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DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

Attorney for Petitioners

MAUNA KEA ANAINA HOU and KEALOHA
PISCIOTTA; CLARENCE KUKAUAKAHI CHING;
FLORES-CASE OHANA; DEBORAH J. WARD;
PAUL K. NEVES; and KAHEA: THE HAWAIIAN
ENVIRONMENTAL ALLIANCE, a domestic non-profit
Corporation

BOARD OF LAND AND NATURAL RESOURCES
STATE OF HAWAII

IN THE MATTER OF) Case No. BLNR-CC-16-002
)
) PETITIONERS' MEMORANDUM IN
A Contested Case Hearing Re) OPPOSITION TO PERPETUATING
Conservation District Use Permit) UNIQUE EDUCATIONAL
(CDUP) HA-3568 for the Thirty Meter) OPPORTUNITIES, INC.'S MOTION
Telescope at the Mauna Kea Science) TO INTERVENE, DATED MAY 16,
Reserve, Kahohe Mauka, Hamakua) 2016; DECLARATION OF
District, Island of Hawaii,) COUNSEL; EXHIBIT "A"; and
TMK (3) 4-4-015:009) CERTIFICATE OF SERVICE
)
)

PETITIONERS' MEMORANDUM IN OPPOSITION TO
PERPETUATING UNIQUE EDUCATIONAL OPPORTUNITIES, INC.'S
MOTION TO INTERVENE, DATED MAY, 16, 2016

Petitioners MAUNA KEA ANAINA HOU and KEALOHA PISCIOTTA, CLARENCE KUKAUAKAHI CHING, FLORES-CASE OHANA, DEBORAH J. WARD, PAUL K. NEVES, and KAHEA: THE HAWAIIAN ENVIRONMENTAL ALLIANCE, a domestic non-profit corporation (also referred to herein collectively as "Mauna Kea Anaina Hou" or "Petitioners"), by and through their counsel undersigned, and hereby submit their

opposition to Perpetuating Unique Educational Opportunities, Inc.'s ("P.U.E.O., Inc.") Motion to Intervene, dated May 16, 2016,

I. BACKGROUND.

The Conservation District Use Permit Application ("CDUA") for the Thirty Meter Telescope, Island of Hawai'i, dated September 2, 2010, was filed by the "University of Hawai'i c/o of University of Hawaii at Hilo" and the contact person and the contact person's title was listed as Dr. Donald Straney, Chancellor [of the University of Hawaii at Hilo]." Under the Overview of the Proposed Use, Section 1.2 of the CDUA, it provides, in pertinent part (with footnote 4 omitted), as follows:

On behalf of the TMT Observatory Corporation, the University of Hawai'i is seeking a conservation District Use Permit (CDUP) from the State of Hawai'i Board of Land and Natural Resources (BLNR) that will allow the construction, operation, and eventual decommissioning of the Thirty Meter Telescope (TMT) Observatory within an area below the summit of Mauna Kea known as "Area E." The Observatory Corporation is a private non-profit corporation that will be responsible for constructing the TMT project and for managing its operations. The TMT project is currently a partnership among the TMT Observatory Corporation (TMT), the University of California (UC), the California Institute of Technology (Caltech) and the Association of Canadian Universities for Research in Astronomy (ACURA). The National Astronomical Observatory of Japan (NAOJ) is a collaborator and potential partner, and the National Astronomical Observatories of the Chinese Academy of Sciences (NAOC) and India's Department of Science and Technology (DST) are observers and potential partners in the TMT project.

(Emphasis added).

On December 2 and 3, 2010, BLNR held public hearings on the CDUA in Hilo and Kailua-Kona, respectively. Approximately 200 individuals attended the hearings, 84 of whom testified, and a number of individuals and groups provided written comments before and after the hearings. A range of opinions were expressed in support of and against the CDUA, and at least 6 individuals or groups requested a contested case hearing verbally, in writing, or both. In the weeks that followed, Samuel Lemmo, Administrator of the Office of Conservation and Coastal Lands, and Michael Cain, Staff Planner for the Office of Conservation and Coastal Lands, completed a staff report for the BLNR that summarized the CDUA and public comments, including the requests for a contested case hearing, and recommended that BLNR approve the CDUA and issue a

Conservation District Use Permit (CDUP), along with twenty-one conditions for the permit.

