deposit of \$9,450 at St James branch, 1 cash deposit of \$9,350 at George & Market branch, 2 cash deposits (\$9,600, \$9,400) at Town Hall branch – total deposits of \$126,640
3	29.10.14	1 cash deposit of \$9,500 at Enmore branch and 1 cash deposit of \$9,550 at Earlwood branch - total deposits of \$19,050
4	7.11.14	1 cash deposit of \$6,150 at King & Clarence branch, 1 cash deposit of \$100 at Bankstown branch and 1 cash deposit of \$5,100 at Condell Park branch – total deposits of \$11,350
5	26.11.14	2 cash deposits (\$9,000, \$4,750) at North Essendon branch, 2 cash deposits (\$8,900, \$9,950) at Moonee Ponds branch, 2 cash deposits (\$9,100, \$9,850) at Ascot Vale branch, 2 cash deposits (\$8,800, \$8,850) at Highpoint branch, 2 cash deposits (\$9,150, \$9,750) at Brunswick branch, 2 cash deposits (\$9,150, \$9,750) at Coburg branch, 3 cash deposits (\$9,350, \$8,950, \$9,600) at Fawkner branch, 4 cash deposits (\$9,800, \$9,450, \$9,200, \$9,550) at Preston branch, 4 cash deposits (\$9,700, \$9,300, \$9,400, \$9,650) at Northland Centre branch, 2 cash deposits (\$9,900, \$9,500) at Reservoir branch – total deposits of \$230,350

ITEM	DATE	TRANSACTION/S
6	27.11.14	1 cash deposit of \$7,550 at Elizabeth & Foveaux branch and 1 cash deposit of \$7,000 at Haymarket branch - total deposits of \$14,550
7	8.12.14	1 cash deposit of \$1,000 at Lidcombe branch, 1 cash deposit of \$6,800 at Auburn branch, 2 cash deposits (\$9,450, \$9,500) at North Essendon branch, 2 cash deposits (\$9,700, \$9,350) at Moonee Ponds branch, 2 cash deposits (\$9,550, \$9,400) at Ascot Vale branch, 1 cash deposit of \$9,750 at Elizabeth & Foveaux branch, 2 cash deposits (\$9,650, \$9,300) at Brunswick branch, 1 cash deposit of \$9,600 at Haymarket branch, 4 cash deposits (\$9,250, \$9,600, \$9,800, \$9,100) at Coburg branch, 2 cash deposits (\$9,650, \$9,700) at Chinatown branch, 2 cash deposits (\$9,900, \$9,050) at Preston branch, 2 cash deposits (\$9,850, \$9,100) at Northland Centre branch, 1 cash deposit of \$9,500 at Town Hall branch, 2 cash deposits (\$9,950, \$4,130) at Reservoir branch and 2 cash deposits (\$9,750, \$9,200) at Thomastown branch – total deposits of \$240,580
8	9.12.14	2 cash deposits (\$7,500, \$2,870) at Auburn branch – total deposits of \$10,370
9	8.01.15	1 cash deposit of \$1,515 at King & Clarence St branch
10	20.03.15	18 cash deposits (\$9,100, \$9,450, \$9,150, \$9,200, \$9,400, \$9,250, \$9,300, \$9,350, \$9,750, \$9,800, \$9,950, \$9,900, \$9,850, \$9,600, \$9,550, \$9,650, \$9,500, \$9,700) at Haymarket branch – total deposits of \$171,450
11	23.03.15	1 cash deposit of \$9,000 at Moonee Ponds branch, 1 cash deposit of \$9,150 at Ascot Vale branch, 1 cash deposit of \$9,050 at Pascoe Vale branch, 1 cash deposit of \$9,100 at Coburg branch, 1 cash deposit of \$9,200 at Reservoir branch, 1 cash deposit of \$9,250 at Fawkner branch, 1 cash deposit of \$9,300 at Thomastown branch, 3 cash deposits (\$9,850, \$7,800, \$9,950) at Auburn branch, 1 cash deposit of \$9,350 at Lalor branch, 1 cash deposit of \$9,400 at Bundoora branch, 1 cash deposit of \$9,450 at Preston branch, 2 cash deposits (\$9,700, \$9,500) at Elizabeth & Foveaux branch, 1 cash deposit of \$9,500 at Northcote branch, 3 cash deposits (\$9,750, \$9,800, \$9,900) at Chinatown branch, 2 cash deposits (\$9,765, \$9,450) at Haymarket branch – total deposits of \$197,215
12	24.03.15	1 cash deposit of \$12,500 at King & Clarence St branch, 5 cash deposits (\$5,000, \$5,500, \$9,600, \$9,650, \$9,700) at Lakemba branch, 2 cash deposits (\$9,200, \$9,100) at Earlwood branch, 6 cash deposits (\$5,150, \$9,300, \$50, \$9,800, \$9,750, \$9,950) at Marrickville branch, 2 cash deposits (\$9,850, \$9,900) at Dulwich Hill branch, 1 cash deposit of \$9,550 at Kingsgrove branch – total deposits of \$143,550
13	25.03.15	5 cash deposits (\$9,200, \$9,300, \$9,100, \$8,550, \$6,400) at Auburn branch, 3 cash deposits (\$9,000, \$9,400, \$9,950) at Elizabeth & Foveaux branch, 14 cash deposits (\$9,900, \$9,500, \$8,650, \$8,700, \$8,450, \$8,850, \$9,250, \$9,150, \$8,750, \$8,800, \$9,700, \$9,550, \$9,350, \$9,850) at Haymarket branch, 3 cash deposits (\$8,400, \$8,900, \$9,650) at Chinatown branch, 3 cash deposits (\$8,600, \$9,050, \$9,600) at L&C Sts branch, 3 cash deposits (\$9,800, \$8,950, \$8,500) at Park & Castlereagh St branch, 2 cash deposits (\$9,750, \$9,450) at Town Hall branch – total deposits of \$300,000
14	26.03.15	1 cash deposit of \$2,700 at Brunswick branch, 1 cash deposit of \$9,500 at Ascot Vale branch, 1 cash deposit of \$9,550 at Moonee Ponds branch, 1 cash deposit of \$9,600 at North Essendon branch, 1 cash deposit of \$9,650 at Niddrie branch, 1 cash deposit of \$9,000 at Pascoe Vale branch, 3 cash deposits (\$9,850, \$9,750, \$9,900) at Elizabeth & Foveaux branch, 10 cash deposits (\$9,700, \$9,650, \$9,600, \$9,550, \$9,550, \$9,500, \$9,450, \$9,350, \$9,400, \$5,355) at Haymarket branch (with a \$9,550 reversal), 2 cash deposits (\$9,800, \$9,950) at Town Hall branch – total deposits of \$190,355

ITEM	DATE	TRANSACTION/S
15	27.03.15	2 cash deposits (\$9,600, \$9,595) at Auburn branch – total deposits of \$19,195
16	7.04.15	1 cash deposit of \$2,000 at Brunswick branch, 1 cash deposit of \$9,300 at Moonee Ponds branch, 1 cash deposit of \$9,350 at Ascot Vale branch, 1 cash deposit of \$9,400 at Highpoint branch, 1 cash deposit of \$9,450 at Glenroy branch, 1 cash deposit of \$9,500 at Broadmeadows branch, 1 cash deposit of \$9,550 at Pascoe Vale branch and 1 cash deposit of \$9,600 at Coburg branch – total deposits of \$68,150
17	8.04.15	1 cash deposit of \$4,500 at Highpoint branch, 1 cash deposit of \$9,000 at Essendon branch, 1 cash deposit of \$9,200 at Niddrie branch, 1 cash deposit of \$9,100 at Thomastown branch, 1 cash deposit of \$9,300 at Lalor branch, 2 cash deposits (\$4,900, \$5,100) at Auburn branch, 1 cash deposit of \$9,500 at Northcote branch – total deposits of \$60,600
18	9.04.15	1 cash deposit of \$9,000 at Brunswick branch, 1 cash deposit of \$9,050 at Moonee Ponds branch, 1 cash deposit of \$9,100 at Ascot Vale branch, 1 cash deposit of \$9,150 at Highpoint branch, 1 cash deposit of \$9,200 at North Essendon branch, 1 cash deposit of \$9,250 at Niddrie branch, 1 cash deposit of \$9,300 at Coburg branch, 1 cash deposit of \$9,350 at Pascoe Vale branch, 1 cash deposit of \$9,400 at Glenroy branch, 1 cash deposit of \$9,450 at Broadmeadows branch, 1 cash deposit of \$9,500 at Thomastown branch, 1 cash deposit of \$8,500 at Lalor branch – total deposits of \$110,250
19	10.04.15	1 cash deposit of \$9,000 at Pascoe Vale branch, 1 cash deposit of \$9,050 at Hadfield branch, 1 cash deposit of \$9,100 at Fawkner branch, 1 cash deposit of \$9,150 at Thomastown branch, 1 cash deposit of \$9,200 at Epping branch, 1 cash deposit of \$9,250 at Lalor branch, 1 cash deposit of \$9,300 at Reservoir branch, 1 cash deposit of \$9,350 at Preston branch, 1 cash deposit of \$9,400 at Coburg branch, 5 cash deposits (\$9,850, \$9,950, \$9,900, \$9,800, \$5,400) at Auburn branch – total deposits of \$127,700
20	13.04.15	3 cash deposits (\$9,700, \$9,450, \$9,900) at Elizabeth & Foveaux branch, 10 cash deposits (\$8,300, \$9,250, \$9,000, \$9,800, \$9,550, \$9,300, \$9,350, \$8,950, \$9,200, \$8,800) at Haymarket branch, 3 cash deposits (\$9,650, \$9,400, \$9,950) at Chinatown branch, 3 cash deposits (\$9,150, \$8,850, \$9,600) at Haymarket branch, 3 cash deposits (\$9,850, \$9,500, \$9,050) at L&C Sts branch, 3 cash deposits (\$9,100, \$8,900, \$9,750) at Town Hall branch – total deposits of \$233,300
21	12.05.15	1 cash deposit of \$9,200 at Northpark Enfield branch, 1 cash deposit of \$9,150 at Prospect branch, 2 cash deposits (\$9,000, \$3,150) at Dandenong branch, 1 cash deposit of \$9,500 at Dandenong Plaza branch – total deposits of \$40,000
22	13.05.15	1 cash deposit of \$7,500 at Corio branch, 1 cash deposit of \$7,500 at Geelong branch, 1 cash deposit of \$7,500 at Belmont branch, 1 cash deposit of \$7,500 at Highpoint branch – total deposits of \$30,000
23	14.05.15	1 cash deposit of \$200 at Guildford branch, 1 cash deposit of \$2,850 at Niddrie branch, 1 cash deposit of \$9,000 at Pascoe Vale branch, 1 cash deposit of \$9,350 at Coburg branch, 1 cash deposit of \$8,000 at Dandenong branch – total deposits of \$29,400
24	15.05.15	1 cash deposit of \$7,000 at Prospect branch, 1 cash deposit of \$15,000 at Auburn branch, 1 cash deposit of \$9,700 at Elizabeth & Foveaux branch, 6 cash deposits (\$9,750, \$9,800, \$9,850, \$9,900, \$9,650) at Haymarket branch – total deposits of \$80,650
25	18.05.15	2 cash deposits (\$9,150, \$9,650) at Auburn branch, 1 cash deposit of \$9,350 at Elizabeth & Foveaux branch, 14 cash deposits (\$9,050, \$9,750,

ITEM	DATE	TRANSACTION/S
		\$9,800, \$9,850, \$9,900, \$8,700, \$8,800, \$8,900, \$9,000, \$9,700, \$9,100, \$9,950, \$9,550, \$9,250) at Haymarket branch, 1 cash deposit of \$6,450 at L&C Sts branch, 1 cash deposit of \$9,400 at Park & Castlereagh branch, 1 cash deposit of \$9,500 at St James branch, 4 cash deposits (\$9,600, \$9,200, \$9,450, \$9,300) at Town Hall branch – total deposits of \$222,350
26	19.05.15	2 cash deposits (\$9,500, \$9,500) at Liverpool branch, 2 cash deposits (\$9,500, \$9,500) at Liverpool Westfield branch - total deposits of \$38,000
27	20.05.15	1 cash deposit of \$9,950 at Merrylands branch, 1 cash deposit of \$9,950 at Carnes Hill branch, 1 cash deposit of \$9,950 at Casula branch, 2 cash deposits (\$9,500, \$9,500) at Liverpool branch - total deposits of \$48,850

SCHEDULE AAD**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED**ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 13 – COMMBANK ACCOUNT 66

ITEM	DATE	TRANSACTION/S
1	24.10.11	1 cash deposit of \$8,000 at Palmyra branch, 1 cash deposit of \$5,000 at Fremantle branch, 1 cash deposit of \$7,000 at Hilton branch - total deposits of \$20,000
2	17.08.12	4 cash deposits (\$9,000 x 4) at Northpark Enfield branch – total deposits of \$36,000
3	12.12.14	2 cash deposits (\$3,300, \$9,800) at Auburn branch, 2 cash deposits (\$8,000, \$9,000) at Haymarket branch, 1 cash deposit of \$9,900 at Chinatown branch, 2 cash deposits (\$9,200, \$9,000) at Brunswick branch, 2 cash deposits (\$9,350, \$5,000) at North Essendon branch, 3 cash deposits (\$9,050, \$9,300, \$9,100) at Preston branch - total deposits of \$100,000
4	15.12.14	4 cash deposits (\$9,900, \$5,000, \$9,800, \$5,600) at Elizabeth & Foveaux Sts branch, 1 cash deposit of \$9,700 at Auburn branch - total deposits of \$40,000
5	17.12.14	1 cash deposit of \$9,850 at North Essendon branch, 1 cash deposit of \$8,900 at Moonee Ponds branch, 2 cash deposits (\$9,700, \$6,000) at Brunswick branch, 3 cash deposits (\$5,000, \$9,750, \$9,800) at Coburg branch - total deposits of \$59,000
6	18.12.14	2 cash deposits (\$9,200, \$3,700) at Brunswick branch, 2 cash deposits (\$9,000, \$9,100) at Coburg branch - total deposits of \$31,000
7	22.12.14	2 cash deposits (\$9,400, \$9,500) at North Essendon branch, 3 cash deposits (\$9,300, \$9,200, \$3,600) at Moonee Ponds branch, 4 cash deposits (\$9,900, \$6,000, \$9,800, \$9,900) at Brunswick branch, 3 cash deposits (\$9,950, \$8,000, \$9,500) at Elizabeth & Foveaux Sts branch, 2 cash deposits (\$9,700, \$9,600) at Glenroy branch, 11 cash deposits (\$9,750, \$9,850, \$9,400, \$9,700, \$9,650, \$5,550, \$9,800, \$9,350, \$9,550, \$9,600, \$9,450) at Haymarket branch - total deposits of \$225,000
8	14.01.15	2 cash deposits (\$9,800, \$9,600) at North Essendon branch, 2 cash deposits (\$9,900, \$9,150) at Moonee Ponds branch, 1 cash deposit of \$9,700 at Brunswick branch, 1 cash deposit of \$9,850 at Coburg branch - total deposits of \$58,000

ITEM	DATE	TRANSACTION/S
9	9.02.15	11 cash deposits (\$9,500, \$9,700, \$9,900, \$8,000, \$9,400, \$9,450, \$9,550, \$9,600, \$9,750, \$9,850, \$5,300) at Haymarket branch - total deposits of \$100,000
10	23.02.15	3 cash deposits (\$9,000, \$6,000, \$7,405) at Moonee Ponds branch, 8 cash deposits (\$3,350, \$9,650, \$9,000, \$9,850, \$9,800, \$9,900, \$9,750, \$9,700) at Haymarket branch - total deposits of \$93,405
11	24.02.15	11 cash deposits (\$7,000, \$9,800, \$9,850, \$9,900, \$9,950, \$8,500, \$9,550, \$9,600, \$9,650, \$9,700, \$9,750) at Haymarket branch - total deposits of \$103,250
12	25.02.15	11 cash deposits (\$9,500, \$9,800, \$9,850, \$9,900, \$9,950, \$9,550, \$9,600, \$9,650, \$9,700, \$9,750, \$6,095) at Haymarket branch - total deposits of \$103,345
13	4.03.15	1 cash deposit of \$9,700 at North Essendon branch, 2 cash deposits (\$9,600, \$9,000) at Moonee Ponds branch, 1 cash deposit of \$3,200 at Highpoint branch, 1 cash deposit of \$6,550 at Brunswick branch - total deposits of \$38,050
14	5.03.15	3 cash deposits (\$8,750, \$9,200, \$9,700) at Auburn branch, 5 cash deposits (\$9,250, \$9,300, \$9,750, \$9,650, \$9,800) at Elizabeth & Foveaux branch, 9 cash deposits (\$9,600, \$9,350, \$9,500, \$9,900, \$9,450, \$9,950, \$9,550, \$9,850, \$9,400) at Haymarket branch - total deposits of \$161,950
15	6.03.15	1 cash deposit of \$9,950 at Auburn branch, 2 cash deposits (\$9,900, \$5,150) at Elizabeth & Foveaux branch - total deposits of \$25,000
16	10.03.15	2 cash deposits (\$9,800, \$7,700) at Elizabeth & Foveaux branch, 3 cash deposits (\$9,250, \$9,900, \$9,950) at Haymarket branch, 1 cash deposit of \$9,700 at Chinatown branch, 2 cash deposits (\$9,500, \$9,200) at Town Hall branch - total deposits of \$75,000
17	13.03.15	1 cash deposit of \$9,000 at Coburg branch, 1 cash deposit of \$9,000 at Pascoe Vale branch - total deposits of \$18,000
18	16.03.15	2 cash deposits (\$9,300, \$9,900) at Dulwich Hill branch, 2 cash deposits (\$9,400, \$9,600) at Marrickville branch, 2 cash deposits (\$9,500, \$9,200) at Newtown branch, 3 cash deposits (\$5,600, \$9,700, \$9,800) at Earlwood branch - total deposits of \$82,000
19	20.03.15	3 cash deposits (\$5,750, \$9,750, \$9,800) at Chinatown branch, 3 cash deposits (\$9,850, \$9,900, \$9,950) at Haymarket branch - total deposits of \$55,000
20	1.04.15	1 cash deposit of \$9,000 at Pascoe Vale branch, 1 cash deposit of \$9,100 at Glenroy branch, 1 cash deposit of \$9,200 at Broadmeadows branch, 1 cash deposit of \$2,700 at Coburg branch - total deposits of \$30,000
21	2.04.15	1 cash deposit of \$9,000 at Ascot Vale branch, 1 cash deposit of \$9,050 at FI & Elz Melbourne branch - total deposits of \$18,050
22	7.04.15	1 cash deposit of \$9,000 at Brunswick branch, 1 cash deposit of \$9,050 at Moonee Ponds branch, 1 cash deposit of \$9,100 at Ascot Vale branch, 1 cash deposit of \$9,150 at Highpoint branch, 1 cash deposit of \$9,200 at Glenroy branch, 1 cash deposit of \$6,450 at Broadmeadows branch, 1 cash deposit of \$9,000 at Belconnen branch - total deposits of \$60,950
23	10.04.15	1 cash deposit of \$9,000 at Dandenong Plaza branch, 3 cash deposits (\$9,000, \$9,000, \$3,000) at Dandenong branch - total deposits of \$30,000
24	13.04.15	1 cash deposit of \$9,000 at Moonee Ponds branch, 1 cash deposit of \$9,300 at Ascot Vale branch, 1 cash deposit of \$9,200 at Highpoint branch, 1 cash deposit of \$7,500 at Broadmeadows branch, 1 cash deposit of \$9,000 at

