



Australian Government

AUSTRAC

**NOTICE UNDER SUBSECTION 167(2) OF THE ANTI-MONEY  
LAUNDERING AND COUNTER-TERRORISM FINANCING ACT 2006**

**NOTICE REQUIRING THE GIVING OF INFORMATION AND THE  
PRODUCTION OF DOCUMENTS**

To: The Proper Officer  
Commonwealth Bank of Australia Limited (**CommBank**)  
ACN 123 123 124  
Level 14, Darling Park  
201 Sussex Street  
SYDNEY NSW 2000

I, **Section 22** A/g Director Enforcement, Australian Transaction Reports and Analysis Centre (**AUSTRAC**), am an authorised officer for the purposes of section 167 of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (the **AML/CTF Act**).

I believe on reasonable grounds that **CommBank** is a reporting entity and has information and documents that are relevant to the operation of the **AML/CTF Act** and the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)* (the **AML/CTF Rules**).

In accordance with subsection 167(2) of the Act, you are required to give the information and produce copies of the documents described in the Schedule:

To: **Section 22**  
At: Zenith Centre, 821 Pacific Highway  
CHATSWOOD NSW 2067

The information and documents must be given and produced:

- within **28 days** after the Notice is given;
- by reference to the relevant paragraph in the Schedule; and
- in electronic form on portable media such as DVD or USB drive.

**TAKE NOTICE:**

A person commits an offence if they fail to comply with a notice given to the person under subsection 167(2): subsection 167(3). A penalty of imprisonment for 6 months or 30 penalty units or both applies in relation to this offence.

A person is not excused from giving information or producing a document under section 167 on the ground that the information or the production of the document might tend to incriminate the person or expose the person to a penalty: subsection 169(1).

A person commits an offence under section 136 of the AML/CTF Act if they:

- (a) knowingly give false or misleading information in response to this Notice
- (b) give information knowing that such information omits any matter or thing without which the information is misleading.

A penalty of imprisonment for 10 years or 10,000 penalty units or both applies in relation to this offence.

A person commits an offence under section 137 of the AML/CTF Act if they knowingly produce a document that is false or misleading in a material particular in response to this Notice. A penalty of imprisonment for 10 years or 10,000 penalty units or both applies in relation to this offence.

Under section 168 of the AML/CTF Act, you are entitled to be paid reasonable compensation for complying with a requirement to make copies of documents and to produce those copies as specified in this Notice.

Section 22

Section 22

A/g Director Enforcement

Date

22/06/2016

Released under the FOI Act

## SCHEDULE

### DEFINITIONS

For the purpose of this notice, all terms have the same meaning as used in the AML/CTF Act and/or AML/CTF Rules.

Further, for the purposes of this notice:

*Electronic verification* means verification of know your customer (KYC) information with respect to a customer using reliable and independent electronic data

*Enhanced customer due diligence* has the same meaning as in Part 15 of the AML/CTF Rules

Section 47G

*Intelligent deposit machine* means an automatic teller machine that accepts cash deposits which are automatically counted and instantly credited to the nominated beneficiary account, as described in CommBank's letter to AUSTRAC of 26 October 2015, page 3

Section 47G

*Transaction monitoring* means any monitoring of transactions of customers in accordance with Part 15 of the AML/CTF Rules or section 36 of the AML/CTF Act

*Transaction monitoring alert* means an alert or 'red flag' triggered or raised in accordance with any transaction monitoring conducted for the purposes of Part 15 of the AML/CTF Rules

### PART A – Information to be given

#### *Intelligent Deposit Machines*

1. The total value of cash deposited into CommBank accounts through intelligent deposit machines for each month of the following years:
  - a. 2012;
  - b. 2013;
  - c. 2014;
  - d. 2015; and
  - e. 2016.

