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BOARD OF LAND AND NATURAL RESOURCES

STATE OF HAWAII

Contested Case Hearing Re Conservation  
District Use Application (CDUA) HA-3568  
for the Thirty Meter Telescope at the Mauna  
Kea Science Reserve, Ka'ohe Mauka,  
Hāmakua, Hawai'i, TMK (3) 4-4-015:009

BLNR Contested Case HA-16-02

JOSEPH KUALII LINDSEY CAMARA'S RESPONSE TO  
UH'S AND TIO'S OPPOSITIONS TO MOTIONS TO  
ADMIT EXHIBITS AND WRITTEN DIRECT  
TESTIMONIES (DOCS 511 AND 516):  
MEMORANDUM IN SUPPORT OF RESPONSE:  
CERTIFICATE OF SERVICE

JOSEPH KUALII LINDSEY CAMARA'S RESPONSE TO UH'S AND TIO'S OPPOSITIONS TO MOTIONS TO ADMIT  
EXHIBITS AND WRITTEN DIRECT TESTIMONIES (DOCS 511 AND 516): MEMORANDUM IN SUPPORT OF  
MOTION CERTIFICATE OF SERVICE

Here comes Joseph Kualii Lindsey Camara's response to UH's and TIO's motions (Docs 511 and 516). On March 16, Both UH and TIO submitted motions opposing admittance of exhibits and WDT that I submitted. I have included my response and defense of the relevance of all the exhibits, testimony and other submittals that were challenged by UH and TIO.

Me ke aloha aina,

Joseph K. L. Camara\_\_\_\_\_

Hilo, Hawaii\_\_\_\_\_

Received  
Office of Conservation and Coastal Lands  
Department of Land and Natural Resources  
State of Hawaii  
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JOSEPH KUALII LINDSEY CAMARA'S  
MEMORANDUM IN SUPPORT OF RESPONSE

MEMORANDUM IN SUPPORT OF RESPONSE

The evidence presented by Joseph Kualii Lindsey Camara is relevant, material and is not privileged or unduly repetitious, and is therefore admissible under the liberal standard of admissibility of evidence in administrative hearings. Therefore, pursuant to HRS 91-10, Camara defends the admittance into the record the following testimony and documentary evidence:

WRITTEN DIRECT TESTIMONY/OPENING STATEMENT CHALLENGED BY UH AND OR  
TIO AND EXPLANATIONS

Exhibit #	Response and Relevance
Written Direct Tetimony of Joseph Kualii Lindsey Camara (Minimally Revised and Submitted March 7)	UH and TIO opposed this testimony on the grounds that it was submitted late and they did not have a chance to cross examine me on the content: This testimony is essentially the same as the testimony submitted by me in October and only has grammatical changes. While reviewing my testimony in preparation to take the stand, I noticed about a dozen grammatical errors. I was rushed to submit my testimony in October and wished to fix the errors before my testimony was put in the permanent record. The content, information and views are the same as the testimony I was cross examined on. If my revised testimony is not admitted by the Hearings Officer for any reason I reserve the right to submit my original testimony be admitted into evidence.
Pre hearing Statement	Joseph Kualii Lindsey Camara Opening Statement: This statement contains my personal views and gives concise insight into why I am a party in this case.

EXHIBITS CHALLENGED BY UH AND OR TIO AND EXPLANATIONS

Exhibit #	Response and Relevance
H-1: Testimony and Pictures of Mauna Kea Rangers Documenting Desecration:	This documents a history of desecration facilitated by Astronomy development on Mauna Kea
H-2, H-3, H-4, H-12: UNDRIP 2007, UN Sacred Site Intervention, UN Rulings, Permanent Forum on Indigenous Issues, Report on	These documents are vital to understanding Native rights under international law. These rights are the foundation of why I stand in opposition to further desecration of Mauna Kea. I continue to oppose the acceptance of Minute Order 19 set forth by PUEO, the scope of which is too narrow. Rulings on Native rights in Hawaii

the fifteenth session (9-20 May 2016)	cannot be viewed in a vacuum. Willful ignorance to the internationally recognized rights of indigenous peoples is not advisable and would amount to negligence.
H-8: Linda Lindsey Kaapuni Mookuauhau	This is a supporting document of my genealogical ties to Mauna Kea
H-9: Credentials and Supporting Documents of Luana Busby Neff	This exhibit gives a background to my cultural anchor on Mauna Kea. Her views and beliefs align with mine and have been foundational to my understanding of and connection to Mauna Kea
H-10: 2013 Hawaii Revised Statutes Title 12 Conservation and Resources 171. Public Lands, Management and Disposition of 171-17 Appraisals	Exhibit showing 2 laws that have been blatantly disregarded and broken on Mauna Kea
H-11: 2009 Comprehensive Management Plan (cross referenced with UHH Exhibit A 009)	I submitted this exhibit because my witness Mililani Trask's testimony made direct references to it.
H-13	May 18, 2016 correspondence between Trask, Trask, Kualii and Ruddle & Kahu Ku Manu

Joseph Kualii Lindsey Camara's WDT has been minimally revised to correct grammatical errors before being moved to the permanent record. The content of the revised document is essentially the same as the WDT previously submitted and on file.

If the Hearings Officer will not accept this minimally revised version of my testimony, I reserve the right to submit the original testimony I submitted in October and have been cross examined into evidence. My testimony is very relevant to this case and needs to be considered in one form or another by the Hearings Officer when ruling on this matter. A technicality should not undermine my investment of time and efforts to this case.

Moreover, Joseph Kualii Lindsey Camara reserves the right to supplement this motion based on additional evidence introduced during cross-examination and or rebuttal. Based on the foregoing, Joseph Kualii Lindsey Camara respectfully requests that the Hearing Officer grant this Motion.

Me ke aloha aina,

Joseph K. L. Camara \_\_\_\_\_ Hilo, Hawaii \_\_\_\_\_

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Document title:

I.

II. CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above referenced document was served upon the following parties by the means indicated:

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