BEFORE THE WAITANGI TRIBUNAL

WAI 3310
WAI TBC

IN THE MATTER OF	the Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	the Education Outcomes and Services Kaupapa Inquiry **(WAI 3310)**
AND	
IN THE MATTER OF	a claim by **Watson Ohia, Heywood Kuka** and **Sophie Tukukino** for and on behalf of **Ngā Kura ā Iwi o Aotearoa**

STATEMENT OF CLAIM FOR NGĀ KURA-Ā-IWI O AOTEAROA

Dated on this 16th day of April 2025

RECEIVED
Waitangi Tribunal
16 Apr 25
Ministry of Justice
WELLINGTON

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KUPU WHAKATAKI

He uri whai mana motuhake

Mō tātou, mā tātou, e ai ki a tātou

NGĀ KAITONO – THE CLAIMANTS

1. This Statement of Claim **("SoC")** is brought by **Watson Ohia, Heywood Kuka** and **Sophie Tukukino** for and on behalf of Ngā Kura ā Iwi o Aotearoa ("**the Claimants**").

NGĀ KURA Ā IWI O AOTEAROA

2. Ngā Kura ā Iwi o Aotearoa ("**NKAI**") is a constituted body established in 2007 that represents and supports 50 tribal schools that affiliate voluntarily with it. NKAI supports the aspirations of iwi, whānau, and kura by advocating on a national and international level for the rights and aspirations of their iwi, families, schools, staff, and students, establishing and nurturing partnerships with tribal entities, government agencies, and the private sector to support the schools' kaupapa and strategic priorities.[1]

3. NKAI operates within the state school system as Māori-medium schools with 'designated character' where some or all ākonga are taught the curriculum in te reo Māori (at least 51% of the time).

4. Ngā Kura ā Iwi o Aotearoa is the representative body with a governance body (Ngā Ringa Raupā) consisting of the principals of each Kura ā Iwi.

5. The current members of the Executive Board (Te Komiti Whāiti) are **Heywood Kuka** from Te Wharekura o Mauao (Chair), **Renata Curtis** from Te Wharekura o Ngāti Rongomai, **Michelle Treadaway-Ohia** from Ngā Taiātea Wharekura, **Hira Hona** from Te Kura o Matapihi and **Tamahaia Skinner** from Te Kura o Kōkōhuia. The current Chief Executive Officer is **Watson Ohia**.

6. NKAI currently represent the following kura:

   6.1 Ngā Taiātea Wharekura

   6.2 Tāwera Bilingual School

   6.3 Te Kura ā Iwi o Ngāti Kauwhata

[1] Te Maru o Ngā Kura ā Iwi o Aotearoa can be found here: https://www.kuraaiwi.nz/temaru.html