On February 25, 2011, at the regularly-scheduled BLNR public board meeting Samuel Lemmo gave a presentation to the Board and forty-one individuals testified either for or against the application, which included several more requests for a contested case hearing and objections to the BLNR issuing a permit before holding a contested case hearing. Despite the public testimony and the objections to the BLNR's issuance of a permit before the contested case hearing was held, the BLNR voted unanimously to approve the application and issued a permit. The BLNR adopted the recommendations and the conditions in the staff report. Subsequently, at the same Board meeting, BLNR voted unanimously to hold a contested case hearing and written requests were also subsequently made by the Petitioners. The Petitioners made timely requests for a contested case hearing as required by Hawaii Administrative Rules ("HAR") §§13-1-28, 13-1-29, 13-1-30 and 13-1-31. While any of the individuals associated with P.U.E.O., Inc., i.e. Richard Ha, Jr., the apparent "Incorporator," according to the Articles of Corporation of P.U.E.O., Inc., Shadd Keahi Warfield, listed as its President, Patrick Le'o Kahaiwaiola'a, William H. Brown, and any others could have requested a contested case hearing on February 25, 2011 and then paid the related fee or received a waiver of the fee and then proceeded to the contested case hearing, if admitted, none of these individuals made such an effort. Similarly, P.U.E.O., Inc. could have been incorporated at that time and then made a timely request to be admitted at the time, but the current board members of P.U.E.O., Inc. did not form such a non-profit and they have provided no explanation for their failure to do so in their pleadings.

Commencing in August of 2011, a hearing officer approved by BLNR's Chair presided over a lengthy contested case hearing process, during which voluminous written direct testimony was admitted, and twenty-six witnesses, under oath, testified and were cross-examined.

On April 12, 2013, and following the conclusion of the contested case hearing, the BLNR issued its 126-page findings of fact, conclusions of law and decision and order ("BLNR's decision and order"). A timely agency appeal was taken by the

Petitioners to the Circuit Court of the Third Circuit and after briefs were submitted by the parties and oral arguments were made before the court, the court issued its decision and order affirming the BLNR's decision and order and entered final judgment on May 5, 2014. The Petitioners then timely filed a notice of appeal.

In that same month, May of 2014, and according to TMT's instant Motion, TMT moved forward with the establishment of the TMT International Observatory, LLC. Please see page 3 of the Memorandum in Support of Motion ("TIO's Memorandum in Support"), attached to TMT's instant Motion. According to TIO's Memorandum in Support, TMT International Observatory, LLC's members include the the Regents of the University of California, the California Institute of Technology, the National Institutes of Natural Sciences Japan, the National Astronomical Observatories of the Chinese Academy of Sciences, the Department of Science and Technology of India, and the National Research Council of Canada and the Association of Universities in Astronomy is a TIO associate.

On July 28, 2014, and according to TIO's Memorandum in Support, the University of Hawaii and the TMT International Observatory, LLC. entered into a sublease agreement and non-exclusive easement agreement ("Sublease") in which a portion of the Mauna Kea Science Reserve was subleased by the University of Hawaii to TMT International Observatory, LLC. to construct and operate the TMT Project on Mauna Kea.¹ Please see Page 4 of TIO's Memorandum in Support.

On August 27, 2015, oral arguments on the Petitioners' appeal were held before the Hawaii Supreme Court and on December 2, 2015, the Hawaii Supreme Court entered its decision in Mauna Kea Anaina Hou v. Board of Land and Natural Resources, 136 Hawai'i 376, 363 P.3d 224 (2015) in which it vacated the Third Circuit Court's May 5, 2014 Decision and Order and Final Judgment thereon and remanded to the circuit court to further remand to the BLNR for proceedings consistent with the Supreme

¹ It is important to note that the CDUA, dated September 2, 2010, that was submitted by UH, has never been amended or resubmitted and it is still being brought on behalf of a different entity from the instant movants, TMT Observatory Corporation, that is still an active corporation according to DCCA records, and the CDUA is not being brought on behalf of the movants, TMT International Observatory, LLC.

Court's opinion, so that "a contested case hearing can be conducted before the Board or a new hearing officer, or for other proceedings consistent with this opinion." On February 22, 2016, the Third Circuit Court, the Honorable Greg K. Nakamura, presiding, entered its order of remand.

