

Party Donations and Loans Return for the year ending 31 December 2023

DECLARATION

1. Party name:

Freedoms New Zealand

Party secretary name:

Jennifer Marshall

2. TOTAL PARTY DONATIONS

Complete Parts A to G on pages 2 to 12 if you have any donations to declare.

Write 'NIL' if you have **NO** donations, or contributions to a donation, in Parts A to G

Part A: Party donations of more than \$5,000

\$ 216,438.20

Part C: Anonymous party donations of more than \$1,500

\$ 0.00

Part D: Overseas party donations of more than \$50

\$ 0.00

Part F: Donations protected from disclosure

\$ 0.00

Part G: Other party donations up to \$5,000

\$ 1,832.50

Total Party Donations (A + C + D + F + G)

\$ 218,270.70

Total monetary and non-monetary donations received by party

Total Monetary Party Donations

\$ 146,375.85

Total Non-Monetary Party Donations

\$ 71,894.85

3. TOTAL PARTY LOANS

Complete Parts H and I on pages 13 to 14 if you have any loans to declare.

Write 'NIL' if you have **NO** loans to declare

NIL

Part H: Party loans exceeding \$15,000

\$ 0.00

Part I: Party loans between \$1,500 – \$15,000

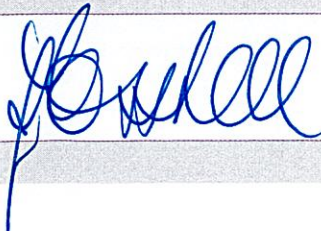
\$ 0.00

Total (H + I)

\$ 0.00

4. I declare that to the best of my knowledge this return contains all donations and loans information required pursuant to sections 210 and 214C of the Electoral Act 1993, is an accurate record of the party donations and loans and is not false in any material particular.

SIGNATURE



DATE: DD / MM / YYYY

30/04/24

COMPLETING THE RETURN

You can complete the return electronically or by hand.

If you complete the return electronically amounts entered will automatically be formatted as currency (so no need to type \$ or commas) and the totals in each part will be automatically added up for you, as well as the totals on this page of the return.

If you do not have any donations and/or loans to declare enter 'NIL' in **step 2** and/or **step 3** on this page before completing the declaration at **step 4**.

An audit report is required if the total party donations exceed \$50,000 or there are any party loans disclosed in Parts H or I of the return.

CHECKLIST

Step 1 completed



Parts A to I completed or 'NIL' entered at step 2 and/or step 3



Party secretary signed and dated the return



All relevant supporting documentation supplied to auditor, if applicable



Auditor stamped or an initialled copy of the return to keep for own records, if applicable



Auditor's report enclosed, if applicable



Representation letter enclosed, if used



FILING THE RETURN

The return needs to be signed and dated by the party secretary and be accompanied by an auditor's report, if applicable. The signed return and the auditor's report must be received by the Electoral Commission by **Tuesday, 30 April 2024**.

The return can be filed:

- by email to: legal@elections.govt.nz
- by delivery to Level 4, 34-42 Manners Street, Wellington 6011

Reminder: the returns are open to public inspection and will be published on www.elections.nz.

SAVE AS

PRINT



DONATIONS Complete Parts A to G

Party Donations

A party donation is a donation of money (or the equivalent of money), goods or services that is made to a party, or to any person or body of persons if there are reasonable grounds to believe that the donation is intended for the benefit of the party. A party donation includes:

- a donation of money or the equivalent of money, including where a person pays something for the party
- where a party is provided with goods or services free of charge that have a reasonable market value of more than \$1,500 (or \$50 if provided by an overseas person – see Part D for more information on who is an overseas person)
- where a party is provided with discounted goods or services and the reasonable market value of the goods or services is greater than \$1,500 (or \$50 if provided by an overseas person); the difference between the contract or agreed price and the reasonable market value of the goods or services is a donation

- when a party sells over-valued goods or services, the difference between the price paid and the reasonable market value is a donation (for example a fundraising auction or dinner)
- where credit is provided to a party on more favourable terms than those prevailing at the same time for similar credit, the value of the favourable terms is a donation.

The following are not a party donation:

- free labour
- goods or services provided free of charge to a party, or to any person on the party's behalf, that have a reasonable market value of \$1,500 or less (or \$50 or less if from an overseas person), or
- a candidate donation that is included in a candidate's return of donations.

