APPENDIX 1: Questions of clarification of the Crown for Anthony Patete in respect of his report, "Whanganui Northern Cluster ki Te Rohe Pōtae Oral and Traditional History Report" (Wai 898, A108)

1. Would you please specify the source or sources you are you relying upon at paragraphs 104 and 105 (with page references where the sources are written)?

2. At para 105, you state that the Five Tribes negotiated and signed "a compact with the Crown between 1883 and 1886". You then list a number of components to the "series of agreements" and conclude by stating, "What is now known as the 'Rohe Pōtae petition' of 1883 to the House of Representatives was the product of these discussions".

   2.1 How can the Rohe Pōtae petition of June 1883 be the product of "discussions" that spanned the period 1883-1886?

3. At paragraph 109, you state:

   > The Kingitanga leadership was still resisting the opening of the district, unless its authority was recognised, but the Government could now virtually ignore it.

   3.1 Would you please clarify what you are saying the Government could "now virtually ignore"?

   3.2 On what basis do you say that?

4. At para 116 you refer to the North Island Main Trunk Railway Loan Application Act 1886. Do you agree that:

   4.1 the Act specified how a loan of £1m from the Public Work Fund, which loan Parliament had authorised in 1882, was to be used for the construction of the North Island Main Trunk Railway; and

   4.2 more particularly, section 4(5) authorised the Crown to spend up to £100,000 of that loan for the purpose of "acquiring Native or other lands lying within the boundaries described in the Schedule to 'The Native Land Alienation Restriction Act, 1884'"?

5. At para 667, you state that Whakapapa 50 "shows the tuakana line for Ngāti Hikairo from which all Ngāti Hikairo people can trace descent".

   5.1 Does that statement include Ngāti Hikairo ki Kawhia and Ngāti Hikairo ki Tongariro?

6. At para 674 you set out a description of Ngāti Hikairo's rohe, which you source to "Wa [sic] 898 #1.2.6", which is the Amended Statement of Claim dated 9 December 2011 for Wai 833, Wai 965, Wai 1044 and Wai 1065. Then, at para 675, you set out another description of those same claimants'

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rohe, which you source to "Wai 833 #1.1.1(h), p. 2". Would you please clarify:

6.1 the date and title of that statement of claim (ie, Wai 833 #1.1.1(h));

6.2 why you have set out the two descriptions;

6.3 why you have not set out information relating to the rohe to which Wai 37, Wai 933 and Wai 1196 relates; and

6.4 your understanding of why the Amended Statement of Claim dated 23 December 2011 for Wai 37, Wai 933 and Wai 1196 (Wai 898, #1.2.128) lists land blocks that are predominantly in the Kawhia/Pirongia area of the inquiry district?

7. Were the Ngāti Hikairo representatives who entered into the agreements of 1883-1886 with the Crown members of the Ngāti Hikairo groups who are the focus of your report? If so, would you state who those representatives were?