

aml

From: [REDACTED]@raywhite.com>
Sent: Thursday, 25 November 2021 2:02 pm
To: aml
Subject: AML
Attachments: REINZ Advocacy Submission form.pdf

Hi

Please see attached submission with regards to AML changes.

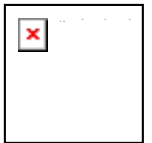
Regards



[REDACTED]

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Ray White Commercial Tauranga | BOP Commercial Realty Limited Licensed (REAA 2008)



[REDACTED]

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REINZ Advocacy Submission Form

*For Anti-Money Laundering and Countering Financing of Terrorism
Statutory Review*



We look forward to receiving your submission on or before **Friday 26 November 2021**.

Submission detail

Name of Submitter	[REDACTED]
Organisation	Ray White Commercial Tauranga
Contact Details	[REDACTED]

Confidential details

The information in this submissions form is collected, used and may be published within REINZ's public submission to the Department of Internal Affairs in regard to the statutory review of the anti-money laundering and countering financing of terrorism regime. You may request that your contact details be kept confidential, but your name, organisation and your submission may be referenced to in REINZ's submission, which will become a public document and may consequently become public knowledge.



I wish to keep my contact details confidential

Contact details

REINZ will deal with any personal information you supply in your submission in accordance with the Privacy Act 2020. We will only use your contact details for the purpose of processing this form and contacting you should we require further clarification to your responses. Despite the above, if REINZ does come to hold any of your personal information, you will have the right to access and correct that personal information by contacting REINZ at info@reinz.co.nz or by post or telephone.



I support the proposals indicated within this statutory review



I oppose the proposals indicated within this statutory review



I neither support nor oppose the application



Question 1:

Should we amend the existing regulations to require real estate agents to conduct CDD on both the purchaser and vendor? Is this manageable? REINZ would appreciate any examples where it would be a logistical challenge to do so.

For example:

I agree/do not agree...

I provide the following examples:

- Example 1
- Example2v

I do not agree with this proposal, this will cause additional delays as all potential agreements will be conditional on CDD being completed. This would be difficult to manage and would also potentially dissuade purchasers from making offers. In addition this is impractical in multi offer situations.



Question 2:

How might the challenges provided in Question 1 be addressed? Do you have any solutions?

For example:

To address the challenges outlined in the above response, I propose that...

The status quo remains that the lawyers handle purchaser CDD.



Question 3:

What is the appropriate time for CDD on the vendor or purchaser to be conducted in real estate transaction?

For example:

For the vendor, CDD can be conducted... For the purchaser...

For the vendor as part of the listing process, for the purchaser once agreement has been reached and deposit paid.

For any further comments.

We appreciate your contribution and thank you for your responses. Your completed form can be sent to us via email at advisory@reinz.co.nz.

Once our public submissions have been submitted to the Department of Internal Affairs, a copy will be made available on the REINZ's Advocacy Page, and our members will be notified via our weekly newsletter, *In The Know*.