

FORMAL GOVERNANCE COMPLAINT AND NOTICE OF REGULATORY ESCALATION

To:

Chief Executive and Privacy Officer
Horizons Regional Council

Cc:

Board of Directors – Manawatū-Whanganui LASS Limited (MWLASS)

Subject:

Formal Complaint – Alleged Misuse of Position, Privacy Breach, Doxing, and Defamatory Publication by Martyn Lindsay Boyce

This document constitutes a **formal governance complaint** concerning the conduct of **Martyn Lindsay Boyce**, Operations Manager of Manawatū-Whanganui LASS Limited (MWLASS), in relation to the **collection, compilation, and public disclosure of personal information within a sworn affidavit filed in High Court proceedings CIV-2024-454-000074**.

The matters raised in the attached complaint involve **serious concerns regarding:**

- Unauthorised collection and disclosure of personal information
- Publication of private personal identifying information in a public court filing
- Allegations capable of causing reputational harm and embarrassment
- Potential misuse of organisational authority and resources
- Conduct capable of constituting “doxing” and defamatory publication

The complaint identifies potential issues arising under the following legislation:

- Privacy Act 2020
- Local Government Act 2002
- Companies Act 1993
- Harmful Digital Communications Act 2015
- Harassment Act 1997
- Defamation Act 1992
- Crimes Act 1961
- Public Records Act 2005
- Local Government Official Information and Meetings Act 1987

The attached complaint also raises questions regarding **governance accountability for a council-controlled organisation and the potential use of publicly funded resources** in the preparation and publication of the material in question.

For clarity, this notice also confirms that:

- **A formal complaint will be lodged with New Zealand Police** requesting assessment of potential criminal offences.
- Regulatory escalation may occur to the **Office of the Privacy Commissioner** and the **Office of the Auditor-General** should the issues raised require independent review.

Requested Action

Given the seriousness of the issues raised, I respectfully request that:

1. This complaint be **acknowledged within five (5) working days**.
2. A **formal investigation** be initiated into the conduct described.
3. Relevant governance oversight bodies within Horizons Regional Council and MWLASS be **notified of the complaint**.

A **record preservation notice** is included within the attached complaint requiring the preservation of all relevant communications, records, and electronic information relating to the matters raised.

Attachments

Formal Complaint – Breach of Staff Code of Conduct, Privacy Breach, Defamation and Misuse of Position

Supporting documentation and affidavit references

Submitted by:

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Date: 12 March 2026