

JUL 12 2016

11:30am

Reso: REJECTED  
CODE: 16-28 CLERK: *DA*

IN THE NOOKSACK TRIBAL COURT OF APPEALS

In re: Gabriel S. Galanda, pro se, Anthony S.  
Broadman, pro se, and Ryan D. Dreveskracht,

Petitioners,

v.

Nooksack Tribal Court,

Respondent,

and

Nooksack Indian Tribe,

Real Party in Interest.

Trial Court No. 2016-CI-CL-001

**DECLARATION OF GABRIEL S.  
GALANDA IN SUPPORT OF  
MOTION TO ENFORCE  
CONTEMPT ORDER**

I, Gabriel S. Galanda, declare as follows:

1. By preparing and filing this Declaration, I do not intend to practice law or transact business within the Nooksack Tribe's jurisdiction.

2. For the last ten days, my *pro se* colleagues and I have attempted to ascertain whether the Tribal Court Clerk or Police Chief have honored this Appeals Court's June 28, 2016, contempt order. I have sent emails to the Court Clerk, Police Chief and Tribal Attorney and left a voicemail with the Court Clerk. Attached as **Exhibit A** is a true and correct copy of those emails. We have not received any reply email or return call. Nor have we received anything from the Court Clerk via U.S. Mail.

3. Yesterday, I reached Tribal Attorney Rickie Armstrong by phone. I first asked him if he knew whether our complaint had been filed and two pending motions had

been filed and noted for hearing in *Galanda v. Bernard*. Mr. Armstrong responded by saying he did not, and explaining that he has no control over the Clerk. I then asked him if he knew whether the Clerk had been arrested and jailed. Mr. Armstrong responded by indicating he did not, saying that he saw her in court last week. I then asked him if he could provide us a copy of the latest Title 10 amendments. Mr. Armstrong indicated I would need to fill out a form and request those Tribal Court rules form the Tribal Council. I then asked him if he could confirm whether Ray Dodge was appointed as the new Chief Judge of the Tribal Court. Mr. Armstrong said he could not confirm or deny that.

4. Attached as **Exhibit B** is a true and correct copy of the Declaration of Wilma K. Rabang, detailing her unsuccessful efforts to file a motion with the Tribal Court via the Court Clerk in *Belmont v. Kelly*. Attached as **Exhibit C** is a true and correct copy of emails sent to the Court Clerk and Mr. Armstrong, detailing her unsuccessful efforts to note that same motion with the Tribal Court via the Court Clerk.

5. Attached as **Exhibit D** is a true and correct copy of Samantha Wohlfeil, *Judges Threaten to Jail Nooksack Court Clerk in Disenrollment Cases*, BELLINGHAM HERALD, July 5, 2016.

6. Attached as **Exhibit E** is a true and correct copy of the envelope that includes the latest "REFUSED" Court of Appeals filing by Petitioners. The filing appears to have been "RECEIVED" at Nooksack on June 22, 2016, but "REFUSED" and returned to us on June 29, 2016, the day after this Appeals Court's contempt ruling.

7. Attached as **Exhibit F** is a true and correct copy of a July 7, 2016, letter from Katherine Canete, denying my firm's reconsideration request of her denial of a business license. We have now been seeking a business license since February 26, 2016.

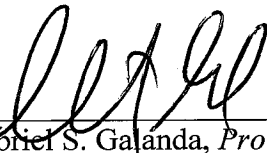
8. As of today, I have yet to receive any decision from the purported Nooksack Tribal Council as a result of my June 9, 2016, telephonic banishment, disbarment, etc.,

“hearing.” Nor have my colleagues or I yet received or seen the February 24, 2016, Resolution No. 16-28 by which we were banishment, disbarment, etc., despite orders from the Trial Court and this Appeals Court. Our *pro se* lawsuit has languished since late March 2016, also despite orders from this Court.

9. While delaying and subverting justice via improper control over the Court Clerk and now the Police Chief—for nearly five months—the Defendants and Tribal Attorney continue to take arbitrary and capricious legislative actions against us. *See* Exhibit F. I implore this Appeals Court to take some decisive action that will end this saga.

The foregoing statement is made under penalty of perjury under the laws of the Nooksack Tribe and the State of Washington and is true and correct.

Signed this 11th date of July, 2016.

