

November 16, 2009

00900.0505

WSBA Board of Governors
Attn: Paula C. Littlewood, Executive Director
1325 4th Avenue, Suite 600
Seattle, WA 98101-2539

Dean Kellye Y. Testy
University of Washington School of Law
William H. Gates Hall
Box 353020
Seattle, WA 98195-3020

Dean Earl F. Martin
Gonzaga University School of Law
P.O. Box 3528
Spokane, WA 99220-3528

Dean Annette Clark
Seattle University School of Law
P.O. Box 222000
Seattle, WA 98122-1090

Re: WSBA Bar Exam Reform

Dear Sirs and Madams:

I write to express concern about the speed with which it appears the WSBA might reform our state bar exam program. I am a former Chair of the WSBA Indian Law Section and the current Editor-in-Chief of the Section's Indian Law Newsletter. I am a former two-term President of the Northwest Indian Bar Association, and current Chair of NIBA and the Section's Indian Legal Scholars Program. It appears that an October 13, 2009 report, within which it is clear minimal stakeholder outreach has been performed, could be acted on by the Board by January 2010. The proposed reform appears to be moving at light speed, especially compared with the WSBA's far more deliberative approach to our bar exam over at least the last decade. This letter to the WSBA Board of Governors (BOG) is also being sent directly to the deans of Washington's three law schools, as they and the faculties they lead, more than anybody else, are the trustees of our local law students' and aspiring lawyers' futures.

Consider the last substantive change to the exam: the Board's decision in October 2004 to add federal Indian jurisdiction to the test. That decision culminated from 2 ½ years of deliberations amongst and between various WSBA stakeholders, including the WSBA's membership at large (via petition), and its Committee of Bar Examiners, Diversity Committee, Professional Development Committee, Young Lawyers Division and various Sections; our three local law schools, including their deans and faculty; the bench, including the Washington State Supreme Court's Access to Justice Board and members of the King County Superior Court; county bar associations; the minority and specialty bars; local legal aid providers, including the Northwest Justice Project and the then Columbia Legal Services; and others, including bar leaders such as the late Norm Maleng and then U.S. Attorney John McKay and newly elected Attorney General Rob McKenna. *See* appended list of supporters and related statements

Williams, Kastner & Gibbs PLLC
Two Union Square
601 Union Street, Suite 4100
Seattle, Washington 98101
main 206.628.6600 fax 206.628.6611
www.williamskastner.com
SEATTLE . TACOMA . PORTLAND

WSBA Board of Governors
Kellye Y. Testy, Dean
Earl F. Martin, Dean
Annette Clark, Interim Dean
November 16, 2009
Page 2

of support. Once the Board considered the input from all of the stakeholders and in turn resolved to test federal Indian law, the change was not implemented until July 2007.

All tolled, the process to add one new subject to the exam by the BOG involved vast input from our bar and took a total of five years from start to implementation. Now, it appears the far broader and much more complicated proposition of overhauling the entire exam is proposed for Board action within just three months. Has the BOG yet had time to fully consider how the reform might impact the law schools? Civil legal aid? Diversity? And above all, the competence of Washington lawyers? In 2004, the BOG considered all of these questions relative to Indian law, concluding its addition would positively impact, *inter alia*, the provision of indigent legal aid, the diversification of our bar, and lawyer competence.¹ I urge a slower, more deliberate bar exam reform process, to allow for these types of issues to be fully vetted, with the full participation of all interested WSBA parties.

