

Legal Concepts and Crises in Tahiti, 1819-1838

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Shortly after Pomare II declared himself to be a Christian convert, the Tahitian Auxiliary Missionary Society was established on May 18, 1818 for the purpose of perpetuating Christianity in his dominions as well as to help finance the efforts of the London Missionary Society throughout the world. At the same time the members of the L.M.S. thought it both expedient and imperative that a set of laws be promulgated, with Pomare's assistance and approbation, that would reflect the precepts "contained in the word of God and the customs of . . . civilized nations."¹ John Davies and Henry Nott, both senior members of the Tahitian Mission, conferred with Pomare in the succeeding months over the details of the proposed code. Although the missionaries insisted that they had "carefully avoided meddling with . . . civil and political affairs," their own spiritual interests and the demands made by the Tahitians themselves compelled them to assume a more active role in the secular affairs of the islands.² Missionary influence in the formation of the new code was considerably more profound than the missionaries themselves were willing to admit, but it is likewise apparent that Pomare himself was most anxious to have his realm transformed into a Polynesian imitation of Great Britain in order to strengthen the political and commercial nexus between the two distant polities.³ On the other hand, Pomare was most reluctant to apportion any part of his power to subordinate chiefs, especially the independently-minded gentry, the *hui ra'atira*, or to allow them any meaningful part in the formation of the new laws. Contrarily, the missionaries were most willing to have the district chiefs share in the government of the islands in order better to supervise the activities of the district parishes. In the end, an amicable compromise was effected between the king and the chiefs, though Pomare's hegemony was in no way changed in favor of the district chiefs (*ari'i*).⁴

The missionaries were quite insistent upon separating civil and religious powers of the new monarchy, though undoubtedly the political administration

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would be founded upon Christian principles. The missionaries were convinced that the history of Christianity proved that combined ecclesiastical and secular power resulted in a "great and serious evil."⁵ Every effort was made to preserve the political autonomy of the district parishes from Pomare's autocratic rule.⁶ The missionaries envisioned a government led by virtuous and devoted men who would promote Christian principles through pious example.⁷

The Pomare code of 1819 was formally presented to the island populace a year later on the anniversary of the founding of the auxiliary mission. In what largely appears to have been a vague ceremonial act of fealty Tati, Utami, Arahu and Veve, the paramount chiefs of Tahiti and Mo'orea, acknowledged the formal promulgation of the code by Pomare.⁸ The code itself was simple and succinct; however, several important administrative concepts were introduced. Articles XVI, XVII and XVIII enumerated the districts (*mataeina'a*) and sub-districts (*mataeina'a i huna*) and their respective judges (*ha'ava*) together with the mandatory judicial procedures. The judges were appointed from the paramount nobility (*hui iatoa'i*) who had professed themselves to be righteous Christians. The court houses were situated throughout the principal divisions of Tahiti and Mo'orea. *Te Fana* and *Te Oroa'a* had three court houses each. *Teva-i-uta* and *Teva-i-tai* had four each while *Te Porionu'u* and the island of Mo'orea had eight each. Judicial procedure (*ha'apao rua i ha'ava*) designated a plaintiff (*fei'a ri'i*) and a defendant (*fei'a hamani ino*), the former of whom was prohibited from taking any action against the accused, but instead was compelled to submit the dispute (*hapa*) to litigation by a judge. Both parties in the dispute could summon witnesses (*fei'a ite*) to testify before the judge located in the area in which the crime was committed and the judge alone would decide the verdict.⁹ Other articles of the code were directed almost exclusively at moral behavior.

- I. Murder (*taparahi*) punishable by death
- II. Theft (*'eia*) confined mainly to livestock
- III. Wandering pigs (*ia tomo ra te puaa*)
- IV. Stolen property (*'eia taoo*)
- V. Recovered property (*taoo moe*)
- VI. Commercial intercourse (*te ho'o*) designed for the protection of merchandise
- VII. Failure to observe the Sabbath (*te ha'apao ra i te Sabati*)
- VIII. Rebellion and sedition (*aitama'i*)
- IX. Male bigamy (*vahine to'opiti hoe tane*)
- X. Deserted females (*vahine mairi tahito*)
- XI. Male and female adultery (*te hara vahine e te hara tane*)
- XII. Desertion of spouses (*te fa'arue tane e te fa'arue vahine*)
- XIII. Failure to provide wife support (*te rave ore te ma'a na te vahine*)
- XIX. Marriage (*fa'aipoipo*)¹⁰