*Customer identification and ongoing due diligence*

2. In relation to each of the accounts specified in Attachment A to this Schedule:
  - a. the date it was opened;
  - b. whether it was opened online or at a CommBank branch;
  - c. whether, for transaction monitoring and other AML/CTF Act purposes, each customer of each account was classed by CommBank as a Retail Banking Services (RBS) customer;
  - d. if any customer of an account was not classed as an RBS customer, identify the relevant customer class for transaction monitoring and other AML/CTF Act purposes;
  - e. the date on which the applicable customer identification procedure was carried out to completion with respect to the holder of the account – that is, the date by which all of the minimum KYC information had been collected and fully verified;
  - f. whether or not an attempt was made by CommBank to verify KYC information about the holder of the account by way of electronic verification;
  - g. if an attempt was made by CommBank to verify KYC information about the holder of the account by way of electronic verification, the date on which the electronic verification was carried out and the type of electronic data relied upon;
  - h. if an attempt was made by CommBank to verify KYC information about the holder of the account by way of electronic verification, whether the KYC information with respect to the account holder was successfully verified;
  - i. if an attempt by CommBank to verify KYC information about the holder of the account by way of electronic verification was not successful, why not, and what appropriate risk-based systems and controls were applied by CommBank to respond to the discrepancy and on what date;
  - j. whether or not an attempt was made by CommBank to verify KYC information about the holder of the account using reliable and independent documentation;
  - k. if an attempt was made by CommBank to verify KYC information about the holder of the account using reliable and independent documentation, the date on which the verification was carried out and the type of documentation relied upon;
  - l. if an attempt was made by CommBank to verify KYC information about the holder of the account using reliable and independent documentation, whether

the KYC information with respect to the account holder was successfully verified;

- m. if an attempt by CommBank to verify KYC information about the holder of the account using reliable and independent documentation was not successful, why not, and what appropriate risk-based systems and controls were applied by CommBank to respond to the discrepancy; and
  - n. each date that a debit card was issued to the holder of the account.
3. In relation to each of the accounts specified in Attachment A to this Schedule:
- a. the full name of each signatory to the account;
  - b. the date on which each person identified at 3a. above became a signatory;
  - c. the date on which the applicable customer identification procedure was completed with respect to each signatory – that is, the date by which all of the minimum KYC information had been collected and fully verified.

*Transaction monitoring, enhanced customer due diligence and SMR reporting*

4. In relation to each of the accounts specified in Attachment A to this Schedule:
- a. whether any transaction monitoring alert was raised and if so, what triggered each alert and on what date was each alert triggered;
  - b. to whom was each transaction monitoring alert the subject of 4a. above referred to and on what date;
  - c. whether any enhanced customer due diligence measure was taken with respect to an account holder or signatory in connection with any account for the purposes of rule 15.10 of the AML/CTF Rules, and if so, what was the measure and on what date was it taken; and
  - d. whether **Section 47G** was applied to any account and, if so, on what dates and in respect of what matter.

5. **Section 47G**

6. Advise:

- a. whether any transaction monitoring alert was raised and if so, what triggered each alert and on what date was each alert triggered with respect to the transfer of funds from any CommBank account to:

- i. **Section 47G**

Released under the FOI Act

- b. to whom was each transaction monitoring alert the subject of 6a. above referred to and on what date.

*Late Threshold Transaction Reports (TTRs)*

7. A full description of the errors that resulted in the failure to give section 43 AML/CTF Act reports to AUSTRAC within the period specified by subsection 43(2) with respect to the threshold transactions identified at page 2 of the CommBank letter of 26 October 2015 as follows:
  - a. the 795 unreported TTRs from 6 August 2014 to 30 September 2015;

- b. the 386 transactions between 22 August 2011 and 5 August 2015; and
  - c. the possible further 1,312 transactions impacted by the same error at b above.
8. The CommBank transaction reference number and date of any section 43 report now given to AUSTRAC with respect to a transaction identified at paragraph 7 above, by reference to the relevant subparagraph in paragraph 7 above.
  9. A description of the designated service that was the subject of any section 43 report now given to AUSTRAC with respect to a transaction identified at paragraph 7 above and a description of the channel through which that designated service was provided.

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## **PART B – Documents to be produced**

