

IN THE NOOKSACK TRIBAL COURT

MICHELLE JOAN ROBERTS,
Councilmember of the Nooksack Tribal
Council; RUDY ST. GERMAIN, Secretary of
the Nooksack Tribal Council; FRANCINE
ADAMS; ANTHONY ADAMS; BRINA
ALDREDGE; BRITTANY ALDREDGE;
NORMA ALDREDGE; ANGELITA AURE;
DOE AURE; CHELSEA BAKER; KELSEA
BAKER; PRICILLA BAKER; JERIC BAKER;
FLORENTINO BARRIL; CALEB BARRIL-
BOTHELL; CATHALINA BARRILL; BILLIE
BARTLE; ADAM BELLO; EILEEN BELLO;
PATRICK BELLO JR.; ELIZABETH BELLO;
PATRICK BELLO; ELPIDO BELLO JR.;
EUGENA BELLO; JOSEPH BELLO; LUCAS
BELLO; NICHOLAS ELPEDIO BELLO;
DOMINIC BELLO; RICHARD BELLO;
ELEANOR BELMONT; DIONNE BENNETT;
OLIVA BOTHELL; KIRK BROWN;
CHRISTINA BUMATAY; ANDREA
BUMATAY; ROBERT BUMATAY;
ANDREW BUMATAY; JAMES BUMATAY;
JONATHAN BUMATAY; BARTON
BUMATAY; ANGELA BUMATAY;
NOELANI BUMATAY-JEFFERSON;
MARIAH BUMATAY-JEFFERSON; CAROL
CAILING; DONNA CAILING; KEITH
CAILING; NEVEAH CAILING; ANITA
CAMPBELL; ALEXANDREA CARR; LEE
CARR; PRICILLA CARR; ROBLEY CARR;
ANNA CARR; QUOLIA CARR; VANESSA
CASIMIR; CHRISSA CASONO; NINA

NO. 2013-CI-CL-003

FIRST AMENDED COMPLAINT FOR
PROSPECTIVE EQUITABLE RELIEF

1 CHOW; KYLE COBLE; LISA COBLE;
2 STEVE COBLE; SEAN COLEMAN; GILDA
3 CORPUZ; PEDRO CORPUZ; VICTORINO
4 CORPUZ; CHRISTINA CORPUZ-PEATO;
5 JORDAN CRAIN; ROLAND CUATERO;
6 NACISCO CUNANAN; DONALD
7 EDWARDS; BRIONNA ERICKSON; SETH
8 ERICKSON; TERESA ERICKSON;
9 MICHAEL FAULKS; VICTORIA FRANZ;
10 ROMA FURUTA; ELEANOR GABRIEL;
11 JESSICA GABRIEL; ZARIA GABRIEL;
12 AVRILYN GABRIEL; REGINALD
13 GABRIEL; AYL A GARDIPE; DANCHO
14 GARDIPE; DAVID GARDIPE; DONNA
15 GASPAS; GUADALUPE GASPAS; JADE
16 GASPAS; JESUS GASPAS; ASIA GILYARD;
17 LEONARD GLADSTONE; LOIS
18 GLADSTONE; MIKALA GLADSTONE;
19 RICHARD GLADSTONE; TYRONE
20 GLADSTONE; MAILE GOMEZ-RABANG;
21 MALAKAI GRIFFETH; MALIA GRIFFETH;
22 MARIE HADDOW; MIRANDA HADDOW;
23 DOLLY HADDOW; TINA HANCOCK;
24 AMYA HART; ANITA HART; CHARLOTTE
HART; DESTINE HART; EDARAY HART;
JENNIFER HART; KIANA HART; LINDA
HART; PHILLIP L. HART; TAYSHUAN
HART; ROSE HERNANDEZ; KIMBERLY
ISED A; AUNDREA JAH R; KAYLEENA-
RAY JAH R; JUANITA JAVIER; MANUEL
JAVIER; SATURNINO JAVIER; ANDREW
JEFFERSON; JOSEPH JEFFERSON;
KALEIOLANI JEFFERSON; JOHNNY
JENSEN; MAXIMO KAUFFMAN; MARC
ANTHONY KAUFFMAN; CAMERON
LAWRENCE; SONIA LOMIELI; ADRIAN
LOPEZ JR.; ADRIAN LOPEZ SR.; ARSENIO
LOPEZ; BERTA LOPEZ (RABANG); TRINA
LOPEZ (HARO); TRENT LOUGHNANE;
KIYOMIE MARSHALL; CARLOS MIGUEL;
LAWRENCE MIGUEL; MATIAS MIGUEL;
RONALD MIGUEL III; RONALD MIGUEL
JR.; TONI MIGUEL; JUSTIN MUNDEN;
ANGELINE NARTE; DANTE NARTE;
FRAZER NARTE; JAIME NARTE; JENAIA
NARTE; KAILEE NARTE; MARIO NARTE

JR.; MARIO NARTE; MICAH NARTE;
RUBY NARTE; ANTONIO NARTE JR.;
PHILLIP D. NARTE; ANTONIO NARTE;
CALEB NARTE; CODY NARTE; ELISAH
NARTE; ANDREW NICOL; TERIA ANN
NICOL; ROY NICOL; ALEXANDER NICOL-
MILLS; DUSTIN OSHIRO; ELIZABETH
OSHIRO; KIYOSHI OSHIRO; MATTHEW
OSHIRO; OLIVE OSHIRO; OLIVIA OSHIRO;
TIANA OSHIRO; STEVEN PARK; EDMUND
PARK; ADELINA PARKER; MALIA PEATO;
PATELESIO PEATO; SOFIA PEATO;
KUAIKA PELETI; RENE PELETI; TINO
PELETI; MORENO PERALTA; ARIEL
PHILLIPS; JOSHUA PHILLIPS; SAMSON
PHILLIPS; AILINA RABANG; SELIA
RABANG; SHALENE RABANG; CLARA
RABANG; LEONARD RABANG; MAXINA
RABANG; MIANA RABANG; REANNA
RABANG; TYRONE RABANG JR.; TYRONE
RABANG; WILLIAM RABANG; ANGEL
RABANG; ANGELITA RABANG;
ANTHONY RABANG; BRIANNA RABANG;
DOMINGO A. RABANG SR.; DOMINGO F.
RABANG; FRANCISCA L.G. RABANG;
FRANCISCA S. RABANG; FRANCISCO A.
RABANG; FRANCISCO D.G. RABANG;
FRANCISCO RABANG JR.; GINA RABANG;
JAMES RABANG; LAJUNE RABANG;
MARTINO RABANG; MICHAEL RABANG;
QUI-SEENUM RABANG; RACHEL
RABANG; ROBERT JAMES RABANG III;
ROBERT JAMES RABANG JR.; ROBERT
JAMES RABANG SR.; SANTANA RABANG;
TIERRA RABANG; TINA RABANG;
CARCIONE RABANG; SUNSIE RABANG;
WILLIAM RABANG JR.; SHARON
RABANG-BROWN; ALEXINA RABANG-
COLEMAN; ALLEN RAPADA; ANDREW
RAPADA; BART RAPADA; CALVIN
RAPADA; DANIEL FRED RAPADA;
DANIEL FELIX RAPADA; DARRELL
RAPADA; EMILY RAPADA; GERALD
RAPADA; HONORATO RAPADA;
HONORATO RAPADA; JAMES RAPADA;
KIMBERLY RAPADA; MELISSA RAPADA;