It is obvious that the aforementioned articles were designed to remedy what was perceived to be a plethora of moral violence in the Tahitian society which would ultimately prove injurious to the moral fiber of the new Christian society. The missionaries were quite concerned over the remnant influences

of the renowned *arioi* society and were determined to exorcise its influence altogether. Marriage was formally institutionalized, with each marital union dutifully recorded in a marriage register (*buka fa'aipoipo*). The missionaries also institutionalized the monarchy under the new law and made rebellion and other seditious actions punishable by death. The idea of an autocratic monarchy was considered to be consistent with prevailing missionary principles and received tacit, though not necessarily enthusiastic support from the missionaries.¹¹

The Leeward Island missions soon followed the example of Tahiti and Mo'orea. In 1822 the chiefs of Huahine approved laws and regulations patterned after those of the Windward Islands. Charles Barff and William Ellis were the legal advisers and the code, entitled *E Ture na Huahine* (Laws for Huahine) was presented to the public assembly. The regulations of the Huahine code contained many of the provisions of the Pomare code, though it was more specific in outlining the penalties (*utua*) for violations. As with the Pomare code, the Huahine laws institutionalized the island monarchy, but in addition provided the government with a legal means of support through individual and district taxes.¹² The judicial system was considerably more bureaucratic, with judges appointed by the high chief (*ari'i nui*) or his governors (*hui tavana*). Court records were kept and the judges were paid directly from the king, though all revenue collected through fines went directly to the royal exchequer. Trial by jury was instituted with individual jurors selected through scrutinous questioning by the defendant.

The enforcement of court penalties was supervised by the court messengers (*fei'a vea*), who also acted as court bailiffs. The Huahine code, as well as the Tamatoa code of Ra'iatea (1820), defined more precisely the relationship between the districts and the central government. The sovereignty of the central government was affirmed and the autonomy of the district parishes was protected in the administration of the judicial system and the enforcement of the legal code.

The court system functioned well overtly, at least in the presence of foreign visitors. Captain Frederick Beechey was demonstrably impressed by the dignity of the court proceedings.

The court was ranged on benches placed in successive rows under the trees, with prisoners in front, under the charge of officers with a drawn saber, and habited in a volunteer's jacket and maro. . . . Magistrates are appointed to try the cases and considered their judicial proceedings in open court, the police are continually on the alert both day and night to prevent irregularities and to suppress the amusements of the people, whom from mistaken views of religion they wish to compel to lead a life of austere privation.¹³

In spite of the optimistic reports written by the missionaries and casual visitors, it was evident that the functioning of the legal system depended to a large extent upon the arbitrary inclinations of the *ari'i* rather than upon a philosophy of impartial justice. The moral atmosphere of the legal system was inevitably enhanced or corrupted by the moral example set by the court and the paramount *ari'i*.¹⁴

Available evidence suggests that many judges exceeded their roles as impartial arbiters of justice, and were at times excessive in their dealings, often to the point of dispute with their missionary mentors as J. M. Orsmond readily observed.

. . . the chief judge had interfered in a business that did not belong to him . . . that in addition . . . he had broken the law by banishing the man who ought to be put to work.¹⁵

In another instance, Alexander Simpson had intervened on behalf of one of his household servants who had been accused of not attending public worship.

I went to court to observe their proceedings; after a great deal of discussion as to what law the culprits came under, the Judge, being in a great dilemma, asked what was our practice in England when the persons came under no existing law? I replied that . . . no law was broken, and the accused, would as a matter of course, be set at liberty. The parties before you have committed no crime against the laws of the land although their conduct is highly criminal in the sight of God. . . . I spoke to the Judge complaining of his conduct towards my servant . . . he replied that if I talked in that way it was no use for them to judge the people for this crime, and tomorrow you will have an empty chapel.¹⁶

Treatment of the accused parties often exceeded acceptable propriety. Enforcement of certain laws proved to be excessive and often counter-productive to the objectives of the mission.

