

**BEFORE THE WAITANGI TRIBUNAL  
KEI MUA I TE TARAIPUNARA**

**WAI 3300  
WAI 3418**

**UNDER**

**The Treaty of Waitangi  
Act 1975**

**CONCERNING**

**Tomokia ngā tatau o  
Matangireia – the  
Constitutional Kaupapa  
Inquiry**

**AND**

**Wai 3418, a claim by  
Aroha Rickus on behalf  
of Waitaha te Iwi ki te  
Waipounamu**

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**MEMORANDUM OF COUNSEL FILING STATEMENT IN RESPONSE FOR  
WAI 3418**

Dated: 20 February 2026

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**KŌKIRI  
CHAMBERS**

**RECEIVED**

Waitangi Tribunal

**20 Feb 26**

Ministry of Justice  
WELLINGTON

## TĒNA, E TE RŌPŪ WHAKAMANA I TE TIRITI

1. This memorandum is filed for Waitaha te Iwi ki te Waipounamu.
2. By email dated 13 February 2026, the Waitangi Tribunal directed parties to file a response to the Crown statement of position, presented on 13 February 2026, by 20 February 2026.
3. The Wai 3418 statement of reply to the Crown's position accompanies this memorandum.

Dated: 20 February 2026



Bryce Lyall  
Counsel for Wai 1515



Hannah Swedlund