ITEM	DATE	TRANSACTION/S
		Elizabeth & Foveaux branch, 1 cash deposit of \$3,000 at Town Hall branch, 1 cash deposit of \$6,000 at Belconnen branch - total deposits of \$53,000
25	14.04.15	2 cash deposits (\$8,000, \$5,100) at L&C Sts branch, 1 cash deposit of \$9,900 at Park & Castlereagh branch - total deposits of \$23,000
26	16.04.15	2 cash deposits (\$9,400, \$9,900) at Elizabeth & Foveaux branch, 6 cash deposits (\$9,800, \$9,200, \$9,700, \$9,300, \$9,600, \$5,200) at Haymarket branch, 2 cash deposits (\$9,100, \$9,500) at Chinatown branch - total deposits of \$90,700
27	21.04.15	1 cash deposit of \$9,200 at North Essendon branch, 1 cash deposit of \$9,000 at Niddrie branch, 1 cash deposit of \$9,050 at Pascoe Vale branch, 1 cash deposit of \$9,100 at Hadfield branch, 1 cash deposit of \$9,150 at Coburg branch, 1 cash deposit of \$4,500 at Broadmeadows branch - total deposits of \$50,000
28	24.04.15	1 cash deposit of \$9,900 at Elizabeth & Foveaux Sts branch, 3 cash deposits (\$9,700, \$5,260, \$9,800) at Haymarket branch, 1 cash deposit of \$7,200 at L&C Sts branch - total deposits of \$41,860
29	28.04.15	1 cash deposit of \$4,000 at Seven Hills branch, 1 cash deposit of \$9,000 at Fairfield Heights branch, 1 cash deposit of \$9,000 at Wetherill Park branch, 1 cash deposit of \$5,000 at Merrylands branch - total deposits of \$27,000
30	29.04.15	1 cash deposit of \$8,900 at Centro Bankstown branch, 1 cash deposit of \$8,800 at Bankstown branch, 1 cash deposit of \$7,100 at Condell Park branch, 1 cash deposit of \$9,400 at Auburn branch, 2 cash deposits (\$6,000, \$8,500) at Chester Hill branch, 1 cash deposit of \$6,100 at Fairfield Heights branch, 1 cash deposit of \$9,000 at Cabramatta branch, 1 cash deposit of \$9,200 at Canley Heights branch - total deposits of \$73,000
31	14.05.15	1 cash deposit of \$9,000 at Brunswick branch, 1 cash deposit of \$9,050 at Ascot Vale branch, 1 cash deposit of \$9,100 at Highpoint branch, 1 cash deposit of \$9,150 at Moonee Ponds branch, 1 cash deposit of \$9,200 at Niddrie branch, 1 cash deposit of \$4,500 at Pascoe Vale branch - total deposits of \$50,000
32	15.05.15	1 cash deposit of \$9,000 at Pascoe Vale branch, 1 cash deposit of \$9,050 at Hadfield branch, 1 cash deposit of \$9,100 at Glenroy branch, 1 cash deposit of \$9,150 at Broadmeadows branch, 1 cash deposit of \$9,200 at Ascot Vale branch, 1 cash deposit of \$4,500 at Moonee Ponds branch, 2 cash deposits (\$2,750, \$9,550) at Elizabeth & Foveaux branch, 6 cash deposits (\$9,800, \$9,750, \$9,950, \$9,900, \$9,850, \$9,650) at Haymarket branch, 1 cash deposit of \$9,600 at L & C Sts branch, 2 cash deposits (\$9,500, \$9,700) at Town Hall branch - total deposits of \$150,000
33	20.05.15	6 cash deposits (\$6,600, \$5,000, \$9,300, \$9,500, \$9,700, \$9,900) at Haymarket branch – total deposits of \$50,000
34	9.06.15	2 cash deposits (\$9,000, \$9,600) at Maddington branch, 1 cash deposit of \$5,000 at Mildura Plaza branch, 2 cash deposits (\$9,000, \$9,000) at Belmont branch - total deposits of \$41,600
35	10.06.15	1 cash deposit of \$3,500 at Midland branch, 1 cash deposit of \$1,295 at Maddington branch, 3 cash deposits (\$9,000 x 3) at Belmont branch - total deposits of \$31,795
36	16.06.15	1 cash deposit of \$9,000 at Dandenong branch, 1 cash deposit of \$9,000 at 06 3359 branch, 2 cash deposits (\$9,000, \$8,500) at Enfield branch, 1 cash deposit of \$8,500 at Prospect branch - total deposits of \$44,000
37	20.08.15	3 cash deposit (\$6,000, \$2,000, \$8,000) at Logan Central branch, 1 cash deposit of \$9,000 at Victoria Park branch, 1 cash deposit of \$1,000 at Belmont branch - total deposits of \$26,000

ITEM	DATE	TRANSACTION/S
38	21.08.15	3 cash deposits (\$9,000, \$3,100, \$500) at Maddington branch, 1 cash deposit of \$7,900 at Logan Central branch and 1 cash deposit of \$1,500 at Busselton branch –total deposits of \$22,000

SCHEDULE AAE**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED**ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 14 – COMMBANK ACCOUNT 67

ITEM	DATE	TRANSACTION/S
1	27.08.15	1 cash deposit of \$8,100 at Bankstown branch, 1 cash deposit of \$9,000 at Condell Park branch, 1 cash deposit of \$3,600 at Westfield Liverpool branch, 1 cash deposit of \$9,000 at Seven Hills branch, 1 cash deposit of \$3,800 at Moorebank branch, 1 cash deposit of \$9,000 at Smithfield branch, 1 cash deposit of \$9,100 at Guildford branch – total deposits of \$51,600
2	28.08.15	2 cash deposits (\$8,500, \$8,900) at Blacktown branch, 1 cash deposit of \$8,400 at Wentworthville branch, 2 cash deposits (\$9,000, \$7,948) at Seven Hills branch, 1 cash deposit of \$9,000 at Maddington branch, 1 cash deposit of \$9,000 at Fairfield branch – total deposits of \$60,748
3	30.09.15	1 cash deposit of \$4,500 at Guildford branch, 1 cash deposit of \$9,000 at Granville branch, 1 cash deposit of \$8,000 at Top Ryde City branch, 1 cash deposit of \$9,000 at Regents Park branch, 1 cash deposit of \$7,000 at Ermington branch - total deposits of \$37,500
4	9.12.15	1 cash deposit of \$9,900 at Flemington Markets branch, 1 cash deposit of \$9,800 at 06 2475 branch, 1 cash deposit of \$2,500 at Wentworthville branch, 1 cash deposit of \$9,200 at Guildford branch, 1 cash deposit of \$9,300 at Lidcombe branch, 1 cash deposit of \$9,200 at Auburn branch, 1 cash deposit of \$9,000 at Toongabbie branch, 1 cash deposit of \$9,400 at Granville branch, 1 cash deposit of \$9,500 at Lilydale branch, 1 cash deposit of \$9,500 at Chirnside Park branch, 1 cash deposit of \$4,600 at Merrylands branch, 1 cash deposit of \$9,300 at Fairfield Heights branch, 1 cash deposit of \$9,700 at Strathfield branch, 1 cash deposit of \$9,600 at Burwood branch and 1 cash deposit of \$9,500 at Burwood Rd branch - total deposits of \$130,000
5	10.12.15	1 cash deposit of \$9,000 at Greystanes branch, 1 cash deposit of \$9,200 at Wentworthville branch, 1 cash deposit of \$2,000 at Auburn branch, 1 cash deposit of \$9,100 at Blacktown branch, 1 cash deposit of \$9,000 at Smithfield branch, 1 cash deposit of \$9,000 at Fairfield Heights branch - total deposits of \$47,300
6	11.12.15	1 cash deposit of \$5,000 at Blacktown branch, 1 cash deposit of \$6,350 at Seven Hills branch, 1 cash deposit of \$2,350 at Guildford branch, 1 cash deposit of \$9,000 at Auburn branch - total deposits of \$22,700

ITEM	DATE	TRANSACTION/S
7	21.01.16	1 cash deposit of \$9,000 at Auburn branch, 1 cash deposit of \$2,500 at Brimbank Cntl branch - total deposits of \$11,500
8	22.01.16	1 cash deposit of \$9,000 at Merrylands branch, 1 cash deposit of \$2,000 at Smithfield branch - total deposits of \$11,000

SCHEDULE AAF**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED**ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 58 – COMMBANK ACCOUNT 68

ITEM	DATE	TRANSACTION/S
1	23.04.15	2 cash deposits (\$6,400, \$2,000) at Granville branch, 1 cash deposit of \$9,000 at Wentworthville branch, 2 cash deposits (\$8,000, \$9,000) at Chester Hill branch, 1 cash deposit of \$7,000 at Smithfield branch - total deposits of \$41,400
2	29.04.15	1 cash deposit of \$5,500 at Centro Bankstown branch, 1 cash deposit of \$5,500 at Bankstown branch, 1 cash deposit of \$5,100 at Condell Park branch, 1 cash deposit of \$5,566 at Chester Hill branch - total deposits of \$21,666
3	30.04.15	1 cash deposit of \$8,000 at Pendle Hill branch, 1 cash deposit of \$3,234 at Castle Towers branch, 1 cash deposit of \$9,000 at Winston Hills branch - total deposits of \$20,234
4	12.05.15	2 cash deposits (\$5,000, \$9,800) at Chinatown branch, 1 cash deposit of \$5,488 at L&C Sts branch - total deposits of \$20,288
5	20.05.15	1 cash deposit of \$8,916 at Wyndham Village branch, 1 cash deposit of \$7,500 at Moorebank branch, 1 cash deposit of \$7,000 at Westfield Liverpool branch - total deposits of \$23,416
6	20.05.15	1 cash deposit at Quick Deposit Box, Branch 06 2867
7	21.05.15	1 cash deposit of \$5,000 at Moorebank branch, 1 cash deposit of \$7,002 at Werribee branch, 1 cash deposit of \$7,500 at Castle Towers branch, 1 cash deposit of \$5,000 at Moorebank branch - total deposits of \$24,502
8	22.05.15	2 cash deposits (\$8,000, \$99) at Castle Towers branch, 1 cash deposit of \$6,998 at Werribee branch, 1 cheque deposit of \$7,800 at 06 2867 branch - total deposits of \$23,797
9	29.06.15	1 cash deposit of \$9,000 at Bankstown branch
10	30.06.15	1 cash deposit of \$9,000 at Roselands branch, 1 cash deposit of \$9,000 at Lakemba branch, 1 cash deposit of \$9,000 at Campsie branch, 1 cash deposit of \$5,100 at Strathfield branch, 1 cash deposit of \$488 at Sunnybank branch - total deposits of \$32,588

ITEM	DATE	TRANSACTION/S
11	8.07.15	1 cash deposit of \$9,000 at Wentworthville branch, 1 cash deposit of \$8,000 at Sydney Olympic park branch, 1 cash deposit of \$9,000 at Lidcombe branch, 1 cash deposit of \$5,025 at Merrylands branch, 1 cash deposit of \$8,500 at Smithfield branch, 1 cash deposit of \$9,000 at Canley Heights branch – total deposits of \$48,525
12	9.07.15	1 cash deposit of \$9,000 at Wentworthville branch, 1 cash deposit of \$4,772 at Guildford branch - total deposits of \$13,772
13	16.10.15	1 cash deposit of \$1,000 at Sunnybank Hill branch
14	7.01.16	1 cash deposit of \$5,123 at Blacktown branch, 1 cash deposit of \$9,500 at Granville branch, 1 cash deposit of \$8,000 at Bankstown branch, 1 cash deposit of \$7,662 at Chester Hill branch, 1 cash deposit of \$1,000 at Smithfield branch - total deposits of \$31,285
15	18.02.16	1 cash deposit of \$1,485 at East Perth branch
16	4.03.16	1 cash deposit of \$8,000 at Strathfield branch, 1 cash deposit of \$8,500 at Burwood branch, 1 cash deposit of \$8,500 at Elizabeth & Foveaux Sts branch, 1 cash deposit of \$8,500 at Town Hall branch, 1 cash deposit of \$8,500 at George & Mkt branch, 1 cash deposit of \$8,000 at Wynyard branch, 1 cash deposit of \$8,000 at St James branch, 1 cash deposit of \$8,500 at Park & Castlereagh branch, 1 cash deposit of \$8,000 at L&C Sts branch, 1 cash deposit of \$8,000 at Haymarket branch - total deposits of \$82,500
17	7.03.16	1 cash deposit of \$8,000 at Eastwood branch, 1 cash deposit of \$8,000 at 06 2475 branch, 1 cash deposit of \$8,000 at Strathfield branch, 1 cash deposit of \$5,785 at Elizabeth & Foveaux branch, 1 cash deposit of \$8,500 at Burwood branch, 1 cash deposit of \$8,500 at L&C Sts branch, 1 cash deposit of \$8,500 at George Street branch - total deposits of \$55,285
18	8.03.16	1 cash deposit of \$8,500 at L&C Sts branch, 1 cash deposit of \$8,500 at 06 2004 branch - total deposits of \$17,000

SCHEDULE AAG

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 15 – COMMBANK ACCOUNT 69

ITEM	DATE	TRANSACTION/S
1	13.01.16	1 cash deposit of \$8,000 at Wynyard branch, 1 cash deposit of \$7,750 at George Street branch, 1 cash deposit of \$9,000 at L&C Sts branch, 1 cash deposit of \$7,000 at Park & Castlereagh Sts branch, 1 cash deposit of \$8,000 at St James branch, 1 cash deposit of \$8,000 at Town Hall branch, 1 cash deposit of \$5,150 at Chinatown branch - total deposits of \$52,900
2	14.01.16	1 cash deposit of \$5,500 at Chester Hill branch, 2 cash deposits (\$7,500, \$2,000) at Cabramatta branch, 1 cash deposit of \$9,100 at Merrylands branch - total deposits of \$24,100
3	15.01.16	1 cash deposit of \$7,750 at Rockdale branch, 1 cash deposit of \$9,000 at Merrylands branch, 1 cash deposit of \$8,000 at Ramsgate branch - total deposits of \$24,750
4	6.05.16	1 cash deposit of \$5,000 at Belmore branch, 1 cash deposit of \$8,000 at Ashfield branch, 1 cash deposit of \$9,000 at Campsie branch, 1 cash deposit of \$8,000 at Burwood branch - total deposits of \$30,000

SCHEDULE AAH**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED**ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 59 – COMMBANK ACCOUNT 70

ITEM	DATE	TRANSACTION/S
1	20.06.2014	1 cash deposit of \$3,000, 1 cash deposit of \$3,000, 1 cash deposit of \$1,000 at Dandenong branch – total deposits of \$7,000
2	23.06.2014	1 cash deposit of \$7,000
3	24.06.2014	1 cash deposit of \$7,000
4	22.12.2014	1 cash deposit of \$9,000 at Strathfield branch, 2 cash deposits (\$3,000, \$9,000) at Fairfield Heights branch, 1 cash deposit of \$9,000 at Fairfield Branch – total deposits of \$30,000
5	24.02.2015	1 cash deposit of \$9,000 at Granville branch, 1 cash deposit of \$9,100 at Auburn branch, 2 cash deposits (\$6,064, \$9,200) at Wentworthville branch, 1 cash deposit of \$9,300 at Merrylands branch – total deposits of \$42,664
6	22.04.2015	1 cash deposit of \$9,000 at Brunswick branch, 1 cash deposit of \$9,100 at Moonee Ponds branch, 1 cash deposit of \$2,700 at Ascot Vale branch, 1 cash deposit of \$9,200 at Highpoint branch – total deposits of \$30,000
7	19.05.2015	3 cash deposits (\$9,510, \$5,000, \$5,540) at Granville branch, 1 cash deposit of \$9,950 at Auburn branch – total deposits of \$30,000
8	08.10.2015	1 cash deposit of \$500 at Woolgoolga branch, 1 cash deposit of \$1,360 at Shepparton branch, 1 cash and cheque deposit of \$2,105 at Shepparton branch, 1 cash deposit of \$1,000 at Naracoorte branch, 1 cash deposit of \$360 at Dandenong Plaza branch, 1 cash deposit of \$2,938 at Maddington branch – total deposits of \$8,263
9	09.10.2015	1 cash deposit of \$7,162 at Elizabeth branch, 1 cash deposit of \$7,360.55 at Morley branch, 1 cash deposit of \$800 at Woolgoolga branch – total deposits of \$15,322.55
10	20.11.2015	1 Automatic Teller Machine (ATM) deposit of \$7,000 at Ingle Farm C
11	20.11.2015	2 cash deposits (\$7,150, \$648) at Mildura branch, 1 cash deposit of \$9,000 at Salisbury branch, 1 cash deposit of \$1,358 at Footscray branch, 1 cash deposit of \$1,010 at Naracoorte branch, 1 cash deposit of \$1,000 at Plaza Toowoomba branch – total deposits of \$20,166

ITEM	DATE	TRANSACTION/S
12	21.11.2015	1 cash deposit of \$6,000 at Dandenong Plaza branch, 1 cash deposit of \$5,421 at Highpoint branch – total deposits of \$11,421
13	29.04.2016	1 cash deposit of \$9,000 at Auburn branch, 1 cash deposit of \$7,000 at Fairfield branch, 1 cash deposit of \$8,000 at Fairfield Heights branch, 1 cash deposit of \$7,000 at Greystones branch, 1 cash deposit of \$9,000 at Guildford branch – total deposits of \$40,000
14	03.05.2016	1 cash deposit of \$7,000 at Keysborough branch

SCHEDULE AAI**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED ACN**123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 61 – COMMBANK ACCOUNT 72

ITEM	DATE	TRANSACTION/S
1	20.05.2015	3 cash deposits (\$5,500, \$5,000, \$9,500) totalling \$20,000 at Haymarket Branch
2	22.06.2015	1 cash deposit of \$5,000 at Logan Central branch, 1 cash deposit of \$5,000 at Springwood branch – total deposits of \$10,000
3	28.10.2015	2 cash deposits (\$9,000, \$1,000) totalling \$10,000 at Sunshine branch
4	05.04.2016	1 cash deposit of \$6,000 at Central Wst Plz branch, 1 cash deposit of \$590 at Warwick branch, 1 cash deposit of \$8,910 at Brimbank Cntl branch, 1 cash deposit of \$4,550 at Corio branch – total deposits of \$20,050
5	07.04.2016	1 cash deposit of \$5,000 at St Albans branch, 1 cash deposit of \$1,900 at Geelong West branch, 1 cash deposit of \$8,050 at Brimbank Cntl branch – total deposits of \$14,950
6	08.04.2016	1 cash deposit of \$4,000 at Brimbank Cntl branch, 1 cash deposit of \$6,317 at St Albans branch, 1 cash deposit of \$4,680 at Morley branch – total deposits of \$14,997
7	21.04.2016	1 cash deposit of \$2,000 at Geelong West branch, 1 cash deposit of \$7,500 at Brimbank Cntl branch, 1 cash deposit of \$7,500 at Sunshine branch, 1 cash deposit of \$7,000 at Werribee Plaza branch – total deposits of \$24,000
8	27.04.2016	1 cash deposit of \$8,995 at Mirrabooka branch, 1 cash deposit of \$965 at Apollo Bay branch, 1 cash deposit of \$315 at Brimbank Cntl branch – total deposits of \$10,275
9	03.06.2016	4 cash deposits (\$6,000, \$2,000, \$6,000, \$8,000) totalling \$22,000
10	06.06.2016	4 cash deposits (\$9,000, \$2,000, \$800, \$9,000) totalling \$20,800
11	17.06.2016	1 cash deposit of \$6,440
12	18.06.2016	1 cash deposit of \$5,285

SCHEDULE AAJ

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 62 – COMMBANK ACCOUNT 73

ITEM	DATE	TRANSACTION/S
1	20.05.2015	3 cash deposits (\$9,000, \$6,500, \$9,500) at Town Hall branch totalling \$25,000
2	30.06.2015	1 cash deposit of \$5,000 at Rhodes branch, 1 cash deposit of \$5,000 at West Ryde branch – total deposits of \$10,000
3	19.08.2015	1 cash deposit of \$7,500 at Brimbank Cntl branch
4	20.08.2015	1 cash deposit of \$4,000 at Brimbank Cntl branch
5	07.09.2015	1 cash deposit of \$5,500 at Winston Hills branch, 1 cash deposit of \$4,500 at Toongabbie branch – total deposits of \$10,000
6	10.09.2015	2 cash deposits (\$5,000, \$5,000) at Sunshine branch totalling \$10,000
7	01.02.2016	1 cash deposit of \$7,500 at Broadmeadows branch, 1 cash deposit of \$7,500 at Roxburgh Park branch, 1 cash deposit of \$7,500 at Gladstone Park branch, 1 cash deposit of \$7,500 at Airport West branch – total deposits of \$30,000
8	17.05.2016	1 cash deposit of \$9,000 at Granville Branch, 1 cash deposit of \$3,570 at Merrylands branch – total deposits of \$12,570
9	31.05.2016	1 cash deposit of \$7,000 at Kilsyth branch
10	07.06.2016	1 cash deposit of \$8,000 ay Revesby branch

SCHEDULE AAK

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

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OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 63 – COMMBANK ACCOUNT 74

ITEM	DATE	TRANSACTION/S
1	26.11.2014	1 cash deposit of \$9,600 at Moonee Ponds branch, 1 cash deposit of \$9,700 at Ascot Vale branch, 2 cash deposits (\$5,500, \$9,800) at Highpoint branch, 1 cash deposit of \$9,900 at Ascot Vale branch – total deposits of \$44,500

SCHEDULE AAL

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 64 – COMMBANK ACCOUNT 75

ITEM	DATE	TRANSACTION/S
1	18.05.2015	2 cash deposits (\$9,700, \$6,700) at Auburn branch, 1 cash deposit of \$9,900 at Haymarket branch, 1 cash deposit of \$5,400 at L & C Sts Sydney branch, 1 cash deposit of \$9,800 at George & Market Sydney branch, 1 cash deposit of \$7,000 at Merrylands branch – total deposits of \$48,500
2	07.01.2016	1 cash deposit of \$8,500 at Mountain Gate branch
3	08.01.2016	1 cash deposit of \$9,500 at Granville branch, 1 cash deposit of \$5,500 at Chester Hill branch – total deposits of \$15,000
4	11.01.2016	1 cash deposit of \$9,500 at Toongabbie branch
5	12.01.2016	1 cash deposit of \$1,500 at Pendle Hill branch