  
\_\_\_\_\_  
Gabriel S. Galanda, *Pro Se*



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

**Re: Purging Contempt**

1 message

**Gabe Galanda** <gabe@galandabroadman.com>

Mon, Jul 11, 2016 at 1:35 PM

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

Cc: AB &lt;anthony@galandabroadman.com&gt;, Ryan Dreveskracht &lt;ryan@galandabroadman.com&gt;,

"CSMartin@SCHWABE.com" &lt;CSMartin@schwabe.com&gt;, "Rickie W. Armstrong" &lt;ramstrong@nooksack-nsn.gov&gt;, rgilliland@nooksack-nsn.gov

Ms. Leathers, Ms. Francis:

I write in follow-up to my emails below and to my earlier calls and voicemails to both you and Mr. Armstrong.

Once again, has our Amended Complaint been filed and our two pending Motions been filed and noted?

We have not received any indication from the Court via phone, email or U.S. Mail. Nor have we received any word of the Clerk's arrest or imprisonment.

We are left to presume that the Appeals Court's order has not been honored in any respect.

We hope to avoid further appellate contempt motion practice but unless we hear from you this afternoon, we will be forced to again seek relief from the Appeals Court. Please advise.

Thank you,

Gabriel S. Galanda, Pro Se

On Wed, Jul 6, 2016 at 3:15 PM, Gabe Galanda &lt;gabe@galandabroadman.com&gt; wrote:

Ms. Leathers, Ms. Francis:

To the extent you file our Amended Complaint and file and note our two pending Motions today as ordered, we would appreciate receiving some form of electronic notification of those transactions.

We also remain in need of the new Title 10 or any other new rules of court at Nooksack.

Finally, having received an auto-reply yesterday from Ray that suggests he is in fact the new Chief Judge at Nooksack, we have taken him off of this strand. If he is not the new Chief Judge, please let us know, so we can again copy him; lest we be accused further of not properly noticing the Tribe or its lawyers.

Thank you,

Gabriel S. Galanda, Pro Se

Anthony S. Broadman, Pro Se

Ryan D. Dreveskracht, Pro Se

On Tue, Jul 5, 2016 at 1:21 PM, Gabe Galanda &lt;gabe@galandabroadman.com&gt; wrote:

Ms. Leathers, Ms. Francis:

What's the status of the filing of our Amended Complaint and the filing and noting of our two Motions?

We understand Ms. Leathers was working in the Tribal Courthouse late last week (rather than having been immediately arrested and jailed by the Police Chief), which causes us to wonder if those papers were filed and noted for hearing such that the her contempt of court was purged. But we have yet to receive notice of anything from the Trial Court. Please let us know at once.

Also, we await your or others' response to our various inquiries below. We need and deserve to know of the very latest court rules of engagement, and the identity of any new judge who will administer them.

**EXHIBIT A**

Thank you,

Gabriel S. Galanda, Pro Se  
Anthony S. Broadman, Pro Se  
Ryan D. Dreveskracht, Pro Se

On Fri, Jul 1, 2016 at 10:18 AM, Gabe Galanda <gabe@galandabroadman.com> wrote:

All:

We still need the new Title 10 and its authorizing Resolution, as most recently discussed in the Appeals Courts' latest rulings. If there have been any other changes to Tribal Court rules or procedures, we need those too. We continued to be libeled with accusation that we do not follow the court rules. Please reply with any such information.

Rickie:

We also need the ex parte letter from Bob to the Panel that you wrote. Please reply with it.

Ray:

Is it true that you are or will soon be the new Nooksack Chief Judge? I ask so we can run afoul of any new ex parte contact rules (which we have yet to be provided). Unlike your colleague, you never noticed any withdrawal from any of the active 306 cases. It's of course been a who's on first situation with the Tribe's inhouse and outside lawyers, judges and court staff since late February, largely at your doing, and we can never get any straight answers about who we are dealing with as counsel or on the bench. Please let us know.

Thank you,

Gabriel S. Galanda, Pro Se

On Tue, Jun 14, 2016 at 12:18 PM, Gabe Galanda <gabe@galandabroadman.com> wrote:

All:

Can you please reply with a copy of the new Title 10 and it's authorizing Resolution? This is my second request for that latest new law.

Also, I understand that yesterday when Michelle attempted to ask Clerk Francis whether there is currently any judge at Nooksack and if so, who that might be, Clerk Leathers obstructed her from answering. If any one of you would, please reply to indicate whether or not there is any judge currently under contract at Nooksack.

Thank you,

Gabriel S. Galanda, Pro Se

On Jun 14, 2016, at 12:01 PM, Molly Jones <molly@galandabroadman.com> wrote:

Please see attached a of:

Second Declaration of Gabriel S. Galanda in Support of Motion for Injunction

On Thu, Jun 2, 2016 at 8:23 AM, Gabe Galanda <gabe@galandabroadman.com> wrote:  
Ms. Leathers, Ms. Francis:

We await your response, having heard nothing from you since the Court's Order on May 27 or my email in May 29.