You may . . . see cripples blind & bedridden persons crawling on all fours to school & to the hearing of the gospel. Some who cannot walk shuffling along on their bottoms. . . . I have said . . . where are you going? To the place of prayer it has been replied, for the Judges and chiefs say they will take all of our land away if we do not go. . . . On Tairapu the land was actually taken. . . . As soon as the fact reached my ears I sent for the two deacons gave them a hearty reproof & took both of their offices from them. They ran & officially gave back the lands & the breach was made up.¹⁷

Subsequent revisions of the laws were made during the brief reign of Pomare III, largely as a result of a need for the simplification of the judicial bureaucracy and a need to strengthen the weaker aspects of the old laws.¹⁸ An appellate tribunal called the *To'ohitu* (the Seven) was established in revised code of 1824.

The supreme court is composed of seven judges, two of whom are residents of the island of Eimeo (Mo'orea). The judges are also executive officers (governors), and nearly all are chiefs. This double capacity gives them great influence, and their power is sufficient . . . at the same time serves as a check against any encroachment upon the prerogatives of the sovereign.

The power of the court even extends to an impeachment of the royal ruler.

The mode of trial, both civil and criminal cases, is by jury. . . . The jury is composed of six persons and every one has the right of being tried by his peers.¹⁹

The *To'ohitu* were nominated by the *ari'i nui* and confirmed by the newly organized legislature, and no doubt with the unofficial approval of the missionaries.²⁰ The L.M.S. invested a great deal of faith in the leadership qualities of the *To'ohitu*, quite likely because both Pomare III and his successor, Queen Pomare IV, were minors and remained under the dominating influence of the regent Ari'ipaea and other members of the court.²¹ This uneasy situation precipitated a crisis during the reign of the young queen. Ari'ipaea and the royal court pursued a libertine existence and indulged in

practices which many considered morally questionable. Missionary confidence in the young queen diminished considerably.

Pomare has none of the high natural endowments for governing a people . . . professing nothing of talent beyond mediocrity, no acquirements beyond the simple rudiments of reading & writing, governed much more by her senses & selfishness than by her reason she is as might be expected from one having authority under such circumstances despotic, & often revengeful & cruel. The chiefs her minions, the people her slaves.²²

The *To'ohitu* eventually confronted the queen on the subject of her arbitrary and carnal existence.

The supreme judges through Paofai as their speaker addressed the queen, desiring to be informed, whether she was determined to cast off the laws.

. . . The judges reproved the mother and aunt and charged them with leading the queen aside. . . . It was reported that if the supreme judges had brought the queen to her trial . . . they would seize upon the judges and bind them. The judges were united and firm, and have great influence in their districts.²³

After a lengthy sojourn to the Leeward group, Pomare returned to Tahiti in mid-1831 in the company of Tamatoa of Ra'iatea, Mahine of Huahine, and other prestigious chiefs. The Leeward island chiefs had prevailed upon Pomare to restore the traditional fealty rite of the *ahu oto* (weeping cloth) much to the consternation of the *To'ohitu* and the missionaries.²⁴ The judges protested the revival of the ancient custom and attempted to persuade Pomare to relinquish her demands.

The intensity of the crisis heightened when both parties began preparing themselves for armed conflict. Pomare, seeing the danger, retired to Motu Uta island in Papeete harbor. Utami, one of the *To'ohitu*, boldly sought an audience with Pomare and "exhorted the Queen to consider her situation and requested her consent."²⁵ Pomare refused any concessions, no doubt at the urging of her rebellious advisers. Thereupon, Utami seized several persons in the queen's party and "judged them, deprived them of their offices as Governors & sent them away to other districts."²⁶

Ironically, Utami's actions contributed to a lessening of tensions, though the crisis itself remained unresolved. By a fortunate coincidence, a British ship H.M.S. *Comet* arrived in Papeete, attempting to relocate a few Pitcairn Islanders to Tahiti. The presence of the vessel aroused noticeable apprehension in Pomare, whereupon she wrote to Charles Barff and John Williams, asking them to intercede with the governors on her behalf for favorable terms. Both Barff and Williams agreed on the condition that the "Queen should engage to re-establish the Laws & also promise to see them put in full force, that she should relinquish her demands for the *ahu oto* which had occasioned the above difference."²⁷ The officers of the *Comet* aided in the reconciliation, though it was evident that some unspecified concessions were made by the *To'ohitu* in the agreement.