1 MILDRED RAPADA; RECONAR RAPADA;
2 RECONAR G.B. RAPADA; SONIA
3 RAPADA; TIERRA RAPADA; ZACK
4 RAPADA; NADINE RAPADA; ANGELA
5 RAPADA; BETSIEBO RAPADA; CATALINA
6 RENTERIA; MARCELLINA RENTERIA;
7 SYLVIA RENTERIA; VINCENT RENTERIA;
8 ALLEN RICHAMIRE; VERONICA
9 RICHMIRE; ANGELO RITUALO; DIANA
10 (MONA) RITUALO; FELIPE RITUALO;
11 TERESA RITUALO; BRITTINIE ROBERTS;
12 RAFFINAND ROBERTS; DEANNA
13 ROMERO; RUDY ROMERO; EMMANUAL
ROMERO-DANCEL; KRISTOFFER SILVA;
SEVINA SILVA; TYLER SILVA; ENZO
SIOSON; JULIETTE SIOSON; ROCCO
SIOSON; DEBBIE SMITH (NARTE); ALEX
ST. GERMAIN; BREANNA ST. GERMAIN;
RUDY ST. GERMAIN; TAYLOR ST.
GERMAIN; TERRY ST. GERMAIN JR.;
ROSE TOVAR; AND JOCELYN TOVAR;
CHERYL TRAINOR; KRISTAL TRAINOR,
individually and on behalf of their minor
children, enrolled members of the Nooksack
Indian Tribe

14 Plaintiffs,

15 v.

16 ROBERT KELLY, Chairman of the Nooksack
17 Tribal Council; RICK D. GEORGE, Vice-
18 Chairman of the Nooksack Tribal Council;
19 AGRIPINA SMITH, Treasurer of the Nooksack
20 Tribal Council; BOB SOLOMON,
21 Councilmember of the Nooksack Tribal
22 Council; KATHERINE CANETE,
Councilmember of the Nooksack Tribal Council
and Nooksack General Services Executive; and
AGRIPINA “LONA” JOHNSON,
Councilmember of the Nooksack Tribal
Council, in their official capacities,
Defendants.

I. INTRODUCTION

1. Plaintiffs, enrolled members of the Nooksack Tribe (“Tribe”), bring this action to halt the process and prosecution of disenrollment against them through the Tribal Council Procedures for Involuntary Disenrollment Meetings (“Disenrollment Procedures”), which violate Nooksack Tribal Code (“N.T.C.”) Title 63 and the Nooksack Constitution.

2. Defendants are violating and will patently violate the law by taking action under the Disenrollment Procedures and they are being sued in their official capacity for prospective injunctive relief; therefore Nooksack *Ex parte Young* allows a suit to proceed against them despite Nooksack Tribal sovereign immunity.

II. JURISDICTION

3. The Court has personal jurisdiction over Defendants pursuant to N.T.C. § 10.05.020(c). The Court has subject matter over this action pursuant to N.T.C. § 10.00.050.

5. Because Defendants are being sued for nonmonetary injunctive relief in their official capacities and have acted and are threatening to act illegally, the Tribe’s sovereign immunity is not implicated in this action. *Lomeli v. Kelly*, Order Denying Permission For Interlocutory Appeal (Nooksack Ct. App. 2013), 4, fn. 4 (under Nooksack law, when “an official commits an act prohibited by law, he acts beyond his authority and is not protected by sovereign immunity.”).

III. PARTIES

6. Defendants are members of the Nooksack Tribal Council sued in their respective official capacities.

7. Plaintiffs are enrolled members of the Tribe against whom impending disenrollment actions have been brought, pursuant to procedures that violate Nooksack law.¹ Plaintiffs Nadine Rapada, Rose Hernandez, Cody Narte, and Kristal Trainor are enrolled members of the Tribe who were each mailed Notices of Automatic Disenrollment by Defendants on August 13, 2013.

8. Plaintiffs bring this action on behalf of themselves and on behalf of their minor children, who are also enrolled members of the Tribe against whom impending disenrollment actions have been brought pursuant to procedures that violate Nooksack law, and also on behalf of those other enrolled members of the Tribe who are similarly situated.

IV. FACTS

9. Beginning on February 14, 2013, Defendants issued issuance a Notice of Intent to Disenroll (“Notice”) to 306 Enrolled Nooksack Members. The Notice states that the potential disenrollee is entitled to a “meeting” with the Tribal Council to dispute their disenrollment. The letter was vague as to the process and/or procedures that will be employed at the “meeting,” if any.

10. The Tribal Council has the power to enact ordinances to “prescribe rules and regulations governing involuntary loss of membership.” Const. art. II, § 4; *see also id.* at § 2. But it must do so in conformity with the Constitution. *Id.*

11. On August 8, 2013, Defendants met in secret and passed the **appended Disenrollment Procedures** (“Disenrollment Procedures”), which among other things:

- Forbid a disenrollee from being represented by counsel during his or her disenrollment meeting, *id.* Sec. VI, C – in contravention of at least the **appended March 20,**

¹ Plaintiffs are also, or alternatively, identified in the **appended Representation List** as contemplated by a March 20, 2013 Nooksack Tribal Court-entered Stipulation in *Lomeli v. Kelly*. Nooksack Tribal Court Case No. 2013-CI-CL-001, and on file therein.

1 **2013 Tribal Court-entered Stipulation** whereby Defendants acknowledged that Galanda
2 Broadman, PLLC was “authorized to act in . . . the related proceedings regarding disenrollment”
3 on behalf of Plaintiffs.²

4 • Allow a disenrollee “a maximum of ten (10) minutes to present his or her case,”
5 *id.* Sec. VI, H;

6 • Require a disenrollee’s response papers and supporting evidence to be filed “no
7 later than five (5) calendar days prior to the scheduled Meeting.” *Id.* Sec. V, A(3), (C).³ This
8 time period has already lapsed for Plaintiffs Roberts and St. Germain.

9 • Require that meetings “be held v [sic] telephonically via conference call,” rather
10 than in person, *id.* Sec. VI, B; and

11 • Fails to include provisions that allow a disenrollee to schedule his or her hearing
12 or to do so through the Tribal Council Secretary, which violates the N.T.C. §
13 63.04.001(B)(2) requirement that “[i]f a meeting is requested with the Tribal Council, the
14 member must contact the Tribal Council to obtain a date for the meeting.”