On March 31, 2016, the BLNR appointed the Honorable Riki May Amano, Judge (ret.) as the Hearing Officer in the instant proceeding. According to the Articles of Incorporation of P.U.E.O., Inc., attached as Exhibit "A" to its instant Motion, Richard Ha, Jr., Incorporator, signed the Articles of Incorporation on the very same day. On April 8, 2016, TMT International Observatory, LLC, filed its Motion to be admitted as a party in the contested case hearing. According to the State of Hawaii Department of Commerce and Consumer Affairs ("DCCA") records, P.U.E.O., Inc. was registered with the DCCA on April 12, 2016. Please see Exhibit "A" attached hereto which is a true and correct copy of DCCA records on the DCCA website relating to P.U.E.O., Inc. On May 16, 2016, on the same day as the first scheduling conference before the Honorable Hearing Officer, P.U.E.O., Inc. submitted on the same day its instant motion to intervene.

The corporate purposes and powers of the Articles of Incorporation of P.U.E.O., Inc., although including such things as (a), to share the interaction of Hawaiian culture and science, (b) to research and educate the public on the interaction of Hawaiian culture and science and to inspire exploration, and (c) to further educational opportunities for the children of Hawai'i in the fields of science, technology, engineering and mathematics, make no specific reference to Mauna Kea, nor the impacts of the TMT project on the corporation. P.U.E.O., Inc., also does not provide any other information about what it has conducted or performed, to date, as a corporate entity other than the formation of the corporation, seemingly, for the sole purpose of trying to intervene in the instant contested case hearing. Again, the individual board members have not petitioned or moved to be admitted as individuals in the instant proceedings.

II. ARGUMENT.

A. P.U.E.O., INC.'S REQUEST TO BE ADMITTED AS A PARTY IS NOT TIMELY.

P.U.E.O., Inc. requests "intervention" in the contested case as a party pursuant to HAR § 13-1-31(b)(2) or under HAR § 13-1-31(c). The said administrative rules do not allow for intervention. The said administrative rules deal with the admission of parties at a certain stage in the proceedings.

HAR § 13-1-31, provides, in pertinent part, as follows:

Parties. (a) ...[P]arties to a contested case **shall be determined within a reasonable time following the ten-day period following the board meeting,** the presiding officer shall notify all persons and agencies, including the applicant...., who timely petitioned for the contested case hearing of the date and time for a hearing to be determine whether any or all of the persons and agencies seeking to participate in the contested case hearing are entitled to be parties in the contested case...

(b) The following persons or agencies shall be admitted as parties:

...(2) All persons who...otherwise can demonstrate that they will be so directly and immediately affected by the requested action that their interest in the proceeding is clearly distinguishable from that of the general public **shall be admitted as parties upon timely application.**

(c) Other persons who can show a substantial interest in the matter may be admitted as parties. The board may approve such requests if it finds that the requestor's participation will substantially assist the board in its decision making. The board may deny any request to be a party when it appears that:

(1) The position of the requestor is substantially the same as the position of a party already admitted to the proceedings; and

(2) The admission of additional parties will not add substantially new relevant information or the addition will make the proceedings inefficient and unmanageable.

(Emphasis added).

While the Petitioners argued in their Objections filed on April 15, 2016 (as well as correspondence to Board Counsel prior to April 15, 2016) and their subsequent Motion filed on May 13, 2016 in the above-entitled matter that the Board was required to conduct a public hearing pursuant to Sunshine Law, the Board found in three (3) different Minute Orders, Minute Order No. 2, dated April 8, 2016; Minute Order No. 4,

filed on May 6, 2016; and Minute Order No. 9, filed on June 3, 2016, that such a meeting, pursuant to Sunshine Law, does not apply as the Board claimed that it was exercising its adjudicatory functions, pursuant to H.R.S. Section 91-9. As a result, and without the Petitioners waiving their objections and challenges, the BLNR has already determined that the process in determining parties, pursuant to HAR § 13-1-31, is not applicable and has already passed that stage in the proceedings. In fact, and again without waiving the Petitioners' waiving their objections, the Board has already determined, with its findings that it was exercising its adjudicatory functions, pursuant to HRS Section 91-9, that the proceedings are now at the stage of HAR § 13-1-32(c) and the provisions set forth thereafter in the process, with the party determination, under HAR § 13-1-31, no longer being at issue as the proceedings are already in the adjudicatory process, as found by the BLNR.²

In addition, while any of the individuals associated with P.U.E.O., Inc., i.e. Richard Ha, Jr., the apparent "Incorporator," according to the Articles of Corporation of P.U.E.O., Inc., Shadd Keahi Warfield, listed as its President, Patrick Le'o Kahaiwaiola'a, William H. Brown, and any others could have requested a contested case hearing on February 25, 2011 and then paid the related fee or received a waiver of the fee and then proceeded to the contested case hearing, if admitted, none of these