SCHEDULE AAM

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

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**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 65 – COMMBANK ACCOUNT 76

ITEM	DATE	TRANSACTION/S
1	10.12.2014	2 cash deposits (\$9,000, \$8,000) at Coburg branch, 2 cash deposits (\$4,850, \$9,100) at Preston branch, 1 cash deposit of \$9,050 at Nthland Centre branch – total deposits of \$40,000
2	22.12.2014	2 cash deposits (\$6,000, \$5,000) totalling \$11,000 at Haymarket branch
3	16.01.2015	1 cash deposit of \$9,900 at North Essendon branch, 1 cash deposit of \$9,500 at Moonee Ponds branch, 2 cash deposits (\$900, \$9,700) at Coburg branch – total deposits of \$30,000
4	27.01.2015	1 cash deposit of \$9,427 at Moonee Ponds branch, 1 cash deposit of \$9,000 at Coburg branch – total deposits of \$18,427

SCHEDULE AAN**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED**ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 16 – COMMBANK ACCOUNT 77

ITEM	DATE	TRANSACTION/S
1	16.01.2015	2 cash deposits (\$8,058, \$9,104) totalling \$17,162 at North Essendon branch
2	26.01.2015	1 cash deposit of \$9,104 at North Essendon branch, 1 cash deposit of \$9,104 at Moonee Ponds branch – total deposits of \$18,208
3	16.02.2015	1 cash deposit of \$5,500 at Bonnyrigg branch
4	17.02.2015	1 cash deposit of \$7,300 at World Square NSW branch
5	18.02.2015	1 cash deposit of \$7,300 at Moonee Ponds branch
6	06.03.2015	1 cash deposit of \$5,250 at Haymarket branch, 1 cash deposit of \$3,250 at Wynyard branch – total deposits of \$8,500
7	09.03.2015	1 cash deposit of \$6,500 at Campsie branch
8	10.03.2015	1 cash deposit of \$5,108 at Westfield Parramatta branch
9	11.03.2015	1 cash deposit of \$7,300 at Auburn branch
10	12.03.2015	3 cash deposits (\$2,275, \$3,250, \$38.57) at Chatswood branch, 1 cash deposit of \$8,800 at World Square NSW branch, 1 cash deposit of \$1,208 at Westfield Parramatta branch – total deposits of \$15,571.57
11	13.03.2015	1 cash deposit of \$2,000 at Chatswood branch, 1 cash deposit of \$2,200 at Lane Cove branch, 1 cash deposit of \$3,300 at Campsie branch, 1 cash deposit of \$2,666.56 at Cabramatta branch – total deposits of \$10,166.56
12	16.03.2015	1 cash deposit of \$4,500 at Chatswood branch
13	17.03.2015	1 cash deposit of \$2,880 at L & C Sts Sydney branch, 1 cash deposit of \$1,987.50 at 116 Burwood Road branch – total deposits of \$4,867.50
14	18.03.2015	1 cash deposit of \$4,975 at Chinatown branch
15	19.03.2015	2 cash deposits (\$4,125, \$3,250) totalling \$7,375 at Westfield Parramatta branch
16	20.03.2015	1 cash deposit of \$896 at Lane Cove branch

ITEM	DATE	TRANSACTION/S
17	24.03.2015	1 cash deposit of \$8,800 at Strathfield branch
18	25.03.2015	1 cash deposit of \$1,500 at Westfield Parramatta branch
19	27.03.2015	1 cash deposit of \$1,000 at St Leonards branch
20	30.03.2015	1 cash deposit of \$7,300 at Rouse Hill branch
21	07.05.2015	1 cash deposit of \$9,217 at Town Hall Sydney branch, 1 cash deposit of \$3,250 at Kingsford branch – total deposits of \$12,467
22	18.05.2015	2 cash deposits (\$4,000, \$6,500) totalling \$10,500 at Westfield Parramatta branch
23	19.05.2015	1 cash deposit of \$6,500 at Wetherill Park branch, 1 cash deposit of \$7,994 at Chatswood branch, 1 cash deposit of \$3,250 at George & Market branch – total deposits of \$17,744
24	21.05.2015	1 cash deposit of \$6,500 at Chatswood branch, 1 cash deposit of \$3,250 at Mc Campbelltown branch – total deposits of \$9,750
25	22.05.2015	1 cash deposit of \$3,300 at Ermington branch, 1 cash deposit of \$4,125 at Hornsby branch – total deposits of \$7,425
26	04.08.2015	1 cash deposit of \$7,300 at Strathfield branch
27	05.08.2015	1 cash deposit of \$3,080 at Chatswood branch
28	06.08.2015	1 cash deposit of \$3,250 at Westfield Parramatta branch
29	12.10.2015	1 cash deposit of \$3,250 at Chatswood branch
30	13.10.2015	1 cash deposit of \$6,500 at Wetherill Park branch
31	14.10.2015	1 cash deposit of \$3,300 at Westfield Parramatta branch

SCHEDULE AAO

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 66 AND PERSON 67 – COMMBANK ACCOUNT 79

ITEM	DATE	TRANSACTION/S
1	03.06.2013	1 cash deposit of \$9,000 at Hampton Park branch, 2 cash deposits (\$2,000, \$9,000) at Berwick branch – total deposits of \$20,000
2	18.07.2013	1 cash deposit of \$7,000 at Dandenong Plaza branch, 1 cash deposit of \$7,000 at Dandenong branch – total deposits of \$14,000
3	18.07.2013	1 Automatic Teller Machine (ATM) deposit of \$6,000 at Dandenong P A
4	18.11.2013	1 cash deposit of \$7,500 at Sutherland branch, 1 cash deposit of \$7,500 at Gympie branch – total deposits of \$15,000
5	11.12.2013	1 cash deposit of \$9,000 at Guildford branch, 1 cash deposit of \$6,000 at Fairfield branch – total deposits of \$15,000
6	28.10.2014	1 cash deposit of \$9,000 at Mount Druitt branch, 1 cash deposit of \$9,000 at Seven Hills branch, 1 cash deposit of \$8,900 at Toongabbie branch, 1 cash deposit of \$3,000 at Pendle Hill branch – total deposits of \$29,900
7	30.01.2015	1 cash deposit of \$5,000 at Granville branch, 1 cash deposit of \$5,000 at Auburn branch – total deposits of \$10,000
8	04.02.2015	1 cash deposit of \$4,741 at Parramatta branch, 1 cash deposit of \$6,259 at Auburn branch – total deposits of \$11,000
9	06.02.2015	1 cash deposit of \$9,000 at Girrawheen branch
10	09.02.2015	1 cash deposit of \$6,734 at Auburn branch, 1 cash deposit of \$3,266 at Chester Hill branch, 1 cash deposit of \$5,000 at Guildford branch, 1 cash deposit of \$862 at Dandenong Plaza branch – total deposits of \$18,862
11	11.02.2015	1 cash deposit of \$5,000 at Fairfield Heights branch
12	12.02.2015	1 cash deposit of \$5,000 at Granville branch
13	16.02.2015	1 cash deposit of \$1,165 at Salisbury branch, 1 cash deposit of \$7,175 at Sunshine branch – total deposits of \$8,340
14	17.02.2015	1 cash deposit of \$660 at M&F Perth branch

ITEM	DATE	TRANSACTION/S
15	06.05.2015	1 cash deposit of \$1,651 at Auburn branch
16	08.05.2015	1 cash deposit of \$9,000 at Fountain Gate branch
17	11.05.2015	1 cash deposit of \$1,283 at Sunshine branch, 1 cash deposit of \$1,010 at Logan Central branch, 1 cash deposit of \$660 at Mildura branch, 1 cash deposit of \$4,906 at Sunshine branch – total deposits of \$7,859
18	12.05.2015	1 cash deposit of \$1,315 at Shepparton branch, 1 cash deposit of \$549 at Maddington branch – total deposits of \$1,864

SCHEDULE AAP**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED**ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 68 – COMMBANK ACCOUNT 80

ITEM	DATE	TRANSACTION/S
1	29.07.2014	3 cash deposits (\$9,000, \$8,000, \$8,000) totalling \$25,000 at Cheltenham branch
2	04.08.2014	2 cash deposit (\$8,000, \$4,000) at Dandenong branch, 1 cash deposit of \$9,000 at Dandenong Plaza branch – total deposits of \$21,000
3	23.12.2014	1 cash deposit of \$6,000 at Smithfield branch, 1 cash deposit of \$9,000 at Burwood branch – total deposits of \$15,000
4	05.08.2015	2 cash deposits (\$8,550, \$6,500) at Stones Corner branch, 1 cash deposit of \$1,752 at Salisbury branch – total deposits of \$16,802
5	06.08.2015	1 cash deposit of \$2,198 at Pines Doncaster branch, 1 cash deposit of \$8,000 at Salisbury branch, 1 cash deposit of \$6,000 at Stones Corner branch – total deposits of \$16,198
6	11.01.2016	1 cash deposit of \$416 at Dandenong branch, 1 cash deposit of \$3,000 at Elizabeth branch, 1 cash deposit of \$2,584 at Shepparton branch, 1 cash deposit of \$9,000 at Merrylands branch – total deposits of \$15,000
7	01.02.2016	1 cash deposit of \$9,000 at Prospect branch
8	02.02.2016	1 cash deposit of \$9,000 at Nthpark Enfield branch
9	05.04.2016	1 cash deposit of \$18,000 at Auburn branch
10	29.04.2016	1 cash deposit of \$9,500 at Revesby branch, 1 cash deposit of \$9,500 at Bankstown branch – total deposits of \$19,000
11	11.05.2016	1 cash deposit of \$9,000 at Campsie branch
12	12.05.2016	1 cash deposit of \$7,500 at Merrylands branch
13	13.05.2016	1 cash deposit of \$2,500 at Smithfield branch
14	16.05.2016	1 cash deposit of \$2,500 at Pagewood branch
15	25.05.2016	1 cash deposit of \$6,500 at Dandenong branch
16	29.08.2016	2 cash deposits (\$9,000 x 2) totalling \$18,000

ITEM	DATE	TRANSACTION/S
17	30.08.2016	1 cash deposit of \$9,000
18	31.08.2016	2 cash deposits (\$9,000, \$2,000) totalling \$11,000

SCHEDULE AAQ**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED**ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS COMPANY 17 – COMMBANK ACCOUNT 81

ITEM	DATE	TRANSACTION/S
1	17.11.2014	3 cash deposits (\$8,000, \$7,000, \$5,000) totalling \$20,000 at Belmont branch
2	21.11.2014	1 cash deposit of \$9,200 at Wentworthville branch, 2 cash deposits (\$9,200, \$9,450) at Guildford branch, 1 cash deposit of \$8,900 at Granville branch, 1 cash deposit of \$9,300 at Burwood branch, 1 cash deposit of \$8,041 at Auburn branch, 1 cash deposit of \$8,800 at Strathfield branch, 1 cash deposit of \$9,000 at Smithfield branch, 1 cash deposit of \$9,400 at Merrylands branch, 1 cash deposit of \$9,100 at Smithfield branch – total deposits of \$90,391
3	24.11.2014	1 cash deposit of \$9,609 at Granville branch
4	05.12.2014	1 cash deposit of \$9,500 at Wentworthville branch, 1 cash deposit of \$9,100 at Merrylands branch, 1 cash deposit of \$9,200 at Chester Hill branch, 1 cash deposit of \$9,500 at Auburn branch, 1 cash deposit of \$9,550 at Wentworthville branch, 1 cash deposit of \$9,300 at Fairfield branch, 1 cash deposit of \$9,000 at Westfield Parramatta branch, 1 cash deposit of \$9,650 at Granville branch, 1 cash deposit of \$4,000 at Wetherill Park branch, 1 cash deposit of \$9,400 at Auburn branch, 2 cash deposits (\$200, \$9,600) at Smithfield branch – total deposits of \$98,000
5	08.12.2014	1 cash deposit of \$2,000 at Smithfield branch
6	16.01.2015	1 cash deposit of \$8,000 at Wentworthville branch, 1 cash deposit of \$7,050 at Granville branch, 1 cash deposit of \$8,950 at Auburn branch, 1 cash deposit of \$8,000 at Burwood branch, 1 cash deposit of \$1,000 at Smithfield branch, 1 cash deposit of \$8,000 at Smithfield branch, 1 cash deposit of \$4,000 at Fairfield Heights branch, 1 cash deposit of \$5,000 at Guildford branch – total deposits of \$50,000
7	12.02.2015	1 cash deposit of \$9,000 at Wentworthville branch, 1 cash deposit of \$3,000 at Flemington Mkts branch, 1 cash deposit of \$9,000 at Ermington branch, 1 cash deposit of \$9,000 at Westfield Parramatta branch – total deposits of \$30,000

ITEM	DATE	TRANSACTION/S
8	13.02.2015	1 cash deposit of \$8,000 at Merrylands branch, 1 cash deposit of \$2,071 at Belmont branch – total deposits of \$10,071
9	13.02.2015	1 Automatic Teller Machine (ATM) deposit of \$3,500 at Belmont A
10	14.02.2015	1 cash deposit of \$3,429 at Fountain Gate branch
11	17.03.2015	1 cash deposit of \$9,100 at Moonee Ponds branch, 1 cash deposit of \$9,200 at Coburg branch, 1 cash deposit of \$9,300 at North Essendon branch, 1 cash deposit of \$9,400 at Niddrie branch, 1 cash deposit of \$4,270 at Northcote branch – total deposits of \$41,270
12	18.03.2015	1 cash deposit of \$9,000 at Guildford branch, 1 cash deposit of \$9,000 at Granville branch, 1 cash deposit of \$5,000 at Auburn branch, 1 cash deposit of \$1,000 at Dandenong Plaza branch, 1 cash deposit of \$9,000 at Joondalup branch – total deposits of \$33,000
13	19.03.2015	1 cash deposit of \$351 at Griffith branch, 3 cash deposits (\$8,880, \$9,900, \$9,950) at Haymarket branch, 1 cash deposit of \$7,500 at Hampton Park branch, 1 cash deposit of \$6,500 at Berwick branch – total deposits of \$43,081
14	11.04.2015	1 cash deposit of \$9,000 at Dandenong Plaza branch
15	13.04.2015	1 cash deposit of \$8,400 at Shepparton branch, 1 cash deposit of \$3,800 at Prospect branch, 2 cash deposits (\$3,400, \$9,200) at Dandenong branch, 1 cash deposit of \$6,200 at Prospect branch – total deposits of \$31,000
16	15.04.2015	1 cash deposit of \$7,000 at Fountain Gate branch, 1 cash deposit of \$3,000 at Dandenong branch – total deposits of \$10,000
17	15.07.2015	1 cash deposit of \$9,000 at Dandenong Plaza branch
18	17.07.2015	1 cash deposit of \$2,000 at Salisbury branch, 1 cash deposit of \$8,500 at Box Hill branch, 1 cash deposit of \$8,000 at Dandenong branch, 1 cash deposit of \$1,010 at Springfield branch, 1 cash deposit of \$1,300 at Auburn branch, 1 cash deposit of \$1,245 at Mildura branch, 1 cash deposit of \$5,000 at Dandenong Plaza branch, 1 cash deposit of \$1,690 at Busselton branch – total deposits of \$28,745
19	13.08.2015	2 cash deposits (\$5,050, \$6,000) at Nthpark Enfield branch, 1 cash deposit of \$6,000 at Prospect branch, 1 cash deposit of \$9,500 at Armadale branch, 1 cash deposit of \$935 at Keysborough branch, 2 cash deposits (\$2,800, \$5,010) at Maddington branch – total deposits of \$35,295
20	14.08.2015	1 cash deposit of \$6,000 at Shepparton branch, 1 cash deposit of \$4,005 at Sunshine branch, 2 cash deposits (\$4,000, \$6,500) at Mirrabooka branch – total deposits of \$20,505
21	18.08.2015	1 cash deposit of \$2,000 at Armadale branch, 1 cash deposit of \$4,900 at Maddington branch – total deposits of \$6,900
22	21.08.2015	1 cash deposit of \$9,000 at Wentworthville branch, 1 cash deposit of \$9,000 at Fairfield branch – total deposits of \$18,000
23	25.08.2015	1 cash deposit of \$6,880 at Granville branch, 1 cash deposit of \$9,000 at Auburn branch – total deposits of \$15,880
24	01.09.2015	1 cash deposit of \$9,000 at Wpnt Blacktown branch, 1 cash deposit of \$9,000 at Fairfield branch – total deposits of \$18,000
25	02.09.2015	1 cash deposit of \$5,600 at Pendle Hill branch, 1 cash deposit of \$2,000 at Parramatta branch – total deposits of \$7,600
26	28.09.2015	2 cash deposits (\$9,500, \$9,000) totalling \$18,500 at Dandenong branch

ITEM	DATE	TRANSACTION/S
27	29.09.2015	3 cash deposits (\$9,500, \$9,500, \$9,000) at Dandenong Plaxa branch, 3 cash deposits (\$9,500, \$5,000, \$9,000) at Dandenong branch – total deposits of \$51,500
28	13.11.2015	1 cash deposit of \$1,000 at Beaconsfield branch, 1 cash deposit of \$7,000 at Dandenong branch, 1 cash deposit of \$2,752 at Shepparton branch – total deposits of \$10,752
29	14.11.2015	1 cash deposit of \$6,186 at Dandenong Plaza branch
30	16.11.2015	1 cash deposit of \$8,000 at Dandenong Plaza branch
31	01.12.2015	1 cash deposit of \$8,600 at Castle Towers branch, 1 cash deposit of \$4,000 at Baulkham Hills branch, 1 cash deposit of \$9,000 at Guildford branch, 1 cash deposit of \$8,400 at Toongabbie branch, 1 cash deposit of \$8,947 at Auburn branch, 1 cash deposit of \$3,053 at Smithfield branch, 1 cash deposit of \$9,000 at Merrylands branch, 1 cash deposit of \$8,300 at Armadale branch, 1 cash deposit of \$9,000 at Smithfield branch, 2 cash deposits (\$6,000, \$5,000) at Maddington branch, 1 cash deposit of \$9,000 at Mirrabooka branch – total deposits of \$88,300
32	03.12.2015	1 cash deposit of \$1,690 at Maddington branch
33	04.12.2015	1 cash deposit of \$5,000 at Salisbury branch
34	09.12.2015	1 cash deposit of \$5,000 at Wpnt Blacktown branch

SCHEDULE AAR

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 18 – COMMBANK ACCOUNT 82

ITEM	DATE	TRANSACTION/S
1	31.01.2012	1 cash deposit of \$6,500 at Hornsby branch
2	02.02.2012	1 cash deposit of \$4,560 at St Ives branch
3	09.02.2012	1 cash deposit of \$7,700 at Castle Towers branch, 1 cash deposit of \$4,000 at Wahroonga branch – total deposits of \$11,700
4	12.03.2013	1 cash deposit of \$6,000 at Crows Nest branch
5	13.03.2013	1 cash deposit of \$4,065 at Nthpark Enfield branch
6	14.03.2013	2 cash deposits (\$6,940, \$5,060) totalling \$12,000 at Crows Nest branch
7	26.06.2013	1 cash deposit of \$8,750 at Wahroonga branch, 1 cash deposit of \$8,560 at Pymble branch – total deposits of \$17,310
8	30.07.2013	2 cash deposits (\$5,500, \$4,590) totalling \$10,090 at Crows Nest branch
9	12.08.2013	1 cash deposit of \$7,290 at Dandenong branch
10	13.08.2013	1 cash deposit of \$4,897 at Dandenong Plaza branch, 1 cash deposit of \$4,103 at Belmont branch – total deposits of \$9,000
11	19.08.2013	1 cash deposit of \$5,346 at Crows Nest branch
12	22.08.2013	1 cash deposit of \$7,115 at Winston Hills branch
13	02.10.2013	1 cash deposit of \$9,370 at Crows Nest branch, 1 cash deposit of \$7,000 at Artarmon branch – total deposits of \$16,370
14	03.10.2013	3 cash deposits (\$1,515, \$8,185, \$870) at Top Ryde City branch, 1 cash deposit of \$3,520 at Crows Nest branch – total deposits of \$14,090
15	21.10.2013	1 cash deposit of \$5,280 at St Ives branch
16	23.10.2013	1 cash deposit of \$5,280 at Artarmon branch
17	25.10.2013	1 cash deposit of \$8,185 at Rhodes branch

