Benjamin [redacted]

From: Dean [redacted]
Sent: Wednesday, 1 April 2026 10:07 am
To: Benjamin [redacted]
Subject: FW: NZ First Donations and Loan Return - follow up

Follow Up Flag: Follow up
Flag Status: Flagged

From: Dean [redacted]
Sent: Monday, 28 April 2025 1:04 pm
To: Holly Howard [redacted]nzfirst.nz>
Subject: RE: NZ First Donations and Loan Return - follow up

Kia ora Holly,

You need to report any unpaid loans as at 31 December 2024 that remains unpaid so it appears that you were correct to originally include these details.

I have pasted a screenshot of the relevant section of the Act below.

214C Annual return of party loans

(1) A party secretary must file with the Electoral Commission, for each year, a return of party loans s

(a) the details specified in subsection (2) in respect of—

(i) every loan entered into during the year that has a loan amount exceeding $15,000; ar

(ii) every loan entered into in any previous year that—

(A) has a loan amount exceeding $15,000; and

(B) at the close of 31 December of the year for which the return of party loans is f balance exceeding $15,000; and

(b) the details specified in subsection (3) in respect of every loan entered into during the year t not exceeding $15,000, but which exceeds $15,000 when aggregated with—

(i) the loan amounts of all other loans provided by the same lender during the year; or

(ii) the unpaid balances of any loans provided by the same lender during any previous y

(c) the details specified in subsection (4) in respect of all other loans entered into during the ye amounts of not less than $1,500 and not more than $15,000.

Please let me know if you need anything further.

Ngā mihi

Dean [redacted] | Senior Advisor Legal | Electoral Commission | Te Kaitiaki Take Kōwhiri
PO Box 3220 | Level 10, 34-42 Manners Street | Wellington

From: Holly Howard s 9(2)(a) [redacted]@nzfirst.nz>
Sent: Monday, 28 April 2025 12:49 pm
To: Dean s 9(2)(a) [redacted]@elections.govt.nz>
Subject: Re: NZ First Donations and Loan Return - follow up

EXTERNAL EMAIL WARNING: Do not open any **attachments** or **links** until you are certain they are safe. Beware of **phishing** attacks, check the sender address. Always report emails you are not certain are safe.

Hi Dean,

Just a question about the loans, originally I had completed section H in full with the details of the pre-existing loan (declared in the previous year). My auditors told me to remove that as the section explicitly asks for details of loans 'entered into during the year'. The loan we have falls outside of the period.

Can you please clarify?

Kind regards

Holly Howard
NZ First Party Secretary

On Mon, 28 Apr 2025 at 10:19, Dean s 9(2)(a) [redacted]@elections.govt.nz> wrote:

> Kia ora Holly,
>
> Thank you for submitting your 2024 Party Donations and Loans Return. We have reviewed the return and would like to follow up on the following issues:
>
> - The return does not provide a split of monetary and non-monetary donations on the front page.

- Part H of the return includes $119,000 for an unpaid loan, but there are no other details and the front page of the return indicates nil loans to report.

- There is no audit report.

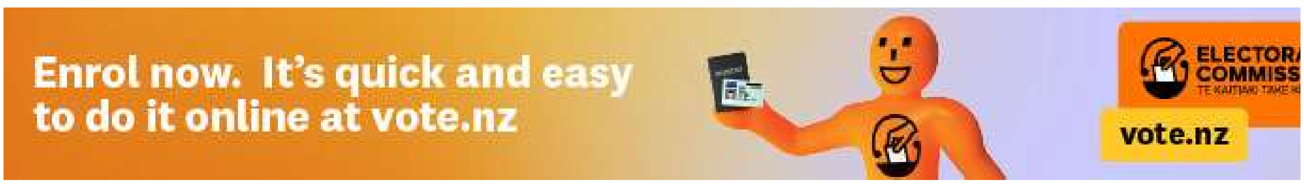
Also, just a reminder that New Zealand First's Section 71A declaration and accompanying information is also due by 30 April.

Please let me know if you have any questions or require any further clarification.