Neither the missionaries nor the *To'ohitu* were successful in reforming the moral conduct of the queen and her court, though they were apparently resigned to accept a distinction between her personal behavior and official acts as the reigning *ari'i nui*.²⁸ Though the *To'ohitu* themselves were not always

united on all legal and political issues, they did manage to maintain the integrity of their office in important matters. The determination of the supreme judges in this respect curtailed any attempt by other *ari'i* to revive traditional patterns of rule considered to be inimicable to the new Christian society.

The early days of Queen Pomare's reign witnessed an increase in the amount of foreign commerce and likewise an increase in the number of foreign residents (*ta'ata popa'a* or *ta'ata mataitai*). Other than the missionaries, most of the foreign residents were former seamen, actively engaged in the liquor trade.

Occasionally these men come on shore . . . with the consent of the chief of the place, but more frequently they come on shore without the knowledge of the latter, and remain in concealment till the vessel to which they belong has sailed and sometime they have been put on shore by the masters of the vessels in opposition to the strongly expressed remonstrances of the chiefs. In most instances the chiefs soon find the conduct and example of their class so desolate and pernicious as to endanger the peace of the community, and to render necessary their immediate removal. This the chiefs have not the power of effecting. . . . The native chiefs are frequently threatened with being fired upon . . . if they persevere in their attempts to remove obnoxious persons in question from their shores.²⁹

It soon became apparent that some form of regulation was needed to control the disruptive influence caused by these sometimes unwelcomed visitors. The Tahitian legislature enacted a set of harbor regulations as amendments to the 1824 code. It was no doubt the first overt attempt to incorporate the growing foreign population into the legal purview of the kingdom.

The enactment of temperance laws in Tahiti effected another legal crisis, this time between the kingdom and its foreign population. The L.M.S. had been greatly influenced by visiting American missionaries to enact temperance laws as a remedy for the growing lawlessness and fading evangelical spirit.³⁰ Although the L.M.S. members had strongly disapproved of the unrestricted use of liquor, they themselves were engaged in distilling spirits to supplement their meager incomes. They, however, were finally convinced that a time had come for more definitive regulation of the liquor trade. On March 3, 1835, a law forbidding the use and trade of liquor, except for medicinal purposes, was passed.³¹

The American and European residents chose not to abide by the new law, in spite of the efforts of the Tahitian authorities to enforce it.

In consequence of that law, the persons appointed to carry it into effect had desired to destroy the contents of various casks of bottles and spirits, but the foreigners who owned spirits objected, denying the right to interfere with private property. The Otaheitian authorities did not persist, as they were told that the first man-o-war which might arrive would certainly take vengeance upon them if they meddled with private property.³²

Reaction from the foreign community was vociferous and a circular of protest was posted in the harbor area.³³ Reliable evidence suggests that the temperance laws were enforced in an arbitrary, if not unlawful manner. Though visiting ships were subject to search in a sometimes less than courteous manner, the missionaries, according to some foreign residents, still kept

private stores of spirits in violation of the law.³⁴ The temperance laws were not successful in the regulation of the illicit liquor trade. Many of the leeward island chiefs continued to manufacture local brews in defiance of their own laws and the advice given by their missionary associates.

Prior to 1836, problems with the foreign community for the most part remained a local concern. The situation, however, changed drastically when the ship *Eliza* arrived from Mangareva in 1836 with two Roman Catholic priests, Louis-Jacques Laval and François d'Assie Caret. United States Consul J. A. Moerenhout offered the two priests his hospitality and protection. British consul-missionary George Pritchard protested the landing of the two priests and attempted to effect their deportation from the islands. Pritchard sought foreign office support in his endeavor and Foreign Secretary Lord Palmerston responded by saying:

... every government has the right to refuse any foreigners permission to reside within its Dominions if the presence of such foreigners is considered hurtful to the state; but if no such reason exists for requiring the foreigners to depart, it is contrary to the Rules of International Hospitality to force them to leave a country in which they wish to take up abode provided they do not infringe upon the Laws of the country.³⁵

Pritchard had no difficulty in persuading the Queen to issue an order of deportation; however, Moerenhout challenged the use of such arbitrary powers, asserting that the queen had no right to enforce such laws and that the Tahitians "were not as yet in a state to make laws for the regulation of commercial intercourse with foreign powers or even to understand the customary interchange of countries. . . ."³⁶ Moerenhout made an earnest attempt to intimidate the queen into revoking her decree. The American consul presented a formal protest written by the two priests saying that "... it was unjust to expel them in this manner that . . . the law . . . was . . . illegal and contrary to the rights of man. . . ."³⁷ Moerenhout argued further that the payment of the disembarkation fee was a *de facto* acceptance of the priests into the kingdom.³⁸ Pritchard rejected Moerenhout's argument and upheld the sovereign right of the Polynesian kingdom to enact and enforce any of its laws in its dominions.

