



Gabe Galanda &lt;gabe@galandabroadman.com&gt;

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1 message

**Deanna Francis** <DFrancis@nooksack-nsn.gov>

Tue, Apr 5, 2016 at 11:59 AM

To: Gabriel Galanda &lt;gabe@galandabroadman.com&gt;

Cc: AB &lt;anthony@galandabroadman.com&gt;, Ryan Dreveskracht &lt;ryan@galandabroadman.com&gt;, Ray Dodge &lt;rdodge@nooksack-nsn.gov&gt;, "Rickie W. Armstrong" &lt;rarmstrong@nooksack-nsn.gov&gt;, "Thomas P. Schlosser (t.schlosser@msaj.com)" &lt;t.schlosser@msaj.com&gt;, "r.jackson@msaj.com" &lt;r.jackson@msaj.com&gt;, "michelle.roberts3012@gmail.com" &lt;michelle.roberts3012@gmail.com&gt;, Susan Alexander &lt;saalexander@nooksack-nsn.gov&gt;

Mr. Galanda:

1. Please find attached Letter re: Galanda, et. al. v. Bernard, et. al., Case No. 2016-CI-CL-001 [sic], Galanda, et. al. v. Bernard, et. al., Case No. 2016-CI-CL-002, your complaint and motion.
2. As we previously advised, the Court is bound by Resolution #16-28. Neither you nor any of the members of your firm are permitted to practice in Tribal Court. Your Complaint and Motion have been rejected, and Galanda v. Bernard is not pending with the Court.

Respectfully,  
Deanna Francis  
Nooksack Tribal Court Clerk

-----Original Message-----

From: [helpdesk@nooksack-nsn.gov](mailto:helpdesk@nooksack-nsn.gov) [mailto:[helpdesk@nooksack-nsn.gov](mailto:helpdesk@nooksack-nsn.gov)]

Sent: Monday, April 06, 2015 11:50 AM

To: Deanna Francis &lt;DFrancis@nooksack-nsn.gov&gt;

Subject: Scanned from a Xerox multifunction device

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# Nooksack Indian Tribe

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Nooksack Tribal Court  
5016 Deming Rd.  
Deming, WA 98244

April 1, 2016

Gabriel S. Galanda  
Anthony S. Broadman  
Ryan D. Dreveskracht  
PO Box 15146  
Seattle, WA 98115

Re: *Galanda, et. al. v. Bernard, et. al.*, Case No. 2016-CI-CL-001 [sic]  
*Galanda, et. al. v. Bernard, et. al.*, Case No. 2016-CI-CL-002

Gentlemen:

Enclosed are your original Complaint and Motion for Injunctive and Declaratory Relief. These documents, which were filed on the day before a Court holiday, are rejected for the following reasons:

1. The motion and the complaint should not have had two different cause numbers, because they are the same matter.
2. Because they are the same matter, the time limits established in NTC 10.05.040 apply. Your Motion was therefore improperly noted and will not be set for hearing. Pursuant to NTC 10.05.030(c), the Court Clerk is charged with setting hearings. For a complaint filed against the Nooksack Indian Tribe or its officers, employees or agents, the answer shall be due within 60 days, exclusive of the day of service, and no hearing may be set until 14 days after the deadline for filing the answer. NTC 10.05.040(b)(i), 10.05.040(f). The earliest a motion could be heard, if the Complaint had not been rejected, is 74 days after the date of service of the Complaint on the Tribal employees/agents.
3. You have captioned this matter, and are appearing as, "pro se plaintiffs." However, you also assert in your complaint that each of you are admitted to the practice of law in Washington. The Clerk's Office has sought the advice of legal counsel regarding whether a lawyer who is acting pro se is "practicing in tribal court," prohibited by Resolution #16-28. In the interim, or until such time as the Nooksack Tribal Council takes further action, the Tribal Court is bound by Resolution #16-28 barring you from practicing in Nooksack Tribal Court.

A refund of the filing fees will be processed shortly.

03-24-16A10:38 RCVD  
Betty Leathers

03-24-16A10:38 RCVD

IN THE NOOKSACK TRIBAL COURT

GABRIEL S. GALANDA, ANTHONY S.  
BROADMAN, and RYAN D.  
DREVESKRACHT,

*Pro Se* Plaintiffs,

v.

CHARITY BERNARD, BETTY LEATHERS,  
and JOHN and JANE DOES NOS. 1-5, in their  
official capacities,

Defendants.

NO. 2016-CI-CL- ~~079~~ 52

MOTION FOR INJUNCTIVE AND  
DECLARATORY RELIEF

**I. INTRODUCTION**

Defendants are violating and will violate the Indian Civil Rights Act, the Nooksack Indian Tribe's Constitution, and other Nooksack and federal laws. Defendants have attempted to bar or disbar Plaintiffs pursuant to an unlawful Tribal Council Resolution, and, by doing so, Defendants are acting unlawfully. Defendants have also attempted to exclude or expel Plaintiffs from conducting business at Nooksack by acting and threatening to act in furtherance of an unlawful business licensure policy, and, by doing so, Defendants are also acting unlawfully. Plaintiffs have been denied, and are being denied, due process and equal protection. Plaintiffs have been harmed, and continue to be harmed. Unless and until Defendants are enjoined from acting unlawfully and declaratory relief is issued, Plaintiffs will continue to be harmed.

03-24-16A10:38 RCVD

*Betty Leathers*

IN THE NOOKSACK TRIBAL COURT

GABRIEL S. GALANDA, ANTHONY S.  
BROADMAN, and RYAN D.  
DREVESKRACHT,

*Pro Se* Plaintiffs,

v.

CHARITY BERNARD, BETTY LEATHERS,  
and JOHN and JANE DOES NOS. 1-5, in their  
official capacities,

Defendants.

NO. 2016-CI-CL-001

COMPLAINT

**I. INTRODUCTION**

1. Defendants are violating and will violate the Indian Civil Rights Act, the Nooksack Indian Tribe's ("Tribe") Constitution, and other laws of the Tribe. Defendants have attempted to bar or disbar Plaintiffs pursuant to unlawful Tribal Council Resolutions, and, by doing so, Defendants are acting unlawfully. Defendants have also attempted to exclude or expel Plaintiffs from conducting business on the Tribe's lands by acting and threatening to act in furtherance of an unlawful business licensure policy, and, by doing so, Defendants are acting unlawfully. Plaintiffs have been denied, and are being denied, due process. Plaintiffs have been harmed, and continue to be harmed. Unless and until Defendants are enjoined from acting unlawfully and declaratory relief is issued, Plaintiffs will continue to be harmed.