
KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA
I TE TIRITI O WAITANGI

BEFORE THE WAITANGI TRIBUNAL

WAI 3513

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

a claim by JOHN RUDDOCK on behalf of his
whānau and Māori who do not qualify for
citizenship by descent

MEMORANDUM OF COUNSEL FOR THE CROWN
SEEKING LEAVE TO FILE FURTHER BRIEF OF EVIDENCE OF ANDREW ROBERT
JACKSON

24 Hēpetema | September 2025



**Te Tari Ture
o te Karauna**
Crown Law

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RECEIVED

Waitangi Tribunal

24 Sep 25

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. Attached with this memorandum is a brief of evidence of Andrew Robert Jackson on behalf of the Crown.
2. The Crown seeks leave of the Tribunal to file this additional evidence. The purpose of the evidence is to clarify a matter raised during Ms Keisha Castle-Hughes' evidence at the hearing as to whether a child without New Zealand citizenship and who does not hold a residence-class visa or student visa is entitled to enrol in a Kōhanga Reo and attend without paying fees. The Crown submits that the evidence may be of assistance to the Inquiry and, accordingly, respectfully invites the Tribunal to receive it as additional evidence.

24 Hepetema | September 2025



T Smith / Z McCoy
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal
AND TO: Claimant Counsel