

# COMPLIANCE PACK

FOR THE PURCHASE OF

32 Tarragon Road, Maidstone, ME160NG

BY

■ **Dr Magdalena Rogut**

■ **Dr Peter Higgins**

THIS PACK

Prepared 1 September 2025

by Lifetime Legal Ltd on behalf of

**Simon Miller**

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- Risk Assessment
- Identity Verification

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Fully Managed Compliance

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# RISK ASSESSMENT

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The HMRC guidance for estate agents with regard to Anti-Money Laundering and Counter-Terrorist Funding sets out the specific requirement for an Estate Agent to consider the risk presented by any client with whom they enter into a business relationship.

This requirement extends to both vendors and purchasers; the risk assessment must be carried out on an individual basis and must consider a variety of factors.

The objective of the risk assessment is to establish the level of Customer Due Diligence which must be carried out. We use an online ID verification service which matches the details of a given client to databases managed by Experian and Equifax.

This service aims to link an individual by name and date of birth to an address and thereby prove that the individual exists and is known to reside at the address they have given.

The databases which are used verify data against multiple sources such as bank account records, credit applications, the electoral roll and so on. Where an individual is considered to represent a higher level of risk, the ID verification service must match against a higher number of primary data sources than are required for an individual who is considered to represent a lower risk.

Taking a number of factors into account, which are listed on the next page, our assessment is:

**HIGH RISK**

# RISK ASSESSMENT

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## CONSIDERATIONS

In assessing the risk associated with this transaction we have considered the following factors:

- 32 Tarragon Road, Maidstone, ME160NG is being purchased by Dr Magdalena Rogut and Dr Peter Higgins
- Dr Magdalena Rogut and Dr Peter Higgins are acting on their own behalf
- Dr Magdalena Rogut is resident in the UK at: 15 St. Andrews Road, Maidstone, ME169AN
- Dr Peter Higgins is resident in the UK at: 15 St. Andrews Road, Maidstone, ME169AN
- The estate agent has not met with the clients
- The property is valued for purchase at £410,000

# IDENTITY VERIFICATION

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## Dr Magdalena Rogut

Date of Birth: 10 November 1996

Resident at: 15 St. Andrews Road, Maidstone,  
ME169AN

Report Outcome: **PASS**

Report Date: 1 September 2025



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## RESULTS

- Address verified with Royal Mail: Pass
- Is client matched to address given?: Pass
- Deceased check: Pass
- Politically Exposed Person (PEP) check: Pass
- Worldwide Sanctions check: Pass
- Relative / Close Associate (RCA) check: Pass
- Special Interest Person (SIP) check: Pass
- Is client identified for AML purposes?: Yes

## ACCOUNTS/SOURCES

- Number of Primary Checks: 6
- Oldest account: 1 August, 2022
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# IDENTITY VERIFICATION

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## Dr Peter Higgins

Date of Birth: 07 February 1993

Resident at: 15 St. Andrews Road, Maidstone,  
ME169AN

Report Outcome: **PASS**

Report Date: 1 September 2025



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## RESULTS

- Address verified with Royal Mail: Pass
- Is client matched to address given?: Pass
- Deceased check: Pass
- Politically Exposed Person (PEP) check: Pass
- Worldwide Sanctions check: Pass
- Relative / Close Associate (RCA) check: Pass
- Special Interest Person (SIP) check: Pass
- Is client identified for AML purposes?: Yes

## ACCOUNTS/SOURCES

- Number of Primary Checks: 5
  - Oldest account: 1 May, 2009
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