### ***AML/CTF Program***

10. All versions of Part A of the AML/CTF Program adopted and maintained by CommBank on and from 1 January 2011 for the purposes of the AML/CTF Act.
11. All versions of Part B of the AML/CTF Program adopted and maintained by CommBank on and from 1 January 2011 for the purposes of the AML/CTF Act.
12. Documents recording the assessment of the money laundering and financing of terrorism risks posed by the delivery of designated services through intelligent deposit machines prior to CommBank adopting this method of service delivery/new technology.
13. All documents recording any identification or assessment of the risk that CommBank may reasonably face that the provision of designated services through the channel of an intelligent deposit machine might involve or facilitate money laundering or financing of terrorism.
14. All documents recording the systems, controls or procedures in Part A of the CommBank AML/CTF Program, adopted and maintained on and from 1 May 2012, the primary purpose of which is to identify, mitigate and manage the risk that intelligent deposit machines might involve or facilitate money laundering or financing of terrorism.
15. Documents recording all of the systems and controls, adopted and maintained on and from 1 May 2012, to monitor cash deposits by customers through intelligent deposit machines.
16. Documents recording all of the systems and controls, adopted and maintained on and from 1 May 2012, to monitor international money transfers by customers from CommBank accounts.
17. Documents recording all systems and controls, adopted and maintained on and from 1 May 2012, that have the purpose of identifying any transaction processed by an intelligent deposit machine that appears to be structured contrary to section 142 of the AML/CTF Act.
18. Documents recording:
  - a. the risk based systems and controls included in CommBank's enhanced customer due diligence program in Part A of its AML/CTF Program: and
  - b. the measures that may be taken in accordance with those risk based systems and controls,as would have applied to each account holder or signatory with respect to each account specified in Attachments A and C to this Schedule had a circumstance



prescribed by rule 15.9 of the AML/CTF Rules arisen or occurred in respect of that account holder or signatory.

19. Documents recording the systems and controls in Part A of the CommBank AML/CTF program, adopted and maintained on and from 1 May 2012, that are designed to ensure compliance with section 43 reporting in relation to:
  - a. transactions effected through intelligent deposit machines; and
  - b. the transactions as described at paragraph 7 above.
20. Documents recording the systems and controls in Part A of the CommBank AML/CTF program, adopted and maintained on and from 1 May 2012, that are designed to ensure compliance with section 41 reporting in relation to:
  - a. transactions effected through intelligent deposit machines; and
  - b. international money transfers from CommBank accounts.
21. Documents recording the systems and controls in Part B of the CommBank AML/CTF program, adopted and maintained on and from 1 January 2011 to respond to discrepancies that arise in the course of verifying KYC information electronically when opening an account following an online application, so that CommBank can be reasonably satisfied that the customer is the person he or she claims to be.

***Customer identification***

22. For the purposes of paragraph 112(2)(a) of the AML/CTF Act, records of the applicable customer identification procedure carried out in respect of each account holder specified in Attachments A and C to this Schedule including, but not limited to, records of any electronic verification procedure carried out to verify any KYC information collected from the customer.
23. For the purposes of paragraph 112(2)(b) of the AML/CTF Act, records of information obtained in the course of carrying out the applicable customer identification procedure in respect of each account holder specified in Attachments A and C to this Schedule including, but not limited to, records of information obtained in the course of carrying out any electronic verification procedure with respect to KYC information collected from the customer.
24. For the purposes of paragraph 112(2)(a) of the AML/CTF Act, records of the applicable customer identification procedure carried out in respect of any signatory to each account specified in Attachments A and C to this Schedule including, but not limited to, records of any electronic verification procedure carried out to verify any KYC information collected from the signatory.
25. For the purposes of paragraph 112(2)(b) of the AML/CTF Act, records of information obtained in the course of carrying out the applicable customer identification procedure in respect of each signatory to each account specified in

Attachments A and C to this Schedule including, but not limited to, records of information obtained in the course of carrying out any electronic verification procedure with respect to KYC information collected from the signatory.

26. Records of any response to any discrepancy that arose in the course of verifying KYC information when carrying out the applicable customer identification procedure in respect of each account holder or signatory for each account listed in Attachment A.
27. Records of the issue of all debit cards to the holder of each account specified in Attachment A to this Schedule.

***Ongoing customer due diligence and transaction monitoring***

28. Documents recording the identification by CommBank of any transaction conducted contrary to section 142 of the AML/CTF Act with respect to each account specified in Attachments A and C to this Schedule, including but not limited to any transaction monitoring alerts with respect to structured transactions on these accounts.
29. Documents recording the review or analysis by CommBank of any transaction conducted contrary to section 142 of the AML/CTF Act with respect to each account specified in Attachments A and C to this Schedule.
30. Documents recording the identification by CommBank of any transaction conducted on each account specified in Attachment A to this Schedule that appeared to be complex, unusually large or part of an unusual pattern of transactions, having no apparent economic or visible lawful purpose, including but not limited to any transaction monitoring alerts with respect to such transactions on these accounts.
31. Documents recording the review and analysis by CommBank of any transaction conducted on each account specified in Attachment A to this Schedule that appeared to be complex, unusually large or part of an unusual pattern of transactions, having no apparent economic or visible lawful purpose.
32. Records of any monitoring of each customer specified in Attachment A and C to this Schedule in relation to the provision of designated services for the purposes of section 36 of the AML/CTF Act.
33. Records of any enhanced customer due diligence carried out with respect to each customer specified in Attachment A and C to this Schedule for the purposes of rule 15.10 of the AML/CTF Rules.
34. A copy of the **Section 47G** for each customer specified at Attachments A and C to this Schedule.