To that end, if state bar exam reform is to occur on such shortened time, the Board should maintain some aspect of the exam that is not "uniform," i.e., that is Washington State specific. Indian law is one of many bar topics unique to Washington, yet not to all other jurisdictions served by the UBE. As Thomas Dressing observes, the UBE has: "No wills/estates, no native american law, nothing specific to community property law, and of course, nothing specific to Washington at all." Recall that the central purpose of the exam, as with the addition of Indian law, is to ensure the competence of *Washington* lawyers; not necessarily those seeking to "waive" admission into or out of the WSBA. The enclosed WSBA-member petition that catalyzed the bar exam change in 2004, provided: "the integrity and competence of the legal profession in this state would be enhanced if attorneys licensed by the WSBA generally understood significant federal jurisdictional Indian principles." Likewise, any bar exam reform must ensure the integrity and competence of the legal profession *in Washington*.

Specifically, Indian law should not be left on the cutting room floor. There has been much national legal scholarship about the need to bar test Indian law in certain states, which was catalyzed by the BOG's decision here in 2004.² As with many other things, like the WSBA Leadership Institute, the

¹ "Bar None! The Social Impact of Testing Federal Indian Law in Washington," *Washington State Bar News*, August 2007.

² See the Michigan State University College of Law's compendium of research materials on, available at <http://turtletalk.wordpress.com/resources/state-bar-exams-and-indian-law-materials>.

WSBA Board of Governors
Kellye Y. Testy, Dean
Earl F. Martin, Dean
Annette Clark, Interim Dean
November 16, 2009
Page 3

WSBA was and remains the bellwether on that issue. North Dakota just followed New Mexico and Washington's lead to become the third state to test Indian law on its bar exam. Although our focus here again need be on what is right for Washington, that includes the historic precedent we have set in the arenas of Indian legal education and lawyer competence.

As University of New Mexico Law School Professor Gloria Valencia-Weber writes: "Ultimately, each state, its history, and its contemporary circumstances provide the basis for why familiarity with Indian law can strengthen the knowledge that licensed attorneys use to serve their clients and the public interest."³ In 2004, with a view towards 2007, the Board decided that Washington, our history, and our contemporary circumstances, including historical and modern tribal-state relations, compelled the addition of Indian law to our exam.⁴ *Stare decisis*. Therefore, if, after adequate notice and a full opportunity to be heard has been provided to all interested members of the WSBA family, some form of local bar exam reform or other is believed to be in the Washington public's best interest, at least one state-specific day of testing should be maintained; and Indian law should either be left as its own topic or included in state-centric civil procedure, contracts, torts and/or other topics. We can ill afford to lose sight of what makes us the *Washington State Bar Association*

Thank you for your time and consideration of my opinions.

Very truly yours,



Gabriel S. Galanda
(206) 628-2780
ggalanda@williamskastner.com

GSG:mep

Enclosures

³ "Indian Law on State Bar Exams: A Situational Report," *The Federal Lawyer*, March/April 2007.

⁴ See footnote 1.

WSBA Board of Governors
Kellye Y. Testy, Dean
Earl F. Martin, Dean
Annette Clark, Interim Dean
November 16, 2009
Page 4

cc: WSBA Indian Law Section Board of Trustees
Northwest Indian Bar Association Governing Council
National Native American Bar Association
Attn: Indian Law on State Bar Exam Project



WSBA
Washington State Bar Association

RESOLUTION

Federal Indian Jurisdiction on the Washington State Bar Examination

**As Amended and Recommended for Adoption by the WSBA Resolutions Committee
September 9, 2004**

WHEREAS, we, interested members of the Washington State Bar Association (WSBA), in support of our friends and colleagues in the WSBA Indian Law Section and the Northwest Indian Bar Association, in union with the King County Bar Association, Whatcom County Bar Association, WSBA World Peace Through Law Section, Loren Miller Bar Association, Latino/a Bar Association of Washington, Asian Bar Association of Washington and Kanoon South Asian Bar Association, hereby submit this Resolution; and

WHEREAS, the recent growth in tribal economic development and the resulting increase in interaction of Washington's twenty-nine (29) federally recognized Indian tribes with non-Indian entities and individuals, both on and off of the reservation, has given rise to an array of business transactions, regulatory issues and litigation matters between tribal and non-tribal parties in this state; and

