OFFICIAL

IN THE WAITANGI TRIBUNAL

OF NEW ZEALAND

WAI 1040
WAI 2003

IN THE MATTER OF	the Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	Te Paparahi o Te Raki Inquiry
AND	
IN THE MATTER OF	a claim by Cheryl Turner and others on behalf of Ngati Korokoro Ngati Wharara and Te Pouka Hapu

---

MEMORANDUM OF COUNSEL AND DRAFT CLAIMANT STATEMENT OF LOCAL ISSUES
Dated this 16th day of April 2012

RECEIVED
Waitangi Tribunal
16 Apr 2012
Ministry of Justice
WELLINGTON

Instructing Solicitor:
Koning Webster Lawyers
PO Box 13309
TAURANGA 3141
Tel (07) 578 2120
Fax(07) 571 8506

Counsel Acting: Katharine Taurau
PO Box 1015
Kerikeri 0245
NORTHLAND
Tel: 09 407 175
Email: kath.taurau@xtra.co.nz

May it please the Tribunal:

1. This Memorandum is filed with the claimants Draft Claimant Statement of Local Issues ("DCSLI") following the Memorandum Directions of the Presiding Officer dated 29 March 2012 (Wai 1040, #2.5.117) granting an extension to midday today.

2. This memorandum is filed on behalf of Cheryl Turner, John Klaricich, Harerei Toia, Ellen Naera, Fred Toi, Warren Moetara and Hone Taimona, claimants on behalf of Ngati Korokoro, Ngati Wharara, Te Pouka Hapu, Nga Hapu o Te Wahapu o Hokianga nui a Kupe ("the claimants").

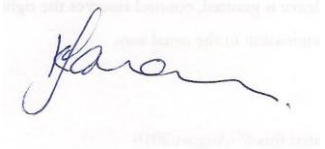
3. The claimants position as ahika at Te Wahapu is unique and the DSCLI is filed to draw the Tribunal's attention to particular Crown breaches of Te Tiriti o Waitangi that affect their rohe. The detail of these breaches are out in their Amended Statement of Claim filed on 31 October 2012 and in the submissions made during week 3 of the Stage One hearings.

4. The DCSLI which is appended to this memorandum below, refers to those of Te Wahapu represented by the claimants as, "the people of Te Wahapu, tangata whenua or ahika" according to the context and the issue.

5. The claimants are supportive of the Hokianga Claimant Statement of Local Issues to be filed shortly.

6. Counsel is grateful for the additional time granted by the Tribunal for the filing of the attached Claimant Statement of Local Issues.

Dated at Kerikeri this 16th day March 2012



Katharine Taurau
Counsel Acting