ITEM	DATE	TRANSACTION/S
18	25.11.2013	1 cash deposit of \$8,000 at Niddrie branch, 1 cash deposit of \$2,590 at Artarmon branch – total deposits of \$10,590
19	02.12.2013	1 cash deposit of \$5,000 at Crows Nest branch, 1 cash deposit of \$7,350 at Artarmon branch – total deposits of \$12,350
20	13.12.2013	1 cash deposit of \$5,000 at Karrinyup branch
21	15.12.2013	1 cash deposit of \$8,185 at Westfield Parramatta branch
22	16.12.2013	2 cash deposits (\$2,015, \$3,575) totalling \$5,590 at Crows Nest branch
23	06.02.2014	1 cash deposit of \$5,000 at Wentworthville branch, 1 cash deposit of \$5,525 at Casula branch – total deposits of \$10,525
24	11.11.2014	1 cash deposit of \$3,560 at Belmont branch
25	14.11.2014	1 cash deposit of \$2,000 at Westfield Parramatta branch
26	17.11.2014	1 cash deposit of \$5,340 at Wentworthville branch

SCHEDULE AAS

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS PERSON 73 – COMMBANK ACCOUNT 83

ITEM	DATE	TRANSACTION/S
1	21.11.2012	1 cash deposit of \$5,000 at Westmead branch, 1 cash deposit of \$7,160 at Parramatta branch – total deposits of \$12,160
2	28.11.2012	1 cash deposit of \$9,900 at Auburn branch, 1 cash deposit of \$9,600 at Granville branch – total deposits of \$19,500
3	29.11.2012	1 cash deposit of \$4,000 at Merrylands branch, 1 cash deposit of \$5,000 at Mill Park branch, 1 cash deposit of \$2,050 at Parramatta branch – total deposits of \$11,050
4	26.06.2013	1 cash deposit of \$8,990 at Epping branch, 2 cash deposits (\$8,700, \$8,500) at Castle Towers branch, 2 cash deposit (\$8,700, \$8,800) at Crows Nest branch, 1 cash deposit of \$8,500 at 10 Bridge Street branch – total deposits of \$52,190
5	17.07.2014	1 cash deposit of \$4,000 at Wentworthville branch, 1 cash deposit of \$5,000 at Fountain gate branch, 1 cash deposit of \$6,000 at Westfield Liverpool branch, 2 cash deposits (\$7,000, \$5,000) at Dandenong branch, 1 cash deposit of \$5,280 at Hampton park branch – total deposits of \$32,280
6	19.11.2014	1 cash deposit of \$5,000 at Ermington branch, 1 cash deposit of \$9,000 at Auburn branch, 1 cash deposit of \$7,000 at Chester Hill branch, 1 cash deposit of \$5,000 at Parramatta branch – total deposits of \$26,000

SCHEDULE AAT

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NEW SOUTH WALES

DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD

OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED

ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 74 – COMMBANK ACCOUNT 84

ITEM	DATE	TRANSACTION/S
1	16.12.2013	1 cash deposit of \$7,500 at Rose Bay branch, 1 cash deposit of \$7,500 at Rose Bay North branch – total deposits of \$15,000
2	17.04.2014	1 cash deposit of \$7,000 at Ermington branch, 1 cash deposit of \$3,000 at Westfield Parramatta branch – total deposits of \$10,000
3	10.07.2014	1 cash deposit of \$3,000 at Belmont branch, 1 cash deposit of \$7,000 at Maddington branch – total deposits of \$10,000
4	05.12.2014	1 cash deposit of \$2,000 at Seven Hills branch, 1 cash deposit of \$8,000 at Seven Hills branch – total deposits of \$10,000
5	27.12.2014	1 cash deposit of \$4,410 at Hornsby branch, 2 cash deposits (\$4,000, \$2,000) at Chatswood branch – total deposits of \$10,410
6	10.03.2015	1 cash deposit of \$5,000 at Auburn branch
7	11.03.2015	1 cash deposit of \$5,000 at Chester Hill branch
8	17.06.2015	1 cash deposit of \$4,500 at Hornsby branch, 2 cash deposits (\$4,500, \$3,000) at Wahroonga branch – total deposits of \$12,000
9	28.01.2016	1 cash deposit of \$2,048 at Swan Hill branch, 1 cash deposit of \$7,500 at Naracoorte branch – total deposits of \$9,548
10	29.01.2016	1 cash deposit of \$2,452 at Shepparton branch
11	18.04.2016	1 cash deposit of \$5,000 at Maddington branch
12	18.04.2016	1 cash deposit of \$5,000 at Belmont branch

SCHEDULE AAU**FEDERAL COURT OF AUSTRALIA****DISTRICT REGISTRY: NEW SOUTH WALES****DIVISION: COMMERCIAL AND CORPORATIONS****NO NSD****OF 2017****CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED**ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 75 – COMMBANK ACCOUNT 85

ITEM	DATE	TRANSACTION/S
1	25.06.14	1 cash deposit of \$10,300 at Lalor branch
2	25.06.14	1 cash deposit of \$9,966 at Blacktown branch, 1 cash deposit of \$1,000 at South Wagga Wagga branch, 1 cash deposit of \$1,500 at Rockhampton North branch, 1 cash deposit of \$6,400 at Doncaster STown branch – total deposits of \$18,866
3	26.06.14	2 cash deposits (\$500, \$300) at Brandon Park branch, 1 cash deposit of \$1,300 at Garden City branch – total deposits of \$2,100
4	27.06.14	1 cash deposit of \$200 at Reservoir branch, 1 cash deposit of \$1,022 at Keysborough branch, 1 cash deposit of \$510 at Acacia Ridge branch, 1 cash deposit of \$5,100 at Dandenong Plaza branch, 1 cash deposit of \$400 at Griffith branch, 1 cash deposit of \$1,700 at Northland Centre branch, 1 cash deposit of \$910 at Dallas branch, 1 cash deposit of \$5,000 at Torrensville branch, 2 cash deposits (2 x \$5,800) at Kardinya branch – total deposits of \$26,442
5	27.06.14	1 cash deposit of \$20,000 at Doncaster STown branch, 1 cash deposit of \$27,000 at St Albans branch – total deposits of \$47,000
6	28.06.14	1 cash deposit of \$4,957.50 at Wpnt Blacktown branch
7	28.06.14	1 cash deposit of \$22,800 at Doncaster STown branch
8	30.06.14	1 cash deposit of \$130 at Lalor branch, 1 cash deposit of \$1,000 at Werribee branch, 1 cash deposit of \$5,000 at Torrensville branch, 1 cash deposit of \$410 at 66 Eagle St Brisbane, 1 cash deposit of \$150 at Altona Gate Cnt branch, 1 cash deposit of \$160 at Epping branch, 1 cash deposit of \$8,000 at Maylands branch, 1 cash deposit of \$4,600 at Morley branch – total deposits of \$19,450
9	30.06.14	1 cash deposit of \$17,400 at Cannington branch
10	02.07.14	1 cash deposit of \$230 at Griffith branch
11	02.07.14	1 Automatic Teller Machine (ATM) deposit of \$1,300 at Sunnybank D

ITEM	DATE	TRANSACTION/S
12	03.07.14	1 cash deposit of \$2,500 at Camberwell branch, 1 cash deposit of \$800 at South Wagga Wagga branch, 1 cash deposit of \$3,000 at Chadstone Centre branch, 1 cash deposit of \$9,000 at Westfield Liverpool branch, 1 cash deposit of \$210 at St Albans branch, 1 cash deposit of \$8,000 at Liverpool branch – total deposits of \$23,510
13	03.07.14	1 cash deposit of \$45,000 at Blackburn North branch
14	04.07.14	1 cash deposit of \$5,000 at Torrensville branch, 1 cash deposit of \$1,336 at Sunshine branch, 1 cash deposit of \$1,720 at Lalor branch, 1 cash deposit of \$6,000 at Kardinya branch, 1 cash deposit of \$1,500 at Coburg branch, 2 cash deposits (\$9,000, \$2,400) at Cannington branch, 1 cash deposit of \$410 at Thomastown branch – total deposits of \$27,366
15	07.07.14	1 cash deposit of \$5,000 at Torrensville branch, 1 cash deposit of \$1,210 at Dallas branch, 1 cash deposit of \$150 at Merrylands branch, 1 cash deposit of \$500 at Blacktown branch – total deposits of \$6,860
16	07.07.14	1 cash deposit of \$51,000 at Box Hill branch, 1 cash deposit of \$30,000 at Doncaster STown branch – total deposits of \$81,000
17	08.07.14	1 cash deposit of \$800 at Sth Wagga Wagga branch, 2 cash deposits (\$7,800, \$5,000) at Doncaster STown branch, 1 cash deposit of \$1,000 at Broadmeadows branch, 1 cash deposit of \$5,000 at Torrensville branch, 1 cash deposit of \$5,000 at Maylands branch, 1 cash deposit of \$356 at Brandon Park branch, 1 cash deposit of \$6,200 at Morley branch, 1 cash deposit of \$2,000 at Epping branch – total deposits of \$33,156
18	08.07.14	1 cash deposit of \$19,400 at Rockhampton branch, 1 cash deposit of \$34,000 at St Albans branch – total deposits of \$53,400
19	09.07.14	2 cash deposits (\$1,897, \$3448.50) at Griffith branch, 1 cash deposit of \$1,000 at South Wagga Wagga branch, 1 cash deposit of \$5,000 at Plympton branch, 1 cash deposit of \$3,200 at Moorooka branch, 1 cash deposit of \$510 at Epping branch, 1 cash deposit of \$1,547 at Blacktown branch – total deposits of \$16,602.50
20	10.07.14	1 cash deposit of \$5,000 at Torrensville branch, 1 cash deposit of \$1,730 at Box Hill branch, 1 cash deposit of \$356 at Glenroy branch, 1 cash deposit of \$1,000 at Ind'roopilly ST, 1 cash deposit of \$500 at Point Cook branch, 1 cash deposit of \$623 at Lalor branch – total deposits of
21	11.07.14	1 ATM deposit of \$430 at King George F
22	11.07.14	1 cash deposit of \$900 at New Lambton branch, 1 cash deposit of \$45 at Elsternwick branch, 1 cash deposit of \$9,200 at Westfield Parramatta branch – total deposits of \$10,145
23	14.07.14	1 cash deposit of \$6,200 at Mount Lawley branch, 1 cash deposit of \$5,000 at Morley branch, 1 cash deposit of \$3,000 at Mirrabooka branch – total deposits of \$14,200

SCHEDULE AAV

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 82 – COMMBANK ACCOUNT 128

ITEM	DATE	TRANSACTION/S
1.	<u>01.07.2013</u>	<u>NSW – Cash deposit of \$9,000 at Fairfield Branch</u>
2.	<u>02.07.2013</u>	<u>NSW – Cash deposit of \$6,000 at Smithfield Branch</u>
3.	<u>05.07.2013</u>	<u>SA – Cash deposit of \$15,500 at 96 King William St Branch</u>
4.	<u>17.07.2013</u>	<u>Vic – Cash deposit of \$9,000 at Springvale Branch</u>
5.	<u>21.08.2013</u>	<u>Vic – 1 cash deposit of \$2,000 at Northcote Branch, 1 cash deposit of \$5,000 at 385 Bourke St Melbourne Branch, 1 cash deposit of \$5,000 at Latrobe St Melbourne Branch, 1 cash deposit of \$5,000 at R.M.I.T. Branch – total deposits of \$17,000</u>
6.	<u>04.09.2013</u>	<u>Vic – Cash deposit of \$7,500 at Springvale Branch</u>
7.	<u>10.09.2013</u>	<u>Vic – Cash deposit of \$7,000 at Springvale Branch</u>
8.	<u>02.06.2015</u>	<u>Vic – Cash deposit of \$7,800 at Springvale Branch</u>
9.	<u>05.06.2015</u>	<u>NSW – 1 cash deposit of \$8,000 at Cabramatta Branch, 1 cash deposit of \$7,000 at Mascot Branch – total deposits of \$15,000</u>
10.	<u>21.06.2015</u>	<u>NSW – 1 cash deposit of \$7,500 at Mc Campbelltown Branch, 1 cash deposit of \$7,500 at Penrith Plaza branch – total deposits of \$15,000</u>
11.	<u>23.06.2015</u>	<u>Vic – Cash deposit of \$9,000 at Springvale Branch</u>
12.	<u>07.07.2015</u>	<u>Vic – Cash deposit of \$6,000 at Springvale Branch</u>
13.	<u>08.07.2015</u>	<u>Vic & NSW – 1 cash deposit of \$7,000 at Smithfield Branch, 1 cash deposit of \$3,000 at Fairfield Branch – total deposits of \$10,000</u>
14.	<u>17.07.2015</u>	<u>NSW – 1 cash deposit of \$8,000 at Doonside Branch, 1 cash deposit of \$7,000 at Plumpton Branch – total deposits of \$15,000</u>
15.	<u>27.07.2015</u>	<u>NSW – 1 cash deposit of \$9,000 at Wetherill Park Branch, 1 cash deposit of \$1,000 at Canley Heights Branch – total deposits of \$10,000</u>
16.	<u>10.08.2015</u>	<u>Vic – Cash deposit of \$4,000 at Springvale Branch</u>

ITEM	DATE	TRANSACTION/S
17.	<u>18.08.2015</u>	<u>NSW – 1 cash deposit of \$5,000 at Concord Branch, 1 cash deposit of \$5,000 at Burwood Branch – total deposits of \$10,000</u>
18.	<u>04.09.2015</u>	<u>NSW – 1 cash deposit of \$7,500, 1 cash deposit of \$7,500 at Miranda Branch – total deposits of \$15,000</u>
19.	<u>20.01.2016</u>	<u>NSW – Cash deposit of \$3,824 at Auburn Branch</u>
20.	<u>21.01.2016</u>	<u>Vic & NSW – 1 cash deposit of \$5,000 at Springvale Branch, 1 cash deposit of \$7,500 at Wynyard Branch, 1 cash deposit of \$3,676 at Dulwich Hill Branch – total deposits of \$16,176</u>
21.	<u>01.02.2016</u>	<u>Vic – Cash deposit of \$8,000 at Springvale Branch</u>
22.	<u>12.02.2016</u>	<u>Vic – Cash deposit of \$6,000 at Springvale Branch</u>
23.	<u>17.03.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Bonnyrigg Branch, 1 cash deposit of \$7,000 at Smithfield Branch, 1 cash deposit of \$9,000 at Cabramatta Branch – total deposits of \$25,000</u>
24.	<u>23.03.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Regents Park Branch, 1 cash deposit of \$8,500 at Revesby Branch, 1 cash deposit of \$8,500 at Riverwood Branch – total deposits of \$25,000</u>
25.	<u>08.04.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Revesby Branch, 1 cash deposit of \$8,900 at Belmore Branch – total deposits of \$17,900</u>
26.	<u>08.04.2016</u>	<u>NSW – Automatic Teller Machine (ATM) deposit of \$7,100 at Bankstown D</u>
27.	<u>26.04.2016</u>	<u>NSW – Cash deposit of \$9,000 at Belmore Branch</u>
28.	<u>27.04.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Bankstown Branch, 1 cash deposit of \$8,000 at Belmore Branch – total deposits of \$16,000</u>
29.	<u>05.05.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Fairfield Branch, 1 cash deposit of \$8,500 at Wentworthville Branch, 1 cash deposit of \$8,500 at Seven Hills Branch – total deposits of \$25,000</u>
30.	<u>10.05.2016</u>	<u>Vic – Cash deposit of \$3,500 at Springvale Branch</u>
31.	<u>13.05.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Westfield Parramatta Branch, 1 cash deposit of \$7,920 at Smithfield Branch, 1 cash deposit of \$1,080 at Mascot Branch, 1 cash deposit of \$7,500 at Westfield Liverpool Branch, 1 cash deposit of \$500 at Cabramatta Branch – total deposits of \$25,000</u>
<u>TOTAL</u>		<u>\$375,300 in cash deposits (\$368,200 at branches, \$7,100 at an ATM)</u>

SCHEDULE AAW

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 83 – COMMBANK ACCOUNT 129

ITEM	DATE	TRANSACTION/S
1.	<u>24.07.2013</u>	<u>NSW – Cash deposit of \$9,000 at Doonside Branch</u>
2.	<u>25.07.2013</u>	<u>NSW – Cash deposit of \$2,000 at Roselands Branch</u>
3.	<u>31.07.2013</u>	<u>NSW – Cash deposit of \$8,000 at Wetherill Park</u>
4.	<u>20.09.2013</u>	<u>NSW & Vic – 1 cash deposit of \$6,500 at Central West Plaza Branch, 1 cash deposit of \$4,500 at Ascot Vale Branch – total deposits of \$11,000</u>
5.	<u>05.03.2014</u>	<u>Vic – 1 cash deposit of \$4,500 at Carlton Branch, 1 cash deposit of \$6,000 at Collingwood Branch – total deposits of \$10,500</u>
6.	<u>18.03.2014</u>	<u>NSW – 1 cash deposit of \$7,000 at Chester Hill Branch, 1 cash deposit of \$3,000 at Fairfield Branch – total deposits of \$10,000</u>
7.	<u>20.03.2014</u>	<u>NSW – 2 cash deposits (\$8,000, \$4,000) totalling \$12,000 at Cabramatta Branch</u>
8.	<u>06.01.2015</u>	<u>NSW – Cash deposit of \$8,800 at Market Place Branch</u>
9.	<u>07.01.2015</u>	<u>NSW – 1 cash deposit of \$6,800 at Cabramatta Branch, 1 cash deposit of \$7,700 at Wetherill Park Branch, 1 cash deposit of \$7,300 at Merrylands Branch – total deposits of \$21,800</u>
10.	<u>08.08.2015</u>	<u>NSW – 1 cash deposit of \$6,950 at Centro Bankstown Branch, 1 cash deposit of \$7,000 at Westfield Hurstville Branch, 2 cash deposits (\$7,050, \$4,500) at Westfield Parramatta Branch – total deposits of \$25,500</u>
11.	<u>10.08.2015</u>	<u>NSW – 1 cash deposit of \$7,500 at Strathfield Branch, 1 cash deposit of \$7,500 at Five Dock Branch – total deposits of \$15,000</u>
12.	<u>08.12.2015</u>	<u>NSW – 2 cash deposits (\$9,000, \$5,000) totalling \$14,000 at Wentworthville Branch</u>
13.	<u>25.05.2016</u>	<u>NSW – 1 cash deposit of \$8,500 at Chester Hill Branch, 1 cash deposit of \$8,000 at Flemington Markets Branch, 1 cash deposit of \$8,500 at Roselands Branch – total deposits of \$25,000</u>

ITEM	DATE	TRANSACTION/S
14.	<u>01.06.2016</u>	<u>NSW – 1 cash deposit of \$7,400 at Hurstville Branch, 1 cash deposit of \$7,600 at Westfield Hurstville Branch, 1 cash deposit of \$7,500 at South Hurstville Branch, 1 cash deposit of \$7,500 at Rockdale Branch, 1 cash deposit of \$7,000 at Kogarah Branch, 1 cash deposit of \$7,000 at Earlwood Branch – total deposits of \$44,000</u>
15.	<u>14.02.2016</u>	<u>NSW – 1 cash deposit of \$7,500 at Wetherill Park Branch, 1 cash deposit of \$7,000 at Bonnyrigg Branch – total deposits of \$14,500</u>
16.	<u>19.04.2017</u>	<u>NSW – 1 cash deposit of \$8,000 at Cabramatta Branch, 1 cash deposit of \$8,000 at Fairfield Branch – total deposits of \$16,000</u>
<u>TOTAL:</u>		<u>\$247,100 in cash deposits</u>

SCHEDULE AAX

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD 1305 OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 84 – COMMBANK ACCOUNT 130

ITEM	DATE	TRANSACTION/S
1.	<u>05.07.2015</u>	<u>NSW – 1 cash deposit of \$8,000 at Mc Campbelltown Branch, 1 cash deposit of \$7,000 at Westfield Parramatta Branch – total deposits of \$15,000</u>
2.	<u>22.09.2015</u>	<u>NSW & Vic – 1 cash deposit of \$6,000 at Moonee Ponds Branch, 1 cash deposit of \$6,000 at Central West Plaza Branch – total deposits of \$12,000</u>
3.	<u>17.03.2016</u>	<u>NSW – 1 cash deposit of \$7,000 at Wetherill Park Branch, 1 cash deposit of \$6,000 at Canley Heights Branch, 1 cash deposit of \$7,000 at Cabramatta Branch – total deposits of \$20,000</u>
<u>TOTAL</u>		<u>\$47,000 in cash deposits</u>