Your continued obstruction of justice especially prejudices me given an administrative banishment hearing against me that the former Tribal Council has scheduled for one week from today. Our pending Motion for Injunction relates to that hearing and must be heard at once. I remain unavailable Wednesday but otherwise can make time for a hearing in coming days.

Also, we are dismayed that our recent mailing to the Nooksack Tribal Court Judge was rejected, with a rather childish note, as you can see from the attached copy of a rejected envelope. Given your refusal to accept our various papers for filing, our mailings to the Judge should be sent to whomever is the current Judge at Nooksack, if anybody. Please make arrangements with whomever answers the mail at the Court's PO Box to ensure that this does not happen again.

Gabriel S. Galanda, Pro Se  
Anthony S. Broadman, Pro Se  
Ryan. D. Dreveskracht, Pro Se

On Sun, May 29, 2016 at 2:25 PM, Gabe Galanda <gabe@galandabroadman.com> wrote:  
Ms. Leathers, Ms. Francis:

Please reply to us by close of business on Tuesday, May 31, to confirm that our Complaint, First Amended Complaint, Motion for Injunction, and my pro se Declaration (four pleadings in all) have been filed in the Court record.

In case you did not maintain copies of those pleadings before rejecting them, I have attached them all hereto.

For the three pleadings that were stamped "REJECTED" with the Court's new stamp, perhaps you could cross out that stamping on those three papers, and then stamp all four papers "FILED." We would appreciate receiving e-copies of all four documents once they are filed. Once we get those papers, we will work with you to have Summonses issued.

Please also reply to us by close of business on Tuesday to confirm when our Motion for Injunction has been set for a hearing before Thursday, June 9. Please be advised that I will be out of town on Wednesday, June 8, so the hearing will need to take place before that date. The injunction motion hearing of course relates to an administrative banishment hearing that has been scheduled against me for Thursday, June 9, so time is of the essence as to the motion.

If we do not hear from you on either front by close of business on Tuesday, May 31, we may email Judge Randy Doucet in this regard, to ensure that they are filed by the end of this coming week per the Court of Appeals Order.

Like the Court of Appeals, we do not know whether there is any Judge presiding at Nooksack since Chief Judge Alexander was fired in late March, but we have heard that Judge Doucet is presiding in some capacity or another.

Under the rather extreme circumstances in which we all find ourselves, Nooksack Tribal law allows such direct inquiry to the Judge, specifically the former Chief Judge's March 7, 2016, Order in Belmont v. Kelly, at pp. 5-6.

Rickie:

We trust you have noted the ethical admonishment from the Court of Appeals, and will now heed it.

After receiving several unsigned letters that you and/or Ray wrote for the Clerk to reject our filings and pro se appearances, we were further dismayed by Ms. Francis asking for thirty minutes in which to call you ex parte for legal advice both last Monday and Wednesday, May 23 and 25, when we attempted to file our First Amended Complaint and Motion for Injunction papers through a third party.

Your unethical exploits and rather obvious obstruction of the administration of justice at Nooksack must stop.

Ray:

Insofar as the Court of Appeals and others continue to copy you on matters, you may want to file some sort of notice of withdrawal or resignation. It remains rather unclear who represents,

and who does not, represent the Tribe these days.

This email is not intended to be the practice of law or transaction of business at Nooksack.

Gabriel S. Galanda, Pro Se  
Anthony S. Broadman, Pro Se  
Ryan. D. Dreveskracht, Pro Se

----- Forwarded message -----

From: **Katie Nicoara** <katien@nics.ws>  
Date: Fri, May 27, 2016 at 5:55 PM  
Subject: In Re Galanda v. Nooksack Tribal Court: Second Petition for Writ of Mandamus  
To: Betty Leathers <BLEathers@nooksack-nsn.gov>  
Cc: "Deanna Francis (DFrancis@nooksack-nsn.gov)" <DFrancis@nooksack-nsn.gov>, "Rickie W. Armstrong (rarmstrong@nooksack-nsn.gov)" <rarmstrong@nooksack-nsn.gov>, "rdodge@nooksack-nsn.gov" <rdodge@nooksack-nsn.gov>, "Gabe Galanda (gabe@galandabroadman.com)" <gabe@galandabroadman.com>, Anthony Broadman <anthony@galandabroadman.com>, "Ryan Dreveskracht (ryan@galandabroadman.com)" <ryan@galandabroadman.com>

Good afternoon,

Please find the attached Court of Appeals' Order Re: Second Petition for Writ of Mandamus in the Galanda v. Nooksack Tribal Court matter. Thank you.

