

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

KONIAG, INC.

(b) County of Residence of First Listed Plaintiff  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

James E. Torgerson, John R. Evans (Stoel Rives LLP)  
510 L Street, Suite 500, Anchorage, AK 99501

## DEFENDANTS

KURT KANAM, individually and as Tribal Attorney for the Native Village of Karluk, and ORBIE MULLINS, individually and as Village of Karluk Tribal Court Judge for the Karluk Tribal Court for the Native Village of Karluk

County of Residence of First Listed Defendant  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 2 U.S. Government Defendant  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input checked="" type="checkbox"/> 290 All Other Real Property					

## V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

*Federal Common Law governing Tribal Court Jurisdiction*

Brief description of cause: Action for injunctive relief

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

## DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE/USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

James E. Torgerson (Bar No. 8509120)  
John R. Evans (Bar No. 1005035)  
STOEL RIVES LLP  
510 L Street, Suite 500  
Anchorage, AK 99501  
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jrevans@stoel.com

Attorneys for Plaintiff  
Koniag, Inc.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

KONIAG, INC., an Alaska corporation,  
Plaintiff,

Case No.: 3:12-cv-00077-JWS

VERIFIED COMPLAINT

v.

KURT KANAM, individually and as Tribal  
Attorney for the Native Village of Karluk, and  
ORBIE MULLINS, individually and as Village  
of Karluk Tribal Court Judge for the Karluk  
Tribal Court for the Native Village of Karluk,  
Defendants.

**I. NATURE OF THE CASE**

1. Koniag, Inc. (Koniag) brings this action for injunctive and other prospective relief to prevent Kurt Kanam, individually and as Tribal Attorney for the Native Village of Karluk, and the Honorable Orbie Mullins, individually and as Village of Karluk Tribal Court Judge, for The Karluk Tribal Court For the Native Village of Karluk (Kurt Kanam and Orbie Mullins are the “Defendants” and either one of them is a “Defendant”), and individuals and entities affiliated with and acting in concert with either Defendant from violating federal law by unlawfully exercising jurisdiction in the Karluk Tribal Court over Koniag in the Karluk Tribal Court case styled *The Native Village of Karluk, Plaintiff, against Koniag Corporation, Defendant*, Cause VERIFIED COMPLAINT

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No. 3-19-12-1. The unlawful actions of Defendants are evidenced in part by an Original Complaint for Declaratory Judgment and Affidavit in Support executed by Defendant Kanam and Order to Show Cause executed by Defendant Mullins ordering Koniag “to show cause within 20 days [of March 19, 2012] and by 4-20-2012 date why this court should not grant Plaintiff’s requested relief.” The Plaintiff in said Complaint and Order to Show Cause is the Native Village of Karluk. A copy of the Complaint, Order to Show Cause, Proposed Declaratory Judgment, Summons and related documents received by Koniag (collectively, the Karluk Tribal Court Documents) are attached to the Declaration of John Evans, which is Exhibit A to this Complaint.<sup>1</sup>

2. The Proposed Declaratory Judgment served on Koniag declares that the Native Village of Karluk is entitled to unspecified “awards” against Koniag and directs that the “The Federal District Court is obliged to register the Declaratory Order of this court under the Uniform Foreign Judgments Act.”

3. Without temporary, preliminary, and permanent prospective prohibitory, and if necessary mandatory, injunctive relief, Defendants’ illegal conduct will subject Koniag to the jurisdiction of the Karluk Tribal Court in violation of federal law and subject Koniag to irreparable injury and harm and immeasurable and unspecified monetary damages.

## **II. THE PARTIES**

4. Koniag is an Alaska corporation with its principal place of business on Kodiak Island, Alaska.

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<sup>1</sup> The Karluk Tribal Court Documents are Exhibit A-1 to the Declaration of John Evans (Evans Decl.). Exhibit A-2 to the Evans Decl. is the March 30, 2012 “Response to Bar Application” issued by the Karluk Tribal Court.

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5. On information and belief, Koniag alleges that the “Koniag Corporation” so named in the Original Complaint for Declaratory Judgment and Affidavit in Support, Proposed Declaratory Judgment, Summons, and Order to Show Cause means Koniag, the Plaintiff in this action.