SCHEDULE AAY

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 85 – ACCOUNT 131

ITEM	DATE	TRANSACTION/S
1.	<u>17.07.2012</u>	<u>NSW – Cash deposit of \$9,800 at Wetherill Park Branch</u>
2.	<u>19.07.2012</u>	<u>NSW – 1 cash deposit of \$9,800 at Bonnyrigg Branch, 1 cash deposit of \$9,800 at Fairfield Heights Branch – total deposits of \$19,600</u>
3.	<u>15.04.2014</u>	<u>NSW – Cash deposit of \$9,800 at Fairfield Heights Branch</u>
4.	<u>16.04.2014</u>	<u>NSW – Cash deposit of \$9,800 at Smithfield Branch</u>
5.	<u>04.08.2014</u>	<u>Vic -1 cash deposit of \$9,800 at Latrobe St Melbourne Branch, 2 cash deposits (\$5,000, \$4,800) at Footscray Branch – total deposits of \$19,600</u>
6.	<u>13.03.2015</u>	<u>Vic – Automatic Teller Machine (ATM) deposit of \$4,500 at Hawthorn A</u>
7.	<u>18.03.2015</u>	<u>NSW – 1 cash deposit of \$6,000 at Fairfield Branch, 1 cash deposit of \$7,600 at Canley Heights Branch – total deposits of \$13,600</u>
8.	<u>19.03.2015</u>	<u>NSW – Cash deposit of \$6,000 at Smithfield Branch</u>
9.	<u>25.06.2015</u>	<u>NSW – Cash deposit of \$9,800 at Baulkham Hills Branch</u>
10.	<u>26.06.2015</u>	<u>Vic – 1 cash deposit of \$9,800 at Yarraville Branch, 1 cash deposit of \$9,800 at Highpoint Branch – total deposits of \$19,600</u>
11.	<u>10.11.2015</u>	<u>NSW – 1 cash deposit of \$9,800 at Granville Branch, 1 cash deposit of \$9,800 at Westfield Parramatta Branch – total deposits of \$19,600</u>
12.	<u>12.01.2016</u>	<u>NSW – 1 cash deposit of \$7,000 at Ashfield Branch, 1 cash deposit of \$2,800 at Centro Bankstown Branch – total deposits of \$9,800</u>
13.	<u>15.01.2016</u>	<u>NSW – 1 cash deposit of \$7,000 at Baulkham Hills Branch, 1 cash deposit of \$2,800 at Winston Hills Branch – total deposits of \$9,800</u>
14.	<u>18.01.2016</u>	<u>NSW – 1 cash deposit of \$2,000 at Westfield Liverpool Branch, 1 cash deposit of \$7,800 at Regents Park Branch – total deposits of \$9,800</u>
15.	<u>21.01.2016</u>	<u>NSW – 1 cash deposit of \$7,500 at Wynyard Branch, 1 cash deposit of \$3,550 at Dulwich Hill Branch – total deposits of \$11,050</u>

ITEM	DATE	TRANSACTION/S
16.	<u>22.03.2016</u>	<u>NSW – 1 cash deposit of \$7,000 at Lidcombe Branch, 1 cash deposit of \$2,800 at Condell Park Branch – total deposits of \$9,800</u>
17.	<u>28.04.2016</u>	<u>NSW – Cash deposit of \$1,800 at Carnes Hill Branch</u>
18.	<u>02.05.2016</u>	<u>NSW – 1 cash deposit of \$6,800 at Summer Hill Branch, 1 cash deposit of \$3,000 at Dulwich Hill Branch – total deposits of \$9,800</u>
19.	<u>14.06.2016</u>	<u>NSW – Cash deposit of \$9,800 at Chester Hill Branch</u>
20.	<u>15.06.2016</u>	<u>NSW – Cash deposit of \$9,800 at Strathfield Branch</u>
21.	<u>16.06.2016</u>	<u>NSW – Cash deposit of \$5,300 at Liverpool Branch</u>
22.	<u>17.06.2016</u>	<u>NSW – Cash deposit of \$4,500 at Liverpool Branch</u>
<u>TOTAL</u>		<u>\$232,950 in cash deposits (\$228,450 at branches, \$4,500 at an ATM)</u>

SCHEDULE AAZ

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD 1305 OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 86 – COMMBANK ACCOUNT 132

ITEM	DATE	TRANSACTION/S
1.	<u>06.12.2011</u>	<u>NSW – 2 cash deposits (\$7,000, \$9,000) at Burwood Branch, 1 cash deposit of \$9,500 at Strathfield Branch, 1 cash deposit of \$9,500 at Bankstown Branch – total deposits of \$35,000</u>
2.	<u>06.12.2011</u>	<u>WA – Withdrawal of \$34,335.40 at Morley Branch</u>
3.	<u>19.06.2012</u>	<u>NSW – Cash deposit of \$9,500 at Moorebank Branch</u>
4.	<u>21.06.2012</u>	<u>NSW – Cash deposit of \$500 at Pagewood Branch</u>
5.	<u>06.01.2015</u>	<u>WA – Automatic Teller Machine (ATM) deposit of \$5,000 at Morley C</u>
6.	<u>07.01.2015</u>	<u>WA – ATM deposit of \$5,000 at Morley C</u>
7.	<u>13.01.2015</u>	<u>WA – ATM deposit of \$5,000 at Morley C</u>
8.	<u>01.04.2016</u>	<u>NSW – 1 cash deposit of \$7,000 at Roselands Branch, 1 cash deposit of \$5,000 at Fairfield Branch – total deposits of \$12,000</u>
9.	<u>24.05.2016</u>	<u>NSW – Cash deposit of \$5,000 at Canley Heights Branch</u>
10.	<u>27.05.2016</u>	<u>NSW – Cash deposit of \$5,500 at Centro Bankstown Branch</u>
11.	<u>22.06.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Pendle Hill Branch, 1 cash deposit of \$7,500 at Wetherill Park Branch, 1 cash deposit of \$6,500 at Carlingford Branch, 1 cash deposit of \$8,000 at Fairfield Branch – total deposits of \$30,000</u>
12.	<u>26.07.2016</u>	<u>NSW – 1 cash deposit of \$8,500 at Wetherill Park Branch, 1 cash deposit of \$3,500 at Chester Hill Branch – total deposits of \$12,000</u>
13.	<u>14.10.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Fairfield Branch, 1 cash deposit of \$1,000 at Wentworthville Branch – total deposits of \$10,000</u>
<u>TOTAL</u>		<u>\$134,500 in cash deposits (\$119,500 at branches, \$15,000 at ATMs)</u>

SCHEDULE ABA

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD 1305 OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 87 – COMMBANK ACCOUNT 133

ITEM	DATE	TRANSACTION/S
1.	<u>12.05.2016</u>	<u>NSW – 1 cash deposit of \$8,500 at Blacktown Branch, 1 cash deposit of \$9,000 at Wpnt Blacktown Branch, 1 cash deposit of \$8,000 at 116 Burwood Road Branch, 1 cash deposit of \$9,000 at Cabramatta Branch, 1 cash deposit of \$2,000 at Concord Branch, 1 cash deposit of \$1,000 at Revesby Branch, 1 cash deposit of \$9,600 at Bonnyrigg Branch, 1 cash deposit of \$9,700 at Wentworthville Branch, 1 cash deposit of \$9,700 at Liverpool Branch, 1 cash deposit of \$8,000 at Canley Heights Branch – total deposits of \$74,500</u>
2.	<u>18.05.2016</u>	<u>NSW – 1 cash deposit of \$8,500 at Haymarket Branch, 1 cash deposit of \$8,500 at L&C Streets Sydney Branch – total deposits of \$17,000</u>
3.	<u>19.05.2016</u>	<u>NSW – 1 cash deposit of \$6,000 at Canley Heights Branch, 1 cash deposit of \$7,000 at Fairfield Branch, 1 cash deposit of \$7,000 at Ashfield Branch, 1 cash deposit of \$7,000 at Summer Hill Branch, 1 cash deposit of \$7,000 at Cabramatta Branch, 3 cash deposits (\$7,000 x 2, \$6,000) at Cabramatta Branch, 1 cash deposit of \$7,000 at Smithfield Branch, 1 cash deposit of \$8,850 at Chester Hill Branch, 1 cash deposit of \$4,150 at Camden Branch, 1 cash deposit of \$8,000 at Narellan Branch – total deposits of \$75,000</u>
4.	<u>16.07.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Wetherill Park Branch</u>
5.	<u>17.06.2016</u>	<u>NSW – 2 cash deposits (\$9,000 x 2) at Cabramatta Branch totalling \$18,000</u>
6.	<u>21.06.2016</u>	<u>WA – Automatic Teller Machine (ATM) deposit of \$8000 at Maddington B</u>
7.	<u>22.06.2016</u>	<u>NSW – Cash deposit of \$6,000 at Canley Heights Branch</u>
8.	<u>24.06.2016</u>	<u>NSW – Cash deposit of \$35,000 at Rockdale Branch</u>
9.	<u>27.06.2016</u>	<u>NSW – Cash deposit of \$8,000 at Cabramatta Branch</u>
10.	<u>08.07.2016</u>	<u>NSW – Cash deposit of \$5,500 at Moorebank Branch</u>
11.	<u>11.07.2016</u>	<u>NSW – Cash deposit of \$9,500 at Canley Heights Branch</u>
12.	<u>12.07.2016</u>	<u>NSW – Cash deposit of \$5,000 at Penrith Plaza</u>
13.	<u>13.02.2017</u>	<u>NSW – ATM deposit of \$8,000 at Chester Hill C</u>

ITEM	DATE	TRANSACTION/S
14.	<u>14.02.2017</u>	<u>NSW – ATM deposit of \$7,000 at Penrith D</u>
<u>TOTAL</u>		<u>\$285,500 in cash deposits (\$262,500 at branches, \$23,000 at ATMs)</u>

SCHEDULE ABB

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 88 – COMMBANK ACCOUNT 134

<u>ITEM</u>	<u>DATE</u>	<u>TRANSACTION/S</u>
1.	<u>7.09.2015</u>	<u>NSW – 1 cash deposit of \$8,000 at Top Ryde Branch, 1 cash deposit of \$8,000 at Rhodes Branch, 1 cash deposit of \$3,000 at Flemington Markets Branch – total deposits of \$19,000</u>
2.	<u>26.09.2015</u>	<u>NSW – 4 cash deposits (\$9,100, \$9,000, \$8,900, \$9,200) at Penrith Plaza Branch, 2 cash deposits (\$4,800, \$9,000) at Mc Campbelltown Branch – total deposits of \$50,000</u>
3.	<u>28.09.2015</u>	<u>NSW – 1 cash deposit of \$7,000 at Rozelle Branch, 1 cash deposit of \$7,000 at Annandale Branch, 1 cash deposit of \$6,000 at Summer Hill Branch – total deposits of \$20,000</u>
4.	<u>29.09.2015</u>	<u>NSW – Withdrawal of \$44,152.12 at Cabramatta Branch</u>
5.	<u>24.11.2015</u>	<u>Vic and NSW – 1 cash deposit of \$7,500 at Highpoint Branch, 1 cash deposit of \$7,500 at St Albans Branch – total deposits of \$15,000</u>
6.	<u>26.11.2015</u>	<u>NSW – 1 cash deposit of \$5,000 at Park & Castlereagh Street Branch</u>
7.	<u>24.03.2016–</u>	<u>NSW – 1 cash deposit of \$6,000 at Chinatown Branch, 1 cash deposit of \$7,000 at Haymarket Branch, 1 cash deposit of \$7,000 at World Square Branch – total deposits of \$20,000</u>
8.	<u>12.05.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Wetherill Park Branch, 1 cash deposit of \$8,500 at Wpnt Blacktown Branch, 1 cash deposit of \$7,500 at Burwood Branch, 1 cash deposit of \$7,550 at 116 Burwood Road Branch, 1 cash deposit of \$8,000 at Auburn Branch, 1 cash deposit of \$7,500 at Concord Branch, 1 cash deposit of \$8,000 at Smithfield Branch, 2 cash deposits (\$9,000, \$4,500) at Centro Bankstown Branch, 1 cash deposit of \$7,450 at Top Ryde Branch – total deposits of \$77,000</u>
9.	<u>08.07.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Bonnyrigg Branch</u>
10.	<u>12.07.2016</u>	<u>NSW – 1 cash and cheque deposit of \$6,010.18 at Cabramatta Branch</u>
<u>TOTAL</u>		<u>\$221,010.18 in cash and ‘cash and cheque’ deposits</u> <u>\$44,152.12 in one large withdrawal</u>

SCHEDULE ABC

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 89 – COMMBANK ACCOUNT 135

ITEM	DATE	TRANSACTION/S
1.	<u>20.10.2014</u>	<u>NSW 3 Automatic Teller Machine (ATM) deposits (\$900, \$1,500, \$2,600) totalling \$5,000 at Bankstown D</u>
2.	<u>23.10.2014</u>	<u>NSW – 1 cash deposit of \$5,000 at Centro Bankstown Branch, 2 cash deposits (\$7,000, \$7,000) at Bankstown Branch – total deposits of \$19,000</u>
3.	<u>26.10.2014</u>	<u>NSW – Cash deposit of \$4,925 at Centro Bankstown Branch</u>
4.	<u>27.10.2014</u>	<u>NSW – Cash deposit of \$5,075 at Bankstown Branch</u>
5.	<u>03.11.2014</u>	<u>NSW – 1 cash deposit of \$8,000 at Hunters Hill Branch, 1 cash deposit of \$7,000 at Lane Cove Branch – total deposits of \$15,000</u>
6.	<u>15.11.2014</u>	<u>NSW – 2 ATM deposits (\$4,300, \$2,000) totalling \$6,300 at Bankstown D</u>
7.	<u>24.11.2014</u>	<u>NSW – 2 cash deposits (\$6,000, \$8,000) totalling \$14,000 at St Albans Branch</u>
8.	<u>25.11.2014</u>	<u>NSW – Cash deposit of \$6,000 at St Albans Branch</u>
9.	<u>26.11.2014</u>	<u>Vic – 2 cash deposits (\$3,000, \$7,000) totalling \$10,000 at Keilor Downs Branch</u>
10.	<u>01.12.2014</u>	<u>NSW – ATM deposit of \$5,300 at Bankstown D</u>
11.	<u>12.12.2014</u>	<u>Vic – 1 cash deposit of \$7,500 at Carlton Branch, 1 cash deposit of \$7,500 at Fitzroy Branch, 1 cash deposit of \$7,500 at Clifton Hill Branch, 1 cash deposit of \$7,500 at Ivanhoe Branch – total deposits of \$30,000</u>
12.	<u>31.01.2015</u>	<u>NSW – Cash deposit of \$7,000 at Centro Bankstown Branch</u>
13.	<u>02.02.2015</u>	<u>NSW – 1 cash deposit of \$8,000 at Ingleburn Branch, 1 cash deposit of \$5,000 at Campbelltown Branch – total deposits of \$13,000</u>
14.	<u>08.04.2015</u>	<u>NSW – Withdrawal of \$210,663.84 at Bankstown Branch</u>
15.	<u>20.11.2015</u>	<u>Vic – 3 ATM deposits (\$10,000 x3) totalling \$30,000 at Brimbank Centre A</u>
16.	<u>03.12.2015</u>	<u>Vic – 2 ATM deposits (\$10,000 x2) totalling \$20,000 at Brimbank Centre A</u>

ITEM	DATE	TRANSACTION/S
17.	<u>04.04.2016</u>	<u>Vic – 3 ATM deposits (\$10,000 x3) totalling \$30,000 at Brimbank Centre A</u>
18.	<u>05.05.2016</u>	<u>Vic – ATM deposit of \$6,000 at Melbourne Central C</u>
19.	<u>06.05.2016</u>	<u>Vic – ATM deposit of \$7,000 at Melbourne Central C</u>
20.	<u>08.05.2016</u>	<u>Vic – ATM deposit of \$5,000 at Brimbank Centre A</u>
21.	<u>11.05.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Chester Hill Branch, 1 cash deposit of \$9,000 at Cabramatta Branch – total deposits of \$17,000</u>
22.	<u>12.05.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Wetherill Park Branch, 1 cash deposit of \$5,000 at Chester Hill Branch – total deposits of \$13,000</u>
<u>TOTAL</u>		<u>\$268,600 in cash deposits (\$154,000 at branches, \$114,600 at ATMs)</u> <u>\$210,663.84 in cash withdrawals</u>

SCHEDULE ABD

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 90 – COMMBANK ACCOUNT 136

ITEM	DATE	TRANSACTION/S
1.	<u>14.05.2015</u>	<u>NSW – 3 cash deposits (\$9,000, \$5,500, \$9,500) totalling \$24,000 at Bankstown Branch</u>
2.	<u>27.05.2015</u>	<u>NSW – 1 cash deposit of \$5,000 at Burwood Branch, 1 cash deposit of \$5,000 at 116 Burwood Road Branch – total deposits of \$10,000</u>
3.	<u>03.06.2015</u>	<u>NSW – 1 cash deposit of \$9,000 at Fairfield Heights Branch, 1 cash deposit of \$6,000 at Fairfield Branch – total deposits of \$15,000</u>
4.	<u>07.06.2015</u>	<u>NSW – Cash deposit of \$4,000 at Penrith Plaza Branch</u>
5.	<u>19.06.2015</u>	<u>NSW – Cash deposit of \$5,000 at Ingleburn Branch</u>
6.	<u>23.06.2015</u>	<u>NSW – Cash deposit of \$8,000 at Sunshine Branch</u>
7.	<u>29.06.2015</u>	<u>NSW – 1 cash deposit of \$6,000 at Wetherill Park Branch, 1 cash deposit of \$7,500 at Chester Hill Branch – total deposits of \$13,500</u>
8.	<u>07.07.2015</u>	<u>NSW – Automatic Teller Machine (ATM) deposit of \$1,600 at Haymarket B</u>
9.	<u>07.07.2015</u>	<u>NSW – Cash deposit of \$4,000 at St James Branch</u>
10.	<u>08.07.2015</u>	<u>NSW – Cash deposit of \$3,000 at Hurstville Branch</u>
11.	<u>15.07.2015</u>	<u>NSW – Cash deposit of \$3,000 at Bankstown Branch</u>
12.	<u>18.12.2015</u>	<u>Vic – 1 cash deposit of \$9,000 at Box Hill Branch, 1 cash deposit of \$1,000 at Collingwood Branch – total deposits of \$10,000</u>
13.	<u>13.04.2016</u>	<u>NSW – 1 cash deposit of \$8,500 at L & C Streets Sydney Branch, 1 cash deposit of \$8,500 at Town Hall Sydney Branch, 1 cash deposit of \$8,000 at George and Market Streets Sydney Branch – total deposits of \$25,000</u>
14.	<u>14.04.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Bonnyrigg Branch, 1 cash deposit of \$8,000 at Wetherill Park Branch, 1 cash deposit of \$9,000 at Fairfield Branch – total deposits of \$25,000</u>
<u>TOTAL</u>		<u>\$151,100 in cash deposits (\$149,500 at branches, \$1,600 at an ATM)</u>

SCHEDULE ABE

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 91 – COMMBANK ACCOUNT 137

ITEM	DATE	TRANSACTION/S
1.	<u>06.08.2013</u>	<u>NSW – 1 cash deposit of \$4,000 at Cabramatta Branch, 1 cash deposit of \$6,000 at Bankstown Branch – total deposits of \$10,000</u>
2.	<u>12.08.2013</u>	<u>NSW – 1 cash deposit of \$5,000 at 254 George Street Branch, 1 cash deposit of \$5,000 at 48 Martin Place Branch – total deposits of \$10,000</u>
3.	<u>26.08.2013</u>	<u>NSW – 1 cash deposit of \$6,050 at Wetherill Park Branch, 1 cash deposit of \$6,000 at Westfield Parramatta Branch – total deposits of \$12,050</u>
4.	<u>03.09.2013</u>	<u>Vic – 1 cash deposit of \$7,000 at Collins St Branch, 1 cash deposit of \$8,000 at Western Melbourne Branch – total deposits of \$15,000</u>
5.	<u>13.03.2014</u>	<u>NSW – Withdrawal of \$39,510 at Cabramatta Branch</u>
6.	<u>13.02.2015</u>	<u>NSW – Withdrawal of \$39,510 at Bankstown Branch</u>
7.	<u>04.05.2015</u>	<u>NSW – 1 cash deposit of \$9,800 at Chester Hill Branch, 1 cash deposit of \$200 to Bankstown Branch – total deposits of \$10,000</u>
8.	<u>26.02.2016</u>	<u>NSW – Cash deposit of \$5,000 at Carnes Hill Branch</u>
9.	<u>01.03.2016</u>	<u>NSW – Cash deposit of \$6,000 at Carnes Hill Branch</u>
10.	<u>17.03.2016</u>	<u>NSW – 1 cash deposit of \$5,400 at Bankstown Branch, 1 cash deposit of \$6,000 at Centro Bankstown Branch – total deposits of \$11,400</u>
11.	<u>28.07.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Carlingford Branch, 1 cash deposit of \$8,000 at Winston Hills Branch, 1 cash deposit of \$4,000 at Seven Hills Branch – total deposits of \$20,000</u>
12.	<u>28.07.2016</u>	<u>NSW – Cash deposit of \$24,145 at Carnes Hill Branch</u>
13.	<u>01.08.2016</u>	<u>NSW – Cash deposit of \$4,970 at Carnes Hill Branch</u>
14.	<u>29.01.2017</u>	<u>NSW – ATM deposit of \$9,400 at Cabramatta G</u>
15.	<u>30.01.2017</u>	<u>NSW – ATM deposit of \$5,600 at Marrickville C</u>