6.4 Te Kura ā Iwi o Pawarenga

6.5 Te Kura ā Iwi o Whakatupuranga Rua Mano

6.6 Te Kura Ākonga o Manurewa

6.7 Te Kura Kaupapa Māori o Bernard Fergusson

6.8 Te Kura Kaupapa Māori o Mangātuna

6.9 Te Kura Kaupapa Motuhake o Tawhiuau

6.10 Te Kura Mana Māori o Maraenui

6.11 Te Kura Mana Māori o Whangaparaoa

6.12 Te Kura Māori ā Rohe o Waiohau

6.13 Te Kura Māori o Ngā Tapuwae

6.14 Te Kura Māori o Porirua

6.15 Te Kura o Hāpuku

6.16 Te Kura o Hīrangi

6.17 Te Kura o Hiruharama

6.18 Te Kura o Kōkōhuia

6.19 Te Kura o Manutūkē

6.20 Te Kura o Matapihi

6.21 Te Kura o Mātihetihe

6.22 Te Kura o Ngāpuke

6.23 Te Kura o Ngaati Hauaa

6.24 Te Kura o Omanaia

6.25 Te Kura o Ōmarumutu

6.26 Te Kura o Rangiriri

6.27 Te Kura o Te Kao

6.28 Te Kura o Te Moutere o Matakana

6.29 Te Kura o Te Waharoa

6.30 Te Kura o Te Wainui-ā-Rua

6.31 Te Kura o Te Whānau a Apanui

6.32 Te Kura o Tōrere

6.33 Te Kura o Waihārara

6.34 Te Kura o Waikare

6.35 Te Kura o Waioweka

6.36 Te Kura o Waitahanui

6.37 Te Kura o Whāngārā

6.38 Te Kura Taumata o Panguru

6.39 Te Pā o Rākaihautū

6.40 Te Puna Ruku Mātauranga o Whangaruru

6.41 Te Whare Kura Morehu o Ratana

6.42 Te Wharekura o Kirikiriroa

6.43 Te Wharekura o Manaia

6.44 Te Wharekura o Maniapoto

6.45 Te Wharekura o Mauao

6.46 Te Wharekura o Ngāti Rongomai

6.47 Te Wharekura o Rākaumangamanga

6.48 Te Wharekura o Ruatoki

6.49 Te Wharekura o Te Kaokaoroa o Patetere

6.50 Te Whata Tau o Putauaki

7. There are different types of Māori-medium kura. Of the 50 kura represented NKAI, there are 27 Wharekura (Tau 1-14), 2 Kura Tuarua (Tau 7-14, Tau 9-14) and 21 Kura Tuatahi (Tau 1-8).

8. Kura represented by NKAI operate according to the aims, purposes and objectives of its character that are set out in its strategic plan. These kura localise their curriculum to the aims of their iwi, hapū and whānau based on the values of Tihi o Angitu (peaks of achievement/success).

MĀRAURAUTANGA - ELIGIBILITY

9. The named claimants satisfy s 6(1) of the Treaty of Waitangi Act 1975, namely:

    9.1 They are Māori; and

    9.2 The claimant(s) has been, and continues to be, prejudicially affected by the various Acts and Crown policies, practices, acts and omissions adopted by or on behalf of the Crown and its agents.

10. The Claimants' concerns regarding Māori education require addressing by the Tribunal and have not yet been heard.

TE TIRITI O WAITANGI ME ŌNA MĀTĀPONO

11. The Claimants submit that the Crown's acts and omissions breach the following principles of Te Tiriti o Waitangi and the Treaty of Waitangi:

    11.1 **Te mātāpono o te tino rangatiratanga | The principle of tino rangatiratanga (self-determination):** Article 2 of Te Tiriti guaranteed Māori tino rangatiratanga over their land, villages, forests and other taonga. In other words, it guaranteed to Māori the right to live as Māori in terms of their cultural values and practices.

    11.2 **Te mātāpono o te kāwanatanga | The principle of kāwanatanga**: Te Tiriti conferred only limited governmental powers, intended to co-exist with rangatiratanga and not the elevation of naked political power over Te Tiriti obligations. There are clearly defined spheres of influence of kāwanantanga and Crown often oversteps these bounds. This principle is to be upheld in accordance with what is required by good government.

    11.3 **Te mātāpono o te kōtuinga | The principle of partnership**: The principle of partnership seeks to balance the rights of Māori and the Crown to tino rangatiratanga and kāwanatanga, respectively. Te Tiriti established a partnership requiring shared responsibility and control, where each partner acts with utmost good faith. The Crown must enable Māori to have meaningful consultation, engagement and input in decision-making processes.

    11.4 **Te mātāpono o te mana taurite | The principle of equity**: The principle of equity requires the Crown to act fairly and impartially towards Māori and arises from article 3 of the Treaty. It is closely linked to active protection, as the exercise of kāwanatanga requires the Crown to act, to the fullest extent practicable, to achieve equitable outcomes

for Māori

11.5 **Te mātāpono o te kaitiakitanga | The principle of active protection**: The Crown must actively protect Māori rights and interests, including te reo Māori and tikanga as a taonga. The Crown's duty extends beyond passive recognition to the active protection of those Māori rights and interests as guaranteed in the Te Tiriti, its promises, and the principles of partnership and reciprocity.

11.6 **Te mātāpono o te whiringa | The principle of options**: Māori have the right to choose and determine their social, cultural and educational path, whether through living according to their relevant tikanga, participating in mainstream society, or integrating aspects of both worlds.

