

IN THE WAITANGI TRIBUNAL

WAI 3060

WAI 3081

IN THE MATTER OF

Te Rau o te Tika: the Justice System
Kaupapa Inquiry

AND

A claim by BROWNIE JOSEPH
HARDING on behalf of himself and
other Māori inmates from
Northland.

MEMORANDUM OF COUNSEL

Dated 9 October 2025

RECEIVED Waitangi Tribunal
9 Oct 25
Ministry of Justice WELLINGTON

P A R K L A W

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TĒNĀ, E TE TARAIPIUNARA

1. This Memorandum of Counsel is filed on behalf of Brownie Harding (“the Claimant”) and Wai 3081. It responds to the Memorandum-Directions issued by Her Honour Judge Wainwright on 25 September 2025 concerning inquiry planning and fixtures for the 2025/2026 financial year (Wai 3060, #2.6.48).
2. In relation to the information sought at paragraph 15 of the Memorandum-Directions, Counsel advises that:
 - a. The Claimant is due to appear before the Parole Board in early December 2025. If the Claimant’s application for parole is successful, it is likely that he will be released from prison prior to the custodial hearings taking place. In which case, Counsel will seek for his evidence to be provided along with those kaikōrero who are not in custody who are yet to be heard. Counsel will be able to update the Tribunal on the Claimant’s situation by mid-December 2025.
 - b. The Claimant would like 90 minutes to speak about:
 - i. How being housed in prisons outside his home region has caused disconnection from his whānau and culture;
 - ii. The lack of rehabilitation programs available, especially for prisoners serving long sentences; and
 - iii. Inconsistencies in the administration of prison policies and their effects.

Late filing

3. This memorandum was due to be filed by 5pm yesterday, 8 October 2025.
4. Counsel apologises for her late filing and seeks leave to do the same.

DATED at Kaikohe this 9 Tūmatareia 2025.

A handwritten signature in blue ink, appearing to read 'Roslyn Park', is written over a light blue horizontal line.

Roslyn Park
Counsel for the Claimant