ITEM	DATE	TRANSACTION/S
16.	<u>31.03.2017</u>	<u>NSW – 2 cash deposits (\$8,500, \$8,000) at Town Hall Sydney Branch, 1 cash deposit of \$8,500 at Wynyard Branch – total deposits of \$25,000</u>
17.	<u>03.04.2017</u>	<u>NSW – 1 cash deposit of \$7,000 at George And Market Street Sydney Branch, 2 cash deposits (\$9,000 x2) at Town Hall Sydney Branch – total deposits of \$25,000</u>
<u>TOTAL</u>		<u>\$193,565 in cash deposits (\$178,565 at branches, \$15,000 at ATMs)</u> <u>\$79,020 in cash withdrawals</u>

SCHEDULE ABF

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 92 –COMMBANK ACCOUNT 138

ITEM	DATE	TRANSACTION/S
1.	<u>29.03.2016</u>	<u>WA – 2 cash deposits (\$5,000 x 2) totalling \$10,000 at M&F Perth Branch</u>
2.	<u>12.05.2016</u>	<u>NSW – 1 cash deposit of \$9,500 at Westfield Parramatta Branch, 1 cash deposit of \$1,000 at Wentworthville Branch, 1 cash deposit of \$9,500 at Westfield Parramatta Branch, 1 cash deposit of \$7,500 at Westfield Liverpool Branch, 2 cash deposits (\$7,500, \$8,000) at Canley Heights Branch, 1 cash deposit of \$7,000 at Cabramatta Branch – total deposits of \$50,000</u>
3.	<u>13.05.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Centro Bankstown Branch, 1 cash deposit of \$5,000 at Mortdale Branch – total deposits of \$14,000</u>
4.	<u>14.05.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Centro Bankstown Branch</u>
5.	<u>16.05.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Canley Heights Branch, 1 cash deposit of \$1,000 at Roselands Branch – total deposits of \$9,000</u>
6.	<u>16.05.16</u>	<u>WA – Withdrawal of \$27,015 at Osborne Park Branch</u>
7.	<u>17.05.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Canley Heights Branch</u>
8.	<u>18.05.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Canley Heights Branch, 1 cash deposit of \$7,450 at Chinatown Branch, 1 cash deposit of \$7,550 at Haymarket Branch, 1 cash deposit of \$7,500 at World Square Branch, 1 cash deposit of \$7,500 at L & C Streets Sydney Branch, 1 cash deposit of \$9,000 at Condell Park Branch – total deposits of \$48,000</u>
9.	<u>19.05.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Chester Hill Branch, 1 cash deposit of \$9,000 at Bankstown Branch, 1 cash deposit of \$8,000 at Guildford Branch, 1 cash deposit of \$9,000 at Cabramatta Branch – total deposits of \$35,000</u>
10.	<u>21.05.2016</u>	<u>NSW – 1 cash deposit of \$7,248 at Westfield Parramatta Branch, 1 cash deposit of \$7,500 at Centro Bankstown Branch, 1 cash deposit of \$7,500 at Westfield Hurstville Branch – total deposits of \$22,248</u>
11.	<u>23.05.2016</u>	<u>NSW – 1 cash deposit of \$7,752 at Ashfield Branch</u>

ITEM	DATE	TRANSACTION/S
12.	<u>24.05.2016</u>	<u>NSW – 1 cash deposit of \$7,500 at Hurstville Branch, 1 cash deposit of \$8,500 at Kogarah Branch, 1 cash deposit of \$8,500 at Kingsgrove Branch – total deposits of \$24,500</u>
13.	<u>24.05.2016</u>	<u>NSW – ATM deposit of \$5,500 at Rockdale B</u>
14.	<u>27.05.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Smithfield Branch</u>
15.	<u>28.05.2016</u>	<u>NSW – 1 cash deposit of \$6,000 at Westfield Parramatta Branch</u>
16.	<u>30.05.2016</u>	<u>NSW – 1 cash deposit of \$5,000 at Lakemba Branch</u>
17.	<u>09.06.2016</u>	<u>NSW – 1 cash deposit of \$9,200 at Blacktown Branch, 1 cash deposit of \$8,500 at Wpnt Blacktown Branch, 1 cash deposit of \$2,300 at Granville Branch – total deposits of \$20,000</u>
18.	<u>29.08.2016</u>	<u>WA – Withdrawal of \$40,807 at Osborne Park Branch</u>
<u>TOTAL</u>		<u>\$284,000 in cash deposits (\$278,500 at branches, \$5,500 at ATMs)</u> <u>\$67,822 in withdrawals</u>

SCHEDULE ABG

FEDERAL COURT OF AUSTRALIA
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DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD 1305 OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 93 – COMMBANK ACCOUNT 139

ITEM	DATE	TRANSACTION/S
1.	<u>23.08.2014</u>	<u>Vic – 1 Automatic Teller Machine (ATM) deposit of \$5,000 at Bentleigh B, 1 ATM deposit of \$4,000 at Chadstone Court A – total deposits of \$9,000</u>
2.	<u>30.08.2014</u>	<u>Vic – 4 ATM deposits (\$2,350, \$2,550, \$3,800, \$1,300) totalling \$10,000 at Bentleigh B</u>
3.	<u>13.09.2014</u>	<u>Vic – 2 ATM deposits (\$7,900, \$1,500) totalling \$9,400 at Bentleigh B</u>
4.	<u>12.05.2016</u>	<u>NSW – 1 cash deposit of \$8,393 at Burwood Branch, 1 cash deposit of \$9,607 at Smithfield Branch, 1 cash deposit of \$2,000 at Wentworthville Branch, 1 cash deposit of \$9,000 at Cabramatta Branch – total deposits of \$29,000</u>
5.	<u>13.05.2016</u>	<u>NSW – 1 cash deposit of \$1,000 at Casula Branch</u>
<u>TOTAL</u>		<u>\$58,400 in cash deposits (\$30,000 at branches, \$28,400 at ATMs)</u>

SCHEDULE ABH

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 94 – COMMBANK ACCOUNT 140

ITEM	DATE	TRANSACTION/S
1.	<u>17.09.2014– 22.01.2015</u>	<u>4 cash deposits at various branches totalling \$129,500</u>
2.	<u>20.05.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Merrylands Branch, 1 cash deposit of \$7,000 at Guildford Branch – total deposits of \$13,000</u>
3.	<u>21.05.2016</u>	<u>NSW – 1 cash deposit of \$7,000 at Centro Bankstown Branch</u>
4.	<u>16.08.2016</u>	<u>NSW – 3 cash deposits (\$9,100, \$8,800, \$2,000) totalling \$19,900 at Casula Branch</u>
5.	<u>18.08.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Pendle Hill Branch, 1 cash deposit of \$8,000 at Chester Hill Branch – total deposits of \$16,000</u>
6.	<u>19.08.2016</u>	<u>NSW – Cash deposit of \$8,000 at Liverpool Branch</u>
<u>TOTAL</u>		<u>\$193,400 in cash deposits</u>

SCHEDULE ABI

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 95 – COMMBANK ACCOUNT 141

ITEM	DATE	TRANSACTION/S
1.	<u>16.05.2016</u>	<u>NSW – 1 cash deposit of \$7,610 at Elz & Foveaux Sydney Branch, 1 cash deposit of \$2,390 at Broadway Branch – total deposits of \$10,000</u>
2.	<u>19.05.2016</u>	<u>NSW – 1 cash deposit of \$5,000 at Fairfield branch, 1 cash deposit of \$5,000 at Smithfield Branch – total deposits of \$10,000</u>
3.	<u>20.05.2016</u>	<u>NSW – 1 cash deposit of \$5,000 at Cabramatta Branch</u>
4.	<u>27.05.2016</u>	<u>NSW – 2 cash deposits (\$3,000, \$7,000) totalling \$10,000 at Smithfield Branch</u>
<u>TOTAL</u>		<u>\$35,000 in cash deposits</u>

SCHEDULE ABJ

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 96– COMMBANK ACCOUNT 142

ITEM	DATE	TRANSACTION/S
1.	<u>11.03.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Bonnyrigg Branch, 1 cash deposit of \$7,500 at Cabramatta Branch, 1 cash deposit of \$8,670 at Fairfield Branch, 1 cash deposit of \$7,500 at Wetherill Park Branch, 2 cash deposits (\$9,500, \$9,000) at Chester Hill Branch, 1 cash deposit of \$9,500 at Regents Park Branch – total deposits of \$60,670</u>
2.	<u>12.03.2016</u>	<u>NSW – Cash deposit of \$2,330 at Centro Bankstown Branch</u>
3.	<u>13.03.2016</u>	<u>Vic – 2 cash deposits (\$6,000, \$6,500) at Footscray Branch, 1 cash deposit of \$6,000 at Highpoint Branch, 1 cash deposit of \$6,500 at Sunshine Branch – total deposits of \$25,000</u>
4.	<u>28.04.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Smithfield Branch, 1 cash deposit of \$3,000 at Fairfield Heights Branch, 1 cash deposit of \$8,000 at Wetherill Park Branch – total deposits of \$20,000</u>
<u>TOTAL</u>		<u>\$108,000 in cash deposits</u>

SCHEDULE ABK

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 97 – COMMBANK ACCOUNT 143

ITEM	DATE	TRANSACTION/S
1.	<u>12.05.2016</u>	<u>NSW – 1 cash deposit of \$8,920 at Cabramatta Branch, 1 cash deposit of \$7,500 at Auburn Branch, 1 cash deposit of \$6,080 at Fairfield Heights Branch, 1 cash deposit of \$7,500 at Centro Bankstown Branch, 1 cash deposit of \$8,000 at Liverpool Branch, 1 cash deposit of \$7,000 at Wetherill Park Branch – total deposits of \$45,000</u>
2.	<u>13.05.2016</u>	<u>NSW – 1 cash deposit of \$8,275 at Bonnyrigg Branch, 1 cash deposit of \$6,705 at Westfield Parramatta Branch, 1 cash deposit of \$1,020 at Mascot Branch, 1 cash deposit of \$6,000 at Westfield Liverpool Branch, 1 cash deposit of \$8,000 at Fairfield Branch – total deposits of \$30,000</u>
<u>TOTAL</u>		<u>\$75,000 in cash deposits</u>

SCHEDULE ABL

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TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – MONEY MULE 2 – COMMBANK ACCOUNT 144

ITEM	DATE	TRANSACTION/S
1.	<u>21.03.2013</u>	<u>NSW – Cash deposit of \$9,000 at Mount Druitt Branch</u>
2.	<u>22.03.2013</u>	<u>NSW – Automatic Teller Machine (ATM) deposit of \$9,100 at Bankstown D</u>
3.	<u>26.03.2013</u>	<u>NSW – Cash deposit of \$9,000 at Mount Druitt Branch</u>
4.	<u>28.03.2013</u>	<u>NSW – ATM deposit of \$9,000 at Bankstown D</u>
5.	<u>02.04.2013</u>	<u>NSW – 2 cash deposits (\$8,500, \$16,450) totalling \$24,950 at Penrith Branch</u>
6.	<u>05.04.2013</u>	<u>NSW – Cash deposit of \$5,370 at Bankstown Branch</u>
7.	<u>22.05.2015–</u> <u>26.05.2015</u>	<u>3 cash deposits at various branches totalling \$20,100</u>
8.	<u>25.05.2015</u>	<u>NSW – Cash deposit of \$7,000 at Bankstown Branch</u>
9.	<u>26.05.2015</u>	<u>NSW – 1 cash deposit of \$2,500 at Ingleburn Branch, 1 cash deposit of \$7,000 at Revesby Branch, 1 cash deposit of \$7,000 at Centro Bankstown Branch, 1 cash deposit of \$7,600 at Bankstown Branch – total deposits of \$24,100</u>
10.	<u>10.02.2016</u>	<u>NSW – 1 ATM deposit of \$6,850 at Bankstown D, 1 ATM deposit of \$1,100 at Bankstown D – total deposits of \$7,950</u>
11.	<u>15.02.2016</u>	<u>NSW – ATM deposit of \$5,000 at Bankstown D</u>
12.	<u>18.02.2016</u>	<u>NSW – ATM deposit of \$3,000 at Chatswood B</u>
13.	<u>01.07.2016</u>	<u>NSW – ATM deposit of \$9,000 at Bankstown D</u>
<u>TOTAL</u>		<u>\$142,570 in cash deposits (\$99,520 at branches, \$43,050 at ATMs)</u>

SCHEDULE ABM

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 98 – COMMBANK ACCOUNT 145

ITEM	DATE	TRANSACTION/S
1.	<u>14.03.2013</u>	<u>NSW – 1 cash deposit of \$9,500 at Condell Park Branch, 1 cash deposit of \$9,000 at Regents Park Branch – total deposits of \$18,500</u>
2.	<u>09.05.2013</u>	<u>NSW – 1 cash deposit of \$9,000 at George and Market Street Sydney Branch, 1 cash deposit of \$9,900 at St James Branch – total deposits of \$18,900</u>
3.	<u>29.07.2014</u>	<u>Vic – 2 cash deposits (\$8,000, \$8,000) at Latrobe St Branch, 2 cash deposits (\$7,000, \$7,000) at 385 Bourke St Branch – total deposits of \$30,000</u>
4.	<u>02.08.2014</u>	<u>Vic – Cash deposit of \$4,500 at Brimbank Central Branch</u>
5.	<u>04.08.2014</u>	<u>Vic – 2 cash deposits (\$6,500, \$3,500) at Sunshine Branch, 1 cash deposit of \$6,500 at Highpoint Branch – total deposits of \$16,500</u>
6.	<u>27.05.2015</u>	<u>NSW – 1 cash deposit of \$9,500 at Menai M'Place Branch, 1 cash deposit of \$9,500 at Miranda Branch – total deposits of \$19,000</u>
7.	<u>27.02.2016</u>	<u>NSW – Cash deposit of \$9,000 at Broadmeadows Branch</u>
8.	<u>05.05.2016</u>	<u>NSW – Cash deposit of \$4,000 at Cabramatta Branch</u>
9.	<u>13.05.2016</u>	<u>NSW – Cash deposit of 6,000 at Flemington Markets Branch</u>
<u>TOTAL</u>		<u>\$126,400 in cash deposits</u>

SCHEDULE ABN

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

**SUMMARY OF RELEVANT TRANSACTIONS – PERSON 99 AND PERSON 100 –
COMMBANK ACCOUNT 147**

ITEM	DATE	TRANSACTION/S
1.	<u>22.06.2016 – 30.06.2016</u>	<u>\$416,565 in incoming funds via a small number of large Electronic Funds Transfers (EFT) (majority of funds transferred back out via EFT in same period)</u>
2.	<u>08.07.2016</u>	<u>ACT – Cash deposit of \$200,000 at Uni of Canberra Branch</u>
3.	<u>27.07.2016</u>	<u>Incoming EFT of \$120,000</u>
4.	<u>05.08.2016</u>	<u>6 incoming EFTs (\$90,000 x 6) totalling \$540,000</u>
5.	<u>05.08.2016</u>	<u>ACT – 7 withdrawals (\$547, 547.95, \$1,105, 361.07, \$1,046.28, \$715,235.85, \$26,430) totalling \$745,273.15 at Uni of Canberra Branch</u>
6.	<u>03.11.2016</u>	<u>NSW – 1 cash deposit of \$3,000 at Fairfield Heights Branch. 1 cash deposit of \$6,000 at Merrylands Branch. 1 cash deposit of \$9,500 at Chester Hill Branch. 1 cash deposit of \$6,500 at Auburn Branch – total deposits of \$25,000</u>
7.	<u>15.11.2016</u>	<u>NSW –1 Automatic Teller Machine (ATM) deposit of \$7,500 at Chester Hill C. 1 ATM deposit of \$7,500 at Guildford A – total deposits of \$15,000</u>
<u>TOTAL</u>		<u>\$240,000 in cash deposits (\$225,000 at branches, \$15,000 at ATMs) \$1,076,565 in incoming EFTs</u>

SCHEDULE ABO

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

**SUMMARY OF RELEVANT TRANSACTIONS – PERSON 101 AND MONEY MULE 2 –
COMMBANK ACCOUNT 148**

ITEM	DATE	TRANSACTION/S
1.	<u>20.03.2015</u>	<u>Vic – 2 Automatic Teller Machine (ATM) deposits (\$5,000, \$5,000) totalling \$10,000 at Sunshine A</u>
<u>TOTAL</u>		<u>\$10,000 in cash deposits</u>

SCHEDULE ABP

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – COMPANY 21 – COMMBANK ACCOUNT 149

ITEM	DATE	TRANSACTION/S
1.	<u>03.06.2015</u>	<u>NSW & Vic – 1 cash deposit of \$9,000 at Watergardens Branch, 1 cash deposit of \$6,621 at Keilor Downs Branch, 1 cash deposit of \$9,000 at Chadstone Centre Branch, 1 cash deposit of \$9,000 at Western Melbourne Branch – total deposits of \$33,621</u>
2.	<u>04.06.2015</u>	<u>Vic – Cash deposit of \$9,000 at Western Melbourne Branch</u>
3.	<u>28.06.2016</u>	<u>NSW – 1 Automatic Teller Machine (ATM) deposit of \$7,722 at Rockdale B, 1 ATM deposit of \$10,000 at Kogarah A, 3 ATM deposits (\$9,900, \$10,000, \$100) at Mascot A – total deposits of \$37,322</u>
4.	<u>09.11.2016</u>	<u>NSW – 1 cash deposit of \$7,000 at Rockdale Branch, 1 cash deposit of \$7,000 at Mascot Branch, 1 cash deposit of \$4,985 at Pagewood Branch – total deposits of \$18,985</u>
5.	<u>19.04.2017</u>	<u>NSW – 1 ATM deposit of \$6,000 at Morley C</u>
6.	<u>19.04.2017</u>	<u>NSW & WA – 1 cash deposit of \$6,000 at Morley Branch, 1 cash deposit of \$6,000 at Dianella Branch – total deposits of \$12,000</u>
<u>TOTAL</u>		<u>\$117,328 in cash deposits (\$73,606 at branches, \$43,722 at ATMs)</u>

SCHEDULE ABQ

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 102 – COMMBANK ACCOUNT 150

ITEM	DATE	TRANSACTION/S
1.	<u>17.02.2014</u>	<u>Vic – Automatic Teller Machine (ATM) deposit of \$5,000 at Eastern Melbourne A</u>
2.	<u>17.02.2014</u>	<u>Vic – Cash deposit of \$5,000 at Flinders & Elizabeth St Branch</u>
3.	<u>21.07.2014</u>	<u>Vic – Cash deposit of \$5,000 at Box Hill Branch</u>
4.	<u>22.07.2014</u>	<u>Vic – Cash deposit of \$5,000 at Watergardens Branch</u>
5.	<u>06.03.2015</u>	<u>NSW – 1 cash deposit of \$9,400 at Auburn Branch. 1 cash deposit of \$1,100 at Westfield Parramatta Branch. 1 cash deposit of \$9,500 at Parramatta Branch – total deposits of \$20,000</u>
6.	<u>12.01.2016</u>	<u>NSW – Cash deposit of \$8,000 at Blacktown Branch</u>
7.	<u>13.07.2016</u>	<u>NSW – Cash deposit of \$6,500 at Blacktown Branch</u>
8.	<u>20.12.2016</u>	<u>Tas – ATM deposit of \$10,000 at 81 Elizabeth A</u>
9.	<u>31.12.2016</u>	<u>Tas – 3 ATM deposits (\$1,000, \$5,100, \$2,500) totalling \$8,600 at 81 Elizabeth A</u>
10.	<u>16.01.2017</u>	<u>NSW – Cash deposit of \$5,000 at Fairfield Branch</u>
11.	<u>06.04.2017</u>	<u>NSW – Cash deposit of \$6,000 at Town Hall Branch</u>
<u>TOTAL</u>		<u>\$84,100 in cash deposits (\$60,500 at branches, \$23,600 at ATMs)</u>

SCHEDULE ABR

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD 1305 OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 103 – COMMBANK ACCOUNT 151

ITEM	DATE	TRANSACTION/S
1.	<u>12.06.2014</u>	<u>Cash deposit of \$10,000 at Branch 06 7900</u>
2.	<u>28.10.2014</u>	<u>Vic – 1 cash deposit of \$3,000 at William St Branch, 1 cash deposit of \$7,000 at RMIT Branch – total deposits of \$10,000</u>
3.	<u>06.11.2014</u>	<u>NSW – 1 cash deposit of \$6,050 at Cabramatta Branch, 1 cash deposit of \$3,950 at Bankstown Branch – total deposits of \$10,000</u>
4.	<u>27.04.2015</u>	<u>NSW – Cash deposit of \$8,050 at Flemington Markets Branch</u>
5.	<u>11.05.2015</u>	<u>NSW – 1 cash deposit of \$9,000 at Canley Heights Branch, 2 cash deposits (\$9,000, \$9,000) at Fairfield Branch, 1 cash deposit of \$8,850 at Chester Hill Branch – total deposits of \$35,850</u>
6.	<u>12.05.2015</u>	<u>Vic – Automatic Teller Machine (ATM) deposit of \$4,000 at Sunshine A</u>
7.	<u>16.07.2015</u>	<u>NSW – 1 cash deposit of \$9,700 at Canley Heights Branch, 1 cash deposit of \$3,800 at Chester Hill Branch – total deposits of \$13,500</u>
8.	<u>19.07.2015</u>	<u>NSW – 1 cash deposit of \$7,550 at Campbelltown Branch, 1 cash deposit of \$7,450 at Penrith Plaza Branch – total deposits of \$15,000</u>
9.	<u>20.07.2015</u>	<u>NSW – Cash deposit of \$3,000 at Sunshine Branch</u>
10.	<u>23.05.2016</u>	<u>NSW – 1 cash deposit of \$7,200 at Earlwood Branch, 1 cash deposit of \$7,100 at Rockdale Branch, 1 cash deposit of \$2,700 at Kogarah Branch – total deposits of \$17,000</u>
<u>TOTAL</u>		<u>\$126,400 in cash deposits (\$122,400 at branches, \$4,000 at an ATM)</u>