11.7 **Te mātapono o te whakatika, whakaoranga | The principle of redress:** Where the Crown has breached Treaty principles causing prejudice to Māori, there exists a duty to provide appropriate redress to restore the honour of the Crown and the mana and status of Māori.

TE TIRITI O WAITANGI IN EDUCATION

Inadequate recognition of Te Tiriti o Waitangi in educational policy

12. To give background to this claim, it is important to establish that education policy and delivery for Māori is undermined by the Crown's ongoing failure to meaningfully recognise and implement Te Tiriti o Waitangi and its principles.

13. While Section 9 of the Education and Training Act 2020, references Te Tiriti o Waitangi, it does not appropriately integrate or operationalise its principles, resulting in education that fails to reflect Māori cultural identity, values, language, or aspirations.

14. Both historic and contemporary non-recognition and a failure to uphold Te Tiriti and its principles have led to the underperformance of the education system for ākonga Māori.

National-ACT-NZ First Coalition policies that affect Māori education

15. Following the 2023 general election, a Coalition government was formed between the National, ACT and NZ-First parties. The Coalition Agreements between them contain a number of concerning policies.

16. The National and ACT coalition agreement outlines the following education

related policies which the Claimants argue would create Tiriti breaches:[2]

16.1 Reintroduce partnership (charter) schools (kura hourua) and introduce a policy to allow state schools to become partnership schools.

16.2 Explore further options to increase school choice and expand access to integrated and independent schools including reviewing the independent school funding formula to reflect student numbers.

16.3 Prioritise reporting and enforcement action to reduce truancy, including centrally collecting and publishing attendance data.

16.4 Improve the cost-effectiveness of the school lunch programme.

16.5 Amend the Education and Training Act 2020 such that tertiary education providers receiving taxpayer funding must commit to a free speech policy.

16.6 Amend the Education and Training Act 2020 to enshrine educational attainment as the paramount objective for state schools.

16.7 Restore balance to the Aotearoa New Zealand's Histories curriculum.

17. The National and NZ First coalition agreement outlines the following education related policies which the Claimants argue would create Tiriti breaches:[3]

17.1 Enforce compulsory education and address truancy.

17.2 Focus on doing the basics better through emphasising reading, writing, and maths.

17.3 Refocus the curriculum on academic achievement and not ideology, including the removal and replacement of the gender, sexuality, and relationship-based education guidelines.

18. The Claimants say that these policy, programmes and initiatives seek to diminish, reduce, or erase Māori outcomes currently in place in education.

19. These policies represent a significant shift in approach to Māori education (compared to previous governments), with have reduced emphasis on te reo Māori, mātauranga Māori, and Treaty partnership principles in the education system and disbanding on others. The full implementation and impact of these policies are still developing as the coalition government implements its

[2] National-ACT Coalition Agreement at p 8.
[3] National-NZ First Coalition Agreement at p 8.

assimilationist agenda.

20. On 19 December 2023, the education minister announced the first steps of the 100-day plan for education, which were centred on "removing distractions and teaching the basics brilliantly."[4] The Minister also announced the appointment of a Ministerial Advisory Group to lead the policy changes. The members are Dr Michael Johnston, Dr Audrey Tan, Barbara Ala'alatoa, Christine Braid, Professor Elizabeth Rata, Associate Professor Fiona Ell, Distinguished Professor Gaven Martin, Helen Walls, Iain Taylor, Professor James Chapman, Lorrain Taylor and Dr Melissa Derby.

21. It is a concern to the Claimants that the membership of this Ministerial Advisory Group fails to adequately represent the interests of kaupapa Māori education. It is unclear whether any member is Māori themselves, or has an appropriate background in kaupapa Māori education settings and can speak to the unique experiences faced by kaupapa Māori education institutions in the modern era.

22. Some of the legislative amendments that give effect to these policies are captured in the Education Act Amendment Bill (No 2)[5] and the Māori Education Action Plan[6] also gives effect to the policy platform that is being progressed by the Coalition government.