Ngā mihi

Dean [redacted] s 9(2)(a) | **Senior Advisor Legal** | **Electoral Commission** | Te Kaitiaki Take Kōwhiri

PO Box 3220 | Level 10, 34-42 Manners Street | Wellington



ELECTORAL COMMISSION
TE KAITIAKI TAKE KŌWHIRI

Annual return of party donations and loans

Party name: New Zealand First

Initial process on receipt of annual return of donations and loans:		
1.	Date received	29/4/2025
Check return is in order:		
2.	Did the Party Secretary file the return and sign and date the declaration?	✓
3.	Is the return on the Electoral Commission's form?	✓
4.	Does the return have an auditor's report? **An audit report is not required if the total donations are $50,000 or less and there are no new loans to report, or any loans from prior years with a balance over $15,000**	✓
	4.1. Is the auditor's report from the auditor appointed under s 206J?	✓
	4.2. Does the auditor's report state whether, in the auditor's opinion, the return fairly reflects the party donations received and loans entered into by the party secretary?	✓
	4.3. Is the auditor's report dated as being completed after 31 December 2024?	✓
If the return appears to be incomplete:		
5.	Contact the party secretary by email to explain what omission or error has been identified at the initial checking stage and specify what the party secretary needs to do and the timeframe to remedy the return.	Follow up sent prior to 29/4
If the return appears to be complete:		
6.	Advise the party secretary by email the information has been received, and appears to be in order, but will be subject to later checking.	✓
Check the return for compliance:		
7.	Was the completed return received by 30 April? If late, is there a reason it wasn't filed on time? If not, and the matter has already been referred to Police – advise Police that the return has been filed.	✓
8.	Does the return or audit report give any indication there may have been a failure to keep proper records of party donations or party loans?	No
9.	Is it a nil return? If not check each part of the return and complete the relevant parts of the checklist. For all returns check against any loans exceeding $30,000 entered into by parties during 2024.	Done

10.	Has the party included a total of monetary and non-monetary donations reported?	✓
Check Part A: 11.	Is all the information required in Part A present? Check each donation listed includes the following: • The donor's name • The donor's address – residential address for an individual, principal place of business or headquarters for a body • The date the donation was received • Whether the donation contains contributions • The amount of the donation or total aggregated donations from donor	✓
12.	Does Part A appear to be false in any material particular?	No
13.	Does Part A appear to indicate a donation exceeding $50 was received from an overseas person?	No
Check Part B: 14.	Is all the information required in Part B present? Check each contribution listed includes the following: • The contributor's name • The contributor's address – residential address for an individual; principal place of business or headquarters for a body I f • The donation number(s) in Part A that the contribution(s) was part of • The amount of the contribution or total aggregated contributions • The date of the related donation	Nil
15.	Does Part B appear to be false in any material particular?	
16.	Does any contribution listed in the Part B indicate a donation may be missing from Part A?	
17.	Does any of the information in Part B, or in Part A, appear to indicate there may have been a failure to comply with the requirements for disclosing contributors?	
18.	Do any of the contributions listed appear to indicate a donation was received funded from contributions exceeding $50 made by an overseas person?	
Check Part C: 19.	Is all the information required in Part C present? Check each anonymous donation listed includes the following: • The date the donation was received • The amount of the donation • The amount paid to the Electoral Commission • The date payment was made to the Electoral Commission	Nil
20.	Does Part C appear to be false in any material particular?	
21.	Does the return indicate that more than $1,500 of an anonymous donation or more than $50 of an anonymous donation where the party secretary has reasonable grounds to suspect the donor is an overseas person, may have been retained by the party?	

Check Part D: 22. Is all the information required in Part D present? Check each donation from an overseas person listed includes the following: • The name and address of the overseas donor • The amount of the donation or the total amount of aggregated donations • The date(s) of the donation or each aggregated donation received • The amount paid to the overseas person or to the Electoral Commission • The date payment was made to the Electoral Commission	Nil
23. Does Part D appear to be false in any material particular?	
24. Does the return indicate more than $50 of an overseas donation may have been retained by the party?	
Check Part E: 25. Is all the information required in Part E present? Check each donation with a contribution from an overseas person includes: • The name and address of the overseas contributor • The amount of the contribution or total aggregated contributions • The donation number in Part A or D the contribution was part of, and the date made • The amount returned and date paid back to the donor or to the Electoral Commission	Nil
26. Does Part E appear to be false in any material particular?	
27. Does the return indicate that donations containing more than $50 of an overseas contribution may have been retained by the party?	
Check Part F: 28. Is all the information required in Part F present? Check this against the online list of donations protected from disclosure. Check each donation protected from disclosure listed includes the following: • The date the payment was received • The amount of the payment • The amount of interest included in the payment	Nil
29. Does Part F appear to be false in any material particular or incomplete compared to payments made by the Commission?	
Check Part G: 30. Is all the information required in Part G present? Check the party secretary has completed the number and amount of total donations for each of the three categories.	✓