15 12. On August 9, 2013, Plaintiffs Roberts and St. Germain were served with Notices
16 of Meetings. On August 13, 2013, Defendants mailed at least 24 other Plaintiffs either Notices
17 of Meetings, or Notices of Automatic Disenrollment.

18 13. On August 13, 2013, Defendants issued Notices of Automatic Disenrollment to
19 Plaintiffs Nadine Rapada, Rose Hernandez, Cody Narte and Kristal Trainor, alleging that they
20 “received proper notice but did not timely request hearings.” Plaintiffs were listed by
21

22 ² The Stipulation resulted from promises made on Defendants’ behalf by Thomas Schlosser, Esq., in open Court,
before Pro Tem Judge Randy Doucet on March 18, 2013.

23 ³ Although the **appended document titled, “What to expect for your meeting,”** provides: “At least three (3) hours
24 prior to your meeting you must provide a written response, or any documentation you wish the Tribal Council to
consider in anticipation of your meeting (no documentation or response will be accepted after this deadline).”

undersigned counsel on “a list of those individuals for whom they are then authorized to act . . . in the related proceedings regarding disenrollment,” which Defendants agreed to treat as a timely request for a meeting pursuant to Title 63.04.001(B)(2) before the Tribal Council,” per the aforementioned appended March 20, 2013, Tribal Court-entered Stipulation. That Stipulation further provides: “No person will be disenrolled prior to the completion of the meetings before the Tribal Council, regardless of whether that individual has requested a meeting with the Tribal Council.”

14. On August 20, 2013, Defendants announced that Plaintiffs’ children who are students between ages 3 and 19 and “subject to Nooksack disenrollment proceedings” — but not yet disenrolled — are ineligible to receive \$275 in “Back to School Support for the 2013-2014 school year.” Any Nooksack student with proof of educational enrollment (e.g., Head Start, K-8, high school or GED) was declared “eligible for a \$275 check.”

15. From March through August 2013, Defendant Chairman Robert “Bob” Kelly failed to call a Tribal Council Special Meeting upon written requests by Plaintiffs Tribal Council Secretary Rudy St. Germain and Councilmember Michelle Roberts, despite the requirements of Article II, Section 5 of the Bylaws. Defendants also failed to notify Plaintiffs Roberts and St. Germain of Special Meetings of the Nooksack Tribal Council on at least March 13, 2013; April 16, 2013; and August 8, 2013, in violation of Article II, Section 2 of the Bylaws and Article III, Section 2 of the Constitution

V. FIRST CAUSE OF ACTION
(Injunction – Violation of Nooksack Tribal Law and Constitution)

16. Plaintiffs incorporate and reallege the foregoing allegations. Plaintiffs are not requesting affirmative action.

1 17. Defendants have issued procedures and are operating under such procedures that
2 impermissibly conflict with the clear requirements of the Constitution and Title 63.

3 18. The Disenrollment Procedures violate the Constitution and Title 63, and thus
4 Defendants' enforcement of such Disenrollment Procedures gives rise to *Ex parte Young*
5 liability. The Disenrollment Procedures fail to include provisions that allow a disenrollee to
6 schedule his or her hearing and do so through the Tribal Council Secretary, which violates the
7 N.T.C. § 63.04.001(B)(2) requirement that "[i]f a meeting is requested with the Tribal Council,
8 the member must contact the Tribal Council to obtain a date for the meeting."

9 19. Defendants' clear violation of Nooksack statutory protections requires an
10 injunction that prevents Defendants from moving forward with the disenrollment process unless
11 Nooksack law is honored.

12 **VII. SECOND CAUSE OF ACTION**
13 **(Injunction – Nooksack Due Process Violations)**

14 20. Plaintiffs incorporate and reallege the foregoing allegations. Plaintiffs are not
15 requesting affirmative action. Instead, Plaintiffs are seeking prospective injunctive relief.

16 21. This means: Plaintiffs are not asking the Court to force Defendants to do
17 something; rather, Plaintiffs are asking the Court to prohibit Defendants from taking illegal
18 action. Although Defendants have already acted illegally in many instances, Plaintiffs are not
19 seeking to cure those acts and omissions; rather, Plaintiffs are asking that Defendants be
20 prohibited from *continuing* to act illegally.

21 22. Article IX of the Constitution dictates that: "All members of the Nooksack Indian
22 Tribe shall be accorded equal rights pursuant to tribal law."

23 23. Article IX of the Constitution further dictates that "The protection guaranteed to
24 persons by Title II of the Civil Rights Act of 1968 (82 Stat. 77) against actions of the Nooksack

1 Indian Tribe in the exercise of its powers of self-government shall apply to the members of the
2 Nooksack Indian Tribe.” All Nooksack governmental agencies and agents must comply with
3 Title II of the Civil Rights Act of 1968, 82 Stat. 77 (“ICRA”). Relevant sections of ICRA state
4 that the Tribe may not: (a) “deny to any person within its jurisdiction the equal protection of its
5 laws or deprive any person of liberty or property without due process of law.” 25 U.S.C. §§
6 1302(a)(1).

7 24. Defendants are violating these provisions of constitutional law by depriving
8 Plaintiffs and their enrolled children of “Back to School Support for the 2013-2014 school year”
9 and other services and programs that are available to other enrolled members of the Nooksack
10 Tribe. What is more, these services have been denied without notice, a hearing, or an
11 opportunity to be heard.

12 25. Defendants are violating these provisions of constitutional law by (a) depriving
13 Plaintiffs of counsel during their hearings despite assuring Plaintiffs previously that legal
14 representatives could participate on their behalf; (b) limiting Defendants to “a maximum of ten
15 (10) minutes to present his or her case” in light of the profound matters at issues; (c) requiring a
16 disenrollee’s response papers and supporting evidence to be filed “no later than five (5) calendar
17 days prior to the scheduled Meeting” even when this time period has already lapsed for Plaintiffs
18 Roberts and St. Germain – effectively barring them from providing written submissions; (d)
19 requiring that meetings “be held v [sic] telephonically via conference call,” rather than in person,
20 which prevents Plaintiffs from exercising their fundamental right to confront evidence; and (e)
21 refusing to abide by N.T.C. § 63.04.001(B)(2) scheduling requirements, which establish the floor
22 for due process in this context.

1 26. Defendants are also violating the provisions of the March 20, 2013, Tribal Court-
2 entered Stipulation, in relation to Plaintiffs Nadine Rapada, Rose Hernandez, Cody Narte and
3 Kristal Trainor, specifically the assurance that: “No person will be disenrolled prior to the
4 completion of the meetings before the Tribal Council, regardless of whether that individual has
5 requested a meeting with the Tribal Council.”

6 27. Because statutory procedures and governmental assurances establish the
7 minimum due process protections that a member must receive, failure to follow such procedures
8 is a procedural due process violation. Here, Plaintiffs have been denied their rights to procedural
9 due process in connection with Defendants’ disenrollment process.

10 28. Defendants’ clear violation of Nooksack statutory due process requires an
11 injunction that prevents Defendants from moving forward with the disenrollment process unless
12 the appropriate due process is afforded.