*Transaction records*

35. Copies of account statements for each of the accounts specified in Attachment A to this Schedule on and from the date the account was opened.
36. Copies of account statements for each of the accounts specified in Attachment C to this Schedule on and from 1 January 2014 or on and from the date the account was opened, whichever is latest.
37. Copies of payment journals recording all transactions on each of the accounts specified in Attachment A to this Schedule on and from the date the account was opened.

*Audit*

38. All internal and external audit reports with respect to CommBank's compliance with Parts A and B of its AML/CTF Program for the following calendar years:
  - a. 2011;
  - b. 2012;
  - c. 2013;
  - d. 2014;
  - e. 2015; and
  - f. 2016.
39. All minutes of meetings of the CommBank Board and the CommBank audit and/or risk committee at which any report referred to at paragraph 38 above was considered.

*Emails*

40. All emails to or from any of the following CommBank officers:
  - a. Section 22 irrelevant [redacted] Intelligence & Planning, Group Security, Financial Services;
  - b. Section 22 irrelevant [redacted] Group Security Financial Services;
  - c. Section 22 irrelevant [redacted] Intelligence & Planning, Group Security;
  - d. Section 22 irrelevant [redacted] AML & Sanctions Operations;
  - e. Section 22 irrelevant [redacted] AML CTF Operations;

f. Section 22 irrelevant [REDACTED] AML & Sanctions  
Operations;

g. Section 22 irrelevant [REDACTED] Compliance Services, Group Operations;  
and

h. Section 22 irrelevant [REDACTED] Compliance Services, Group  
Operations;

regarding any of the customers or accounts listed at paragraphs 1 to 30 at  
Attachment A, Section 47G [REDACTED]  
[REDACTED]

Released under the FOI Act

ATTACHMENT A

Section 47F

Released under the FOI Act

Released under the FOI Act

ATTACHMENT B

Section 47E

Released under the FOI Act

Released under the FOI Act




Section 22 irrelevant

Released under the FOI Act

ATTACHMENT C

Section 47E



Released under the FOI Act



**Australian Government**

**AUSTRAC**

**NOTICE UNDER SUBSECTION 167(2) OF THE *ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING ACT 2006***

**NOTICE REQUIRING THE GIVING OF INFORMATION AND THE PRODUCTION OF DOCUMENTS**

To: The Proper Officer  
Commonwealth Bank of Australia Limited (**CommBank**)  
ACN 123 123 124  
Level 14, Darling Park  
201 Sussex Street  
SYDNEY NSW 2000

I, **Section 22** Senior Manager Enforcement, Australian Transaction Reports and Analysis Centre (**AUSTRAC**), am an authorised officer for the purposes of section 167 of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (the **AML/CTF Act**).

I believe on reasonable grounds that **CommBank** is a reporting entity and has information and documents that are relevant to the operation of the **AML/CTF Act** and the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)* (the **AML/CTF Rules**).

In accordance with subsection 167(2) of the Act, you are required to give the information and produce copies of the documents described in the Schedule:

To: **Section 22**  
At: Zenith Centre, 821 Pacific Highway  
CHATSWOOD NSW 2067

The information and documents must be given and produced:

- a. within **four weeks (28 days)** after the Notice is given;
- b. by reference to the relevant paragraph in the Schedule; and
- c. in electronic form on portable media such as DVD or USB drive.

Unless stated otherwise, **CommBank** is not required to give information or produce documents in response to this notice where the information or documents relate exclusively to BankWest branded services, customers or intelligent deposit machines.

**TAKE NOTICE:**

A person commits an offence if they fail to comply with a notice given to the person under subsection 167(2): subsection 167(3). A penalty of imprisonment for 6 months or 30 penalty units or both applies in relation to this offence.

A person is not excused from giving information or producing a document under section 167 on the ground that the information or the production of the document might tend to incriminate the person or expose the person to a penalty: subsection 169(1).