Check Part H: 31. Is all the information required in Part H present? Check each party loan listed that exceeds $15,000, or aggregated loan that exceeds $15,000, includes the following: • The lender's name and address • The amount of the loan • The date the loan was entered into • The repayment date • The interest rate or rates • Any unpaid balance • The guarantor's name and address (if any) • Any details of security given or loan terms	✓
32. Does Part H omit information provided in section 214F, return of loans exceeding $30,000, that should be included?	No
33. Does Part H disclose any loan that should have been included in a section 214F return?	No
34. Does Part H appear to be false in any material particular?	No
Check Part I: 35. Is all the information required in Part I present? Check the party secretary has completed the number and total amount of any loans between $1,500 and $15,000.	✓

Return checked by		
Name: Dean [redacted]	**Signed: DS**	**Date: 29/4/25**
Return approved by		
Name	**Signed**	**Date**
If return is incomplete/information is missing:		
36. Advise the party secretary of the required information and whether: • A schedule containing the supplementary advice (provided in a timely manner) will suffice; or • A complete new return (with a new auditor's report) needs to be filed.		Return amended with details of donor in Part A added
Amended return checked by		
Name	**Signed**	**Date**
Return approved by		
Name Natalie [redacted]	**Signed**	**Date 30/4/25**
If return is complete		
37. Save an electronic copy of the return in the appropriate Year Folder 38. Enter details into summary table for the website		Done

From: EC Legal
To: Holly Howard
Subject: RE: Loan declaration
Date: Friday, 22 December 2023 12:17:33 pm
Attachments: Over $30,000 loan form NZF Patterson.pdf
image001.png
Over $30,000 loan form NZF Jones .pdf

Good afternoon Holly

I can confirm receipt of the attached returns.

With regards the loan from Mark and Jude Patterson, the repayment day is reported as 31 March 2023. We presume this is a typo with the year that needs to be corrected.

For completeness can you also include the unpaid balance of the loan in each return. If no payments have been made this will be the total amount of the loan.

Ngā mihi

Natalie [redacted] s9 (she/her) | **Principal Advisor Legal**
Electoral Commission | Te Kaitiaki Take Kōwhiri
PO Box 3220 | Level 10, 34-42 Manners Street | Wellington
www.vote.nz | www.elections.nz

From: Holly Howard
Sent: Friday, December 22, 2023 11:50 AM
To: L & P Enquiries
Subject: Re: Loan declaration

> **Electoral Commission Cyber Security Warning:** This email originated from outside of the Commission. Please take extra care when clicking links or opening attachments. When in doubt, contact the IT Service Desk.

Good morning,

Please find the two loan declaration documents attached,

Kind regards

Holly Howard

NZ First Party Secretary

On Wed, 13 Dec 2023 at 17:51, L & P Enquiries <legal@elections.govt.nz> wrote:

> Good afternoon Holly
>
> Attached is the return form to report loans over $30,000. This form is also available in the Party Portal, along with the annual return form.
>
> Ngā mihi
>
> **Natalie** [redacted] s 9(2)(a) (she/her) | **Principal Advisor Legal**
> **Electoral Commission** | Te Kaitiaki Take Kōwhiri
> PO Box 3220 | Level 10, 34-42 Manners Street | Wellington
> www.vote.nz | www.elections.nz

From: Holly Howard <[redacted]@nzfirst.nz>
Sent: Wednesday, December 13, 2023 1:44 PM
To: L & P Enquiries <legal@Elections.govt.nz>
Subject: Loan declaration

Electoral Commission Cyber Security Warning: This email originated from outside of the Commission. Please take extra care when clicking links or opening attachments. When in doubt, contact the IT Service Desk.