6. Koniag is an Alaska Native Regional Corporation established pursuant to section 7 of the Alaska Native Claims Settlement Act of 1971 (ANCSA), 43 U.S.C. § 1606(d).

7. Koniag is not a member of the Native Village of Karluk.

8. The Native Village of Karluk is not a Koniag shareholder.

9. The Native Village of Karluk is not a regional or village corporation under section 8 of ANCSA, 43 U.S.C. § 1607(a).

10. The Native Village of Karluk is a federally recognized Indian tribe.

11. The Native Village of Karluk is located on Kodiak Island, Alaska.

12. The Karluk Tribal Court for the Native Village of Karluk is an instrumentality and agency of the Native Village of Karluk.

13. The United States does not hold land in trust for the Native Village of Karluk.

14. The Native Village of Karluk does not currently have a reservation recognized as such by the United States.

15. Kurt Kanam is an individual and, in his official capacity, Tribal Attorney for the Native Village of Karluk.

16. The Original Complaint for Declaratory Judgment executed by Kurt Kanam includes as Attachment A substantially identical affidavits by 14 persons claiming to be “eligible voting member[s] of the Native Village of Karluk” made under the laws of the State of Alaska, notarized by an Alaska notary, and asserting each affiant’s “vote” among other things for “return

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of the Old Karluk Reservations lands to the exclusive jurisdiction of the Native Village of Karluk.”

17. The Old Karluk Reservation referenced in said affidavits was located on Kodiak Island, Alaska.

18. Orbie Mullins is an individual and, in his official capacity, Village of Karluk Tribal Court Judge, for The Karluk Tribal Court for the Native Village of Karluk.

19. Koniag received copies of the Karluk Tribal Court Documents on March 27, 2012.

### **III. JURISDICTION AND VENUE**

20. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 because among other matters Koniag’s cause of action is based on questions of federal law, including federal common law of tribal jurisdiction over non-members and ANCSA.

21. Venue is appropriate in this court pursuant to 28 U.S.C. § 1391.

### **IV. GENERAL ALLEGATIONS**

22. Koniag’s business and other transactions with the Native Village of Karluk do not have a nexus to matters described in the Original Complaint for Declaratory Judgment executed by Kurt Kanam, Defendant Kanam’s Proposed Declaratory Judgment, or Order to Show Cause executed by Defendant Orbie Mullins.

23. Koniag has had no consensual relationship with Kurt Kanam, Orbie Mullins or the Native Village of Karluk “of the qualifying kind,” *Strate v. A-1 Contractors*, 520 U.S. 438, 457 (1997), that establishes a nexus to matters described in the Original Complaint for Declaratory Judgment executed by Kurt Kanam, Defendant Kanam’s Proposed Declaratory Judgment or Order to Show Cause executed by Defendant Orbie Mullins.

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24. Koniag has not taken any action that authorizes the exercise of Native Village of Karluk Tribal Court jurisdiction under federal law, including *Montana v. United States*, 450 U.S. 544 (1981).

25. Koniag has not consented to jurisdiction in the Tribal Court for the Native Village of Karluk as to matters described in the Original Complaint for Declaratory Judgment executed by Kurt Kanam, Defendant Kanam's Proposed Declaratory Judgment or Order to Show Cause executed by Defendant Orbie Mullins.

26. Defendants' assertion of jurisdiction over Koniag is "presumptively invalid." *Atkinson Trading Co, Inc. v. Shirley*, 532 U.S. 645, 659 (2001) (where the party subject to that presumption "fail[s] to establish" the basis for tribal court jurisdiction over a non-member, "the presumption ripens into a holding").

27. The Old Karluk Reservation referenced in affidavits attached to Original Complaint for Declaratory Judgment as Attachment A was revoked by Congress by enactment of 43 U.S.C. § 1618(a) of ANCSA.

28. The Native Village of Karluk does not exercise territorial jurisdiction over any federally recognized Indian reservation or Indian trust allotment that is relevant to the Original Complaint for Declaratory Judgment executed by Kurt Kanam, Defendant Kanam's Proposed Declaratory Judgment or Order to Show Cause executed by Defendant Orbie Mullins.