WHEREAS, the citizens of Washington and their attorneys do not generally understand the sovereign legal rights of Washington Indian tribes; nor do they understand precisely how tribal self-governance and self-determination, and the laws and ways of Washington Indian tribes, affect and intersect Anglo-American legal and jurisdictional principles; and

WHEREAS, the integrity and competence of the legal profession in this state would be enhanced if attorneys licensed by the WSBA generally understood significant federal jurisdictional Indian principles, particularly the common law doctrines of tribal sovereignty, tribal sovereign immunity, tribal subject matter jurisdiction (both criminal and civil), and the federal Indian Child Welfare Act; and

NOW THEREFORE BE IT RESOLVED, that we do hereby urge that on October 22, 2004 the WSBA Board of Governors exercise its authority under Washington General Rule 12 and vote to include federal Indian jurisdiction on the Washington State bar examination, beginning with the Summer 2007 examination and continuing thereafter, such that every bar-licensed attorney will receive knowledge reasonably necessary for the representation and protection of all who are subject to Washington State law.



Indian Law Section

**Supporters for the Inclusion of Federal Indian Jurisdiction
on the Washington State Bar Exam**

Washington State Supreme Court-Created Access to Justice Board
King County Bar Association
King County Bar Foundation
Spokane County Bar Association
Whatcom County Bar Association
San Juan County Bar Association
King County Bar Association Young Lawyers' Division
WSBA World Peace Through Law Section
WSBA Indian Law Section
Idaho State Bar Indian Law Section
Northwest Indian Bar Association
Loren Miller Bar Association
Latino/a Bar Association of Washington
Asian Bar Association of Washington
Kanoon South Asian Bar Association
Korean American Bar Association

Washington State Attorney General Christine Gregoire
Washington State Attorney General Candidates Rob McKenna & Deborah Senn
King County Prosecutor Norm Maleng
U.S. Attorneys John McKay & Jim McDevitt
WSBA President Emeritus Dick Manning
WSBA Young Lawyers' Division President Emeritus J.D. Smith
UW Law School Dean Joe Knight
Gonzaga Law School Dean George Critchlow
Seattle University Law School Faculty (Approximately 30 Members)
Columbia Legal Services Director Ada Shen-Jaffe
Washington State Court of Appeals Judge Mary Kay Becker
King County Superior Court Judges Robert Alsdorf, Richard Jones, Steven Gonzalez, Catherine Shaffer, James Doerty, Carol Shapira, Harry McCarthy, James Cayce, Dean Lum, Mary Yu, Michael Hayden & J. Wesley Saint Clair
King County Superior Court Commissioner Kimberly Prochnau
Washington UTC Commissioner Patrick Oshie
King County Bar Foundation President Emeriti Dan Gandra & Steve Rovig
Loren Miller Bar Association President Emeritus Karen Murray
Latino/a Bar Association of Washington Josh Alex
Asian Bar Association of Washington President Ken Payson
Kanoon South Asian Bar Association Shankar Narayan



Indian Law Section

Statements of Support for the Inclusion of Federal Indian Jurisdiction on the Washington State Bar Exam

“Failure to apply the Indian Children Welfare Act correctly can disrupt placement and lead to reversible error. Although there has been more education on the topic in the last few years, I still find many lawyers do not understand this act. I would support this effort.”

– King County Superior Court Commissioner **Kimberly Prochnau**

“I support including questions about Indian Law on the bar exam. In my experience, Indian Law has been increasingly important subject matter in Washington State – not only for public practitioners and policymakers, but also for many in private practice.”

– Washington State Attorney General Candidate **Rob McKenna**

“[O]ne thing leaps out at me from the summaries of Indian law to date in our nation – that it has been and remains very inconsistent and even arbitrary. . . . By all means, please list me not only as supporting a question or questions on the Bar exam, but as supporting the actual development of fair and consistent law in this area.”