Good afternoon,

Can you please send me the current version of the loan declaration document.

Thank you for your assistance,

Kind regards

Holly Howard
NZ First

Over $30,000 loan return

ELECTORAL COMMISSION
TE KAITIAKI TAKE KŌWHIRI

Please turn over and read the guidance before completing this form

Party name

New Zealand First Party

Lender details

Provide the residential address for an individual

Provide the street address of the principal place of business or headquarters for an incorporated or unincorporated body

Name: Dorothy Jones

Address: 119a Waimate North Road
Kerikeri

Total loan amount and date entered into

For aggregated loans give the date the last loan was entered into

Total amount: $ 180,000.00

Date loan entered into: 20 December 2023

Aggregated loans

Complete this section if you need to report multiple loans from the same lender

List each loan and the date it was entered into

Continue on a separate sheet if needed

Amount	Date received	Amount	Date received
$		$	
$		$	
$		$	
$		$	

Details of principal loan

If no repayment date, insert "no repayment date"

Provide any terms of the loan agreement that enables the lender to reduce or extinguish the loan amount, or interest, or both, or grant concessions in respect of repayment of that amount, or interest, or both

Repayment date of loan: 20 December 2025

Interest rate(s) of loan: 6% per annum if demanded.

Unpaid balance of loan:

Details of any security given for the loan:

Details of any term of the loan agreement: Minimum payment $2000.00 per month.

Guarantors

Complete this section if there are any guarantors of the loan

Guarantor's name:

Guarantor's address:

Declaration

Once completed, the return must be filed with the Electoral Commission within 10 working days of entering into the loan (or aggregated loan) exceeding $30,000

I declare that to the best of my knowledge this return contains all the information required pursuant to section 214F of the Electoral Act 1993, is an accurate record and is not false in any material particular.

Name: Holly Howard

Signature:

Date: 22 December 2023

Please turn over to complete and sign the return form

Questions? Read here

When to use this form?

This form must be used for every party loan that:

- exceeds $30,000, or
- when aggregated with all other loans by the same lender in the last 12 months, exceeds $30,000.

Who should complete this form?

The party secretary is responsible for filing the return with the Electoral Commission.

What is the deadline for filing?

This form must be filed with the Commission within 10 working days of the loan being entered into by the party, or the last loan aggregating to more than $30,000 from the same lender in a 12 month period.

What happens to the information provided?

Once a completed return is received, the details in the return will be published on www.elections.nz.

Please note that

- 'over $30,000' means $30,000.01 or more
- aggregation is based only on principal loan amounts
- aggregation for the purpose of a future loan exceeding $30,000 return restarts at $0 for the lender named in this return
- the loan(s) disclosed on this form must also be considered for inclusion in the party's annual return of loans

Further information

For more information about loans please refer to the Guidance and Training section of the Party Portal.

The loan rules can be found in sections 214F-J of the Electoral Act 1993.

Lodging the return

The completed return form can be:

- Uploaded via the portal
- Emailed to legal@elections.govt.nz
- Delivered to Level 4, 34-42 Manners Street, Wellington

ELECTORAL COMMISSION
TE KAITIAKI TAKE KŌWHIRI

Over $30,000 loan return

Please turn over and read the guidance before completing this form

Party name

New Zealand First Party

Lender details

Provide the residential address for an individual

Provide the street address of the principal place of business or headquarters for an incorporated or unincorporated body

Name: Mark and Jude Patterson

Address: 28 Greenbank Road,
Lawrence
9532

Total loan amount and date entered into

For aggregated loans give the date the last loan was entered into

Total amount: $ 75,000.00

Date loan entered into: 20 December 2023

Aggregated loans

Complete this section if you need to report multiple loans from the same lender

List each loan and the date it was entered into

Continue on a separate sheet if needed

Amount	Date received	Amount	Date received
$		$	
$		$	
$		$	
$		$	

Details of principal loan

If no repayment date, insert "no repayment date"

Provide any terms of the loan agreement that enables the lender to reduce or extinguish the loan amount, or interest, or both, or grant concessions in respect of repayment of that amount, or interest, or both

Repayment date of loan: 31 March 2023

Interest rate(s) of loan: 0%

Unpaid balance of loan:

Details of any security given for the loan:

Details of any term of the loan agreement: Minimum Payment $2000.00 per month.