Katie

--  
**Molly Jones**  
*Paralegal*  
**GALANDA BROADMAN PLLC**  
*An Indian Country Law Firm*  
PO Box 15146  
Seattle, WA 98115  
Main: 206.557.7509  
Fax: 206.299.7690

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<6-14-16 Galanda v Bernard- Nooksack Declaration of Service.pdf>

<6-13-16 Second Declaration Re Galanda v Bernard Motion for Injunction Conformed.pdf>

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IN THE NOOKSACK TRIBAL COURT

ELEANOR J. BELMONT; et al.,  
Plaintiffs,  
v.  
ROBERT KELLY; et al,  
Defendants.  
NOOKSACK INDIAN TRIBE, a federally  
recognized Indian tribal government, Third-  
Party Plaintiff,  
v.  
ELEANOR J. BELMONT; et al.,  
Third-Party Defendants.

NO. 2014-CI-CL-007  
DECLARATION OF WILMA K.  
RABANG

I, Wilma K. Rabang, say:

1. I am the above-named wife of an enrolled Nooksack Tribal member who is a direct descendent of Annie George. I am over eighteen years of age, I am competent to testify, and I have personal knowledge of the facts set forth herein.

2. On Friday, June 1, 2016 at about 1:30 PM, I attempted to pick up a filed copy of the attached Motion for Injunction with the Tribal Court on behalf of Michelle Roberts. Michelle had left the Motion with the Court Clerk earlier in the day.

**EXHIBIT B**





NOOKSACK TRIBAL COURT  
NOOKSACK INDIAN TRIBE  
JUL 1 2016  
11:13 a.m.  
REJECTED  
CODE: \_\_\_\_\_ CLERK: *JA*

IN THE NOOKSACK TRIBAL COURT

ELEANOR J. BELMONT; OLIVE T. OSHIRO,  
enrolled members of the Nooksack Indian Tribe;  
and 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; 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; CHRISSE CASONO; NINA  
CHOW; KYLE COBLE; LISA COBLE;  
STEVE COBLE; SEAN COLEMAN; GILDA  
CORPUZ; PEDRO CORPUZ; VICTORINO  
CORPUZ; CHRISTINA CORPUZ-PEATO;  
JORDAN CRAIN; ROLAND CUATERO;  
NARCISCO CUNANAN; DONALD  
EDWARDS; BRIONNA ERICKSON; SETH  
ERICKSON; TERESA ERICKSON;

NO. 2014-CI-CL-007

MOTION FOR INJUNCTION

Note for motion: July 14, 2014

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

1 CALEB NARTE; CODY NARTE; ELISAH  
NARTE; ANDREW NICOL; TERIA ANN  
2 NICOL; ROY NICOL; ALEXANDER NICOL-  
MILLS; DUSTIN OSHIRO; ELIZABETH  
3 OSHIRO; KIYOSHI OSHIRO; MATTHEW  
OSHIRO; OLIVIA OSHIRO; TIANA  
4 OSHIRO; STEVEN PARK; EDMUND PARK;  
ADELINA PARKER; MALIA PEATO;  
5 PATELESIO PEATO; SOFIA PEATO;  
KUAIKA PELETI; RENE PELETI; TINO  
6 PELETI; MORENO PERALTA; ARIEL  
PHILLIPS; JOSHUA PHILLIPS; SAMSON  
7 PHILLIPS; AILINA RABANG; SELIA  
RABANG; SHALENE RABANG; CLARA  
8 RABANG; LEONARD RABANG; MAXINA  
RABANG; MIANA RABANG; REANNA  
9 RABANG; TYRONE RABANG JR.; TYRONE  
RABANG; WILLIAM RABANG; ANGEL  
10 RABANG; ANGELITA RABANG;  
ANTHONY RABANG; BRIANNA RABANG;  
11 DOMINGO A. RABANG SR.; DOMINGO F.  
RABANG; FRANCISCA L.G. RABANG;  
12 FRANCISCA S. RABANG; FRANCISCO A.  
RABANG; FRANCISCO D.G. RABANG;  
13 FRANCISCO RABANG JR.; GINA RABANG;  
JAMES RABANG; LAJUNE RABANG;  
14 MARTINO RABANG; MICHAEL RABANG;  
QUI-SEENUM RABANG; RACHEL  
15 RABANG; ROBERT JAMES RABANG III;  
ROBERT JAMES RABANG JR.; ROBERT  
16 JAMES RABANG SR.; SANTANA RABANG;  
TIERRA RABANG; TINA RABANG;  
17 CARCIONE RABANG; SUNSIE RABANG;  
WILLIAM RABANG JR.; SHARON  
18 RABANG-BROWN; ALEXINA RABANG-  
COLEMAN; ALLEN RAPADA; ANDREW  
19 RAPADA; BART RAPADA; CALVIN  
RAPADA; DANIEL FRED RAPADA;  
20 DANIEL FELIX RAPADA; DARRELL  
RAPADA; EMILY RAPADA; GERALD  
21 RAPADA; HONORATO RAPADA III;  
HONORATO RAPADA; JAMES RAPADA;  
22 KIMBERLY RAPADA; MELISSA RAPADA;  
MILDRED RAPADA; RECONAR RAPADA;  
23 RECONAR G.B. RAPADA; SONIA  
RAPADA; TIERRA RAPADA; ZACK  
24 RAPADA; NADINE RAPADA; ANGELA

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

23 Plaintiffs,

24 v.