² The Board's refusal to conduct a public hearing pursuant to Sunshine Law also calls into question the Board's failure to follow the concurring opinion of Justice Pollack in Mauna Kea Anaina Hou, with which Justice Wilson joined, and Justice McKenna joined, in part, that the administrative agency is not merely a passive actor or neutral umpire. It has an affirmative duty to fulfill the State's constitutional obligations, and there are now over thirty (30) additional movants and petitioners who are requesting to be admitted as parties in the contested case hearings and who are asserting that their constitutionally protected rights regarding customary and traditional practices and/or rights under the public trust doctrine will be adversely impacted by the proposed TMT observatory project. It appears that the Board has already, *sua sponte*, violated these obligations and has, as the Petitioners respectfully submit, already grossly and systematically violated due process in these proceedings on numerous other occasions as well. (As for the claims of P.U.E.O., Inc., its claims are not applicable to the concerns raised by Justice Pollack in his concurring opinion and the steps that the administrative agency needs to take to ensure that those parties, like many of the other individual parties requesting admission in the contested case hearing, are afforded their rights to due process and their constitutional protections).

individuals made such an effort. Similarly, P.U.E.O., Inc. could have been incorporated at that time and then made a timely request to be admitted at the time, but the current board members of P.U.E.O., Inc. did not form such a non-profit and provide no explanation for their failure to do so in their pleadings.³

P.U.E.O., Inc.'s Motion should be denied as being untimely.

B. P.U.E.O., INC., DOES NOT MEET ANY STANDARD FOR ADMISSION AS A PARTY IN THE CONTESTED CASE.

Again, P.U.E.O., Inc. requests "intervention" in the contested case as a party pursuant to HAR § 13-1-31(b)(2) or, alternatively, under HAR § 13-1-31(c). The said administrative rules do not allow for intervention. The said administrative rules deal with the admission of parties at a certain stage in the proceedings.

HAR § 13-1-31(b) provides, in pertinent part, as follows:

(b) The following persons or agencies shall be admitted as parties:

...(2) All persons who...otherwise can demonstrate that they will be so directly and immediately affected by the requested action that their interest in the proceeding is clearly distinguishable from that of the general public shall be admitted as parties upon timely application.

(c) Other persons who can show a substantial interest in the matter may be admitted as parties. The board may approve such requests if it finds that the requestor's participation will substantially assist the board in its decision making. The board may deny any request to be a party when it appears that:

- (1) The position of the requestor is substantially the same as the position of a party already admitted to the proceedings; and
- (2) The admission of additional parties will not add substantially new relevant information or the addition will make the proceedings inefficient and unmanageable.

Without waiving the timeliness issues asserted in Section II.A. above, P.U.E.O., Inc.'s Motion should also be denied as P.U.E.O., Inc. does not meet the requirements

³ While there has been no evidence obtained, to date, as to any financial connection and/or other direct connections between TMT International Observatory, LLC. and P.U.E.O., Inc., one can argue that the timing of P.U.E.O., Inc.'s incorporation and registration with the DCCA with the TMT International Observatory, LLC's decision to request becoming a party in the instant proceedings seems a bit more than just coincidental.

under either HAR § 13-1-31(b)(2) or HAR § 13-1-31(c), the two provisions under which P.U.E.O., Inc. asserts it should be allowed to “intervene” as a party.

In its Motion, P.U.E.O., Inc. has failed to demonstrate how the corporation will be so directly and immediately affected by the requested CDUP that the corporation should be admitted as a party and has failed to show how its interests are distinguishable from that of the general public.

First of all, given the timing of its formation, the P.U.E.O., Inc. was obviously formed solely to try and participate in the contested case hearing and the Petitioners submit that such an attempt is clearly improper. On March 31, 2016, the BLNR appointed the Honorable Riki May Amano, Judge (ret.) as the Hearing Officer in the instant proceeding. According to the Articles of Incorporation of P.U.E.O., Inc., attached as Exhibit “A” to its Instant Motion, Richard Ha, Jr., Incorporator, signed the Articles of Incorporation on the very same day of the Honorable Hearing Officer’s appointment. On April 8, 2016, TMT International Observatory, LLC, filed its Motion to be admitted as a party in the contested case hearing. According to the State of Hawaii Department of Commerce and Consumer Affairs (“DCCA”) records, P.U.E.O., Inc. was registered with the DCCA on April 12, 2016. On May 16, 2016, on the same day as the first scheduling conference before the Honorable Hearing Officer, P.U.E.O., Inc. submitted its instant motion to intervene.