PART A: PARTY DONATIONS OF MORE THAN \$5,000

Instructions for Part A – Donations over \$5,000

Party donations of more than \$5,000 (including GST) received during 2023 are required to be declared in **Part A**, including a series of donations received from the same donor during the year that add up to more than \$5,000. Also include those donations exceeding \$20,000 received during election year and reported under section 210C.

Do not include in **Part A** contributions to donations, anonymous or overseas donations, donations protected from disclosure, or donations not exceeding \$5,000 (see **Parts B, C, D, E, F and G**).

You need to record the name and street address of the donor, the date the donation was received and the amount received from the donor. Where you have received a number of donations from the same donor you should include each date on which a donation was received from the donor and the aggregated total from the donor. You also need to confirm whether any person (other than the donor) has contributed more than \$5,000 to the donation (or more than \$50 if the contributor is an overseas person). Contributions of more than \$5,000 must be disclosed in **Part B** (or **Part E** for overseas contributors).

For any donations from a trust, include the name of the individual at whose direction the donation was made.

WRITE 'NIL' IF YOU HAVE NO DONATIONS TO DECLARE HERE:

TOTAL FOR PART A

\$ 216,438.20

Donor's name and street address	Date donation or aggregated donations received dd/mm/yyyy	Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO	Amount of donation or total aggregated donations (including GST) \$0.00
1 Brian Tamaki, 1 Harry Dreadon Road, Opaheke, Auckland	24/07/23	NO	\$ 15,000.00
2 Cheyne Hakaraia, 105 Pakowhai Road, Hastings	25/07/23	NO	\$ 5,000.00
3 Cheyne Hakaraia, 105 Pakowhai Road, Hastings	28/07/23	NO	\$ 5,000.00
4 Warwick & Averil Norman, 5 Paget Street, Freemans Bay, Auckland	09/05/23	NO	\$ 23,000.00
5 Warwick & Averil Norman, 5 Paget Street, Freemans Bay, Auckland	01/06/23	NO	\$ 23,000.00
6 Warwick & Averil Norman, 5 Paget Street, Freemans Bay, Auckland	20/07/23	NO	\$ 23,000.00
7 Warwick & Averil Norman, 5 Paget Street, Freemans Bay, Auckland	21/08/23	NO	\$ 23,000.00
8 Vision New Zealand, 44 Bob Charles Drive, Golflands, Auckland	13/07/23	NO	\$ 9,989.18
9 Vision New Zealand, 44 Bob Charles Drive, Golflands, Auckland	27/07/23	NO	\$ 18,531.67

PART A: PARTY DONATIONS OF MORE THAN \$5,000

Donor's name and street address	Date donation or aggregated donations received dd/mm/yyyy	Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO	Amount of donation or total aggregated donations (including GST) \$0.00
10 Vision New Zealand, 44 Bob Charles Drive, Golflands, Auckland	25/07/23	NO	\$ 18,531.68
11 Vision New Zealand, 44 Bob Charles Drive, Golflands, Auckland	21/11/23	NO	\$ 19,250.22
12 Aotearoa Media Limited, Level 1/2 Kings Road, Panmure, Auckland	26/07/23	NO	\$ 21,959.25
13 Speedy Signs Kingsland, 333 New North Road, Kingsland, Auckland	12/05/23	NO	\$ 4,149.20
14 Speedy Signs Kingsland, 333 New North Road, Kingsland, Auckland	09/11/23	NO	\$ 7,027.00
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PART A: PARTY DONATIONS OF MORE THAN \$5,000

Donor's name and street address	Date donation or aggregated donations received dd/mm/yyyy	Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO	Amount of donation or total aggregated donations (including GST) \$0.00
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PART A: PARTY DONATIONS OF MORE THAN \$5,000

Donor's name and street address	Date donation or aggregated donations received dd/mm/yyyy	Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO	Amount of donation or total aggregated donations (including GST) \$0.00
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PART A: PARTY DONATIONS OF MORE THAN \$5,000

Donor's name and street address	Date donation or aggregated donations received dd/mm/yyyy	Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO	Amount of donation or total aggregated donations (including GST) \$0.00
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PART G: OTHER PARTY DONATIONS UP TO \$5,000

Instructions for Part G - Other party donations up to \$5,000

The total number and value of other party donations received in the following bands must be disclosed in **Part G**:

- anonymous party donations of \$1,500 or less
- all other donations not exceeding \$1,500
- party donations of more than \$1,500 up to and including \$5,000.