25 ROBERT KELLY, Chairman of the Nooksack  
Tribal Council; RICK D. GEORGE, Vice-  
Chairman of the Nooksack Tribal Council;  
AGRIPINA SMITH, Treasurer of the Nooksack  
Tribal Council; BOB SOLOMON,  
Councilmember of the Nooksack Tribal  
Council; KATHERINE CANETE,  
Councilmember of the Nooksack Tribal Council  
and Nooksack General Manager; AGRIPINA  
"LONA" JOHNSON, Councilmember of the  
Nooksack Tribal Council; ELIZABETH KING  
GEORGE, Enrollment officer of the Nooksack  
Tribal Council; ROY BAILEY, Enrollment  
officer of the Nooksack Tribal Council, in their  
personal and official capacities,

Defendants.

Nooksack Indian Tribe, a federally recognized  
Indian tribal government, Third-Party Plaintiff,

1 v.

2 ELEANOR J. BELMONT; OLIVE T.  
3 OSHIRO, enrolled members of the Nooksack  
4 Indian Tribe; and FRANCINE ADAMS;  
5 ANTHONY ADAMS; BRINA ALDREDGE;  
6 BRITTANY ALDREDGE; NORMA  
7 ALDREDGE; ANGELITA AURE; DOE  
8 AURE; CHELSEA BAKER; KELSEA  
9 BAKER; PRICILLA BAKER; JERIC BAKER;  
10 FLORENTINO BARRIL; CALEB BARRIL-  
11 BOTHELL; CATHALINA BARRILL; BILLIE  
12 BARTLE; ADAM BELLO; EILEEN BELLO;  
13 PATRICK BELLO JR.; ELIZABETH BELLO;  
14 PATRICK BELLO; ELPIDO BELLO JR.;  
15 EUGENA BELLO; JOSEPH BELLO; LUCAS  
16 BELLO; NICHOLAS ELPEDIO BELLO;  
17 DOMINIC BELLO; RICHARD BELLO;  
18 DIONNE BENNETT; OLIVA BOTHELL;  
19 KIRK BROWN; CHRISTINA BUMATAY;  
20 ANDREA BUMATAY; ROBERT  
21 BUMATAY; ANDREW BUMATAY; JAMES  
22 BUMATAY; JONATHAN BUMATAY;  
23 BARTON BUMATAY; ANGELA  
24 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; CHRISSE CASONO; NINA  
CHOW; KYLE COBLE; LISA COBLE;  
STEVE COBLE; SEAN COLEMAN; GILDA  
CORPUZ; PEDRO CORPUZ; VICTORINO  
CORPUZ; CHRISTINA CORPUZ-PEATO;  
JORDAN CRAIN; ROLAND CUATERO;  
NARCISCO CUNANAN; DONALD  
EDWARDS; BRIONNA ERICKSON; SETH  
ERICKSON; TERESA ERICKSON;  
MICHAEL FAULKS; VICTORIA FRANZ;  
ROMA FURUTA; ELEANOR GABRIEL;  
JESSICA GABRIEL; ZARIA GABRIEL;  
AVRILYN GABRIEL; REGINALD  
GABRIEL; AYL A GARDIPE; DANCHO