A person commits an offence under section 136 of the AML/CTF Act if they:

- (a) knowingly give false or misleading information in response to this Notice
- (b) give information knowing that such information omits any matter or thing without which the information is misleading.

A penalty of imprisonment for 10 years or 10,000 penalty units or both applies in relation to this offence.

A person commits an offence under section 137 of the AML/CTF Act if they knowingly produce a document that is false or misleading in a material particular in response to this Notice. A penalty of imprisonment for 10 years or 10,000 penalty units or both applies in relation to this offence.

Under section 168 of the AML/CTF Act, you are entitled to be paid reasonable compensation for complying with a requirement to make copies of documents and to produce those copies as specified in this Notice.

Section 22 [Redacted]

14/10/2016

Section 22 [Redacted]

\_\_\_\_\_  
Date

Senior Manager Enforcement

Released under the FOI Act

## SCHEDULE

### Definitions

*The customer 1 to 30 ACIP records* are the documents produced by CommBank on 20 July 2016 at Attachment 89 in respect of customers 1 to 30 in Attachment A of the notice given to CommBank under s 167 of the AML/CTF Act on 22 June 2016 (as amended).

*The information system* means the CommBank information system described at paragraph 4 of this notice.

### PART A – Information

1. In the second dot point under the heading 'Key Findings' Sections 47F and 47G

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please provide the full name, date of birth, and all account numbers (including the BSB) for each of these customers.

2. In relation to each account held by each customer identified in paragraph 1 above and at Attachment A to this Notice, please provide:
- the full name of each signatory to the account; and
  - the date on which each person identified at 2a. above became a signatory.
3. Please advise whether, on and from 1 January 2014, it has been CommBank's practice to keep records of whether or not a customer who opens an account online elects to undergo electronic customer verification. If so, please advise what records are kept.
4. Please advise the name of the CommBank information system that the customer 1 to 30 ACIP records were extracted from (**the information system**).
5. Please advise whether the information under the heading 'Customer Information' in each of the customer 1 to 30 ACIP records was entered into the information system on the date that the applicable customer identification procedure was carried out in

respect of each customer. If not, please advise the date that the information was entered into the information system in respect of each customer.

6. Please advise whether the information under the heading 'Identification Details' in each of the customer 1 to 30 ACIP records was entered into the information system on the date that the applicable customer identification procedure was carried out in respect of each customer. If not, please advise the date that the information was entered into the information system in respect of each customer.
7. Please advise whether CommBank staff in Group Security and Retail Banking Services had direct access to:
  - a. the information system described at paragraph 4; and
  - b. the information described at paragraphs 5 and 6 in the form it was produced on 20 July 2016

on and from the date each of those customers opened their accounts.

8. Attachment B to this Notice sets out a number of entries **Section 47G** with respect to six CommBank customers, as produced by CommBank under paragraph 34 of the notice given to CommBank under s 167 of the AML/CTF Act on 22 June 2016. Please advise:
  - a. what process or procedure generated each entry in respect of each customer in Attachment B;
  - b. what assumptions triggered the process or procedures identified at 8a., including but not limited to any assumptions about which specific part of the applicable customer identification process had not been completed;
  - c. what data or information was relied upon to reach each assumption for the purposes of 8b.; and
  - d. why each entry in Attachment B was made in circumstances where CommBank has advised that the applicable customer identification procedure was carried out in respect of each customer on a date prior to each entry.

9. On 20 July 2016, CommBank produced **Section 47G**  
**Section 47G**  
**Section 47G**  
**Section 47G** Please advise:
  - a. what happens when **Section 47G** is applied to a customer, including any effects on systems or processes outside of **Section**; and
  - b. what the approval process is for **Section 47G** being applied to a customer.