– King County Superior Court Judge **Robert Alsdorf**

“Federal Indian jurisdictional considerations touch and concern not only the lives of members of the 29 sovereign tribes in Washington, but every individual, business and government that does business with, provides services to, or engages in activities on or near reservation land. The tribes’ ubiquitous presence in our state renders it essential that our bar understand core federal Indian principles, to effectively represent individual, business and governmental clientele.”

– Columbia Legal Services Statewide Coordinator **Jim Bamberger**

“Including American Indian law on the bar exam will produce new attorneys that can spot issues and competently represent tribal and non-tribal clients in Washington. . . . [I]t is our professional responsibility to be skillfully and thoroughly aware of these issues to uphold minimum standards of competence . . . [and] to zealously advocate for all clients to the best of our ability.”

– “Should Indian Law Be Tested on the Washington Bar Exam?,” *De Novo*, June 2004

“There are 29 tribes in the state of Washington – it only seems logical that attorneys should have some idea of what Indian law is about.”

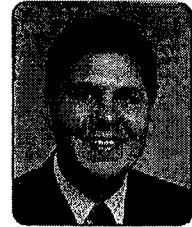
– State Representative **John McCoy**, *Puget Sound Business Journal*, October 1, 2004

“Tribal governments today interact with all sectors of our [State] economy, our social service network, health care systems and educational systems. Requiring Washington State attorneys to demonstrate competency in Federal Indian Law will ensure that their clients, both tribal and non-tribal, can obtain effective representation in all facets of the law.”

– **Swinomish Tribal Chairman Brian Cladoosby**, President of the Association of Washington Tribes

Bar None! The Social Impact of Bar Testing Federal Indian Law in Washington

Guest Columnist Gabriel Galanda writes about a WSBA historic first



Guest Columnist
Gabriel S. Galanda

Indian rights will never be justly protected by any legal system or any civil society that continues to talk about Indians as if they are uncivilized, unsophisticated, and lawless savages.
— Robert A. Williams Jr., *Like a Loaded Weapon*¹

Last month we, the WSBA and all of Washington state, celebrated a historic first — an occasion that will mark the beginning of meaningful social changes in our bar and our state. On July 24 and 25, 2007, aspiring Washington lawyers sat for the bar exam, with the possibility of being tested on federal Indian law for the first time in the history of the WSBA.

In October 2004, the WSBA Board of Governors (BOG) unanimously agreed that, effective this summer, the 23 possible bar exam topics would include Indian law jurisdictional topics. While the WSBA followed precedent set by the New Mexico Supreme Court — which, in 2002, made their state the first to bar test Indian law — it is Washington's bar-exam policy that galvanized national interest in the topic. Consider that in the wake of the BOG's decision:

- Washington's bar-exam change was covered by such national news media as *USA Today*, *National Law Journal*, and *Indian Country Today*;
- South Dakota became the third state to include Indian law on its bar exam in 2006, and Oklahoma recently included one Indian law question on its summer test; and
- Bar leaders in Arizona, Oklahoma, Wisconsin, Minnesota, Montana, Or-

gon, Idaho, and California are now considering whether to also test the topic.

Indian law — and tribal bar-exam policy — is sweeping legal America.

Our legal community must pause to consider the significant positive social impact of bar testing Indian law in Washington state. This article explains how our new Indian bar-exam policy helps ensure the protection of the public; allows indigent Native and non-Native persons access to justice in

an ever-increasing number of disputes arising out of Indian Country; increases the diversity of the legal profession; and heals the historically strained relations between state and tribal sovereigns.