13 **THIRD CAUSE OF ACTION**
14 **(Injunction – Violation of Nooksack Constitution)**

15 29. Plaintiffs incorporate and reallege the foregoing allegations. Plaintiffs are not
16 requesting affirmative action. Instead, Plaintiffs are seeking prospective injunctive relief.

17 30. Defendants have deprived Plaintiffs and their enrolled children of “Back to
18 School Support for the 2013-2014 school year” and other social and educational services and
19 programs that are available to enrolled members of the Nooksack Tribe, in violation of Article
20 IX of the Constitution.

21 31. Defendants’ clear violation of Nooksack constitutional law requires an injunction
22 that prevents Defendants from further depriving Plaintiffs and their enrolled children of equal
23 rights pursuant to tribal law, including the rights to Nooksack social and educational services and
24 programs.

FOURTH CAUSE OF ACTION
(Injunction – Violation of Nooksack Constitution)

32. Plaintiffs Michelle Joan Roberts and Rudy St. Germain, only, incorporate and reallege the foregoing allegations. Plaintiffs Michelle Joan Roberts and Rudy St. Germain are not requesting affirmative action. Instead, Plaintiffs Michelle Joan Roberts and Rudy St. Germain are seeking prospective injunctive relief.

33. Defendant Chairman Robert “Bob” Kelly failed to call a Tribal Council Special Meeting upon multiple written requests by Plaintiffs Tribal Council Secretary Rudy St. Germain and Councilmember Michelle Roberts, pursuant to Article II, Section 5 of the Bylaws.

34. Defendant Chairman Robert “Bob” Kelly must be directed to stop violating Article II, Section 5 of the Bylaws by refusing repeatedly to call Tribal Council Special Meetings as they are legally required to do.

35. Defendants failed to notify Plaintiffs Roberts and St. Germain of Special Meetings of the Nooksack Tribal Council on at least March 13, 2013, April 16, 2013, and August 8, 2013, in violation of Article II, Section 2 of the Bylaws and Article III, Section 2 of the Constitution.

36. Defendants must be directed to stop violating Article II, Section 2 of the Bylaws and Article III, Section 2 of the Constitution by refusing to notify Plaintiffs Roberts and St. Germain of Special Meetings of the Nooksack Tribal Council as they are legally required to do.

FIFTH CAUSE OF ACTION
(Injunction – Violation of Contract)

37. Plaintiffs incorporate and reallege the foregoing allegations. Plaintiffs are not requesting affirmative action. Instead, Plaintiffs are seeking prospective injunctive relief.

1 38. “An agreement made on the record, in open court, and under the eyes of the
2 Court, is a most solemn undertaking requiring the lawyers and the parties to make every
3 reasonable effort to carry out all the terms to a successful conclusion.” *Scharf v. Levittown*
4 *Public Schools*, 970 F.Supp. 122, 129 (E.D.N.Y. 1997) (internal quotation omitted).

5 39. On March 20, 2013, the Tribal Court entered a Stipulation whereby Defendants
6 acknowledged that Galanda Broadman, PLLC was “authorized to act in . . . the related
7 proceedings regarding disenrollment” on behalf of Plaintiffs. That Stipulation further provides:
8 “No person will be disenrolled prior to the completion of the meetings before the Tribal Council,
9 regardless of whether that individual has requested a meeting with the Tribal Council.” The
10 Stipulation is an unambiguous and enforceable contract containing the complete terms of the
11 parties’ agreement.

12 40. On August 8, 2013, Defendants met in secret and passed the “Disenrollment
13 Procedures” referenced above. The Disenrollment Procedures forbid a disenrollee from being
14 represented by counsel during his or her disenrollment meeting, in contravention of the
15 Stipulation entered on March 20, 2013.

16 41. On August 13, 2013, Defendants issued Notices of Automatic Disenrollment to
17 Plaintiffs Nadine Rapada, Rose Hernandez, Cody Narte and Kristal Trainor, alleging that they
18 “received proper notice but did not timely request hearings” — despite the fact that the
19 disenrollment meetings before the Tribal Council has not even commenced, let alone completed.
20 Such also contravenes the Stipulation entered on March 20, 2013.

21 42. Defendants are in breach of the March 20, 2013, Stipulation and related promises
22 made in open court. Defendants must be directed, for instance, to stop violating the Stipulation,
23
24

1 by refusing to allow Galanda Broadman, PLLC “to act in . . . the related proceedings regarding
2 disenrollment” on behalf of Plaintiffs, as they are legally required to do.

3 43. Defendants must also be directed, for instance, to stop violating the March 20,
4 2013, Stipulation, by carrying out the automatic disenrollment of Plaintiffs Nadine Rapada, Rose
5 Hernandez, Cody Narte, and Kristal Trainor.

6 **SIXTH CAUSE OF ACTION**
7 **(Declaratory Relief – Void for Vagueness)**

8 44. Plaintiffs incorporate and reallege the foregoing allegations. Plaintiffs are not
9 requesting affirmative action. Instead, Plaintiffs are seeking prospective declaratory relief.

10 45. The Disenrollment Procedures promulgated by Defendants are contradictory, and
11 fail to adequately prescribe how a citizen may adequately present evidence to the Tribal Council.
12 Indeed, the Disenrollment Procedures contains procedures so vague that persons of common
13 intelligence must necessarily guess at their meaning and differ as to application.

14 46. The Disenrollment Procedures promulgated by Defendants are unconstitutionally
15 vague.

16 **SEVENTH CAUSE OF ACTION**
17 **(Injunction – Estoppel)**

18 47. Plaintiffs incorporate and reallege the foregoing allegations. Plaintiffs are not
19 requesting affirmative action. Instead, Plaintiffs are seeking prospective injunctive relief.

20 48. Estoppel may be applied against the sovereign governments, even when they act
21 in a sovereign rather than a merely proprietary capacity. *United States v. Wharton*, 514 F.2d
22 406, 410 (9th Cir. 1975). Under the doctrine of estoppel, governmental “agenc[ies] must be
23 rigorously held to the standards by which [they] professes.” *Vitarelli v. Seaton*, 359 U.S. 535,
24 546 (1959).

1 49. On March 20, 2013, Defendants professed that Galanda Broadman, PLLC was
2 “authorized to act in . . . the related proceedings regarding disenrollment” on behalf of Plaintiffs.
3 That Stipulation further provided: “No person will be disenrolled prior to the completion of the
4 meetings before the Tribal Council, regardless of whether that individual has requested a meeting
5 with the Tribal Council.”

6 50. On August 8, 2013, Defendants met in secret and passed the “Disenrollment
7 Procedures” referenced above. The Disenrollment Procedures forbid a disenrollee from being
8 represented by counsel during his or her disenrollment meeting, in contravention of the standards
9 by which the Tribal Council professed.