The arrival of the British warship H.M.S. *Actaeon* in late December provided a fortuitous occasion to settle the dispute in a manner so familiar in the Pacific. A meeting was held in which the ship commander Captain Lord Edward Russell served as a mediator. Russell rendered an opinion in favor of the queen, claiming that if the priests remained on the island, "nothing but anarchy and confusion would have inevitably taken place. . . ."³⁹ The priests were compelled to leave the following month. Though the diplomatic victory was won by the jubilant Pritchard, the ultimate victim was Pomare's kingdom, for the Tahitians were oblivious to Pritchard's political and religious prejudices in his dealings with the foreign community. This circumstance would lead disastrously to a confrontation which neither the Tahitians nor the missionaries could successfully avoid.

The legal infrastructure established with the help of the missionaries was challenged by a multitude of problems, both internal and external. Internal

problems were characterized by a conflict between an arbitrary monarchy, inclined to consider the laws as an instrument of subjection, and a determined nobility resolved to preserve what little political power was allotted to them. The mediating influence of the missionaries tended to favor the chiefs, who in the opinion of the missionaries upheld district autonomy and the separation of church and state. Royal prerogatives were affirmed, but royal licentiousness was discouraged. Though the crisis was serious, it did not undermine the relationship between the *ari'i nui* and the *hui ra'atira*, both of whom survived well into the nineteenth century.

The actual administration of justice was neither impartial nor comprehensive. Commoners were reluctant to charge the nobles with any violations of the laws and the district judges were excessive in some of their dealings. Foreigners were rarely punished in the same manner as native Tahitians. The concept of total equality before the law was conspicuously disregarded, largely because justice was not the fundamental purpose of the legal codes, but rather the regulation of human behavior.

Treatment of foreigners was the most perplexing problem encountered, primarily because foreigners, including the missionaries, did not consider themselves as royal subjects of the kingdom, but as extra-territorial extensions of their parent countries. The native courts could not effectively enforce the laws of the land under such circumstances. Though the behavior of foreigners in Tahiti rarely won the approval of their respective countries, the foreign diplomatic community always upheld the rights of citizenship and property in all matters. The notion of political equality was not reciprocal and neither was the concept of justice.

NOTES

- ¹ William Ellis, *Polynesian Researches, Society Islands, Tubuai, New Zealand* (Rutland, Vermont, Tokyo, 1969), p. 137.
- ² Brethern to Directors, July 2, 1817, *South Seas Letters* (hereafter *S.S.L.*).
- ³ Pomare to L.M.S. January 1, 1807, Société des Etudes Océaniques, Papeete. Pomare to King, December 9, 1801, *Historical Records of Australia*, series 1, V, 334.
- ⁴ Ellis, *Polynesian Researches*, p. 13; J. Montgomery (ed.) *Journal of Voyages and Travels by the Rev. Daniel Tyerman and George Bennet esq. deputed from the London Missionary Society to visit the various stations in the South Seas Islands, China, India etc., between the years 1821 and 1829*, Vol. 2 (London, 1832), p. 54. Pomare's reluctance in this instance was no doubt motivated by past experiences when influential *ra'atira* were successful in fomenting disruptive rebellions against his hegemony.
- ⁵ Brethern to Directors, July 2, 1817, *S.S.L.*
- ⁶ Crook to Burder, June 5, 1821; Platt to Directors, May 17, 1821, *S.S.L.*
- ⁷ "Counsels and Instructions for the Regulation of the Mission," 1796, Crook to Directors, May 9, 1827, *S.S.L.*
- ⁸ Brethern to Directors, May 18, 1819, *S.S.L.*