Enhancing Lawyer Competence

At its core, the issue of including Indian law on bar examinations is one of competence and professionalism. As Tim Woolsey, a tribal attorney for the Colville Nation, writes:

Including American Indian law on the bar exam will produce new attorneys that can spot issues and competently represent tribal and non-tribal clients . . . [I]t is our professional responsibility to be skillfully and thoroughly aware of these issues to uphold minimum standards of competence . . . [and] to zealously advocate for all cli-

ents to the best of our ability.²

Further, according to the National Conference of Bar Examiners and the ABA Section of Legal Education and Admission to the Bar:

This article explains how our new Indian bar-exam policy helps ensure the protection of the public; allows indigent Native and non-Native persons access to justice in an ever-increasing number of disputes arising out of Indian Country; increases the diversity of the legal profession; and heals the historically strained relations between state and tribal sovereigns.

The bar examination should test the ability of an applicant to identify legal issues . . . such as may be encountered in the practice of law, to engage in a reasoned analysis of the issues and to arrive at a logical solution by the application of fundamental legal principles . . . Its purpose is to protect the public.³

Fundamental to WSBA's Indian bar-exam policy is that including basic Indian law among the topics on our bar exam will serve to protect the Washington public — Indians and non-Indians alike — from the unknowing, unwitting, or unethical practice of Indian law.

With the upsurge in tribal economic development in Washington — and a correlative direct contribution of \$3.2 billion and 30,000 jobs to the state economy in 2004⁴ — comes a sharp

increase in non-Indian citizens seeking business, employment, or recreation on tribal lands. Such interactions give rise to an array of litigation and transactional matters that implicate federal Indian jurisdictional questions. I have no doubt that every lawyer practicing in our state *will* some day encounter questions about whether a tribal, state, and/or federal court, if any, has or would have authority to adjudicate a dispute arising out of tribal lands in Washington.

Recognizing that a two-day exam should not force prospective lawyers to learn *all* that is a 200-plus-year-old body of highly convoluted federal Indian law that comes to bear in Washington courts, the BOG agreed that new lawyers must at a minimum learn the following four tribal jurisdictional principles to ensure the protection of the public:

1. Tribal self-governance — the legal notion that Washington tribes possess “the right . . . to make their own laws and be ruled by them.”⁵
2. Tribal criminal and civil jurisdiction

**ETHICS and LAWYER
DISCIPLINARY
INVESTIGATION
and PROCEEDINGS**

Stephen C. Smith,
former Chairman of the
Washington State Bar Association
Disciplinary Board, is
now accepting referrals
for attorney disciplinary
investigations and proceedings
in Washington, Idaho,
Hawaii, and Guam

HTEH HAWLEY TROXELL
ENNIS & HAWLEY
ATTORNEYS AT LAW

877 Main Street • Suite 1000
Boise, Idaho 83701
208-344-6000
ssmi@hteh.com

— i.e., whether tribal, state, and/or federal courts have adjudicatory authority to adjudicate a dispute arising out of Indian Country.

3. Sovereign immunity — common law holding that tribes and tribal agencies, entities, and enterprises are generally immune from civil suit, whether in tribal, state, or federal

By and through an enhanced understanding of these federal Indian jurisdictional concepts, our legal community can and will protect that which is sacred to everyone in Washington — health, freedom, home, economic security, and family.

court and/or arising on or off the reservation, as recently affirmed by the Washington State Supreme Court in *Wright v. Colville Tribal Enter. Corp.*⁶

4. Indian Child Welfare Act — a federal statute which, *inter alia*, mandates that “[i]n any State court proceeding for the foster care placement of, or termination of parental rights to, an Indian child, the Indian custodian of the child and the Indian child’s tribe shall have a right to intervene at any point in the proceeding.”⁷

By and through an enhanced understanding of these federal Indian jurisdictional concepts, our legal community can and will protect that which is sacred to everyone in Washington — health, freedom, home, economic security, and family.

Ensuring Access to Justice

Our state and local bars’ failure to understand basic Indian law, and resultant anxiety about handling matters that implicate tribal jurisdiction or practice, deprives indigent Washingtonians from obtaining legal help. In turn, the poor, be they Indian or non-Indian, are not allowed access to tribal, state, or federal courts for the adjudication and resolution of matters affecting

basic familial and property rights.