10 51. On August 13, 2013, Defendants issued Notices of Automatic Disenrollment to
11 Plaintiffs Nadine Rapada, Rose Hernandez, Cody Narte, and Kristal Trainor, alleging that they
12 “received proper notice but did not timely request hearings” — despite the fact that the
13 disenrollment meetings before the Tribal Council has not even commenced, let alone completed.
14 Such act also contravenes the standards by which the Tribal Council professed.

15 52. Defendants are not adhering to the standards by which they profess. Defendants
16 must be directed to stop violating the Stipulation and related promises made in open Court.

17 **XI. RELIEF REQUESTED**

18 WHEREFORE, Plaintiffs pray for relief as follows:

19 A. For injunctive relief;

20 B. For an immediate stay of any and all disenrollment proceedings carried out
21 pursuant to the Disenrollment Procedures;

22 C. A declaration that the Disenrollment Procedures are void for vagueness;

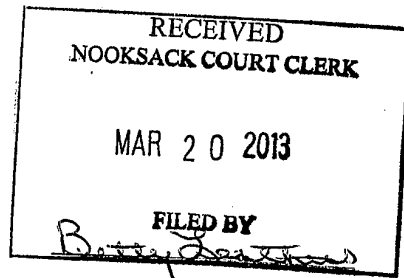
23 D. For attorneys’ fees and costs; and
24

1 E. For such other relief as the Tribal Court may deem just and equitable.
2 Plaintiffs reserve the right to further amend their Complaint for prospective equitable relief.

3 DATED this 21st day of August, 2013.

4 
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7 Anthony S. Broadman
8 Ryan D. Dreveskracht
9 Attorneys for Plaintiffs
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7 IN THE TRIBAL COURT OF THE NOOKSACK TRIBE OF INDIANS FOR THE
8 NOOKSACK INDIAN TRIBE

9 LOMELI, *et al.*,

Case No. 2013-CI-CL-001

10 Plaintiffs,

STIPULATION

11 v.

12 KELLY, *et al.*,

13 Defendants.

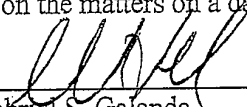
14 Undersigned counsel for Plaintiffs and Defendants have conferred and stipulate and agree
15 as follows:

16 1. On or before April 13, 2013, Galanda Broadman will furnish a list of those
17 individuals for whom they are then authorized to act in this matter and in the related proceedings
18 regarding disenrollment of certain Nooksack Tribal Members pursuant to Title 63. Defendants
19 will treat Mr. Galanda's letter of March 15, 2013, to Chairman Kelly regarding the Notice of
20 Intent to Disenroll as a timely request for a meeting pursuant to Title 63.04.001(B)(2) before the
21 Tribal Council for the individuals identified on that list.

22 2. No person will be disenrolled prior to completion of the meetings before the
23 Tribal Council, regardless of whether that individual has requested a meeting with the Tribal
24 Council.

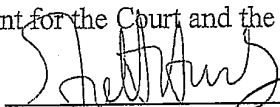
3. Within 15 days, the Nooksack Tribal Council will consider amendments to Title 60, and if that Ordinance is amended, it will be provided to Plaintiffs.

4. The remaining issues concerning whether preliminary equitable relief should be granted to Plaintiffs in the above captioned action shall be briefed and considered as follows: Within 14 days after the Court's approval of this Stipulation, Defendants shall file responsive papers. Within 7 days thereafter, Plaintiffs will file a reply. Thereafter, the Court will hear argument on the matters on a date and time that is convenient for the Court and the parties.



Gabriel S. Galanda
Attorney for Plaintiffs

Dated: 3/19/13



Grett Hurley
Attorney for Defendants

Dated: 3/19/13

4

PROOF OF SERVICE

I, Charity Bernard, say:

I am a citizen of the United States, over 18 years of age, a resident of Ferndale in Whatcom County, and not a party to the action or proceeding; that my business address is Post Office Box 157, Deming, Washington, 98244, and that on **March 20, 2013**, I served a true copy of the following document(s):

STIPULATION

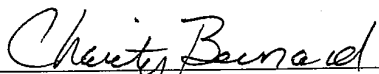
by depositing a true and correct copy thereof enclosed in a sealed envelope, postage prepaid via United States mail for collection in Deming, WA addressed to the following person(s) described below:

Gabriel S. Galanda
Galanda Broadman, PLLC
Attorneys for Plaintiffs
8606 35th Ave. NE, Ste. L1
P.O. Box 15146
Seattle, WA 98115

I am readily familiar with the Office of Tribal Attorney's practice of collection and processing correspondence for mailing via United States mail. It is deposited on the same day in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the March 20, 2013 at Nooksack Indian Reservation, Deming, Washington



Charity Bernard, Paralegal
Nooksack Indian Tribe
Office of Tribal Attorney

TRIBAL COUNCIL PROCEDURES FOR INVOLUNTARY DISENROLLMENT MEETINGS

- I. AUTHORITY AND PURPOSE.** The Tribal Council Procedures for Involuntary Disenrollment Meetings (hereinafter "Procedures") are enacted under the authority granted by Article VI, Section J of the Constitution and Bylaws of the Nooksack Indian Tribe. The purpose of these Procedures is to establish fair and orderly procedures for a disenrollment meeting.
- II. APPLICATION.** These Procedures shall apply to all meetings described in Title 63, sections 63.004.001(B)(2) and requests for reconsideration under section 63.004.001(C) of the Membership Ordinance of the Nooksack Indian Tribe.
- III. DEFINITIONS.**
- A. "Attendees and Participants" means those persons authorized to participate in or attend the Meeting. These persons are limited to Tribal Council Members, Nooksack Tribe Administrative Officials and Employees approved by the Tribal Council.
 - B. "Disenrollee" means a tribal member subject to disenrollment pursuant to Title 63, the Membership Ordinance of the Nooksack Indian Tribe, Section 63.04.001(B).
 - C. "Eligible Party" means any person who has been involuntarily disenrolled who requests reconsideration of the Tribal Council's decision to involuntarily disenroll the person pursuant to Title 63, The Membership Ordinance of the Nooksack Indian Tribe, Section 63.04.001(C)(1).
 - D. "Meeting" means the meeting with the Tribal Council requested by a Disenrollee, pursuant to Title 63, The Membership Ordinance of the Nooksack Indian Tribe, Section 63.04.001(B)(2).
 - E. "Written Response" means a written response to the Tribe's Notice of Involuntary Disenrollment.
 - F. "Tribal Council" means the governing body of the Tribe pursuant to Article III of the Constitution and Bylaws of the Nooksack Indian Tribe.
 - G. "Tribe" means The Nooksack Indian Tribe.
- IV. NOTICE.** The Tribal Council shall provide a Disenrollee written notice of the time, date, and method of the Meeting. The date and time of the Meeting may be subject to change by the Tribal Council. Notice will be provided by personal service or registered mail, return receipt requested (or its Canadian equivalent), to the last known address of

the Disenrollee, no later than twenty-one (21) calendar days prior to the scheduled Meeting date.