The corporate purposes and powers of the Articles of Incorporation of P.U.E.O., Inc., although including such things as (a) to share the interaction of Hawaiian culture and science, (b) to research and educate the public on the interaction of Hawaiian culture and science and to inspire exploration, and (c) to further educational opportunities for the children of Hawai’i in the fields of science, technology, engineering and mathematics, make no specific reference to Mauna Kea, nor the impacts of the TMT project on the corporation. P.U.E.O., Inc., also does not provide any other information about what it has conducted or performed, to date, as a corporate entity other than the formation of the corporation, seemingly, for the sole purpose of trying to intervene in the instant contested case hearing. The corporation has not shown how the TMT CDUP will so directly and immediately affect the corporation as the corporation was just formed. Again, the individual board members of the corporation have not

petitioned or moved to be admitted as individuals in the instant proceedings and P.U.E.O., Inc., also is not an unincorporated association of community members like in PASH, a case cited by P.U.E.O., Inc. in its Motion, with members of the association who could show that they were specifically, personally and adversely affected by agency's action, in any event. See Public Access Shoreline Hawaii v. Hawaii County Planning Commission, 79 Hawai'i 246, 900 P.2d 131 (1993).

As for the assertions made by the four individuals, who apparently are directors of the newly formed P.U.E.O., Inc., Richard Ha, Jr. doesn't even claim to be a cultural practitioner on Mauna Kea, and he is the "incorporator." As for the other three individuals, they seem to assert improved access to the Mauna as a result of telescope development, in general, for any of their asserted cultural practices related to the Mauna. The comparisons they make are essentially pre-development of the summit road access versus access post-development of the summit road. This has nothing to do with the proposed addition of another telescope on the Mauna and, thus, even their individual claims are irrelevant to the instant case and do not establish any specific, personal and adverse affect on any of their practices by the TMT project and the CDUP. The assertions and implications in their declarations that telescope development on the Mauna is somehow a recognized cultural and traditional practice firmly rooted in custom and tradition under HRS Sections 1-1, 7-1 and/or Article XII, Section 7 of the Hawaii State Constitution, and Hawaii case law, is completely nonsensical, unfounded, and absurd.

The corporation is also unable to show a substantial interest in the matter for the reasons set forth above and how its interests are any different from UH Hilo, including the UH Hilo Imiloa Astronomy Center, which also claims to promote interaction of culture and science, education, exhibits and tours for school children and other purposes claimed by P.U.E.O., Inc. Furthermore, UH Hilo has called witnesses in the previous proceeding, including Wallace Ishibashi, UH Mauna Kea Management's appointed cultural officer, who testified to very similar claims and issues made by the four individuals, in fact even more Mauna Kea and TMT-specific than the claims and issues of the four directors of P.U.E.O., Inc., during the last contested case process that was vacated by the Hawaii Supreme Court, and, who will most likely be called as

witnesses by UH again in the upcoming contested case hearing (and whose testimony will also be objected to by the Petitioners at the appropriate time). In addition, simple support for the TMT project and development of astronomy and alleged community benefits cannot be established as being so personal, direct and adverse as to meet the standing requirements, nor in distinguishing themselves or the corporation from the interests of the general public to meet the requirements of the rules.

Neither the corporation, nor the four individuals, who are also directors of the corporation, meets the requirements to be admitted as parties either under HAR § 13-1-31(b)(2) or under HAR § 13-1-31(c) and P.U.E.O., Inc.'s Motion should be denied.

III. CONCLUSION.

For all of the foregoing authorities, arguments, and evidence, Perpetuating Unique Educational Opportunities, Inc.'s Motion to Intervene, dated May 16, 2016, should be DENIED.

Respectfully submitted.

DATED: Honolulu, Hawaii, June 13, 2016.