SCHEDULE ABS

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 104 – COMMBANK ACCOUNT 152

ITEM	DATE	TRANSACTION/S
1.	<u>14.02.2012</u>	<u>NSW – Cash deposit of \$1,100 at Macquarie Centre Branch</u>
2.	<u>16.02.2012</u>	<u>NSW – 1 cash deposit of \$7,000 at Wetherill Park Branch, 1 cash deposit of \$5,800 at Bonnyrigg Branch – total deposits of \$12,800</u>
3.	<u>26.07.2012</u>	<u>NSW – 2 cash deposits (\$9,000, \$3,100) totalling \$12,100 at Cabramatta Branch</u>
4.	<u>08.03.2013</u>	<u>NSW – 1 cash deposit of \$7,300 at Belmore Branch, 1 cash deposit of \$8,000 at Campsie Branch – total deposits of \$15,300</u>
5.	<u>29.07.2013</u>	<u>NSW – 1 cash deposit of \$7,000 at Ermington Branch, 1 cash deposit of \$7,000 at Dulwich Hill Branch – total deposits of \$14,000</u>
6.	<u>18.02.2014</u>	<u>VIC – 1 cash deposit of \$8,000 at Richmond Branch, 2 cash deposits (\$4,500, \$3,000) at Richmond South Branch – total deposits of \$15,500</u>
7.	<u>15.08.2014</u>	<u>NSW – 1 cash deposit of \$9,000 at Canley Heights Branch, 1 cash deposit of \$1,200 at Roselands Branch – total deposits of \$10,200</u>
<u>TOTAL</u>		<u>\$81,000 in cash deposits</u>

SCHEDULE ABT

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD 1305 OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 105 – COMMBANK ACCOUNT 153

ITEM	DATE	TRANSACTION/S
1.	<u>14.11.2013</u>	<u>NSW – 1 cash deposit of \$7,000 at Haymarket Branch, 1 cash deposit of \$6,000 at St James Branch, 1 cash deposit of \$7,000 at Wynyard Branch – total deposits of \$20,000</u>
2.	<u>17.03.2015</u>	<u>NSW – 1 cash deposit of \$4,000 at Miranda Branch, 1 cash deposit of \$6,000 at Caringbah Branch – total deposits of \$10,000</u>
3.	<u>18.03.2015</u>	<u>NSW – Cash deposit of \$7,072 at Lakemba Branch</u>
4.	<u>28.05.2015</u>	<u>Vic – 3 cash deposits (\$8,000, \$6,000, \$6,000) totalling \$20,000 at Richmond North Branch</u>
5.	<u>11.06.2015</u>	<u>NSW – 1 cash deposit of \$7,000 at Auburn Branch, 1 cash deposit of \$8,000 at Bankstown Centro Branch – total deposits of \$15,000</u>
6.	<u>23.09.2015</u>	<u>Vic – 1 cash deposit of \$5,000 at St Albans Branch, 1 cash deposit of \$5,000 at Brimbank Central Branch – total deposits of \$10,000</u>
7.	<u>21.07.2016</u>	<u>NSW – 1 cash deposit of \$5,000 at Ashfield Branch, 1 cash deposit of \$5,000 at Burwood Branch – total deposits of \$10,000</u>
8.	<u>14.12.2016</u>	<u>Vic – Automatic Teller Machine (ATM) deposit of \$10,000 at Monash Uni B</u>
9.	<u>31.03.2017</u>	<u>NSW – 1 cash deposit of \$8,000 at Kogarah Branch, 1 cash deposit of \$7,000 at Rockdale Branch – total deposits of \$15,000</u>
<u>TOTAL</u>		<u>\$117,072 in cash deposits (\$107,072 at branches, \$10,000 at an ATM)</u>

SCHEDULE ABU

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 106 – COMMBANK ACCOUNT 154

ITEM	DATE	TRANSACTION/S
1.	<u>20.07.2015</u>	<u>NSW – 1 cash deposit of \$7,500 at Condell Park branch, 1 cash deposit of \$7,500 at Roselands Branch – total deposits of \$15,000</u>
2.	<u>14.03.2016</u>	<u>NSW –Automatic Teller Machine (ATM) deposit of \$3,800 at Campsie B</u>
3.	<u>14.03.2016</u>	<u>NSW – ATM deposit of \$10,000 at Campsie B</u>
4.	<u>29.07.2016</u>	<u>NSW – 2 cash deposits (\$6,000 x 2) totalling \$12,000 at Bankstown Branch</u>
<u>TOTAL</u>		<u>\$40,800 in cash deposits (\$27,000 at branches, \$13,800 at ATMs)</u>

SCHEDULE ABV

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

**SUMMARY OF RELEVANT TRANSACTIONS – PERSON 107 AND PERSON 108 –
COMMBANK ACCOUNT 155**

ITEM	DATE	TRANSACTION/S
1.	<u>19.04.2016</u>	<u>NSW – 1 cash deposit of \$4,950 at Belmore Branch, 1 cash deposit of \$4,000 at Branch 06 3027 – total deposits of \$8,950</u>
2.	<u>20.04.2016</u>	<u>NSW – Cash deposit of \$4,950 at Kingsgrove Branch</u>
3.	<u>29.04.2016</u>	<u>NSW – Cash deposit of \$5,000 at Kingsgrove Branch</u>
4.	<u>04.05.2017</u>	<u>QLD – Automatic Teller Machine (ATM) deposit of \$1,500 at Sunnybank C</u>
5.	<u>11.05.2017</u>	<u>Vic – Cash deposit of \$9,750 at Sunshine Branch</u>
<u>TOTAL</u>		<u>\$30,150 in cash deposits (\$28,650 at branches, \$1,500 at an ATM)</u>

SCHEDULE ABW

**FEDERAL COURT OF AUSTRALIA
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**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 109 – COMMBANK ACCOUNT 156

ITEM	DATE	TRANSACTION/S
1.	<u>11.12.2015</u>	<u>NSW – 1 cash deposit of \$7,000 at Ashfield Branch, 1 cash deposit of \$7,000 at Summer Hill Branch, 1 cash deposit of \$6,500 at Petersham Branch – total deposits of \$20,500</u>
2.	<u>29.12.2015</u>	<u>NSW – 1 cash deposit of \$9,000 at Cabramatta Branch, 1 cash deposit of \$8,000 at Smithfield Branch, 1 cash deposit of \$9,000 at Auburn Branch – total deposits of \$26,000</u>
3.	<u>10.09.2016</u>	<u>NSW – 3 cash deposits (\$8,500, \$8,400, \$8,100) totalling \$25,000 at Penrith Plaza Branch</u>
<u>TOTAL</u>		<u>\$71,500 in cash deposits</u>

SCHEDULE ABX

**FEDERAL COURT OF AUSTRALIA
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DIVISION: COMMERCIAL AND CORPORATIONS**

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**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 110 – COMMBANK ACCOUNT 157

ITEM	DATE	TRANSACTION/S
1.	<u>03.01.2015</u>	<u>SA – 1 cash deposit of \$5,000 at Mitcham Branch, 1 cash deposit of \$5,000 at Castle Plaza Branch, 1 cash deposit of \$5000 at Park Holme Branch – total deposits of \$15,000</u>
2.	<u>21.10.2015</u>	<u>Vic – 1 cash deposit of \$5,000 at 385 Bourke Branch, 1 cash deposit of \$5,000 at Flinders & Elizabeth Branch – total deposits of \$10,000</u>
3.	<u>03.03.2016</u>	<u>Vic – 2 cash deposits (\$7,500, \$2,500) totalling \$10,000 at Central West Plaza Branch</u>
4.	<u>10.06.2016</u>	<u>NSW – 1 cash deposit of \$1,000 at Fairfield Branch, 1 cash deposit of \$9,000 at Wetherill Park Branch – total deposits of \$10,000</u>
5.	<u>18.07.2016</u>	<u>NSW – 2 cash deposits (\$1,000, \$9,000) totalling \$10,000 at Wetherill Park Branch</u>
6.	<u>22.07.2016</u>	<u>NSW – Cash deposit of \$5,000 at Roselands Branch</u>
7.	<u>22.07.2016</u>	<u>NSW – Automatic Teller Machine (ATM) deposit of \$5,000 at Campsie A</u>
8.	<u>07.09.2016</u>	<u>Vic – Cash deposit of \$10,000 at Airport West Branch</u>
<u>TOTAL</u>		<u>\$75,000 in cash deposits (\$70,000 at branches, \$5,000 at an ATM)</u>

SCHEDULE ABY

**FEDERAL COURT OF AUSTRALIA
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**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 111 – COMMBANK ACCOUNT 158

ITEM	DATE	TRANSACTION/S
1.	<u>25.07.2016</u>	<u>NSW – Cash deposit of \$5,000 at Bankstown Branch</u>
2.	<u>26.07.2016</u>	<u>NSW – Cash deposit of \$7,500 at Burwood Branch</u>
3.	<u>09.08.2016</u>	<u>NSW – 1 cash deposit of \$7,100 at Burwood Branch. 1 cash deposit of \$7,100 at Ashfield Branch – total deposits of \$14,200</u>
4.	<u>07.03.2017</u>	<u>NSW – Cash deposit of \$8,000 at Westfield Eastgardens Branch</u>
5.	<u>08.03.2017</u>	<u>NSW – Cash deposit of \$7,500 at Ramsgate Branch</u>
<u>TOTAL</u>		<u>\$42,200 in cash deposits</u>

SCHEDULE ABZ

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 112 – COMMBANK ACCOUNT 159

ITEM	DATE	TRANSACTION/S
1.	<u>23.01.2015</u>	<u>NSW – 1 cash deposit of \$5,000 at Chester Hill Branch, 1 cash deposit of \$5,344 at Centro Bankstown Branch – total deposits of \$10,344</u>
2.	<u>25.06.2015</u>	<u>NSW – Cash deposit of \$2,963 at Chinatown Branch</u>
3.	<u>26.06.2015</u>	<u>NSW – 1 cash deposit of \$9,435 at Cabramatta Branch, 1 cash deposit of \$9,500 at St Marys Branch – total deposits of \$18,935</u>
4.	<u>05.02.2016</u>	<u>Vic – Cash deposit of \$2,000 at Highpoint Branch</u>
5.	<u>08.02.2016</u>	<u>Vic – 2 cash deposits (\$2,000, \$1,000) totalling \$3,000 at Central West Plaza Branch</u>
6.	<u>15.02.2016</u>	<u>Vic – 2 cash deposits (\$9,000, \$3,000) totalling \$12,000 at Sunshine Branch</u>
7.	<u>25.07.2016</u>	<u>NSW – Automatic Teller Machine (ATM) deposit of \$9,000 at Bankstown D</u>
8.	<u>26.07.2016</u>	<u>NSW – Cash deposit of \$9,560 at Lakemba Branch</u>
9.	<u>24.02.2017</u>	<u>NSW – 2 cash deposits (\$7,000, \$8,000) totalling \$15,000 at Burwood Branch</u>
10.	<u>27.02.2017</u>	<u>NSW – Cash deposit of \$7,766 at Strathfield Branch</u>
<u>TOTAL</u>		<u>\$90,568 in cash deposits (\$81,568 at branches, \$9,000 at an ATM)</u>

SCHEDULE ACA

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 113 – COMMBANK ACCOUNT 160

ITEM	DATE	TRANSACTION/S
1.	<u>30.03.2015</u>	<u>NSW – Cash deposit of \$5,000 at Fairfield Heights Branch</u>
2.	<u>01.04.2015</u>	<u>Vic – Cash deposit of \$9,000 at Highpoint Branch</u>
3.	<u>02.04.2015</u>	<u>Vic – Cash deposit of \$8,000 at Footscray Branch</u>
4.	<u>07.04.2015</u>	<u>Vic – Cash deposit of \$8,000 at 385 Bourke Branch</u>
5.	<u>01.06.2015</u>	<u>Vic – 1 cash deposit of \$8,000 at Keilor Downs Branch, 2 cash deposits (\$6,000, \$6,000) totalling \$12,000 at Sunshine Branch – total deposits of \$20,000</u>
6.	<u>17.07.2015</u>	<u>NSW – 1 cash deposit of \$7,500 at Lakemba Branch, 1 cash deposit of \$7,500 at Belmore Branch – total deposits of \$15,000</u>
7.	<u>18.07.2015</u>	<u>NSW – Cash deposit of \$7,000 at Wpnt Blacktown Branch</u>
8.	<u>19.07.2015</u>	<u>NSW – Cash deposit of \$8,000 at Penrith Plaza Branch</u>
9.	<u>18.05.2016</u>	<u>NSW – 1 cash deposit of \$6,900 at Pagewood Branch, 1 cash deposit of \$6,100 at Maroubra Junction Branch, 1 cash deposit of \$7,000 at Roselands Branch – total deposits of \$20,000</u>
10.	<u>19.05.2016</u>	<u>NSW – 1 cash deposit of \$7,300 at Mascot Branch, 1 cash deposit of \$6,900 at Pagewood Branch, 1 cash deposit of \$4,500 at Kingsford Branch, 1 cash deposit of \$6,800 at Earlwood Branch, 1 cash deposit of \$4,500 at Haymarket Branch – total deposits of \$30,000</u>
11.	<u>27.06.2016</u>	<u>Vic – Automatic Teller Machine (ATM) deposit of \$7,000 at Mount Hawthorn branch</u>
12.	<u>29.06.2016</u>	<u>NSW – 1 ATM deposit of \$10,000 at Rockdale Plaza A, 2 ATM deposit (\$9,950, \$10,000) totalling \$19,500 at Kogarah A – total deposits of \$29,950</u>
13.	<u>30.06.2016</u>	<u>NSW – 1 cash deposit of \$7,500 at Kingsgrove branch, 1 cash deposit of \$5,050 at Belmore branch, 1 cash deposit of \$7,500 at Lakemba branch – total deposits of \$20,050</u>

ITEM	DATE	TRANSACTION/S
14.	<u>04.07.2016</u>	<u>NSW – 1 cash deposit of \$6,000 at Westfield Hurstville branch, 1 cash deposit of \$6,100 at Kogarah branch, 1 cash deposit of \$4,700 at Kingsgrove branch, 1 cash deposit of \$6,200 at Belmore branch – total deposits of \$23,000</u>
15.	<u>26.07.2016</u>	<u>NSW – 1 cash deposit of \$9,000 at Engadine branch, 1 cash deposit of \$7,000 at Burwood branch, 1 cash deposit of \$8,000 at 116 Burwood Road branch, 1 cash deposit of \$8,000 at Strathfield branch, 1 cash deposit of \$8,000 at Belmore branch – total deposits of \$40,000</u>
16.	<u>26.07.2016</u>	<u>NSW – 1 ATM deposit of \$10,000 at Bankstown D, 1 ATM deposit of \$10,000 at Bankstown CT A, 1 ATM deposit of \$10,000 at Campsie A, 1 ATM deposit of \$10,000 at Marrickville A, 1 ATM deposit of \$10,000 at Haymarket B, 1 ATM deposit of \$6,000 at Town Hall A – total deposits of \$56,000</u>
17.	<u>09.08.2016</u>	<u>4 incoming Electronic Funds Transfers (EFTs) from 3 different CommBank accounts totalling \$360,000</u>
<u>TOTAL</u>		\$306,000 in cash deposits (\$243,000 at branches, \$63,000 at ATMs) \$360,000 in incoming EFTs

SCHEDULE ACB

FEDERAL COURT OF AUSTRALIA
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NO NSD 1305 OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 114 – COMMBANK ACCOUNT 161

ITEM	DATE	TRANSACTION/S
1.	<u>09.12.2014</u>	<u>NSW – 1 cash deposit of \$9,500 at Moorebank branch, 1 cash deposit of \$500 at Revesby branch – total deposits of \$10,000</u>
2.	<u>16.03.2016</u>	<u>NSW – 2 cash deposits (\$6,000, \$6,500) totalling \$12,500 at Rockdale branch</u>
3.	<u>27.07.2016</u>	<u>NSW – 1 Automatic Teller Machine (ATM) deposit of \$10,000 at Bankstown CT A, 1 ATM deposit of \$10,000 at Bankstown D, 1 ATM deposit of \$10,000 at Bankstown D – total deposits of \$30,000</u>
<u>TOTAL</u>		<u>\$52,500 in cash deposits (\$22,500 at branches, \$30,000 at ATMs)</u>

SCHEDULE ACC

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 115 – COMMBANK ACCOUNT 162

ITEM	DATE	TRANSACTION/S
1.	<u>22.10.2015</u>	<u>NSW – 1 cash deposit of \$5,000 at Burwood Branch, 1 cash deposit of \$5,000 at 116 Burwood Rd Branch – total deposits of \$10,000</u>
2.	<u>23.10.2015</u>	<u>NSW – 1 cash deposit of \$5,000 at Burwood Branch, 1 cash deposit of \$5,000 at 116 Burwood Rd Branch – total deposits of \$10,000</u>
3.	<u>25.06.2016</u>	<u>NSW – 1 Automatic Teller Machine (ATM) deposit of \$4,800 at Eastgardens B, 1 ATM deposit of \$5,200 at Eastgardens A – total deposits of \$10,000</u>
4.	<u>27.06.2015</u>	<u>NSW – Cash deposit of \$5,000 at Belmore Branch</u>
5.	<u>29.06.2016</u>	<u>NSW & Vic – 1 cash deposit of \$5,000 at Rockdale Branch, 1 cash deposit of \$6,000 at Sunshine Branch, 1 cash deposit of \$9,000 at Highpoint Branch – total deposits of \$20,000</u>
6.	<u>29.06.2016</u>	<u>Vic – ATM deposit of \$5,000 at Highpoint A</u>
7.	<u>29.06.2016</u>	<u>NSW – ATM deposit of \$10,000 at Rockdale Plaza A</u>
8.	<u>10.08.2016</u>	<u>NSW – 1 cash deposit of \$6,500 at Rockdale Branch, 1 cash deposit of \$6,500 at Mascot Branch, 1 cash deposit of \$7,000 at Pagewood Branch – total deposits of \$20,000</u>
9.	<u>12.08.2016</u>	<u>NSW – 1 cash deposit of \$7,000 at Dulwich Hill Branch, 1 cash deposit of \$6,700 at Newtown Branch, 1 cash deposit of \$6,300 at Broadway Branch – total deposits of \$20,000</u>
10.	<u>19.10.2016</u>	<u>NSW – 2 ATM deposits (\$5,950, \$19,900) totalling \$25,850 at Walker St B</u>
<u>TOTAL</u>		<u>\$135,850 in cash deposits (\$85,000 at branches, \$50,850 at ATMs)</u>

SCHEDULE ACD

FEDERAL COURT OF AUSTRALIA
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DIVISION: COMMERCIAL AND CORPORATIONS

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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 116 – COMMBANK ACCOUNT 163

ITEM	DATE	TRANSACTION/S
1.	<u>27.09.2013</u>	<u>NSW – 2 cash deposits (\$5,000, \$5,000) totalling \$10,000 at Belmore Branch</u>
2.	<u>28.03.2014</u>	<u>NSW – 1 cash deposit of \$9,000 at Canley Heights Branch, 1 cash deposit of \$1,000 at Cabramatta Branch – total deposits of \$10,000</u>
3.	<u>17.07.2014</u>	<u>NSW – 2 cash deposits (\$5,000, \$6,000) totalling \$11,000 at Cabramatta Branch</u>
4.	<u>04.03.2015</u>	<u>NSW – Cash deposit of \$6,000 at Bankstown Branch</u>
5.	<u>05.03.2015</u>	<u>NSW – Cash deposit of \$9,000 at Cabramatta Branch</u>
6.	<u>21.07.2015</u>	<u>NSW – 1 cash deposit of \$1,000 at Canley Heights Branch, 1 cash deposit of \$9,000 at Strathfield Branch</u>
7.	<u>03.08.2016</u>	<u>NSW – Cash deposit of \$5,000 at Earlwood Branch</u>
8.	<u>03.08.2016</u>	<u>NSW – Automatic Teller Machine (ATM) deposit of \$5,000 at Campsie A</u>
9.	<u>20.04.2017</u>	<u>NSW – 2 cash deposits (\$9,000, \$9,000) totalling \$18,000 at Bankstown Branch</u>
10.	<u>21.04.2017</u>	<u>NSW – 1 cash deposit of \$3,000 at Bankstown Branch, 1 cash deposit of \$10,000 at Brimbank Branch</u>
<u>TOTAL</u>		<u>\$97,000 in cash deposits (\$92,000 at branches, \$5,000 at an ATM)</u>

