

**aml**

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**From:** [REDACTED]@selectrealty.co.nz>  
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**To:** aml  
**Subject:** Comment on aML rules

**Categories:** To file

I think the government has got the wrong focus with its AML laws/rules.

The big laundering is international crime and optically exposed persons who are gathering Hugh amounts of money and hiding it in tax haven type jurisdictions.

The hassle and cost imposed on real estate agents (and others) is disproportionate to the likelihood of uncovering anything major. Focus on the legislation to catch drug smugglers, fraudsters and gangs.

The inclusion of commercial leasing as an AML notable activity shows how out of touch you are with reality on the ground.

Real estate agents have to "AML" property owners (or landlords/lessors) for commercial leasing transactions. These people have already been vetted when they purchased the building, and it is hard to see how any laundering of money can go on from entering into a lease with another party - especially when that party is "AMLed" by other reporting entities. Real estate agents do not "AML" tenants/lessees and it is these people who have the money they wish to launder. They are presumably caught up by AML investigations by the reporting entities.

I strongly suggest dropping commercial leasing from the AML regime, or at least put a lower limit on reportable occurrences - say \$250,000 pa plus GST. I remind you that residential letting is not caught up in the real-estate agents AML responsibilities, and this is where money laundering is more likely to occur.

I suspect the reason commercial leasing was included in the AML regime was because it was administratively simpler to include ALL real estate work than to have to think about a carve out for leasing. Perhaps some energy and brain power could be applied to remove it.

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