Changes to the NZ curriculum and language policies

23. The Coalition government has directed a refresh of the New Zealand Curriculum to take place. Therefore, the current curriculum is being updated and will be made available in phases.[7]

24. This has caused a halt to the curriculum refresh that was previously taking place under the former government administration, which was incorporating more mātauranga Māori. This current curriculum refresh will provide for a return to curriculum approaches with less emphasis on Māori knowledge systems.

25. A curriculum refocus has also been progressed which puts an emphasis on "core subjects" with reduced focus on culturally responsive curriculum. The refocus

[4] Press release by Hon Erica Stanford dated 19 December 2023: https://www.beehive.govt.nz/release/first-steps-100-day-plan-education-removing-distractions-and-teaching-basics-brilliantly

[5] The Bill's proposed amendments are found here: https://www.education.govt.nz/our-work/information-releases/issue-specific-information-releases/education-and-training-amendment-bill-no-2

[6] Māori Educaction Action Plan dated 5 November 2024: https://www.beehive.govt.nz/sites/default/files/2024-12/M%C4%81ori%20Education%20Action%20Plan.pdf

[7] Information about the curriculum refresh can be found here: https://newzealandcurriculum.tahurangi.education.govt.nz/new-zealand-curriculum-online/new-zealand-curriculum/new-zealand-curriculum-refresh/5637144667.c

will review the national curriculum with potential reduction of Māori content and focus on literacy, numeracy, and science over cultural education components.

26. Changes are also being made to remove compulsory te reo Māori teaching requirements in schools and promote a shift toward optional rather than mandatory te reo Māori learning.

Changes to governance, structure and policy implementation

27. There are changes being made to how kura are expected to govern and implement policy. There is an active dismantling of Te Mahau, which will restructure or eliminate a programme that was designed to be more responsive to Māori communities. This will see a return to more centralised education governance models.

28. The reintroduction and reestablishment of charter schools also raises questions around the impact this will have on the kura represented by NKAI and the pathways available to them.

29. The potential revisions to school boards requirements regarding Tiriti obligations, which will see a reduced emphasis on Treaty partnership in governance structures will also impact on the governance of kura.

30. With regards to the policy implementation approach, proposals have seen reduced consultation requirements which will place less emphasis on consulting with Māori communities on education policy changes and streamlined policy implementation processes with fewer Treaty partnership considerations.

31. The data collection and reporting processes are also likely to be changed, which will see changes to ethnicity-based reporting requirements in education causing a potential reduction in Māori-specific achievement targets and monitoring.

TE KERĒME – THE CLAIM

32. This claim is made against this contemporary backdrop and concerns acts and omissions by the Crown in relation to:

    32.1 The exercise of mana motuhake and tino rangatiratanga by Māori in the education system;

    32.2 The active protection of te reo Māori, tikanga Māori and mātauranga Māori in the education system;

    32.3 The right of tauira Māori to learn, grow and be educated through kaupapa Māori learning institutions such as Kōhanga Reo, Kura Kaupapa Māori, Kura ā Iwi and Whare Wānanga Māori; and

32.4 The right of Kura ā Iwi to operate as Māori - medium schools with variances

Background

33. This claim recognises that the education system fails ākonga Māori, particularly those in mainstream schooling.

34. Under the current system, Māori continue to experience disproportionate negative effects from systemic failures in the education system, resulting in persistently lower educational outcomes compared to non-Māori.

35. NKAI's role is to ensure that these Kura and communities do not work in isolation but are part of a network of like-minded communities. The vision of NKAI is to ensure that all Uri achieve Mana Motuhake and are empowered with the skills, understandings and wellbeing to be able to determine a positive future reality.

NGĀ HARA A TE KARAUNA - CAUSES OF ACTION

36. The Claimants assert that the Crown has breached, and continues to breach Te Tiriti o Waitangi and its principles through the following causes of action:

TE HARA TUATAHI: DENIAL OF TINO RANGATIRATANGA IN EDUCATION

37. The principle of tino rangatiratanga as provided for by Article II of Te Tiriti o Waitangi, guarantees to Māori the full authority over their taonga. This includes over mātauranga and the way it is shared. Therefore, the right to self-determine extends to education, its processes and practices.