29. Under the decision of the United States Supreme Court in *Alaska v. Native Village of Venetie Tribal Government*, 522 U.S. 520, 527 (1998), where an Indian reservation and Indian allotments held in trust are not at issue, tribal "Indian country" jurisdiction "depends on whether [land] falls within the 'dependent Indian communities' prong of" 18 U.S.C. § 1151. To qualify as "dependent Indian communities," lands must "satisfy two requirements—first, they must have

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been set aside by the Federal Government for the use of the Indians as Indian land; second, they must be under federal superintendence.” 522 U.S. at 527.

30. The Native Village of Karluk does not exercise territorial jurisdiction over any “dependent Indian communit[y]” that is relevant to Original Complaint for Declaratory Judgment executed by Kurt Kanam, Defendant Kanam’s Proposed Declaratory Judgment or Order to Show Cause executed by Defendant Orbie Mullins.

31. On March 19, 2012, Kurt Kanam signed, as Karluk Tribal Attorney, the Original Complaint for Declaratory Judgment, including Affidavit in Support, in the case styled The Native Village of Karluk, Plaintiff, against Koniag Corporation, Defendant, Cause No. 3-19-12-1.

32. The court whose jurisdiction is invoked for Original Complaint for Declaratory Judgment Cause No. 3-19-12-1 is identified as “The Karluk Tribal Court For the Native Village of Karluk.”

33. A copy of the Original Complaint for Declaratory Judgment, The Native Village of Karluk, Plaintiff, against Koniag Corporation, Defendant., Cause No. 3-19-12-1, served upon Koniag bears a stamp, stating, “Filed March 19, 2012, Karluk Tribal Court.”

34. A Summons in the Karluk Tribal Court case styled The Native Village of Karluk, Plaintiff, against Koniag Corporation, Defendant, Cause No. 3-19-12-1 is stamped “Filed March 19, 2012, Karluk Tribal Court” shows a signature over a line stating “Clerk of Court”.

35. The Summons described in the preceding paragraph states in part: “Within 21 days after service of this summons on you (not counting the day received it) . . . you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal

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Rules of Civil Procedure.” The Summons also states in part: “If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.”

36. An Order to Show Cause in the Karluk Tribal Court case styled The Native Village of Karluk, Plaintiff, against Koniag Corporation, Defendant, Cause No. 3-19-12-1 showing the signature of Orbie Mullins, Village of Karluk Tribal Court Judge, states in part: “Done 3-19-2012” and bears a statement “Filed March 19, 2012, Karluk Tribal Court ”.

37. The Order to Show Cause described in the preceding paragraph “orders the defendant to show cause within 20 days and by 4-20-2012 date why this court should not grant Plaintiff’s request for relief.”

38. The Original Complaint for Declaratory Judgment and a Proposed Declaratory Judgment served upon Koniag describe “Plaintiff’s [Native Village of Karluk’s] request for relief.”

39. No right of appeal is available to Koniag to any Alaska state or federal court to control the unlawful exercise of jurisdiction by the Karluk Tribal Court for the Native Village of Karluk as to matters described in the Original Complaint for Declaratory Judgment, Order to Show Cause or Proposed Declaratory Judgment.

## **V. CAUSES OF ACTION**

### **First Cause of Action**

#### *Violation of Federal Common Law of Tribal Court Jurisdiction*

40. Koniag re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 39.

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41. Defendants, acting for and on behalf of the Native Village of Karluk, are engaged in a course of conduct that is intended to, that has, and that threatens to continue to assert civil jurisdiction of the Karluk Tribal Court for the Native Village of Karluk over Koniag.

42. Federal common law provides that Koniag can sue the Defendants in both their individual and official capacities in circumstances such as those here. *Ex Parte Young*, 209 U.S. 123 (1908).

43. Federal common law provides that imposition of tribal jurisdiction over non-members is presumptively invalid.

44. Federal law places the burden of proving such jurisdiction on those asserting tribal jurisdiction over non-members.

45. Federal common law provides that when those asserting tribal jurisdiction over non-members fail to establish a basis for the exercise of such jurisdiction, the presumption against such jurisdiction ripens into a holding.

