SUPPLEMENTARY MEMORANDUM

IN THE WAITANGI TRIBUNAL

WAI [TO BE ASSIGNED]

SUPPLEMENTARY MEMORANDUM

I, Alaina Koreena Teki-Clark, Chair of Koriniti Marae Māori Reservation Trust, speaking for Ngāti Pāmoana and the legacy of Tauira (Granddaughter of Chief Poutama), file this supplementary memorandum.

1. THE CLAIM REMAINS AS FILED

1.1 I filed my claim on 15 September 2026. I filed a supplementary memorandum on 16 September 2026 providing Exhibits 88 and 89. This memorandum provides Exhibits 90, 91, and 92. Nothing in this memorandum changes the claim.

2. NEW EXHIBITS

Exhibit 90 — Te Puni Kōkiri Response, 16 September 2026

2.1 On 10 September 2026, I filed a formal post-settlement issue with Te Puni Kōkiri under the He Korowai Whakamana framework.

2.2 On 16 September 2026, Te Puni Kōkiri replied through Jennifer Price, Acting Manager of Public Sector Monitoring 2. Te Puni Kōkiri stated that the issue relates to Te Tari Whakatau's functions in completing the settlement — including ratification of the PSGE and deed of settlement, and the passage of legislation. It forwarded my email and supporting information to Te Tari Whakatau for consideration and response.

Exhibit 91 — Reply to Te Puni Kōkiri, 16 September 2026

2.3 On 16 September 2026, I replied to Ms Price. I accepted the functional distinction she drew. However, I noted that Te Puni Kōkiri is the system lead for the He Korowai Whakamana framework, which includes a resolution pathway for post-settlement issues. Te Puni Kōkiri did not use that pathway. It forwarded the issue instead. That is the failure I have raised.

Exhibit 92 — OIA 88891 Response, Te Tari Whakatau, 22 September 2026

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2.4 On 22 September 2026, Te Tari Whakatau responded to OIA 88891. The response confirms:

(a) Mūmū has not yet been convened for trustee nominations;

(b) no individuals have yet been nominated or appointed to the four Mūmū trustee positions;

(c) there is no information identifying the individuals concerned, the hapū they represent, or any Mūmū resolutions, hapū resolutions, or meeting minutes relating to those appointments;

(d) the four Mūmū-nominated trustee positions will be filled "before, and in connection with, the first trustee election cycle and first AGM"; and

(e) the AGM is scheduled to occur no later than 18 months from the Establishment Date, estimated for early November 2026, being 40 working days from Royal Assent.

3. THE SIGNIFICANCE OF EXHIBIT 92

3.1 Exhibit 92 is direct evidence of the Crown's failure to ensure accountability before transferring assets.

3.2 The Crown's Departmental Report on Submissions, dated 17 July 2026, stated that four trustees of Takapau Whāriki Trust are hapū-appointed. Te Tari Whakatau now confirms that no such appointments exist.

3.3 The settlement date is approximately 9 November 2026. On that date, the Crown will begin transferring assets to Takapau Whāriki Trust, including the Koriniti Scenic Reserve. The Trust will have no hapū-appointed trustees. The hapū representation mechanism the Crown claimed in the Departmental Report does not exist.

3.4 This supports the claim as filed at section 5 (the Crown's failure to ensure accountability before transferring assets).

4. RELIEF SOUGHT

4.1 No relief is sought in this memorandum. The claim stands as filed.

4.2 I ask that Exhibits 90, 91, and 92 be added to the Schedule of Exhibits and placed on the record.

SIGNED:

A Teki-Clark

Alaina Koreena Teki-Clark
Chair, Koriniti Marae Māori Reservation Trust
Speaking for Ngāti Pāmoana and the legacy of Tauira (Granddaughter of Chief Poutama)
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22 September 2026