Tribal Council may elect to shorten the time required in instances where the Disenrollee was personally served and the Tribal Council finds that the Disenrollee has sufficient time to arrange appearance by telephone. In such cases, Tribal Council may, in its sole discretion, proceed with the Meeting making such accommodations as necessary to permit the Disenrollee the opportunity to be heard.

Each Disenrollee or Eligible Party shall ensure that his or her address and telephone number on file is correct and shall immediately notify the Tribal Council of any changes of address or telephone number that occurs during the course of proceedings.

After a Meeting has been scheduled it may be continued, rescheduled, or adjourned only at the discretion of the Tribal Council. A Disenrollee shall not consider a Meeting continued, rescheduled, or adjourned until notified by the Tribal Council.

V. RESPONSE.

A. General Requirements. All response items, including but not limited to the Written Response, Exhibits, and Exhibit Lists, must conform to the following requirements:

- (1) All submissions and requests must be made in electronic or hard copy form.
- (2) All submissions and requests must be addressed to:

Nooksack Indian Tribe
Nooksack Tribal Council
P.O. Box 63
Deming, WA 98244

Or

meeting@nooksack-nsn.gov

- (3) All submissions and requests must clearly identify the Disenrollee by name and enrollment number.
- (4) Submissions and requests may not address more than one Disenrollee; only individual submissions and requests will be accepted.
- (5) All submissions and requests must be received by the Tribal Council before the deadline stated in these Procedures.

Failure to comply with any General Requirement stated in these Procedures may result in rejection of the submission or request.

B. Written Response. A Disenrollee may submit a Written Response to the Tribe's Notice of Involuntary Disenrollment explaining why the proposed action should not be taken against him or her. In addition to the General Requirements above, Written Responses are subject to the following requirements:

- (1) **Format.** Responses must be typed; hand written responses may be rejected. The lower, right hand corner of each page of the Response must contain the page number, and the Disenrollee's full name and enrollment number. Written Responses are limited to ten (10) pages, double spaced, twelve font, not including exhibits or evidence
- (2) **Signed.** Written Responses must be signed and dated by the Disenrollee or a Parent or Legal Guardian of the Disenrollee, if the Parent or Legal Guardian will be representing a minor or incompetent.
- (3) **Time to Submit Response.** The Written Response, and if necessary a Representation Form must be received by the Tribe no later than five (5) calendar days prior to the scheduled Meeting date. Untimely submissions may result in rejection.

C. Evidence and Time for Submission of Evidence. A Disenrollee may present evidence supporting his or her case. All evidence must be received by the Tribe no later than five (5) calendar days prior to the scheduled Meeting date; untimely submissions may result in rejection. Evidence is subject to the following limitations and requirements:

- (1) **Types of Permissible Evidence.** Copies of documentary evidence including affidavits, birth certificates, baptismals and other documents relevant to the Disenrollee's original claim for membership may be submitted.
- (2) **Required Format of Evidence Submissions.**
 - a. Exhibits must be identified in an Exhibit List. The Exhibit List must include the document title and assigned Exhibit number.
 - b. All evidence must be labeled as an individual Exhibit. Exhibits must be marked with an exhibit label on the lower right hand corner. Labels must include the Disenrollee's name and enrollment number, exhibit number, and total page numbers for each exhibit. Example: Member John Doe, #8, Exh. ___, 1 of 2.
 - c. All evidence must be submitted as one complete packet that includes a cover page clearly marked with the Disenrollee's name, enrollment number, and scheduled Meeting date and time.

- d. Failure to comply with these format requirements will result in rejection of submissions.
- (3) **Retention of Evidence.** The Tribal Council will retain all submitted evidence indefinitely; therefore, a Disenrollee is encouraged to submit copies, and use discretion when submitting original evidence.
- (4) **Official Notice.** Official notice may be taken by the Tribal Council of: (a) any judicially cognizable facts; or (b) any tribal historical fact within the Enrollment Department's specialized knowledge.

VI. **DISENROLLMENT MEETING PROCEDURE.**

- A. **Mandatory Confirmation of Meeting.** The Disenrollee requesting a Meeting before Tribal Council shall confirm the Meeting with the Meeting Coordinator by telephone at (360) 592-4158 ext. (1005) or by email at meeting@nooksack-nsn.gov. Confirmations must be done two (2) calendar days prior to the Meeting between the hours of 9:00 a.m. and 4:30 p.m. If a Meeting is not timely confirmed, the Meeting will be stricken and the Tribal Council may consider only timely filed written materials. Individual meetings will occur in the order the individual Disenrollee confirmed his or her Meeting.
- B. **Telephonic Meetings.** Meetings will be held v telephonically via conference call unless otherwise specified.
- C. **Representation at Meeting.** A Disenrollee shall not be permitted to allow another person to represent him or her at the Meeting, with the exception of minors and incompetents. Minor Disenrollees, under the age of eighteen (18), and incompetents, must be represented by a parent or legal guardian. Parents or legal guardians representing minor children and/or incompetents must submit a Representation Form, attesting to their legal authority to make decisions on behalf of the minor and/or incompetent. A Representation Form must be received by the Tribe no later than five (5) calendar days prior to the scheduled Meeting date; untimely submissions may result in rejection.
- D. **Statements under Oath or Affirmation.** Each Disenrollee appearing for a Meeting shall swear or affirm that the statements he or she is about to give at the Meeting shall be the truth according to the laws of the Nooksack Indian Tribe and that he or she agrees to be bound by the laws of the Nooksack Indian Tribe for the purposes of the oath or affirmation.
- E. **Conduct Requirements.** All Attendees and Participants of the Meeting shall maintain the respect due to the Tribal Council and shall abstain from all offensive conduct before, during, and after the Meeting. Such conduct requirements extend to the maximum extent allowed by federal law. Offensive conduct includes, but is not

limited to: any attempt to intimidate the Tribal Council, speaking out of turn, using threatening, obscene, or offensive language, failing to abide by designated time for oral argument, and behaving in a manner that disrupts the Meeting. Failure to abide by these Conduct Requirements will result in immediate removal from and/or early termination of the Meeting; persons engaging in such activity will be subject to all applicable Tribal, state, and federal laws.

F. **Mandatory Attendance.** The scheduled Meeting is a Disenrollee's opportunity to present his or her case. Personal attendance, whether in person or telephonically, is mandatory and a Disenrollee waives his or her right to be heard if he or she fails to confirm the Meeting or fails to appear. All Meetings will begin promptly at the designated time and date. The Tribal Council may deny admission to any person arriving after the scheduled Meeting date and time.

G. **Permissive Attendees and Participants.** Meetings are not open to the public. Attendance at a Meeting is restricted to Disenrollees, and Attendees and Participants. Minors, under the age of eighteen (18), and incompetents, must be represented by and accompanied by an authorized parent or legal guardian. Attendance by all other persons is strictly prohibited.

H. **Time Provided for Presentation.** A Disenrollee shall have a maximum of ten (10) minutes to present his or her case to the Tribal Council. A Disenrollee may rely exclusively on his or her Written Response.

