

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.

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MEMORANDUM OF COUNSEL REGARDING TUHINGA FOR HE RAU  
KŌRERO TARA Ā-WHARE

Dated 11 Hēpetema 2025

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**PARK LAW**

Roslyn Ngariu Park  
35 Halyard Loop, Haruru 0204  
021 0880 5649  
roslyn@parklaw.nz

RECEIVED

Waitangi Tribunal

12 Sep 25

Ministry of Justice  
WELLINGTON

## TĒNĀ, E TE TARAIPIUNARA

1. This memorandum is filed on behalf of Brownie Harding, the claimant in Wai 3081, and Te Ahua Park who gave evidence in relation to the claim at Kerikeri on 16 May 2025. It responds to the Memorandum-Directions issued by Her Honour Judge Wainwright on 4 September 2025 seeking comment on the proposal to provide the revised tuhinga to representatives of the relevant Crown agencies who attended He Rau Kōrero Tara ā-Whare (Wai 3060, #2.6.47).
2. Both Mr Harding and Miss Park have no objection to Miss Park's revised tuhinga being provided to representatives from the Department of Corrections. In fact, they welcome feedback from Corrections on the issues Miss Park has outlined, which have all been raised with Corrections previously with no response.
3. Mr Harding and Miss Park are also happy for the revised tuhinga to be provided to Corrections even though no representatives from the Department attended the wānanga at Kerikeri.

**DATED** at Kaikohe this 11 Hepetema 2025.



**Roslyn Park**  
Counsel for the claimant