OFFICIAL

IN THE WAITANGI TRIBUNAL

Wai 2700
Wai 3011

IN THE MATTER OF	the Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	the Mana Wāhine Kaupapa Inquiry
BY	Paula Ormsby, on behalf of herself, the Wāhine Toa Chapter of the Mongrel Mob Kingdom, and Priority Whānau, including, Māori women and their children associated with other gangs

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OPENING SUBMISSIONS

6 March 2026

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Waitangi Tribunal

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

I: The Claimants

1. These Opening Submissions are filed on behalf of Paula Ormsby, on behalf of herself, the Wāhine Toa Chapter of the Mongrel Mob Kingdom, and Priority Whānau, including Māori women and their children associated with other gangs ("the Claimants").

2. The Claimant is most known for her contribution to the Mongrel Mob by way of holding educational workshops and wānanga with gang whānau.

3. These opening submissions relate to the Rangatiratanga Pou of the Inquiry.

II: The Claimants' Case

4. In essence the Claimants say that the Crown has breached te Tiriti o Waitangi/the Treaty of Waitangi ("te Tiriti/the Treaty") by:

- **a.** failing to recognise Māori wāhine's status, their mana and Tino Rangatiratanga;
- **b.** failing to actively protect Māori wāhine's mana and Tino Rangatiratanga, which involves their status and authority over their tamariki, their whanau, and their lands and other taonga;
- **c.** failing to provide educational services and leadership opportunities consistent with wāhine Māori's status and mana;
- **d.** failing to protect and nuture wāhine Māori's inherited matauranga, which has been handed down through the generations since time immemorial;
- **e.** imposing foreign regimes in relation to education, social services, health, and the care of children, which has caused wāhine Māori severe trauma; and
- **f.** failing to uphold the Partnership envisaged under te Tiriti/the Treaty; and
- **g.** failing to collaborate in a Tiriti/Treaty consistent manner with Māuri, including the Claimants and their constituents, in all decisions

involving both wāhine Māori, and other members of Aotearoa's society.

III: Evidence to be Presented

5. The Claimants reply upon the evidence of the following witnesses, who have provided a Briefs of Evidence and intend to present at Hearing Week Three:

- **a.** Paula Ormsby;[1]
- **b.** Matilda Kahotea;[2] and
- **c.** Esther Peters.[3]

Paula Ormsby

6. Ms. Ormsby is a wāhine Māori of Ngāti Apakura and Ngāti Maniapoto descent.

7. She is the leader of the Wāhine Toa movement for wāhine Māori and their children within the Mongrel Mob Kingdom.

8. She is also an educationalist with vast experience in early childhood, primary, and tertiary education, with a particular focus on Māori education.

9. Her evidence speaks to how she has experienced repeated exclusion and silencing as a wāhine Māori within educational and Crown-engaged environments. She describes how wāhine Māori, particularly those affiliated with the Wāhine Toa movement, have been disproportionately excluded from meaningful participation and engagement with the Crown.

10. Her evidence speaks to Issue 1 of the Inquiry's Statement of Issues: what are the Crown's duties and obligations under te Tiriti/the Treaty concerning the exercise of rangatiratanga and tikanga by wāhine Māori in relation to their status, roles, responsibilities, practices, values, and beliefs.

Matilda Kahotea

11. Ms. Kohtea, is a wāhine Māori of Ngāti Pūkenga descent.

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[1] *Brief of Evidence of Paula Ormsby*, dated 12 February 2026.
[2] *Brief of Evidence of Matilda Kahotea*, dated 12 February 2026.
[3] *Brief of Evidence of Esther Peters*, dated 12 February 2026.

12. She is the founder and director of the Ngā Kete Wānanga Solutions, a kaupapa Māori organisation focused on providing a 12 week rehabilitation programme for Māori.

13. Her evidence also addresses Issue 1 of the Inquiry's Statement of Issues, Ms. Kahotea addresses the nature and extent of wāhine Māori leadership in rehabilitation and grassroots advocacy, the Crown's obligations to recognise and actively protect that leadership, the ways in which those obligations have not been met, and the prejudice that has resulted. Her evidence is grounded in her lived experience.

Esther Peters

14. Ms. Peters is a wāhine Māori of Ngāpuhi, Ngāi Te Rangi, Te Rarawa, and Ngāi Tahu descent.

15. She is the author and developer of the Reintegration Rehabilitation Reduces Reoffending ("RRR") Model in Aotearoa. This was developed based on Ms. Peters observations within the criminal justice and reintegration systems, particularly for wāhine Māori. These failures include the lack of culturally appropriate and grounded reintegration pathways, the overreliance on punitive and risk focused approaches, and the absence of meaningful, whānau centred support for people transitioning from prison back into their communities.

16. Ms. Peters speaks primarily to Issue 3 of the Inquiry's Statement of Issues ("SoI") and also engages Issues 1 and 2 insofar as they concern the protection of rangatiratanga and wāhine Māori participation in leadership roles.

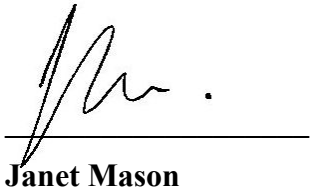
IV: Redress

17. The relief that the Claimants will seek is to be further elaborated upon in Closing Submissions.

V: Conclusion

18. The evidence, presented on behalf of the Claimants, will establish that in breach of te Tiriti/the Treaty and its principles, the Crown has failed to conduct itself in good faith, and has not actively protected the Claimants, their wāhine, their hapū, iwi, whānau whānui, and whāngai in the exercise of their rangatiratanga.

Dated 6 March 2026



Janet Mason
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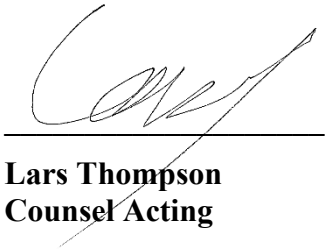

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