I. **Presentation of Case.** The Tribe fulfills its burden of production by providing documentation supporting disenrollment to the Disenrollee establishing why he or she does not meet the Nooksack Constitutional requirements under which they were originally enrolled. All documentary evidence provided in accordance with these Procedures is part of the disenrollment record. The Tribal Council shall preside over the Meeting and ensure order and fairness. The Tribal Council will consider all evidence, Written Response, and evidence presented in accordance with these Procedures. A Disenrollee may present his or her case to the Tribal Council by oral argument or with documentary evidence.

VII. **FINAL DECISION.** The Tribal Council will issue a final written decision regarding a Disenrollee's enrollment status following the Meeting. Final written decisions shall be personally served or sent registered mail, return receipt requested to the Disenrollee's last known address.

VIII. **REQUEST FOR RECONSIDERATION.** Pursuant to Title 63, an Eligible Party may request reconsideration of the Tribal Council's decision to involuntarily disenroll the Eligible Party.

A. **Time for Request.** A request for reconsideration must be received within thirty (30) calendar days of the receipt of the notice of involuntary disenrollment. The

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date stamped on the receipt of the certified letter (or its Canadian Equivalent) shall be considered the beginning of the thirty (30) day period. All late requests will be rejected.

- B. **Format.** All requests for reconsideration must be typed and include the Eligible Party's name and enrollment number prior to disenrollment; and be mailed to:

Nooksack Indian Tribe
Nooksack Tribal Council
P.O. Box 63
Deming, WA 98244

- C. **Grounds for Request.** The request for reconsideration must clearly state the grounds for the request, and include any additional evidence or documentation the Eligible Party will present. The Required Format of Evidence Submissions outlined in Section V (C) of these Procedures shall apply to Requests for Reconsideration.

- D. **Notification.** The Tribal Council Secretary will notify the Eligible Party of the Tribal Council's decision whether or not to grant reconsideration within fourteen (14) calendar days of receipt of the request. If the Tribal Council Secretary is unable to perform this duty, as a result of a conflict of interest, or for other reasons, the Tribal Council may delegate the notification to another councilmember as decided by the Council.

IX. MISCELLANEOUS.

- A. **Binding.** These Procedures are binding upon any and all Disenrollees, Eligible Parties, and Attendees and Participants. Failure to comply with these Procedures may result in rejection of a request or submission and may result in automatic disenrollment, removal of a person from a Meeting, loss of opportunity for reconsideration, or exclusion from further participation in the Disenrollment process.
- B. **Time Computation.** Whenever any document is required to be filed in a certain number of days ("filing deadline"), the time computation does not include the day the action was taken or the date the document was received unless these Procedures specifically state otherwise. In the event that the last day falls on a weekend, or tribal holiday, the filing deadline is the next tribal work day.
- C. **Confidentiality.** Pursuant to Title 63, Section 63.05.001(B), documents contained within individual enrollment folders are confidential. The Tribe releases documents to a Disenrollee for the limited purpose of facilitating a fair and orderly Meeting. Such documents remain confidential and may not be distributed, disseminated, reproduced, copied, photographed, or in any way

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provided to members of the public or media. At its discretion the Tribal Council may redact specific confidential information from documents if its deemed necessary.

- D. **Headings.** The titles to the paragraphs of these Procedures are solely for convenience and are not to be used to explain, modify, simplify, or aid in the interpretation of the provisions of these Procedures.
- E. **Amendments or Modifications.** The Nooksack Tribal Council may amend these Procedures from time to time as may be necessary.
- F. **Jurisdiction.** Decisions made by the Tribal Council are final. The Nooksack Tribal Court shall not have subject matter jurisdiction over any case or controversy related to these Procedures for disenrollment proceedings, any disenrollment proceeding, and/or any determination made during the course of a disenrollment proceeding.
- G. **Sovereign Immunity Not Waived.** Nothing in these Procedures shall be deemed or construed to be a waiver of the sovereign immunity of the Nooksack Indian Tribe, its officials, its entities, or employees acting within their official or individual capacities.

CERTIFICATION


I, the undersigned do hereby certify that the Nooksack Tribal Council is composed of eight (8) members, of which 6 were present, constituting a quorum of a duly called meeting thereof held on this 8th day of Aug., 2013, and that the above Resolution #13 - 111 Approving Tribal Council Procedures For Involuntary Disenrollment Meetings was duly enacted by the Council Members vote of: 5 FOR, 0 OPPOSED, and 1 ABSTENTIONS, and since its approval this Resolution has not been altered, rescinded, or amended in any way

Dated this 8 day of August, 2013.



Robert Kelly, Jr., Chairman
Nooksack Tribal Council

ATTEST:



Rick D. George, Vice Chairman
Nooksack Tribal Council

Tribal Council Procedures For Disenrollment Meetings

Adopted 8/8, 2013

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What to expect for your meeting:

Important Deadlines:

1. Within this packet, you should have received your Notice of Basis for Disenrollment packet. This Notice explains why action is being taken against you.
2. At least three (3) hours prior to your meeting you must provide a written response, or any documentation you wish the Tribal Council to consider in anticipation of your meeting (no documentation or response will be accepted after this deadline).
3. Two (2) calendar days prior to your meeting, you must call (360) 592-4158 x 1005 or email meeting@nooksack-nsn.gov to confirm that you will be attending your teleconference meeting (i.e. If your scheduled hearing is on August 15, 2013, you must call in or email to confirm August 13, 2013 – between the hours of 9:00 am and 4:30 pm.) If you do not confirm, you will not be on the docket to be heard as scheduled. There will be no exceptions. Tribal Council will still consider your written submissions.

Your Teleconference Meeting:

- Please refer to your notice for your date and time to call in for your Meeting.
- Please call into the teleconference number between 1-5 minutes before the scheduled start time of the Meeting. **DO NOT** call in late. Failure to call when required will result in loss of your Meeting.
- To prevent dropped calls, please ensure that you use a landline. If your call is dropped, you will lose your Meeting.
- When you call the teleconference line, you will be prompted to enter the Meeting ID Number, which can be found on your Notice of Meeting. You will immediately hear music while on hold. Stay on the line until you are prompted by Tribal Council. There may be a wait of 10 minutes to 2 hours, as other Meetings are scheduled for the same day and time. Your individual Meeting will occur in the order that you confirmed your Meeting. Failure to stay on the line until your Meeting commences will result in loss of your Meeting.
- When the Tribal Council Members come on the line, you will be informed that the call is being recorded and then be asked to state your full name and enrollment number for identification purposes. At this time, your Meeting has commenced.
- You will be prompted by Tribal Council when your opportunity to present your case begins. No questions will be entertained.
- Upon the conclusion of your Meeting, you will receive Tribal Council's decision in the mail.

