

Submission on discussion document: *Publication of Directors' Residential Addresses on the Companies Register*

Your name and organisation

Name	James Costello
Organisation	The Dunollie Group Ltd

Please select if your submission contains confidential information:

I would like my submission (or specified parts of my submission) to be kept confidential, and attach my reasons for this for consideration by MBIE.

Responses to discussion document questions

1	Do you have any comments of our assessment of the options for approaching directors' residential addresses on the Companies Register?
2	What is your preferred option? Prefer Option A
3	Are there interested parties who may have a legitimate reason to need to access directors' residential addresses? If so, who? Yes, media, government organisations, legitimate property requests
4	Is there a public interest in directors' residential addresses being provided to third parties such as journalists? Yes, journalists and debt collection agencies are legitimate. There are probably many more.
5	Under what circumstances should directors' residential addresses be released to an interested party? Debt collection, investigation of fraud or other crime, credit assessments, legitimate urgent property-related contact.
6	Do you agree that government departments and agencies should have automatic access to directors' residential addresses? Yes.
7	Should this access be limited to the enforcement of law or are there other situations where it

	may be appropriate for government departments and agencies to have access to directors' residential addresses?
	There are many reasons that residential addresses are necessary. Relationship property, debt collection, credit assessment, benefit fraud investigation, media investigations, fair trading.
8	Are there other factors which you think should be included in considering approaches to directors' residential addresses in historic documents?
	Option A is suitable. Historic documents may be useful for recovering old debt. However, I have concerns that inappropriate reasons may be used for name suppression if the director has a good lawyer.
9	Do you agree with our preferred approach to historic documents on the companies register?
	Yes
10	Have you encountered situations where you consider that members of the public have abused this provision? If so, please provide details.
	No
11	Do you agree that shareholders' residential addresses should be treated the same way as directors' residential addresses (ie replaced with an address for service)?
	No
12	Are there circumstances where third parties might have a legitimate interest in the residential address of a shareholder?
	Yes. Often shelf companies are run and controlled by the shareholder with listed directors as accountants and lawyers. I may have that wrong though.
13	Do you think any changes need to be made to the residential address requirements for officers of other types of entities?
	No

Other comments