1 GARDIPE; DAVID GARDIPE; DONNA  
GASPAR; GUADALUPE GASPAR; JADE  
2 GASPAR; JESUS GASPAR; ASIA GILYARD;  
LEONARD GLADSTONE; LOIS  
3 GLADSTONE; MIKALA GLADSTONE;  
RICHARD GLADSTONE; TYRONE  
4 GLADSTONE; MAILE GOMEZ-RABANG;  
MALAKAI GRIFFETH; MALIA GRIFFETH;  
5 MARIE HADDOW; MIRANDA HADDOW;  
DOLLY HADDOW; TINA HANCOCK;  
6 AMYA HART; ANITA HART; CHARLOTTE  
HART; DESTINE HART; EDARAY HART;  
7 JENNIFER HART; KIANA HART; LINDA  
HART; PHILLIP L. HART; TAYSHUAN  
8 HART; ROSE HERNANDEZ; KIMBERLY  
ISEDA; AUNDREA JAHR; KAYLEENA-  
9 RAY JAHR; JUANITA JAVIER; MANUEL  
JAVIER; SATURNINO JAVIER; ANDREW  
10 JEFFERSON; JOSEPH JEFFERSON;  
KALEIOLANI JEFFERSON; JOHNNY  
11 JENSEN; MAXIMO KAUFFMAN; MARC  
ANTHONY KAUFFMAN; CAMERON  
12 LAWRENCE; SONIA LOMIELI; ADRIAN  
LOPEZ JR.; ADRIAN LOPEZ SR.; ARSENIO  
13 LOPEZ; BERTA LOPEZ (RABANG); TRINA  
LOPEZ (HARO); TRENT LOUGHNANE;  
14 KIYOMIE MARSHALL; CARLOS MIGUEL;  
LAWRENCE MIGUEL; MATIAS MIGUEL;  
15 RONALD MIGUEL III; RONALD MIGUEL  
JR.; TONI MIGUEL; JUSTIN MUNDEN;  
16 ANGELINE NARTE; DANTE NARTE;  
FRAZER NARTE; JAIME NARTE; JENAIA  
17 NARTE; KAILEE NARTE; MARIO NARTE  
JR.; MARIO NARTE; MICAH NARTE;  
18 RUBY NARTE; ANTONIO NARTE JR.;  
PHILLIP D. NARTE; ANTONIO NARTE;  
19 CALEB NARTE; CODY NARTE; ELISAH  
NARTE; ANDREW NICOL; TERIA ANN  
20 NICOL; ROY NICOL; ALEXANDER NICOL-  
MILLS; DUSTIN OSHIRO; ELIZABETH  
21 OSHIRO; KIYOSHI OSHIRO; MATTHEW  
OSHIRO; OLIVIA OSHIRO; TIANA  
22 OSHIRO; STEVEN PARK; EDMUND PARK;  
ADELINA PARKER; MALIA PEATO;  
23 PATELESIO PEATO; SOFIA PEATO;  
KUAIKA PELETI; RENE PELETI; TINO  
24 PELETI; MORENO PERALTA; ARIEL

25 MOTION FOR INJUNCTION - 6

1 PHILLIPS; JOSHUA PHILLIPS; SAMSON  
PHILLIPS; AILINA RABANG; SELIA  
2 RABANG; SHALENE RABANG; CLARA  
RABANG; LEONARD RABANG; MAXINA  
3 RABANG; MIANA RABANG; REANNA  
RABANG; TYRONE RABANG JR.; TYRONE  
4 RABANG; WILLIAM RABANG; ANGEL  
RABANG; ANGELITA RABANG;  
5 ANTHONY RABANG; BRIANNA RABANG;  
DOMINGO A. RABANG SR.; DOMINGO F.  
6 RABANG; FRANCISCA L.G. RABANG;  
FRANCISCA S. RABANG; FRANCISCO A.  
7 RABANG; FRANCISCO D.G. RABANG;  
FRANCISCO RABANG JR.; GINA RABANG;  
8 JAMES RABANG; LAJUNE RABANG;  
MARTINO RABANG; MICHAEL RABANG;  
9 QUI-SEENUM RABANG; RACHEL  
RABANG; ROBERT JAMES RABANG III;  
10 ROBERT JAMES RABANG JR.; ROBERT  
JAMES RABANG SR.; SANTANA RABANG;  
11 TIERRA RABANG; TINA RABANG;  
CARCIONE RABANG; SUNSIE RABANG;  
12 WILLIAM RABANG JR.; SHARON  
RABANG-BROWN; ALEXINA RABANG-  
13 COLEMAN; ALLEN RAPADA; ANDREW  
RAPADA; BART RAPADA; CALVIN  
14 RAPADA; DANIEL FRED RAPADA;  
DANIEL FELIX RAPADA; DARRELL  
15 RAPADA; EMILY RAPADA; GERALD  
RAPADA; HONORATO RAPADA III;  
16 HONORATO RAPADA; JAMES RAPADA;  
KIMBERLY RAPADA; MELISSA RAPADA;  
17 MILDRED RAPADA; RECONAR RAPADA;  
RECONAR G.B. RAPADA; SONIA  
18 RAPADA; TIERRA RAPADA; ZACK  
RAPADA; NADINE RAPADA; ANGELA  
19 RAPADA; BETSIEBO RAPADA; CATALINA  
RENTERIA; MARCELLINA RENTERIA;  
20 SYLVIA RENTERIA; VINCENT RENTERIA;  
ALLEN RICHAMIRE; VERONICA  
21 RICHMIRE; ANGELO RITUALO; DIANA  
(MONA) RITUALO; FELIPE RITUALO;  
22 TERESA RITUALO; BRITTINIE ROBERTS;  
MICHELLE JOAN ROBERTS; RAFFINAND  
23 ROBERTS; DEANNA ROMERO; RUDY  
ROMERO; EMMANUAL ROMERO-  
24 DANCEL; KRISTOFFER SILVA; SEVINA