Particulars

38. The Crown has breached this obligation by:

38.1 Imposing centralized governance structures through the Education and Training Act 2020 and its predecessors that marginalize Māori decision-making authority over the education of their tamariki;

38.2 Requiring Kura ā Iwi to operate under regulatory frameworks that do not adequately recognise or accommodate tikanga Māori and iwi-specific educational priorities;

38.3 Implementing policies that restrict the ability of Kura ā Iwi to determine their own curriculum priorities, teaching methodologies, and measures of educational success;

38.4 Failing to provide meaningful mechanisms for iwi and hapū

participation in the development of education policy affecting Māori-medium education; and

38.5 Imposing appointment processes for leadership and governance roles that do not adequately recognize or incorporate tikanga Māori and traditional leadership structures.

TE HARA TUARUA: INEQUITABLE RESOURCING AND FUNDING

39. The principle of kāwanatanga requires the Crown to ensure Māori have access to resources and opportunities as provided to Crown subjects, and as the principle of equity demands, these be provided on an equitable basis with non-Māori:

Particulars

40. The Crown has breached this obligation by:

40.1 Applying funding formulas to Kura ā Iwi that fail to account for the additional costs associated with Māori-medium education, including the development of curriculum resources, professional development for kaiako, and the preservation and transmission of local iwi knowledge;

40.2 Providing inadequate infrastructure funding to Kura ā Iwi, resulting in facilities that are often substandard compared to mainstream schools serving similar populations;

40.3 Failing to provide adequate funding for the development of digital and technological resources appropriate for Māori-medium education contexts and locality of schools;

40.4 Imposing administrative requirements that divert disproportionate resources away from educational delivery in Kura ā Iwi toward compliance activities; and

40.5 Failing to provide equitable funding for professional development and support services for kaiako in Māori-medium settings compared to those available in mainstream education.

TE HARA TUATORU: FAILURE TO PROTECT MĀTAURANGA MĀORI

41. The principles of kāwanatanga and active protection of their taonga, which includes mātauranga Māori (Māori knowledge systems).

Particulars

42. The Crown has breached this obligation by:

42.1 Implementing curriculum frameworks that privilege Western

knowledge systems over mātauranga Māori;

42.2 Failing to adequately incorporate mātauranga Māori into teacher training programs, resulting in a shortage of educators equipped to effectively teach within Māori knowledge frameworks;

42.3 Imposing assessment methodologies that fail to recognize or value learning outcomes grounded in mātauranga Māori;

42.4 Providing inadequate resources for the preservation and transmission of iwi-specific knowledge within educational contexts;

42.5 Failing to protect the intellectual property rights of iwi and hapū in relation to their traditional knowledge when incorporated into educational settings.

TE HARA TUAWHĀ: REGULATORY AND ADMINISTRATIVE BARRIERS

43. The Crown has an obligation to uphold the principle of active protection, which requires the Crown to actively protect Māori interests, including removing barriers to the exercise of tino rangatiratanga.

Particulars

44. The Crown has breached this obligation by:

44.1 Imposing compliance requirements on Kura ā Iwi that are culturally inappropriate and place disproportionate administrative burdens on these institutions;

44.2 Requiring adherence to regulatory frameworks that fail to accommodate tikanga Māori and traditional governance structures;

44.3 Implementing reporting requirements that prioritise measures of success that do not align with Māori educational aspirations and values;

44.4 Failing to provide adequate administrative support tailored to the unique needs and contexts of Kura ā Iwi; and

44.5 Imposing property management requirements that do not accommodate traditional relationships with land and buildings in Māori communities.

TE HARA TUARIMA: INADEQUATE TEACHER TRAINING AND DEVELOPMENT

45. The Crown has an obligation to uphold the principle of active protection, which ensures that Māori have the capacity and capability to exercise tino

rangatiratanga. The principle of options provides for a multiplicity of available avenues for Māori to pursue in their education.

