OFFICIAL

Wai 3584, #1.1.1(a)

Alaina Koreena Teki-Clark
[redacted]

11 September 2026

The Registrar
Waitangi Tribunal
Wellington

Tēnā koe,

RE: REFILING OF CLAIM — NGĀTI PĀMOANA — WAI [TO BE ASSIGNED]

I file the following documents on behalf of Ngāti Pāmoana:

(a) Refiling Notice
(b) Updated Statement of Claim
(c) Urgency Application
(d) Special Aid Application
(e) One Page Summary
(f) Schedule of Exhibits
(g) Impact Statement: Ngāti Pāmoana
(h) Thematic Table of Contents
(i) 87 exhibits, available at the following Google Drive folders:

- PART ONE: CURRENT AND CORE EVIDENCE (Exhibits 01–17): https://drive.google.com/drive/folders/1SBFGbsEMGuX2k3CXtT2MRpk0JHXzam-D?usp=drive_link
- PART TWO: BACKGROUND CHRONOLOGY (Exhibits 18–39): https://drive.google.com/drive/folders/1zgst73Wf5AuEjXLQtBmsVwUQhMKX382i?usp=drive_link
- PART THREE: SUPPORTING EVIDENCE (Exhibits 40–87): https://drive.google.com/drive/folders/1ZY0ylFcYoifdE-Hg7hs3CoU2qDuxX8yv?usp=drive_link
- MAIN CLAIM DOCUMENTS (Documents 00–08): https://drive.google.com/drive/folders/1REhkw_1Km6MvSkZwAG_u-4AySYuVRZhU?usp=drive_link

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Waitangi Tribunal
16 Sep 26
Ministry of Justice
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- MASTER FOLDER: ALL FOLDERS: https://drive.google.com/drive/folders/1_pfAFyhHvBKr7XB1--eVRyml7veUhhxh?usp=drive_link

This claim concerns the Crown's ongoing failure to implement the Whanganui settlement. The Crown has failed to monitor its commitments under He Korowai Whakamana, ensure the PSGE is accountable before transferring assets, and resolve post-settlement issues. The claim is brought under section 6(1) of the Treaty of Waitangi Act 1975.

The Crown's OIA responses confirm it did not assess the Interim Trustees' suitability or whether governance concerns affected the PSGE's fitness for purpose. The Crown's own Auditor-General has found systemic failure in monitoring. The Crown's own agency, Te Puni Kōkiri, is the system lead. The Crown has failed to monitor, ensure accountability, and resolve post-settlement issues.

The Crown knows these PSGE structures are failing. Our own river PSGE, Ngā Tangata Tiaki o Whanganui, is the proof. Participation in its 2026 Deed amendment was 9.28%. The Trust claims a mandate from fewer than one in ten beneficiaries. The Crown is about to lock in the same structure for the land settlement.

The Bill received Royal Assent on 11 September 2026. The as-enacted Act is not yet published on legislation.govt.nz. The Beehive press release confirming the settlement legislation passed its final reading is provided as Exhibit 01. I will provide the as-enacted Act when it becomes available. The section 6(6) bar has lifted. I file this claim on that basis, as directed by the Tribunal's letter of 8 June 2026 and the Deputy Registrar's email of 10 September 2026 [Exhibit 85]. The Deputy Registrar confirmed that once the Bill received Royal Assent, the Tribunal could register the claim, subject to filing and jurisdictional requirements. I ask that the claim now be processed for registration.

Interested Parties to be Notified

The following persons and organisations should be notified of this claim:

(a) Te Tari Whakatau / Te Puni Kōkiri, the Crown agencies responsible for the settlement;
(b) Whanganui Land Settlement Negotiation Trust (WLSNT);
(c) Takapau Whāriki Trust;
(d) Tūpoho Investments Ltd / Tūpoho Whānau Trust;
(e) Whanganui District Council, as lender and land seller;
(f) Ken Mair, Tracey Waitokia, Sandi Ranginui, as named trustees and guarantors in the

record;
(g) Ngā Hapū o Te Iwi o Whanganui, the 22 hapū and 17 marae, as potentially affected parties.

Ngāti Pāmoana did not support this settlement. We were excluded. We were denied advice. I accept the settlement will not be overturned. I ask only that the Crown be held to account for its failure to implement it properly.

The prejudice is happening now. I request:

(a) the claim be registered;
(b) urgency be referred to a presiding officer as soon as practicable;
(c) Special Aid be considered alongside urgency.

No filing fee is required. I am unrepresented. I have applied for Special Aid.

Nāku noa, nā

SIGNED:

Alaina Koreena Teki-Clark
Chair, Koriniti Marae Māori Reservation Trust
Speaking for Ngāti Pāmoana and the legacy of Tauira (Granddaughter of Chief Poutama)
[redacted]