IMPORTANT INFORMATION

LAST NAME	FIRST NAME
Adams	Francine
Adams	Anthony
Aldredge	Brina
Aldredge	Brittany
Aldredge	Norma
Aure	Angelita
Aure	Doe
Baker	Chelsea
Baker	Kelsea
Baker	Pricilla
Baker	Jeric
Barril	Florentino
Barril-Bothell	Caleb
Barrill	Cathalina
Bartle	Billie
Bello	Adam
Bello	Eileen
Bello	Patrick Jr
Bello	Elizabeth
Bello	Patrick
Bello	Elpido Jr
Bello	Eugena
Bello	Joseph
Bello	Lucas
Bello	Nicholas Elpedio
Bello	Dominic
Bello	Richard
Belmont	Eleanor
Bennett	Dionne
Bothell	Oliva
Brown	Kirk
Bumatay	Christina
Bumatay	Andrea
Bumatay	Robert

Bumatay	Andrew
Bumatay	James
Bumatay	Jonathan
Bumatay	Barton
Bumatay	Angela
Bumatay-Jefferson	Noelani
Bumatay-Jefferson	Mariah
Cailing	Carol
Cailing	Donna
Cailing	Keith
Cailing	Neveah
Campbell	Anita
Carr	Alexandrea
Carr	Lee
Carr	Pricilla
Carr	Robley
Carr	Anna
Carr	Quolia
Casimir	Vanessa
Casono	Chrissa
Chow	Nina
Coble	Kyle
Coble	Lisa
Coble	Steve
Coleman	Sean
Corpuz	Gilda
Corpuz	Pedro
Corpuz	Victorino
Corpuz-Peato	Christina
Crain	Jordan
Cuatero	Roland
Cunanan	Nacisco
Edwards	Donald
Erickson	Brionna
Erickson	Seth
Erickson	Teresa

Faulks	Michael
Franz	Victoria
Furuta	Roma
Gabriel	Eleanor
Gabriel	Jessica
Gabriel	Zaria
Gabriel	Avrilyn
Gabriel	Reginald
Gardiipe	Ayla
Gardiipe	Dancho
Gardiipe	David
Gaspar	Donna
Gaspar	Guadalupe
Gaspar	Jade
Gaspar	Jesus
Gilyard	Asia
Gladstone	Leonard
Gladstone	Lois
Gladstone	Mikala
Gladstone	Richard
Gladstone	Tyrone
Gladstone	Maile
Gomez-Rabang	Malakai
Griffeth	Malia
Griffeth	Marie
Haddow	Miranda
Haddow	Dolly
Haddow	Tina
Hancock	Amya
Hart	Anita
Hart	Charlotte
Hart	Destine
Hart	Edaray
Hart	Jennifer
Hart	Kiana
Hart	Linda

Hart	Phillip L
Hart	Taysnuan
Hernandez	Rose
Iseda	Kimberly
Jahr	Aundrea
Jahr	Kayleena-Ray
Javier	Juanita
Javier	Manuel
Javier	Saturnino
Jefferson	Andrew
Jefferson	Joseph
Jefferson	Kaleiolani
Jensen	Johnny
Kauffman	Maximo
Kauffman	Marc Anthony
Lawrence	Cameron
Lomieli	Sonia
Lopez	Adrian Jr
Lopez	Adrian Sr
Lopez	Arsenio
Lopez	Berta
Lopez (Rabang)	Trina
Lopez(Haro)	Trent
Loughnane	Kiyomie
Marshall	Carlos
Miguel	Lawrence
Miguel	Matias
Miguel	Ronald III
Miguel	Ronald Jr
Miguel	Toni
Munden	Justin
Narte	Angeline
Narte	Dante
Narte	Frazer
Narte	Jaime
Narte	Jenaia

Narte	Kailee
Narte	Mario Jr
Narte	Mario
Narte	Micah
Narte	Ruby
Narte	Antonio Jr
Narte	Phillip D
Narte	Antonio
Narte	Caleb
Narte	Cody
Narte	Elisah
Nicol	Andrew
Nicol	Teria Ann
Nicol	Roy
Nicol-Mills	Alexander
Oshiro	Dustin
Oshiro	Elizabeth
Oshiro	Kiyoshi
Oshiro	Matthew
Oshiro	Olive
Oshiro	Olivia
Oshiro	Tiana
Park	Steven
Park	Edmund
Parker	Adelina
Peato	Malia
Peato	Patelesio
Peato	Sofia
Peleti	Kuaika
Peleti	Rene
Peleti	Tino
Peralta	Moreno
Phillips	Ariel
Phillips	Joshua
Phillips	Samson
Rabang	Ailina

Rabang	Selia
Rabang	Shalene
Rabang	Clara
Rabang	Leonard
Rabang	Maxina
Rabang	Miana
Rabang	Reanna
Rabang	Tyrone Jr
Rabang	Tyrone
Rabang	William
Rabang	Angel
Rabang	Angelita
Rabang	Anthony
Rabang	Brianna
Rabang	Domingo A Sr
Rabang	Domingo F
Rabang	Francisca L.G.
Rabang	Francisca S
Rabang	Francisco A
Rabang	Francisco DG
Rabang	Francisco Jr
Rabang	Gina
Rabang	James
Rabang	Lalune
Rabang	Martino
Rabang	Michael
Rabang	Qui-Seenum
Rabang	Rachel
Rabang	Robert James III
Rabang	Robert James Jr
Rabang	Robert James SR
Rabang	Santana
Rabang	Tierra
Rabang	Tina
Rabang	Carcione
Rabang	Sunsie

Rabang	William Jr
Rabang-Brown	Sharon
Rabang-Coleman	Alexina
Rapada	Allen
Rapada	Andrew
Rapada	Bart
Rapada	Calvin
Rapada	Daniel Fred
Rapada	Daniel Felix
Rapada	Darrell
Rapada	Emily
Rapada	Gerald
Rapada	Honorato
Rapada	Honorato
Rapada	James
Rapada	Kimberly
Rapada	Melissa
Rapada	Mildred
Rapada	Reconar
Rapada	Reconar GB
Rapada	Sonia
Rapada	Tierra
Rapada	Zack
Rapada	Nadine
Rapada	Angela
Rapada	Betsiebo
Renteria	Catalina
Renteria	Marcellina
Renteria	Sylvia
Renteria	Vincent
Richamire	Allen
Richmire	Veronica
Ritualo	Angelo
Ritualo	Diana (Mona)
Ritualo	Felipe
Ritualo	Teresa

Roberts	Brittanie
Roberts	Michelle
Roberts	Raffinand
Romero	Deanna
Romero	Rudy
Romero Dancel	Emmanual
Silva	Kristoffer
Silva	Sevina
Silva	Tyler
Sioson	Enzo
Sioson	Juliette
Sioson	Rocco
Sioson	Debbie
Smith (Narte)	Alex
St Germain	Breanna
St Germain	Rudy R
St Germain	Taylor
St Germain	Terry Jr
St Germain	Rudy S
Tovar	Rose
Tovar	Jocelyn
Trainor	Cheryl
Trainor	Kristal