Particulars

46. The Crown has breached these obligations by:

46.1 Failing to implement effective policies to address the critical shortage of qualified teachers for Māori-medium education;

46.2 Providing insufficient support for professional development programs specifically designed for kaiako in Māori-medium institutions;

46.3 Failing to establish clear career pathways and progression opportunities for educators in Māori-medium education;

46.4 Imposing teacher registration and certification requirements that do not adequately recognize or value cultural competence and proficiency in te reo Māori;

46.5 Failing to provide adequate resources for the development of teaching methodologies that effectively integrate tikanga Māori and mātauranga Māori.

NGĀ WHAKAHĀWEATANGA – PREJUIDICE

47. The Crown's acts and omissions as outlined above have resulted in the following prejudicial effects on the Claimants:

47.1 The ongoing marginalization of te reo Māori, tikanga Māori, and mātauranga Māori within the education system;

47.2 Limited ability for Kura ā Iwi to exercise tino rangatiratanga and mana motuhake in determining the educational pathways of their ākonga;

47.3 Inequitable educational outcomes for ākonga Māori compared to non-Māori students;

47.4 Diversion of limited resources toward compliance with Crown requirements rather than toward educational delivery aligned with iwi and hapū aspirations;

47.5 Constraints on the ability of Kura ā Iwi to design and implement curriculum that reflects local iwi knowledge, tikanga, and aspirations;

47.6 Ongoing challenges in recruiting, retaining, and developing suitably qualified kaiako for Māori-medium education; and

47.7 Barriers to the intergenerational transmission of mātauranga Māori, te reo Māori, and tikanga Māori.

NGĀ HUA – RELIEF SOUGHT

48. The Claimants seek recommendations from the Waitangi Tribunal that:

48.1 The Crown formally acknowledge the breaches of Te Tiriti o Waitangi, the Treaty of Waitangi and its principles as outlined in this claim;

48.2 The Crown develop, and co-design in genuine partnership with NKAI and other Māori education authorities, a comprehensive framework for Māori-medium education that:

48.2.1 Recognises and upholds tino rangatiratanga in education;

48.2.2 Provides equitable resources, funding, and infrastructure;

48.2.3 Reduces administrative and compliance burdens;

48.2.4 Supports the development of curriculum, assessment, and pedagogical approaches that reflect tikanga Māori and mātauranga Māori; and

48.2.5 Establishes clear pathways for the training and professional development of kaiako Māori.

48.3 The Crown establish a dedicated Māori-medium education funding stream that provides adequate and sustainable resources for Kura ā Iwi and other Māori-medium education providers;

48.4 The Crown develop and implement, in partnership with NKAI, a comprehensive strategy to address the shortage of kaiako qualified to teach in Māori-medium settings;

48.5 The Crown review and reform the regulatory and administrative frameworks governing Māori-medium education to ensure they align with and support tino rangatiratanga and mana motuhake;

48.6 The Crown develop and implement mechanisms for ongoing and meaningful partnership with NKAI and other Māori education authorities in the development of education policy and practice;

48.7 Any other recommendations that the Tribunal considers appropriate to address the breaches outlined in this claim.

KUPU WHAKAKAPI

49. The Claimants submit that this claim raises significant issues relating to the Crown's obligations under Te Tiriti o Waitangi and its relevant principles in relation to Māori education, particularly with respect to Kura ā Iwi and other Māori-medium education providers.

TE MANA WHAKAPANONI

50. The Claimants reserve the right to amend this claim as necessary.

DATED at Rotorua/Wellington this 16th day of April 2025

Annette Sykes Jack Potaka Maia Te Hira

Roia mō ngā Kaikerēme

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel

AND TO: The Crown

This **STATEMENT OF CLAIM** is filed by **ANNETTE TE IMAIMA SYKES**, **MAIA TE HIRA** and **JACK POTAKA,** Counsel for the Claimants, of the firm Annette Sykes & Co.

The address for service on the abovenamed Claimants is the offices of Annette Sykes & Co. 8 – Unit 1 Marguerita Street, Rotorua 3040.

Documents for service on the abovenamed Claimants may be left at the address for service or may be:- a) posted to the solicitor at Annette Sykes & Co., PO Box 734, Rotorua 3010; or b) transmitted to the solicitor by email on asykes@annettesykes.com and admin@annettesykes.com