1 SILVA; TYLER SILVA; ENZO SIOSON;  
2 JULIETTE SIOSON; ROCCO SIOSON;  
3 DEBBIE SMITH (NARTE); ALEX ST.  
4 GERMAIN; BREANNA ST. GERMAIN;  
5 RUDY ST. GERMAIN; TAYLOR ST.  
6 GERMAIN; TERRY ST. GERMAIN JR.;  
7 ROSE TOVAR; AND JOCELYN TOVAR;  
8 CHERYL TRAINOR; KRISTAL TRAINOR,  
9 individually and on behalf of their minor  
10 children, enrolled members of the Nooksack  
11 Indian Tribe,

12 Third-Party Defendants.

13  
14 On April 15, 2016, I filed a motion with the Nooksack Court of Appeals seeking “a writ  
15 of mandamus directed to the members of the Tribal Council because the Tribal Council’s failure  
16 to appoint a judge to preside over [this] lawsuit.” *Belmont v. Kelly*, No. 2014-CI-CL-007, at 2  
17 (Nooksack Ct. App. June 28, 2016) [hereinafter “COA Order”]. The Court of Appeals granted  
18 my motion, holding:

- 19 (1) The Defendants’ purported amendment of N.T.C. § 10.00.100(b) “is unconstitutional and,  
20 *a fortiori*, without legal effect.” *Id.* at 2.
- 21 (2) If the Tribal Council’s failure to appoint a judge to preside over this lawsuit leads to  
22 disenrollment before the Tribal Court has adjudicated and entered a final judgment on the  
23 legality of the threatened disenrollment, the Tribal Court’s failure to appoint a judge to  
24 preside over this lawsuit would constitute a violation of the Plaintiffs’ rights to equal  
25 protection and due process under the Constitution of the Nooksack Indian Tribe. *Id.*
- (3) Plaintiffs threatened with an injury to their constitutional rights of equal protection and  
due process as a result of the Tribal Council’s failure to appoint a judge to preside over  
this lawsuit are entitled to an injunction. *Id.* at 3.
- (4) A writ of mandamus directed to the Tribal Council is be an appropriate remedy to prevent  
Plaintiffs in this suit from being deprived of their constitutional rights of equal protection  
and due process. *Id.*

26 The Court of Appeals then issued the following relief to me: “Accordingly, we hereby  
27 order that the Tribal Council either appoint in a timely fashion a judge to adjudicate Petitioner’s  
28 challenge to her threatened disenrollment or in the alternative to refrain from taking any further

1 action to disenroll her.” *Id.* The Court of Appeals granted this relief because “the Tribal Council  
2 is threatening to disenroll the [me] from the Tribe.” *Id.* at 2.

3 Plaintiffs in this action “are 272 enrolled members of the Nooksack Indian Tribe who are  
4 subject to disenrollment proceedings” and are similarly threatened with disenrollment. *Belmont*  
5 *v. Kelly*, No. 2014-CI-CL-007, at 1 (Nooksack Tribal Ct. Jan. 26, 2016). Thus, all Plaintiffs in  
6 this action are entitled to the same relief. *See e.g. LCS Servs., Inc. v. Caperton*, 965 F. Supp.  
7 847, 852 (N.D.W. Va. 1997) (“This Court finds that the preliminary injunction encompasses all  
8 defendants similarly situated . . .”).<sup>2</sup>

9 Thus, I respectfully request that this Court issue an injunction that encompasses all  
10 persons similarly situated—*i.e.* all Plaintiffs—and that Defendants be ordered “to refrain from  
11 taking any further action to disenroll” **all Plaintiffs** until Defendants “appoint in a timely  
12 fashion” a judge to adjudicate this action. COA Order, at 3.