An ABA study published in 1994 estimated that some 75 percent of the nation’s low-income families facing civil legal issues do not get legal assistance. Nationally, tribal legal aid lawyers estimate that only 20 percent of Indian peoples’ legal needs are met. As John Sledd, former director of the Northwest Justice Project’s Native American Unit in Washington, writes:

[Local legal aid] intake lawyers tell me that *three-quarters of volunteer lawyer programs and most staff legal service lawyers will not handle Indian or tribal law cases.* Ignorance of the law is a major reason why. As a result, *poor Native Americans get help for only one in ten important legal problems,* according to the statewide legal needs study. Non-Natives get help for one problem in seven. Both statistics are shocking, but *the disparity for Native people is an intolerable discrimination.* [emphasis added]

The knowledge of basic Indian law that will be instilled in new lawyers through bar testing *will* translate into legal help for indigent Indian and non-Indian people throughout our state.

Diversifying the WSBA

Indians remain the single most under-represented pan-ethnic demographic in our legal profession. Depending who you ask, Native attorneys comprise between 0.02 to 0.07 percent of the WSBA’s 30,000 members. Nationally, although the U.S. Census reports that there are 2.6 million self-identified Native Americans and one million lawyers in the United States, there are only 1,800 — yes, eighteen *hundred* — Indian attorneys. And, there is but one Indian jurist sitting on the state or federal bench; he sits on the Utah Court of Appeals.

Our new bar-exam policy has sent, and will continue to send, a loud and clear message to Indian Country that the practice of law is relevant to life on the reservation. As a result, Washington tribal members, particularly Indian youth, will more seriously consider the legal profession as a career option. In time, we will see more Native faces

reflected throughout our bar, as well as the state and federal judiciary.

Strengthening State-Tribal Relations

In 2004, the National Congress of American Indians, following the lead of the Association of Washington Tribes and the 54 Pacific Northwest tribes comprising the Affiliated Tribes of Northwest Indians, resolved that Washington (and 21 other states) should bar-test Indian law, declaring that:

[I]f attorneys for the American public, particularly federal, state and local government, better understood the legal concepts of Tribal self-governance and Tribal jurisdiction, there would be fewer disputes and government-to-government dialogue would be greatly enhanced.

Indeed, one result of the new bar-exam policy will be that tribal leaders and lawyers will no longer have to spend valuable time and resources educating assistant attorneys general and other state lawyers about the basics of tribal sovereignty.

By October 2004, incoming Governor Christine Gregoire signed onto the successful lobby to bar-test federal Indian jurisdiction in Washington — a profound moment in WSBA history. And, shortly after the BOG rendered its decision, state and tribal elected officials and dignitaries, including the likes of Swinomish Chairman Brian Cladoosby, longtime fishing-rights activist Billy Frank, Attorney General Rob McKenna, former U.S. Attorney John McKay, and King County Prosecutor Norm Maleng, joined one another in celebration of that milestone in state-tribal relations.

Over 100 years ago, the U.S. Supreme Court famously wrote that “[b]ecause of the local ill feeling, the people of the states where [tribes] are found are often their deadliest enemies.”⁸ That ill feeling between states and tribes still exists today, to varying degrees. In New Mexico, state bar leaders explain that “including Indian law as a testable subject for the bar exam shows respect for a significant minority whose ancestral lands we happen to occupy” and thus helps quell that ill feeling.⁹ The same holds true in Washington: In “a state that has hanged

Indian leaders, strong-armed treaties, burned villages [and] beat up Indian fishermen,”¹⁰ our bar-exam policy helps harmonize state and tribal voices and exemplifies modern government-to-government relations.