Although aggregation is generally required for donations there is no requirement to aggregate donations from the same donor for the purposes of determining what donations to include and in which band in **Part G**. If a donor has made more than one donation in a category each donation should be counted separately when calculating the number of donations.

Example:

If you received two donations of \$2,000 from the same donor in the calendar year, these should be recorded as two donations in the 'Donations exceeding \$1,500 but not exceeding \$5,000' band.

WRITE 'NIL' IF YOU HAVE NO DONATIONS TO DECLARE HERE:

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	TOTAL FOR PART G	\$ 1,832.50
Description of donation	Total number of donations	Total amount of donations (including GST) \$0.00
Anonymous donations not exceeding \$1,500	1	\$ 5.00
All other donations not exceeding \$1,500	8	\$ 1,827.50
Donations exceeding \$1,500 but not exceeding \$5,000		\$ 0.00

LOANS Complete Parts H and I

Party Loans exceeding \$15,000

A party loan is a written or oral agreement under which a lender lends money to a political party. Money lent by a registered bank at a commercial interest rate is not a party loan, nor are credit cards and overdraft facilities with registered banks.

PART H: PARTY LOANS EXCEEDING \$15,000

Instructions for Part H - Party loans exceeding \$15,000

Party loans from the same lender exceeding \$15,000 entered into during the year (including those exceeding \$30,000 that have been reported during the year under section 214F) must be reported in **Part H**.

Loans from the same lender need to be aggregated. Include loans entered into during the year not exceeding \$15,000, but that exceed \$15,000 when aggregated with all other loans from the same lender during 2023 or unpaid balances as at 31 December 2023 of any loans provided by the same lender in any previous year.

WRITE 'NIL' IF YOU HAVE NO LOANS TO DECLARE HERE:

NIL

TOTAL FOR PART H

\$ 0.00

Lender's name and street address	Loan amount (including GST) \$0.00	Date loan entered into dd/mm/yyyy	Repayment date (if no repayment date, specify "no repayment date" here)

Guarantor's name and street address (if any)	Unpaid balance of loan \$0.00	Interest rate or rates	Details of security given

Total aggregated loan amount from the same lender (if applicable)

Any terms (that enable the lender to reduce or extinguish the loan amount and/or interest or grant any concession in respect of repayment)

Lender's name and street address	Loan amount (including GST) \$0.00	Date loan entered into dd/mm/yyyy	Repayment date (if no repayment date, specify "no repayment date" here)

Guarantor's name and street address (if any)	Unpaid balance of loan \$0.00	Interest rate or rates	Details of security given

Total aggregated loan amount from the same lender (if applicable)

Any terms (that enable the lender to reduce or extinguish the loan amount and/or interest or grant any concession in respect of repayment)

PART I: PARTY LOANS BETWEEN \$1,500 – \$15,000

Instructions for Part I – Party loans between \$1,500 – \$15,000

The total number and value of all other party loans entered into during the year of \$1,500 or more up to and including \$15,000, that have not already been disclosed in **Part H**, must be disclosed in **Part I**.

If a lender has made more than one loan to the party of between \$1,500 and \$15,000 each loan should be counted separately when calculating the total number of loans, for the purposes of **Part I**.

WRITE 'NIL' IF YOU HAVE NO LOANS TO DECLARE HERE:

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TOTAL FOR PART I

\$ 0.00

Number of loans

Total amount of loans (including GST) \$0.00

Loans of not less than \$1,500 and not more than \$15,000

0

\$ 0.00

INDEPENDENT AUDITOR'S REPORT

To the Party Secretary of Freedoms New Zealand

Qualified Opinion

We have undertaken a reasonable assurance engagement of the Freedoms New Zealand (the "Party") compliance, in all material respects, with the requirements of sections of 210 and 214C of the Electoral Act 1993 (the "Act") as evaluated against the Party Donations and Loans Return for the year ending 31 December 2023 (the "Return").

In our opinion, except for the possible effects of the matters described in the *Basis for Qualified Opinion* section of our report, the Party has complied, in all material respects, with the requirements of the Act as evaluated against the Party Donations and Loans Return for the year ending 31 December 2023.