Guarantors

Complete this section if there are any guarantors of the loan

Guarantor's name:

Guarantor's address:

Declaration

Once completed, the return must be filed with the Electoral Commission within 10 working days of entering into the loan (or aggregated loan) exceeding $30,000

I declare that to the best of my knowledge this return contains all the information required pursuant to section 214F of the Electoral Act 1993, is an accurate record and is not false in any material particular.

Name: Holly Howard

Signature:

Date: 22 December 2023

Please turn over to complete and sign the return form

Questions? Read here

When to use this form?

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- exceeds $30,000, or
- when aggregated with all other loans by the same lender in the last 12 months, exceeds $30,000.

Who should complete this form?

The party secretary is responsible for filing the return with the Electoral Commission.

What is the deadline for filing?

This form must be filed with the Commission within 10 working days of the loan being entered into by the party, or the last loan aggregating to more than $30,000 from the same lender in a 12 month period.

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Please note that

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Lodging the return

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- Delivered to Level 4, 34-42 Manners Street, Wellington

From:	Holly Howard
To:	EC Legal
Subject:	Re: Loan declaration
Date:	Friday, 22 December 2023 1:12:39 pm
Attachments:	image001.png Over $30,000 loan form NZF Jones (1).pdf Over $30,000 loan form (1).pdf

Electoral Commission Cyber Security Warning: This email originated from outside of the Commission. Please take extra care when clicking links or opening attachments. When in doubt, contact the IT Service Desk.

Good afternoon,

Thank you for that. I have updated the documents attached here.

Kind regards

Holly Howard
NZ First Party Secretary
E.[redacted] s 9(2)(a) @nzfirst.nz

On Fri, 22 Dec 2023 at 12:17, L & P Enquiries <legal@elections.govt.nz> wrote:

> Good afternoon Holly
>
> I can confirm receipt of the attached returns.
>
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> Ngā mihi
>
> **Natalie** [redacted] s 9 (she/her) | **Principal Advisor Legal**
>
> **Electoral Commission** | Te Kaitiaki Take Kōwhiri
>
> PO Box 3220 | Level 10, 34-42 Manners Street | Wellington
>
> **www.vote.nz** | **www.elections.nz**
>
> ---
>
> **From:** Holly Howard [redacted] s 9(2)(a) @nzfirst.nz>
> **Sent:** Friday, December 22, 2023 11:50 AM

To: L & P Enquiries <legal@Elections.govt.nz>
Subject: Re: Loan declaration

Electoral Commission Cyber Security Warning: This email originated from outside of the Commission. Please take extra care when clicking links or opening attachments. When in doubt, contact the IT Service Desk.

Good morning,

Please find the two loan declaration documents attached,

Kind regards

Holly Howard

NZ First Party Secretary

On Wed, 13 Dec 2023 at 17:51, L & P Enquiries <legal@elections.govt.nz> wrote:

> Good afternoon Holly
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> **Sent:** Wednesday, December 13, 2023 1:44 PM
> **To:** L & P Enquiries <legal@Elections.govt.nz>
> **Subject:** Loan declaration
>
> **Electoral Commission Cyber Security Warning:** This email originated from outside of the Commission. Please take extra care when clicking links or opening attachments. When in doubt, contact the IT Service Desk.
>
> Good afternoon,
>
> Can you please send me the current version of the loan declaration document.
>
> Thank you for your assistance,

Kind regards

Holly Howard
NZ First

Over $30,000 loan return

ELECTORAL COMMISSION
TE KAITIAKI TAKE KŌWHIRI

Please turn over and read the guidance before completing this form

Party name

New Zealand First Party

Lender details

Provide the residential address for an individual

Provide the street address of the principal place of business or headquarters for an incorporated or unincorporated body

Name: Dorothy Jones

Address: 119a Waimate North Road
Kerikeri

Total loan amount and date entered into

For aggregated loans give the date the last loan was entered into

Total amount: $ 180,000.00

Date loan entered into: 20 December 2023

Aggregated loans

Complete this section if you need to report multiple loans from the same lender

List each loan and the date it was entered into

Continue on a separate sheet if needed

Amount	Date received	Amount	Date received
$		$	
$		$	
$		$	
$		$	

Details of principal loan

If no repayment date, insert "no repayment date"

Provide any terms of the loan agreement that enables the lender to reduce or extinguish the loan amount, or interest, or both, or grant concessions in respect of repayment of that amount, or interest, or both

Repayment date of loan: 20 December 2025

Interest rate(s) of loan: 6% per annum if demanded.