Now, as bar leaders throughout America discuss whether to join the Indian bar-exam movement galvanized by the WSBA, we should pause to appreciate not only how our policy has already helped ease the historical ill feeling amongst tribes and their fellow Washingtonians; but how it will heighten the bar for legal professionalism and diversity while lowering the bar indigent people must overcome to secure access to justice here.

Come one and all to the WSBA. And we will bar none. ☺

Gabriel S. Galanda, a descendant of the Nomlaki and Concow Tribes and enrolled member of the Round Valley Indian Confederation in Northern California, is an associate with Williams Kastner. He thanks Professor Robert Williams and Debora Juarez for empowering him to effect change in legal America for the benefit of Indian people, and WSBA Executive Director Paula Littlewood for dedicating her column to this important topic.

NOTES

1. See *Like A Loaded Weapon: The Rehnquist Court, Indian Rights, and The Legal History of Racism in America* xxviii (2005).
2. See WSBA's *De Novo* (WYLD's newsletter), June 2004, at p. 3, available at: www.wsba.org/media/publications/denovo/archives/denovojune2004.pdf.
3. See *Comprehensive Bar Admission Requirements 2004*, at p. ix (www.ncbex.org/pub.htm).
4. See Jonathan B. Taylor, “The Character and Effects of the Indian Economy in Washington State,” June 2006.
5. *Williams v. Lee*, 358 U.S. 217, 220 (1959).
6. 159 Wn.2d 108, 114-115 (Wash. 2006).
7. 25 U.S.C. 1911(c).
8. *U.S. v. Kagama*, 118 U.S. 375, 384-85 (1886).
9. See letter from New Mexico bar examiner Michael P. Gross to Gabriel S. Galanda, October 21, 2004 (on file with author).
10. See Rob McDonald, “Move invalidates long-ignored legal principles,” *Spokesman-Review*, B1, October 29, 2004.

CORPORATION KITS

FOR

WASHINGTON

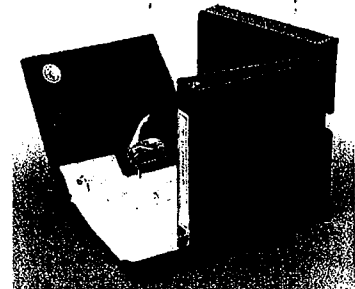
\$57.95

Binder & slipcase, index tab set, printed stock certificates w/full page stubs & gold foil starbursts, transfer ledger, embossing seal & pouch, 30 sheets of blank 25% cotton bond paper.

Same kit with By-Laws, minutes & resolutions package and 6 sheets of blank 25% cotton bond paper plus tax forms for EIN and “S” corporation election.

\$59.95

Kit without seal \$10.00 less than regular price



OTHER PRODUCTS

LTD. LIA. CO. OUTFIT	\$59.95
NON-PROFIT OUTFIT	\$59.95
LTD. PARTNERSHIP	\$59.95
FAMILY, LTD. PART.	\$59.95
SEAL W/POUCH	\$25.00
STOCK CERTS (20)	\$25.00
FORMS ON CD OR DISK	\$29.95

Shipping & Handling additional

NEW!

RUBBER STAMPS

for

Corporate/LLC seals, notarial/notary public, deposit, address, signature, etc.
Self-inking

SAME DAY SERVICE

REGISTERED AGENCY
SERVICE
FOR
MONTANA

**ORDER TOLL FREE !
PHONE 1-800-874-6570**

FAX 1-800-874-6568

E-MAIL : corpkit@corpkitnw.com

Web: www.corpkitnw.com

ORDERS IN BY 2:00 PM SHIPPED SAME DAY.
\$7.00 PER KIT UPS GROUND CHARGE.

(Rural and/or residential, AK & HI higher)

LAW FIRMS: WE WILL BILL WITH YOUR ORDER OAC.

SATISFACTION GUARANTEED !!!

Prices subject to change without notice.

**CORP-KIT NORTHWEST,
INC.**

P.O. BOX 697

LANGLEY, WA 98260