Basis for Qualified Opinion

- There are limited controls that ensure donations and loans included in the Return are complete. Accordingly, we were unable to obtain sufficient appropriate evidence in this respect. Consequently, we were unable to determine whether any adjustments to the donation revenue recorded, or loans disclosed were necessary.
- In addition, pursuant to section 210(1)(d) of the Electoral Act 1993, donations received from an overseas person are required to be disclosed separately in Part D and Part E of the Return. Due to the nature of how donations are generally received, controls over determining the residency status of donors are limited and there are no practical procedures to determine the effect of this limited control.
- In addition, the Party has disclosed the Non-Monetary Party Donations received of \$71,894.85. The controls over these donations are limited by the nature of the Non-Monetary Party Donations received. Consequently, we were unable to determine the completeness of those donations and whether any adjustments to the donation revenue were necessary.

We conducted our engagement in accordance with the Standard of Assurance Engagements (SAE) 3100 (Revised) *Compliance Engagements* issued by the New Zealand Auditing and Assurance Standards Board. Due to the nature of the limitations above, we do not believe there is further information that can be provided to us by the Party to allow us to determine the effects of these limited controls.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our qualified opinion.

Party Secretary's Responsibilities

The Party Secretary is responsible for:

- a. Preparation of the Return in compliance with the requirements of the Act; and
- b. The compliance activity undertaken to meet the requirements of the Act; and
- c. Identification of risks that threaten compliance with the Act identified above being met and controls which will mitigate those risks and monitor ongoing compliance.

Our independence and Quality Control

We have complied with the relevant ethical requirements relating to assurance engagements, which include independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

In accordance with the Professional and Ethical Standard 3 (Amended) Blackmore, Virtue and Owens maintain a comprehensive system of quality control including documented policies and procedures

BVO Audit

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PO Box 9579, Newmarket, Auckland 1149, New Zealand
Telephone: +64-9-520 4089, Email: accounts@bvo.co.nz

www.bvoaudit.co.nz  [@bvo-audit](#)

regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Other than acting as the auditor and assurance practitioner for the Party, we have no relationship with, or interests in Freedoms New Zealand.

Auditor's Responsibilities

Our responsibility is to express an opinion on the Party's compliance, in all material respects, with the Electoral Act as evaluated against the Return throughout the year ended 31 December 2023. SAE 3100 (revised) requires that we plan and perform our procedures to obtain reasonable assurance about whether the Party has complied, in all material respects, with the requirements of the Act, throughout the year ended 31 December 2023.

An assurance engagement report on the Party's compliance with the Electoral Act involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the requirements of the Electoral Act. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance with the requirements of the Electoral Act as evaluated against the Return.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure it is possible that fraud, error, or non-compliance with compliance requirements may occur and not be detected.

A reasonable assurance engagement throughout the year ended 31 December 2023 does not provide assurance on whether compliance with the requirements of the Electoral Act will continue in the future.

Who we Report to

This report is prepared for use by the Party Secretary in accordance with the requirements of the Electoral Act. Our compliance work has been undertaken so we can state to the Freedoms New Zealand Party Secretary those matters undertaken and for no other purpose. To the fullest permitted by law, we do not accept or assume responsibility to anyone other than Freedoms New Zealand and the Party Secretary, for our compliance work, or for any other purpose other than that for which it was prepared.

Blackmore Virtue & Owens

Blackmore, Virtue and Owens
AUCKLAND
1 May 2024

30th April 2024

Alex Houghton
BVO Audit
PO Box 9579
Newmarket
Auckland 1149

Dear Alex

LETTER OF REPRESENTATION FOR PARTY DONATIONS AND LOANS RETURN FOR 2023

This representation letter is furnished in connection with the return of party donations and loans for the 2023 calendar year (the return) by Freedoms New Zealand (the Party) made in accordance with sections 210 and 214C of the Electoral Act 1993 (the Act) as at 31 December 2023, which has been subject to an assurance engagement and reported on by you in accordance with sections 210A and 214D of the Act.

Please note, a number of changes have recently been made to the reporting of party donations in the Act which came into effect on 1 January 2023. These changes apply for the party donations and loans return for the year ending 31 December 2023.

In accordance with the changes, an auditor's report on the annual return of party donations is required if the total amount of donations received exceeds \$50,000, or the party secretary has entered at least one party loan during the year or has an unpaid balance exceeding \$15,000 on a loan entered into during any previous year. An auditor's report on the annual return of party loans is required unless it is a nil return.

I understand that the assurance engagement was conducted in accordance with the relevant provisions of the Act and the applicable auditing and assurance standards issued by the New Zealand Auditing and Assurance Standards Board (SAE 3100 Assurance Engagements on Compliance).