46. Koniag does not bear the burden of proving it is exempt from jurisdiction of the Karluk Tribal Court for the Native Village of Karluk.

47. Koniag has not consented to suit in the Karluk Tribal Court for the Native Village of Karluk as to matters described in the Original Complaint for Declaratory Judgment, Order to Show Cause or Proposed Declaratory Judgment.

48. There is no basis under federal common law for assertion by Kurt Kanam, Orbie Mullins or the Native Village of Karluk of jurisdiction by the Karluk Tribal Court for the Native Village of Karluk over Koniag as to matters described in the Original Complaint for Declaratory Judgment, Order to Show Cause or Proposed Declaratory Judgment.

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49. The Defendants' actions asserting jurisdiction of the Karluk Tribal Court for the Native Village of Karluk over Koniag violate Koniag's federal common law right to be free of such jurisdiction.

50. No right of appeal and no writ of mandamus or writ of prohibition is available to Koniag to any court of the State of Alaska or to any federal court to control the unlawful exercise of jurisdiction by the Karluk Tribal Court for the Native Village of Karluk as to matters described in the Original Complaint for Declaratory Judgment, Order to Show Cause or Proposed Declaratory Judgment.

## VI. REQUEST FOR RELIEF

WHEREFORE, Koniag requests the following relief:

1. Entry of temporary, preliminary and permanent prospective injunctive relief prohibiting Defendants, their agents, servants, employees and all others acting in active concert and participation with Defendants from directly retaining, exercising or threatening to retain or exercise jurisdiction of or by the Karluk Tribal Court for the Native Village of Karluk over Koniag as to matters described in the Original Complaint for Declaratory Judgment, Order to Show Cause, Proposed Declaratory Judgment or Summons in Karluk Tribal Court case *The Native Village of Karluk, Plaintiff, against Koniag Corporation, Defendant*, Cause No. 3-19-12-1;

2. Entry of preliminary and permanent prospective mandatory injunctive relief, if and to the extent necessary, requiring Defendants, their agents, servants, employees and all others acting in active concert and participation with Defendants, to dismiss with prejudice Karluk Tribal Court case *The Native Village of Karluk, Plaintiff, against Koniag Corporation*,

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*Defendant*, Cause No. 3-19-12-1, not later than ten (10) days after this Court's order requiring such action; and

3. Such other and further relief as the Court deems just and equitable.

DATED: April 9, 2012

STOEL RIVES LLP

By: /s/ James E. Torgerson  
JAMES E. TORGERSON  
(BAR NO. 8509120)  
JOHN R. EVANS (BAR NO. 1005035)

Attorneys for Plaintiff  
Koniag, Inc.

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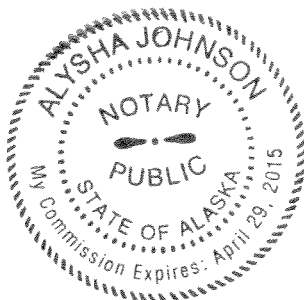
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### VERIFICATION

I, Jim Erickson, having been duly sworn depose and state that I have read the foregoing Verified Complaint for Injunctive Relief, and that the information stated therein is factual and true, and those factual matters that are stated upon information and belief are believed to be true.

[Signature] ERV/RF  
Name

SUBSCRIBED AND SWORN to or affirmed this \_\_\_\_ day of April, 2012, in Anchorage, Alaska.



[Signature]  
Notary Public in and for the State of Alaska  
My Commission expires: April 29, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that on April 9, 2012, I filed a true and correct copy of the foregoing document with the Clerk of the Court for the United States District Court – District of Alaska by using the CM/ECF system. I further certify that Defendants were served same date electronically and via U.S.P.S. Certified Priority Mail as follows:

Mr. Kurt Kanam  
Tribal Attorney  
Karluk Tribe  
2103 Harrison Street, #143  
Olympia, WA 98502  
Email: kurtkanam@gmail.com

Honorable Orbie Mullins  
Village of Karluk Tribal Judge  
Native Village of Karluk  
PO Box 237  
Toledo, WA 98591  
Email: karluktribalcourt@gmail.com

/s/ James E. Torgerson  
James E. Torgerson

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