- ⁹ L. J. Bouge, "Première Législation Tahitienne; Le Code Pomare de 1819," *Journal de la Société des Océanistes*, VIII (1952), 16.
- ¹⁰ *Ibid.*
- ¹¹ Davies Journal, entry October 1817 *South Seas Journal* (hereafter *S.S.J.*).
- ¹² Ellis, *Polynesian Researches*, pp. 177-192.
- ¹³ Frederick Beechey, *Narrative of a Voyage to the Pacific and Beering's Strait to co-operate with the Polar Expeditions performed in the H.M.S. Blossom under the command of Captain F. W. Beechey, R.N., in the years 1825-28*. Vol. I (London, 1831) pp. 270, 294.
- ¹⁴ Crook to Orme, May 14, 1829, *S.S.L.*
- ¹⁵ Orsmond Journal entry, February 12, 1825, *S.S.J.*
- ¹⁶ Simpson to Ellis, November 10, 1840, *S.S.L.*
- ¹⁷ Orsmond to Ellis, October 5, 1836, *S.S.L.*
- ¹⁸ Ellis, *Polynesian Researches*, p. 166.
- ¹⁹ *Ibid.*
- ²⁰ Charles Wilkes, *Narrative of the United States Exploring Expedition during the years 1838-1842*, Vol. 2 (Philadelphia, 1845), pp. 17-18.
- ²¹ Montgomery (ed.), *Journal*, p. 210; Otto von Kotzebue, *A New Voyage Round the World in the Years 1823, 24, 25 and 26*, Vol. 1 (London, 1967), p. 163.
- ²² Stevens to L.M.S., July 5, 1841, *S.S.L.* See also Crook Journal entry, September 8, 1828, *S.S.J.*; Darling to Arundel, March 18, 1829, *S.S.L.*
- ²³ Crook Journal entry, January 12, 1829, *S.S.J.*
- ²⁴ Barff to L.M.S. April 4, 1831. The *ahu oto* rite was a lavish ceremony of presenting produce and garments to the *ari'i* as an acknowledgment of fealty. The missionaries thought that the ceremony was lascivious and wasteful and it had been prohibited in the 1824 code.
- ²⁵ Darling to L.M.S. April 28, 1831, *S.S.L.*
- ²⁶ *Ibid.*
- ²⁷ Barff to L.M.S. April 4, 1831, *S.S.L.*
- ²⁸ The action taken by the *To'ohitu* in this matter may have been politically motivated by self-interest rather than by moral principles. Pomare's "divorce" from a Taha'a chief and her subsequent "marriage to a common cook" jeopardized the status of the paramount *ari'i*, who feared that Pomare's new paramour would soon demand privileges reserved exclusively for chiefs. Orsmond to Orme, July 1829; Darling to Arundel, January 4, 1833, *S.S.L.*
- ²⁹ Ellis to Palmerston, November 24, 1837 (Foreign Office 58/15, BPRO).
- ³⁰ Ellis, *Polynesian Researches*, pp. 207-208.
- ³¹ Nott to Ellis, May 11, 1835, *S.S.L.* A similar law was passed at Huahine in March. Barff to Ellis, June 24, 1835, *S.S.L.* The disastrous Ra'iatea-Taha'a war of 1832 convinced the missionaries that the liquor trade was in a great way responsible for the decline of public morality in the Leeward islands. Temperance societies were instituted throughout the Society group.
- ³² Robert Fitzroy, *Proceedings of the Second Expedition, 1831-1836* (volume II of *Narrative of the Surveying Voyage of the H.M.S. Adventure and Beagle*) (London, 1839), p. 540.
- ³³ The circular read: "Englishmen and Americans how long will you submit to the . . . Tyrants Yoke, the Missionary lash, and the Heathens diabolical system of plundering your property, dragging you to a damnable tribunal falsely denominated a court of justice and the mercenary manner of robbing you under a cloak of their petty and arbitrary laws." April 11, 1837, *Tahiti British Consulate Papers*, Misc. 1827-1842 (Mitchell Library).

- ³⁴ Blacker to Secretary of State, January 15, 1838, U.S.D.S., *Dispatches*; Armitage to Arundel, May 16, 1833, *S.S.L.*
- ³⁵ Palmerston to Pritchard (F.O. 58/14 B.P.R.O.)
- ³⁶ Moerenhout to Forsyte, December 24, 1836, *U.S.D.S.*
- ³⁷ Moerenhout, December 22, 1836. (Ms., Société des Etudes Océaniques, Papeete.)
- ³⁸ "Pritchard's own remarks," n.d. (Ms., Société des Etudes Océaniques, Papeete.)
- ³⁹ *Ibid.*