I confirm and take responsibility for the following representations after taking all reasonable steps to assure myself of them:

1. The return has been prepared in accordance with the relevant provisions of the Act.
2. I acknowledge my responsibility for the preparation of the return in compliance with the Act, including identifying the risks that threaten the compliance requirements being met, and designing, implementing and maintaining internal controls to mitigate those risks, including the risk of fraud, so that those risks will not prevent compliance with the Act.

3. I am responsible for establishing and maintaining a system of internal control designed to provide reasonable assurance as to the integrity and reliability of the return. I have done this, and all explanations or demonstrations of this to you have been complete and accurate.
4. All information, such as records, documentation, and other matters of which the Party is aware are relevant to the assurance engagement have been kept by the Party (including subsidiary entities) and made available to you, and these materials will be retained in accordance with the requirements of the Act.
5. For all donations over \$50 (other than anonymous donations), I have established and implemented processes to ensure that all reasonable steps in the circumstances have been taken to check whether a donation is made by or on behalf of an overseas person or includes a contribution made by or on behalf of an overseas person.
6. I have disclosed to you to the best of my knowledge:
 - 6.1 any material transactions not disclosed in the records;
 - 6.2 any alleged, suspected or proven illegal activity under the Act or other legislation potentially relevant to the return or instances of non-compliance with applicable requirements;
 - 6.3 the fact of, and results from, any assessment made by me that considered whether the records of the Party may be materially misstated or incomplete for any reason;
 - 6.4 any deficiencies in internal control relevant to the assurance engagement that are not clearly trivial and inconsequential of which I am aware; and
 - 6.5 any events subsequent to the date of this letter that could have a significant effect on your conclusion/opinion in your assurance report.
7. I have provided you with:
 - 7.1 any additional information that you requested from the Party for the purposes of the assurance engagement; and
 - 7.2 unrestricted access to persons within the Party from whom you determined it necessary to obtain evidence.
8. The return contains the total returnable donations received by the Party in the 2023 calendar year or for parties registered during 2023, from the date of registration to 31 December. The return includes:
 - 8.1 donations in the form of money, goods or services paid for by others, discounts given on goods or services provided to the party, premiums paid in respect of good or services provided by the party, and credit provided to the party at terms more favourable than the prevailing commercial terms, including the value of GST on any of those items;
 - 8.2 donations of more than \$5,000 in aggregate from an individual donor;
 - 8.3 donation contributions of more than \$1,500 from an individual contributor that add up to more than \$5,000 in aggregate from that contributor;
 - 8.4 anonymous party donations of more than \$1,500 or more than \$50 in any case where the party secretary has reasonable grounds to suspect the donor is an overseas person;

- 8.5 overseas donations of more than \$50;
 - 8.6 donation contributions from an overseas person of more than \$50;
 - 8.7 payments received from the Electoral Commission of donations protected from disclosure;
 - 8.8 the number of, and aggregate amount of, anonymous donations of \$1,500 or less;
 - 8.9 the number of, and aggregate amount of, donations not exceeding \$1,500;
 - 8.10 the number of, and aggregate amount of, donations of more than \$1,500 but not more than \$5,000;
 - 8.11 a breakdown of all donations received showing the amounts received as monetary and non-monetary donations.
9. The return includes:
- 9.1 any loans entered into during the year that exceed \$15,000;
 - 9.2 any loans exceeding \$15,000 entered into in any previous year that have an unpaid balance exceeding \$15,000 as at 31 December 2023;
 - 9.3 any loans entered into during the year of less than or equal to \$15,000 if the loan exceeds \$15,000 when aggregated with all other loans entered into during the year by the same lender and any unpaid balances of any loans from the same lender in any previous year; and
 - 9.4 the number and aggregate amount of all other loans entered into during the year of not less than \$1,500 and not more than \$15,000.
10. The return's contents have been determined by considering the questions set out in the Appendix to this letter and the relevant provisions of the Act.
11. Where an assessment has been made of the reasonable market value of a donation, the basis of the assessment is fair and appropriate, and has been properly applied and recorded.
12. Any and all misstatements you have identified during the course of your assurance engagement have been adjusted in the final return.
13. I have completed my own procedures, distinct from your assurance engagement processes, to evaluate the accuracy and completeness of the return.
14. The return is free of any material misstatements or omissions.

These representations are made in terms mutually agreed between us, and to supplement information obtained by you from the records of the Party and to confirm information given to you orally.

Yours sincerely



Jennifer Marshall
Party Secretary