Unpaid balance of loan: 180,000.00

Details of any security given for the loan:

Details of any term of the loan agreement: Minimum payment $2000.00 per month.

Guarantors

Complete this section if there are any guarantors of the loan

Guarantor's name:

Guarantor's address:

Declaration

Once completed, the return must be filed with the Electoral Commission within 10 working days of entering into the loan (or aggregated loan) exceeding $30,000

I declare that to the best of my knowledge this return contains all the information required pursuant to section 214F of the Electoral Act 1993, is an accurate record and is not false in any material particular.

Name: Holly Howard

Signature:

Date: 22 December 2023

Please turn over to complete and sign the return form

Questions? Read here

When to use this form?

This form must be used for every party loan that:

- exceeds $30,000, or
- when aggregated with all other loans by the same lender in the last 12 months, exceeds $30,000.

Who should complete this form?

The party secretary is responsible for filing the return with the Electoral Commission.

What is the deadline for filing?

This form must be filed with the Commission within 10 working days of the loan being entered into by the party, or the last loan aggregating to more than $30,000 from the same lender in a 12 month period.

What happens to the information provided?

Once a completed return is received, the details in the return will be published on www.elections.nz.

Please note that

- 'over $30,000' means $30,000.01 or more
- aggregation is based only on principal loan amounts
- aggregation for the purpose of a future loan exceeding $30,000 return restarts at $0 for the lender named in this return
- the loan(s) disclosed on this form must also be considered for inclusion in the party's annual return of loans

Further information

For more information about loans please refer to the Guidance and Training section of the Party Portal.

The loan rules can be found in sections 214F-J of the Electoral Act 1993.

Lodging the return

The completed return form can be:

- Uploaded via the portal
- Emailed to legal@elections.govt.nz
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ELECTORAL COMMISSION
TE KAITIAKI TAKE KŌWHIRI

Over $30,000 loan return

Please turn over and read the guidance before completing this form

Party name

New Zealand First Party

Lender details

Provide the residential address for an individual

Provide the street address of the principal place of business or headquarters for an incorporated or unincorporated body

Name: Mark and Jude Patterson

Address: 28 Greenbank Road,
Lawrence
9532

Total loan amount and date entered into

For aggregated loans give the date the last loan was entered into

Total amount: $ 75,000.00

Date loan entered into: 20 December 2023

Aggregated loans

Complete this section if you need to report multiple loans from the same lender

List each loan and the date it was entered into

Continue on a separate sheet if needed

Amount	Date received	Amount	Date received
$		$	
$		$	
$		$	
$		$	

Details of principal loan

If no repayment date, insert "no repayment date"

Provide any terms of the loan agreement that enables the lender to reduce or extinguish the loan amount, or interest, or both, or grant concessions in respect of repayment of that amount, or interest, or both

Repayment date of loan: 31 March 2024

Interest rate(s) of loan: 6% per annum if demanded.

Unpaid balance of loan: 75,000.00

Details of any security given for the loan:

Details of any term of the loan agreement: Minimum Payment $2000.00 per month.

Guarantors

Complete this section if there are any guarantors of the loan

Guarantor's name:

Guarantor's address:

Declaration

Once completed, the return must be filed with the Electoral Commission within 10 working days of entering into the loan (or aggregated loan) exceeding $30,000

I declare that to the best of my knowledge this return contains all the information required pursuant to section 214F of the Electoral Act 1993, is an accurate record and is not false in any material particular.

Name: Holly Howard

Signature:

Date: 22 December 2023

Please turn over to complete and sign the return form

Questions? Read here

When to use this form?

This form must be used for every party loan that:

- exceeds $30,000, or
- when aggregated with all other loans by the same lender in the last 12 months, exceeds $30,000.

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Further information

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- Delivered to Level 4, 34-42 Manners Street, Wellington