## PART B – Documents

10. In respect of the customers identified at paragraph 1 above and at Attachment A to this Notice, please provide:
- a. for the purposes of paragraph 112(2)(a) of the AML/CTF Act, records of the applicable customer identification procedure carried out in respect of each customer;
  - b. for the purposes of paragraph 112(2)(b) of the AML/CTF Act, records of the information obtained in the course of carrying out the applicable customer identification procedure in respect of each customer;
  - c. for the purposes of paragraph 112(2)(a) of the AML/CTF Act, records of the applicable customer identification procedure carried out in respect of any signatory to each account held by each customer;
  - d. for the purposes of paragraph 112(2)(b) of the AML/CTF Act, records of the information obtained in the course of carrying out the applicable customer identification procedure in respect of any signatory to each account held by each customer;
  - e. documents recording the identification by CommBank, on and from 1 July 2014, of any transaction conducted on each customer's account that appeared to be complex, unusually large or part of an unusual pattern of transactions, having no apparent economic or visible lawful purpose, including but not limited to transaction monitoring alerts with respect to each transaction on each account;
  - f. documents recording the review and analysis by CommBank, on and from 1 July 2014, of any transaction conducted on each customer's account that appeared to be complex, unusually large or part of an unusual pattern of transactions, having no apparent economic or visible lawful purpose;
  - g. records of any monitoring of each customer and signatory in relation to the provision of designated services for the purposes of section 36 of the AML/CTF Act, on and from 1 July 2014;
  - h. records of any enhanced customer due diligence carried out with respect to each customer and signatory for the purposes of rule 15.10 of the AML/CTF Rules, on and from 1 July 2014; and
  - i. account statements, on and from 1 July 2014, for each account in each customer's name.
11. Please provide copies of all emails sent to or by **Section 22** which:
- a. enclosed **Section 47G** as identified in paragraph 1 of this Notice; or
  - b. discussed or reported on the matters to which the **Section 47G** related.

ATTACHMENT A

Sections 47F and 47G



Released under the FOI Act



ATTACHMENT B

1. Sections 47F and 47G

2.

Released under the FOI Act

3.

4.

5.

Released under the FOI Act

6

Released under the FOI Act

**Australian Transaction Reports  
and Analysis Centre**

140 William Street  
Melbourne, VIC

Telephone +613 8636 0500



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Melbourne, VIC 8010, Australia

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1 March 2017

**Section 22**

Head of Financial Crime Advisory & Assurance  
Commonwealth Bank of Australia  
Level 20, 2 Market St  
SYDNEY NSW 2000

Dear **Section**

**RE: Notices given under subsection 167(2) of the AML/CTF Act**

I refer to the Commonwealth Bank of Australia's (CommBank's) response to the notices given by AUSTRAC under subsection 167(2) of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (the AML/CTF Act) on 22 June 2016 (the June Notice) and 14 October 2016 (the October Notice).

In reviewing the materials provided by CommBank in response to the above Notices, we have identified two issues which we seek CommBank's assistance to resolve:

1. In response to paragraph 40(d) of the June Notice, CommBank provided an email (attached) **Sections 47F and 47G**  
[Redacted]
2. Please respond to the following:
  - a. What is a **Section 47G** as referred to in the above email?
  - b. How are **Section 47G**? Please describe this process.
  - c. Please provide full reasons why **Section 47G**  
[Redacted]
  - d. For what purpose/s are **Section 47G**? In particular, please describe the AML/CTF processes that are contingent upon **Secti**  
[Redacted]
  - e. When and how was the issue referred to in 1. above identified?
  - f. When and how was the issue referred to in 1. above resolved?
  - g. Please confirm the exact number of **Section 47G**  
[Redacted].
  - h. Provide full details of the consequences of these **Section 47G**  
[Redacted]

- i. Please advise whether, for the period referred to in 2g. above, these [Section] [redacted] were subject to transaction monitoring, including (but not limited to) monitoring for structured cash transactions.
  - j. If the answer to 2i. above is no, since identifying the issue described at 1. above has CommBank reviewed the [Section 47G] referred to in 2g. above?
  - k. As a result of any such review, did CommBank lodge any SMRs? If so, please provide reference numbers.
  - l. Please advise [Section 47G] [redacted] or if there was a wider issue. If [Section] [redacted] were part of a wider issue, please provide details of that wider issue.
3. In response to paragraph 10(i) of the October Notice, CommBank provided bank statements for [Section 47F] [redacted] Statement 45 for the period 1 October 2015 to 31 March 2016 includes the following transaction:

Date	Transaction	Debit	Credit	Balance
[Section]	[redacted]		[redacted]	[redacted]

We have been unable to locate a Threshold Transaction Report (TTR) corresponding to this transaction. Please advise whether CommBank submitted a TTR for this transaction and if so, provide the relevant reference number and the date the report was submitted.

I ask that CommBank provide its response on the above matters by **13 March 2016**. If you have any questions in relation to this request, please contact me [Section 22] [redacted]

Yours sincerely

[Section 22] [redacted]

[Section] [redacted]

Senior Manager, Enforcement

Released under the FOIA Act