

**WAI 2700**

**BEFORE THE WAITANGI TRIBUNAL**

**WAI #TBA**

**IN THE MATTER OF**

the Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF**

the Mana Wāhine Inquiry

**AND**

a claim by Hakepa, on behalf of her tamariki,  
hapū, iwi

and other mana wāhine...

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**Statement of Claim of Hakepa**

**Dated 17 August 2025**

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Prepared by

Hakepa  
Claimant

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**RECEIVED**

Waitangi Tribunal

**18 Aug 25**

Ministry of Justice  
WELLINGTON

## **MAY IT PLEASE THE TRIBUNAL**

### **Statement of Claim seeking to participate in the Mana Wāhine Inquiry**

#### ***Introduction***

1. This memorandum concerns a request regarding participation in the Mana Wāhine (Wai 2700) kaupapa inquiry, and next steps regarding claim particularisation, as the Claimant has recently become aware of the Mana Wāhine inquiry.

#### ***Claimant Whakapapa***

2. The Claimant is Hakepa, her whakapapa is:

Ko Mangarake te maunga  
Ko Ruamahanga te awa  
Ko Takitimu te waka  
Ko Rangitane te iwi  
Ko Ngāti Kahungunu ki Wairarapa te iwi  
Ko Te Atiawa te iwi;  
Ko Ngai Tahu te iwi  
Ko Ngāti Moe toku hapū  
Ko Pāpāwai toku pā  
Kei Te Awa Kairangi ahau e noho ana

#### ***Historical Claim - 2000***

3. This claim concerns Hakepa, who in 2000 was a 27-year-old university student. Later that year, and in the years since, she has suffered profound and enduring harm to her social, economic, and cultural well-being as a direct result of Crown acts and omissions, in breach of Te Tiriti o Waitangi. These systemic failures by state agencies are now the subject of judicial proceedings filed in January 2025 by Hakepa.

#### ***Nature of Claim***

4. This is a claim under section 6 of the Treaty of Waitangi Act 1975 concerning the Crown's ongoing breaches of Te Tiriti o Waitangi in respect of mana wāhine, including:
  - Failure to protect Hakepa and mana wāhine from state discrimination, state violence, familial violence, and unnecessary surgery within state systems.
  - Discriminatory law enforcement practices that have protected violent male perpetrators from prosecution, which failed Hakepa and mana wāhine victims, rendering loss of security.
  - Ongoing structural barriers in access to justice, security, education, economic prosperity and leadership for mana wāhine.

#### ***Treaty Breaches Alleged***

5. The Claimant says these actions and omissions are inconsistent with and breach the principles of Te Tiriti o Waitangi, including:

- **Partnership** – failure to engage with mana wāhine as equal partners in justice and social policy.
- **Active protection** – failure to actively protect the safety, dignity, and well-being of Hakepa and mana wāhine.
- **Equity** – failure to ensure equitable access to security, justice, education, and economic opportunities.
- **Options** – limiting the ability of Hakepa and mana wāhine to exercise choice in their own lives due to systemic abuse and silencing.

***Prejudice***

6. The Claimant has suffered, and continues to suffer, significant prejudice as a result of the Crown’s breaches since 2000, including:
- (a) **Education and Employment** - loss of higher education pathways, stable full-time employment, and professional career prospects.
  - (b) **Health** - misdiagnosis and discriminatory treatment by state health services; harmful and unnecessary medical interventions also resulting in loss of healthy body parts with lasting impacts; and exclusion from decision-making over her infant’s medical care.
  - (c) **Whānau and Culture** - cultural estrangement and exclusion from whānau; loss of connection to children through coercive state actions.
  - (d) **Democratic Rights** - obstruction and discriminatory treatment when seeking to exercise civic and democratic participation, including access to New Zealand Parliament and Ombudsman oversight.
  - (e) **Economic and Intergenerational Impacts** – loss of economic security; intergenerational harm to whānau well-being and prosperity.

***Relief Sought***

7. The Claimant seeks:
- Findings that the Crown has breached Te Tiriti in the ways outlined.
  - Recommendations for systemic reform to protect and uphold mana wāhine.
  - Recommendations for measures to restore economic, cultural, and social well-being to the Claimant and others similarly affected.

Dated at Te Awa Kairangi this 17th day of August 2025.

Signed:



Hakepa  
Claimant