SCHEDULE ACE

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 117 – COMMBANK ACCOUNT 164

ITEM	DATE	TRANSACTION/S
1.	<u>06.02.2014</u>	<u>NSW – 1 cash deposit of \$8,000 at Bankstown Branch, 1 cash deposit of \$5,000 at Cabramatta Branch – total deposits of \$13,000</u>
2.	<u>07.02.2014</u>	<u>Vic – Cash deposit of \$9,000 at Brimbank Central Branch</u>
3.	<u>12.02.2014</u>	<u>NSW – Cash deposit of \$7,500 at Bankstown Branch</u>
4.	<u>17.02.2014</u>	<u>NSW – Cash deposit of \$8,000 at Bankstown Branch</u>
5.	<u>28.01.2015</u>	<u>Vic – Cash deposit of \$10,000 at St Albans Branch</u>
6.	<u>05.02.2015</u>	<u>Vic – Automatic Teller Machine (ATM) deposit of \$9,500 at 385 Bourke B</u>
7.	<u>11.03.2015</u>	<u>Vic – ATM deposit of \$5,000 at 385 Bourke A</u>
8.	<u>12.03.2015</u>	<u>Vic – ATM deposit of \$10,000 at Bourke B</u>
9.	<u>23.03.2015</u>	<u>Vic – ATM deposit of \$10,000 at Bourke B</u>
10.	<u>11.04.2015</u>	<u>Vic – ATM deposit of \$8,000 at Wyndham VLG A</u>
11.	<u>18.04.2015</u>	<u>Vic – ATM deposit of \$5,950 at Wyndham VLG A</u>
12.	<u>06.06.2015</u>	<u>Vic – ATM deposit of \$10,000 at Werribee A</u>
13.	<u>10.01.2016</u>	<u>Vic – ATM deposit of \$5,000 at Point Cook A</u>
14.	<u>13.01.2016</u>	<u>Vic – ATM deposit of \$7,000 at 385 Bourke A</u>
15.	<u>16.01.2016</u>	<u>Vic – ATM deposit of \$7,000 at Werribee C</u>
16.	<u>14.11.2016</u>	<u>Vic – ATM deposit of \$9,000 at 325 Collins B</u>
17.	<u>29.12.2016</u>	<u>NSW – 2 cash deposits (\$7,000, \$8,000) totalling \$15,000 at Fairfield Branch</u>
18.	<u>25.02.2017</u>	<u>Vic – ATM deposit of \$9,000 at Wyndham VLG A</u>
19.	<u>03.03.2017</u>	<u>Vic – ATM deposit of \$9,000 at Werribee Branch</u>

ITEM	DATE	TRANSACTION/S
<u>TOTAL</u>		<u>\$179,950 in cash deposits (\$60,500 at branches, \$119,540 at ATMs)</u>

SCHEDULE ACF

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD 1305 OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 118 – COMMBANK ACCOUNT 165

ITEM	DATE	TRANSACTION/S
1.	<u>15.11.2015</u>	<u>WA – Automatic Teller Machine (ATM) deposit of \$2,350 at Girrawheen A</u>
2.	<u>21.11.2015</u>	<u>WA – ATM deposit of \$7,750 at Girrawheen A</u>
3.	<u>01.01.2016</u>	<u>WA – ATM deposit of \$1,700 at Girrawheen A</u>
4.	<u>21.03.2016</u>	<u>WA – Cash deposit of \$10,000 at Booragoon Branch</u>
5.	<u>10.04.2016</u>	<u>WA – 1 ATM deposit of \$10,000 at Girrawheen A, 1 ATM deposit of \$7,000 at Girrawheen A – total deposits of \$17,000</u>
6.	<u>22.07.2016</u>	<u>NSW – 1 cash deposit of \$4,000 at Engadine Branch, 1 cash deposit of \$5,000 at Belmore Branch, 1 cash deposit of \$5,000 at Revesby Branch, 1 cash deposit of \$6,000 at Bankstown Branch – total deposits of \$20,000</u>
7.	<u>25.07.2016</u>	<u>Vic – 2 cash deposits (\$6,000, \$7,000) totalling \$10,000 at Brimbank Central Branch</u>
8.	<u>26.07.2016</u>	<u>Vic – Cash deposit of \$7,000 at Brimbank Central Branch</u> <u>WA – Cash deposit of \$3,000 at Booragoon Branch</u>
9.	<u>27.07.2016</u>	<u>Vic – 1 cash deposit of \$8,000 at Sunshine Branch, 1 cash deposit of \$7,000 at Brimbank Central Branch – total deposits of \$15,000</u>
10.	<u>01.08.2016</u>	<u>WA – 2 ATM deposits (\$2,900, \$1,000) totalling \$3,900 at Girrawheen A</u>
11.	<u>06.09.2016</u>	<u>WA – Cash deposit of \$9,000 at Booragoon Branch</u>
<u>TOTAL</u>		<u>\$109,700 in cash deposits (\$77,000 at branches, \$32,700 at ATMs)</u>

SCHEDULE ACG

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 119 – COMMBANK ACCOUNT 166

ITEM	DATE	TRANSACTION/S
1.	<u>13.07.2015</u>	<u>NSW – 1 cash deposit of \$7,000 at Strathfield branch, 1 cash deposit of \$7,000 at Burwood branch, 1 cash deposit of \$6,000 at Ashfield branch – total deposits of \$20,000</u>
2.	<u>26.07.2016</u>	<u>NSW – 1 cash deposit of \$5,000 at 116 Burwood Rd branch, 1 cash deposit of \$5,000 at Strathfield branch – total deposits of \$10,000</u>
<u>TOTAL</u>		<u>\$30,000 in cash deposits</u>

SCHEDULE ACH

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 120 – COMMBANK ACCOUNT 167

ITEM	DATE	TRANSACTION/S
1.	<u>08.07.2014</u>	<u>NSW – 1 cash deposit of \$5,000 at Fairfield Branch, 1 cash deposit of \$5,000 at Smithfield Branch – total deposits of \$10,000</u>
2.	<u>25.07.2014</u>	<u>NSW – Cash deposit of \$2,000 at Burwood Branch</u>
3.	<u>23.12.2014</u>	<u>Vic – Cash deposit of \$7,000 at Keilor Downs Branch</u>
4.	<u>25.12.2014</u>	<u>Vic – Cash deposit of \$4,000 at St Albans Branch</u>
5.	<u>02.06.2015</u>	<u>Vic – Cash deposit of \$10,000 at Chadstone Centre Branch</u>
6.	<u>16.02.2016</u>	<u>NSW – 1 cash deposit of \$3,000 at Bonnyrigg Branch, 1 cash deposit of \$9,000 at Smithfield Branch – total deposits of \$12,000</u>
<u>TOTAL</u>		<u>\$45,000 in cash deposits</u>

SCHEDULE ACI

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 121 – COMMBANK ACCOUNT 168

ITEM	DATE	TRANSACTION/S
1.	<u>10.09.2015</u>	<u>NSW – Cash deposit of \$7,000 at Central Branch</u>
2.	<u>10.09.2015</u>	<u>VIC – Automatic Teller Machine (ATM) deposit of \$5,900 at 385 Bourke St A</u>
<u>TOTAL</u>		<u>\$12,900 in cash deposits (\$7,000 at a branch, \$5,900 at an ATM)</u>

SCHEDULE ACJ

FEDERAL COURT OF AUSTRALIA
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DIVISION: COMMERCIAL AND CORPORATIONS

NO NSD 1305 OF 2017

CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

**SUMMARY OF RELEVANT TRANSACTIONS – PERSON 122 AND PERSON 123 –
COMMBANK ACCOUNT 169**

ITEM	DATE	TRANSACTION/S
1.	<u>14.11.2012</u>	<u>NSW – 1 cash deposit of \$7,500 at Belmore Branch, 1 cash deposit of \$7,000 at Campsie Branch – total deposits of \$14,500</u>
2.	<u>01.07.2015</u>	<u>NSW – 1 cash deposit of \$6,845 at Auburn Branch, 1 cash deposit of \$5,000 at Guildford Branch – total deposits of \$11,845</u>
<u>TOTAL</u>		\$26,345 in cash deposits

SCHEDULE ACK

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 124 – COMMBANK ACCOUNT 170

ITEM	DATE	TRANSACTION/S
1.	<u>03.01.2014</u>	<u>NSW – Cash deposit of \$14,500 at Haymarket Branch</u>
2.	<u>15.07.2016</u>	<u>NSW – 1 Automatic Teller Machine (ATM) deposit of \$9,000 at Bankstown D. 1 ATM deposit of \$7,500 at Bankstown B – total deposits of \$16,500</u>
3.	<u>08.08.2016</u>	<u>NSW – ATM deposit of \$5,950 Lakemba B</u>
4.	<u>31.03.2017</u>	<u>NSW – ATM deposit of \$8,000 at Broadway B</u>
<u>TOTAL</u>		<u>\$44,950 in cash deposits (\$14,500 at branches, \$30,450 at ATMs)</u>

SCHEDULE ACL

FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 125 – COMMBANK ACCOUNT 171

ITEM	DATE	TRANSACTION/S
1.	<u>22.07.2016</u>	<u>NSW –Automatic Teller Machine (ATM) deposit of \$5,600 at Parramatta E</u>
2.	<u>22.07.2016</u>	<u>NSW – ATM deposit of \$10,000 at Bankstown D</u>
<u>TOTAL</u>		<u>\$15,600 in cash deposits</u>

SCHEDULE ACM

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 126 – COMMBANK ACCOUNT 172

ITEM	DATE	TRANSACTION/S
1.	<u>03.08.2016</u>	<u>NSW – Cash deposit of \$20,000 at Wetherill Park Branch</u>
2.	<u>03.08.2016</u>	<u>ACT – Withdrawal of \$20,000 at Queanbeyan Branch</u>
3.	<u>17.08.2016</u>	<u>NSW – Cash deposit of \$5,000 at Kogarah Branch</u>
4.	<u>18.08.2016</u>	<u>NSW – 1 cash deposit of \$8,000 at Hurstville Branch, 1 cash deposit of \$7,000 at Kingsgrove Branch – total deposits of \$15,000</u>
<u>TOTAL</u>		<u>\$40,000 in cash deposits</u>

SCHEDULE ACN

**FEDERAL COURT OF AUSTRALIA
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TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 127 – COMMBANK ACCOUNT 173

ITEM	DATE	TRANSACTION/S
1.	<u>15.05.2015</u>	<u>NSW – 1 cash deposit of \$9,500 at Blacktown Branch, 1 cash deposit of \$3,450 at Wpnt Blacktown Branch – total deposits of \$12,950</u>
<u>TOTAL</u>		<u>\$12,950 in cash deposits</u>

SCHEDULE ACO

FEDERAL COURT OF AUSTRALIA
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TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 128 – COMMBANK ACCOUNT 174

ITEM	DATE	TRANSACTION/S
1.	<u>19.10.2015</u>	<u>NSW – Cash deposit of \$7,850 at Canley Heights Branch</u>
2.	<u>23.10.2015</u>	<u>NSW – Cash deposit of \$2,000 at Fairfield Branch</u>
3.	<u>23.10.2015</u>	<u>NSW – Automatic Teller Machine (ATM) deposit of \$4,855 at Bankstown CT C</u>
4.	<u>14.03.2016</u>	<u>WA – Cash deposit of \$10,000 at Waterford Branch</u>
5.	<u>15.03.2017</u>	<u>WA – Cash deposit of \$14,000 at Mount Lawley Branch</u>
<u>TOTAL</u>		<u>\$38,705 in cash deposits (\$33,850 at branches, \$4,855 at ATMs)</u>

SCHEDULE ACP

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 129 – COMMBANK ACCOUNT 175

ITEM	DATE	TRANSACTION/S
1.	<u>20.06.2016</u>	<u>Vic – Cash deposit of \$5,500 at Springvale Branch</u>
2.	<u>21.06.2016</u>	<u>Vic – Cash deposit of \$1,983.75 at Springvale Branch</u>
3.	<u>30.06.2016</u>	<u>Vic – Automatic Teller Machine (ATM) deposit of \$3,700 at Springvale C</u>
4.	<u>25.08.2016</u>	<u>NSW – ATM deposit of \$9,000 at Bankstown CT B</u>
5.	<u>01.09.2016</u>	<u>NSW – Cash deposit of \$6,000 at Liverpool Branch</u>
6.	<u>08.09.2016</u>	<u>NSW – Cash deposit of \$4,500 at Macquarie Centre Branch</u>
<u>TOTAL</u>		<u>\$30,683.75 in cash deposits (\$17,983.75 at branches, \$12,700 at ATMs)</u>

SCHEDULE ACQ

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 130 – COMMBANK ACCOUNT 176

ITEM	DATE	TRANSACTION/S
1.	<u>19.07.2015</u>	<u>NSW – Automatic Teller Machine (ATM) deposit of \$4,550 at Kingsford A</u>
2.	<u>21.07.2015</u>	<u>NSW – ATM deposit of \$5,400 at Kingsford A</u>
3.	<u>27.07.2015</u>	<u>NSW – ATM deposit of \$3,650 at Campsie D</u>
<u>TOTAL</u>		<u>\$13,600 in cash deposits</u>

SCHEDULE ACR

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 131– COMMBANK ACCOUNT 177

ITEM	DATE	TRANSACTION/S
1.	<u>25.07.2016</u>	<u>NSW – Cash deposit of \$5,000 at Bankstown Branch</u>
2.	<u>26.07.2016</u>	<u>NSW – Cash deposit of \$5,000 at Belmore Branch</u>
<u>TOTAL</u>		<u>\$10,000 in cash deposits</u>

SCHEDULE ACS

FEDERAL COURT OF AUSTRALIA
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CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE

Applicant

COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 132 – COMMBANK ACCOUNT 178

ITEM	DATE	TRANSACTION/S
1.	<u>06.07.2015</u>	<u>NSW – 1 cash deposit of \$7,000 at Wynyard Branch, 1 cash deposit of \$2,000 at Chester Hill Branch – total deposits of \$9,000</u>
2.	<u>19.07.2015</u>	<u>Vic – 2 Automatic Teller Machine (ATM) deposits (\$1,950, \$4,750) totalling \$6,700 at 385 Bourke C</u>
3.	<u>26.07.2015</u>	<u>Vic – 2 ATM deposits (\$5,050, \$510) totalling \$5,560 at Sunshine A</u>
4.	<u>27.07.2015</u>	<u>Vic – ATM deposit of \$5,550 at Brimbank Centre A</u>
5.	<u>01.09.2015</u>	<u>Vic – ATM deposit of \$5,000 at Highpoint A</u>
<u>TOTAL</u>		<u>\$31,810 in cash deposits (\$19,550 at branches, \$12,260 at ATMs)</u>

SCHEDULE ACT

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

**SUMMARY OF RELEVANT TRANSACTIONS – PERSON 133 AND PERSON 134 –
COMMBANK ACCOUNT 179**

ITEM	DATE	TRANSACTION/S
1.	<u>29.07.2016</u>	<u>Vic – Cash deposit of \$5,000 at St Albans Branch</u>
2.	<u>29.07.2016</u>	<u>Vic – Automatic Teller Machine (ATM) deposit of \$5,000 at St Albans D</u>
<u>TOTAL</u>		<u>\$10,000 in cash deposits (\$5,000 at a branch, \$5,000 at an ATM)</u>

SCHEDULE ACU

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

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**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 135 – COMMBANK ACCOUNT 180

ITEM	DATE	TRANSACTION/S
1.	<u>27.07.2016</u>	<u>NSW – 1 cash deposit of \$5,000 at Hurstville Branch, 1 cash deposit of \$5,000 at Bankstown Branch – total deposits of \$10,000</u>
<u>TOTAL</u>		<u>\$10,000 in cash deposits</u>

SCHEDULE ACV

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 136 – COMMBANK ACCOUNT 181

ITEM	DATE	TRANSACTION/S
1	<u>10.03.2017</u>	<u>WA – Cash deposit of \$9,500 at Girrawheen Branch</u>
2	<u>13.03.2017</u>	<u>WA – Automatic Teller Machine (ATM) deposit of \$9,500 at Morley B</u>
3	<u>06.04.2017</u>	<u>WA – 1 ATM deposit of \$5,000 at Morley C, 1 ATM deposit of \$9,000 at Girrawheen A – total deposits of \$14,000</u>
4	<u>06.04.2017</u>	<u>WA – 1 ATM deposit of \$10,000 at Morley C, 5 ATM deposits (\$10,000, \$20,000 x 4) at Girrawheen A – total deposits of \$100,000</u>
5	<u>10.04.2017</u>	<u>WA – 8 ATM deposits (\$9,850 x 2, \$9,800, \$9,950, \$9,650, \$9,900, \$9,700, \$300) totalling \$69,000 at Girrawheen A</u>
6	<u>10.04.2017</u>	<u>WA – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Girrawheen A</u>
7	<u>12.04.2017</u>	<u>WA – 3 ATM deposits (\$9,900, \$5,100, \$9,950) totalling \$24,950 at Morley B</u>
8	<u>12.04.2017</u>	<u>WA – 2 ATM deposits (\$10,000 x 2) totalling \$20,000 at Morley B</u>
9	<u>13.04.2017</u>	<u>WA – 11 ATM deposits (\$7,450, \$9,850 x 2, \$9,900 x 2, \$9,950, \$6,500, \$2,630, \$3,840, \$2,455, \$5,175) totalling \$77,500 at Morley B</u>
10	<u>13.04.2017</u>	<u>WA – 3 ATM deposits (\$10,000 x 3) totalling \$30,000 at Morley B</u>
11	<u>10.05.2017</u>	<u>WA – Cash deposit of \$50,000 at Morley Branch</u>
12	<u>12.05.2017</u>	<u>WA – Cash deposit of \$25,000 at Mirrabooka Branch</u>
13	<u>16.05.2017</u>	<u>WA – Cash deposit of \$30,000 at Morley Branch</u>
14	<u>22.05.2017</u>	<u>WA – Cash deposit of \$15,000 at Malaga Branch</u>
15	<u>23.05.2017</u>	<u>WA – 16 ATM deposits (\$4,400, \$4,600, \$4,250, \$4,750, \$4,900, \$4,650, \$4,700, \$4,450, \$1,950, \$1,460 x 2, \$1,080, \$1,060, \$1,360, \$2,670, \$1,110) totalling \$48,850 at Morley C</u>

16	<u>25.05.2017</u>	<u>WA – 9 ATM deposits (\$4,100, \$4,650, \$2,600, \$4,550, \$1,720, \$1,680, \$1,920, \$280, \$400) totalling \$21,900 at Morley C</u>
17	<u>29.05.2017</u>	<u>WA – 16 ATM deposits \$5,000 x 4, \$4,900 x 5, \$4,800 x 2, \$4,850, \$4,950, \$4,750, \$2,540, \$2,460) totalling \$73,650 at Morley B</u>
18	<u>02.06.2017</u>	<u>Domestic transfer of \$640,000 to CommBank Account 182</u>
19	<u>02.06.2017</u>	<u>WA – ATM deposit of \$1,400 at Girrawheen A</u>
20	<u>02.06.2017</u>	<u>Domestic transfer of \$1,000 to CommBank Account 182</u>

SCHEDULE ACW

**FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: NEW SOUTH WALES
DIVISION: COMMERCIAL AND CORPORATIONS**

NO NSD 1305 OF 2017

**CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN
TRANSACTION REPORTS AND ANALYSIS CENTRE**

Applicant

**COMMONWEALTH BANK OF AUSTRALIA LIMITED
ACN 123 123 124**

Respondent

SUMMARY OF RELEVANT TRANSACTIONS – PERSON 137 – COMMBANK ACCOUNT 183

ITEM	DATE	TRANSACTION/S
1	<u>21.10.2016</u>	<u>WA – Cash deposit of \$9,500 at Morley Branch</u>
2	<u>10.03.2017</u>	<u>WA – Cash deposit of \$9,500 at Girrawheen Branch</u>
3	<u>23.05.2017</u>	<u>WA – 14 Automatic Teller Machine (ATM) deposits (\$5,000 x 5, \$5,050, \$4,950, \$4,850, \$4,800 x 2, \$4,950, \$1,920, \$1,960, \$2,060) totalling \$60,340 at Morley B</u>
4	<u>25.05.2017</u>	<u>WA – 6 ATM deposits (\$5,000, \$4,950, \$5,050, \$4,210, \$5,250, \$740) totalling \$25,200 at Morley B</u>