RICHARD NAIWIEHA WURDEMAN
Attorney for Petitioners

MAUNA KEA ANAINA HOU and KEALOHA
PISCIOTTA; CLARENCE KUKAUAKAHI CHING;
FLORES-CASE OHANA; DEBORAH J. WARD;
PAUL K. NEVES; and KAHEA: THE HAWAIIAN
ENVIRONMENTAL ALLIANCE, a domestic non-profit
Corporation

BOARD OF LAND AND NATURAL RESOURCES

STATE OF HAWAII

IN THE MATTER OF) Case No. BLNR-CC-16-002
)
) DECLARATION OF COUNSEL
A Contested Case Hearing Re)
Conservation District Use Permit)
(CDUP) HA-3568 for the Thirty Meter)
Telescope at the Mauna Kea Science)
Reserve, Kaohe Mauka, Hamakua)
District, Island of Hawaii,)
TMK (3) 4-4-015:009)
_____)

DECLARATION OF COUNSEL

I, RICHARD NAIWIEHA WURDEMAN, do declare as follows:

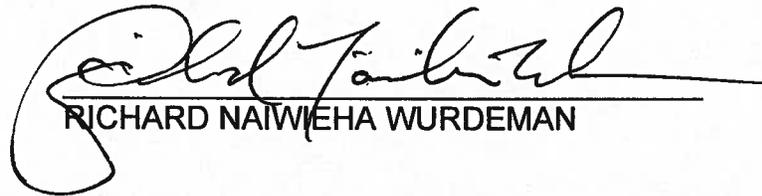
1. I am an attorney licensed to practice law in the State of Hawaii and I represent the Petitioners, MAUNA KEA ANAINA HOU and KEALOHA PISCIOTTA; CLARENCE KUKAUAKAHI CHING; FLORES-CASE OHANA; DEBORAH J. WARD; PAUL K. NEVES; and KAHEA: THE HAWAIIAN ENVIRONMENTAL ALLIANCE, a domestic non-profit Corporation, in the above-entitled matter.

2. I am competent to testify to the matters set forth herein and do so on personal knowledge, unless otherwise indicated.

3. Attached hereto as Exhibit "A" is a true and correct copy of State of Hawaii Department of Commerce and Consumer Affairs ("DCCA") records from the DCCA website (under hbe.ehawaii.gov) relating to Perpetuating Unique Educational Opportunities, Inc.

4. I, RICHARD NAIWIEHA WURDEMAN, do declare under penalty of law do declare that the foregoing is true and correct to the best of my knowledge and belief.

DATED: Honolulu, Hawaii, June 13, 2016.



RICHARD NAIWIEHA WURDEMAN

EXHIBIT "A"

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PERPETUATING UNIQUE EDUCATIONAL OPPORTUNITIES, INC.

DOMESTIC NONPROFIT CORPORATION

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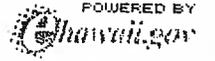


MASTER NAME	PERPETUATING UNIQUE EDUCATIONAL OPPORTUNITIES, INC.
BUSINESS TYPE	Domestic Nonprofit Corporation
FILE NUMBER	262323 D2
STATUS	Active
PURPOSE	A) TO SHARE THE INTERACTION OF HAWAIIAN CULTURE AND SCIENCE. B) TO RESEARCH AND EDUCATE THE PUBLIC ON THE INTERACTION OF HAWAIIAN CULTURE AND SCIENCE AND TO INSPIRE EXPLORATION. (SEE ARTICLES)
PLACE INCORPORATED	Hawaii UNITED STATES
REGISTRATION DATE	Apr 12, 2016
MAILING ADDRESS	120 PAUAHI ST STE 312 HILO, Hawaii 96720 UNITED STATES
TERM	PER
AGENT NAME	NEWTON J CHU
AGENT ADDRESS	120 PAUAHI ST STE 312 HILO, Hawaii 96720 UNITED STATES

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PERPETUATING UNIQUE EDUCATIONAL OPPORTUNITIES, INC.

DOMESTIC NONPROFIT CORPORATION

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Other Filings

DATE ▼	DESCRIPTION ▼	REMARKS ▼
Apr 12, 2016	Articles of Incorporation	Articles of Incorporation

Note: Transactions may be available for purchase. Please see the **Buy Available Docs** tab for additional information.

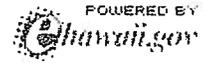


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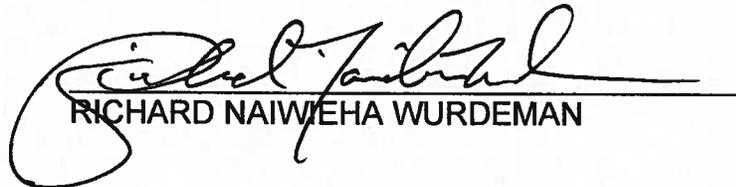
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DATED: Honolulu, Hawaii, June 13, 2016.


RICHARD NAIWEHA WURDEMAN