13 

14 \_\_\_\_\_  
Michelle Roberts, *Pro Se*

15  
16  
17  
18  
19  
20 <sup>2</sup> In addition, currently pending before this Court is Plaintiffs’ Emergency Motion for Mandamus, wherein Plaintiffs  
21 request that “the Court issue a writ of mandamus ordering” a constitutionally required election “in an *expeditious*  
22 and equitable manner.” Emer. Mot. Writ Mand., *Belmont v. Kelly*, No. 2014-CI-CL-007, at 8 (Nooksack Tribal Ct.  
23 Jan. 29, 2016) (emphasis added). On February 12, 2016, this Court held that motion in abeyance “until after the  
24 Court of Appeals disposes of any and all timely requests for interlocutory appeal” related to an Order issued which  
upheld Plaintiffs’ right to vote in any election. *Belmont v. Kelly*, No. 2014-CI-CL-007, at 2 (Nooksack Tribal Ct.  
Feb. 12, 2016). On April 26, 2016, the Nooksack Court of Appeals disposed of Defendants’ request for  
interlocutory appeal, thus terminating the abeyance issued by this Court. *Belmont v. Kelly*, No. 2014-CI-CL-007, at  
2 (Nooksack Ct. App. Apr. 26, 2016). In the interim, though, Defendants “removed the presiding trial judge and  
ha[ve] thus far failed to appoint a new judge.” COA Order, at 1. Plaintiffs are entitled to the requested relief for this  
reason as well.

DECLARATION OF SERVICE

I, Wilma K. Rabang, say:

1. I am over eighteen years of age and am competent to testify, and have personal knowledge of the facts set forth herein.

2. Today, I caused the foregoing document to be filed with the referenced court and served via U.S. certified mail, and emailed to:

Office of Tribal Attorney  
Nooksack Indian Tribe  
5047 Mt. Baker Hwy  
P.O. Box 63  
Deming, WA 98244

The foregoing statement is made under penalty of perjury under the laws of the Nooksack Tribe and the State of Washington and is true and correct.

DATED this 30th day of June, 2016.

 7-1-16  
WILMA K. RABANG

7/11/2016



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## Fwd: Hearing date

1 message

---

Mon, Jul 11, 2016 at 7:54 AM

From: **Betty Leathers** <BLEathers@nooksack-nsn.gov>  
Date: Mon, Jul 11, 2016 at 7:30 AM  
Subject: RE: Hearing date  
To: Michelle Roberts <michelle.roberts3012@gmail.com>

We are trying to make arrangements for a pro tem judge to hear these matters. At the present time, we cannot set these matters for hearing.

As for title 10 you will need to do paper work from the Council House to request the Title 10

**From:** Michelle Roberts [mailto:michelle.roberts3012@gmail.com]  
**Sent:** Friday, July 08, 2016 10:34 AM  
**To:** Betty Leathers <BLEathers@nooksack-nsn.gov>; Deanna Francis <DFrancis@nooksack-nsn.gov>  
**Cc:** Rickie W. Armstrong <rmstrong@nooksack-nsn.gov>  
**Subject:** Re: Hearing date

Betty, Rickie,

I'd like also to have all of my prior pending motions heard (default, election mandamus, injunction, contempt, etc.--there are at least four others) so please allow enough time.

Those other motions have been on hold since at least March. It seems most efficient to have everything heard at once.

Thanks again.

On Friday, July 8, 2016, Michelle Roberts <michelle.roberts3012@gmail.com> wrote:

Betty just checking in with you to see if you came up with any dates, when we had talked weds you said you were still working on it.

Also, when replying could you also attach a copy of the current Title 10?

I appreciate your time and look forward to hear from you soon.

Michelle Roberts

On Wednesday, July 6, 2016, Michelle Roberts <michelle.roberts3012@gmail.com> wrote:

Could you let me know what date is available for a motion to be heard so Rickie and I could schedule it?

Thank you,

Michelle Roberts

Begin forwarded message:

**From:** "Rickie W. Armstrong" <rarmstrong@nooksack-nsn.gov>  
**Date:** July 6, 2016 at 7:44:45 AM PDT  
**To:** 'Michelle Roberts' <michelle.roberts3012@gmail.com>  
**Subject:** RE: Hearing date

Hi Michelle,

I am just returning to the office today. The Court date you indicated in your email does not appear to be a regularly scheduled date for motions, was this a date given to you by the clerk's office? If not, please check with the clerk's office for several possible dates and get back to me with those dates in an effort to satisfy the conferral requirement.

Regards,

Thank you,

***Rickie Wayne Armstrong***

Tribal Attorney

Office of Tribal Attorney

Nooksack Indian Tribe

5047 Mt. Baker Hwy

P.O. Box 63

Deming, WA 98244

Phone: 360-592-4158 Ext. 3352

Fax: 360-592-2227

Cel: 360-303-6738

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**From:** Michelle Roberts [mailto:michelle.roberts3012@gmail.com]  
**Sent:** Saturday, July 02, 2016 9:35 AM  
**To:** Rickie W. Armstrong  
**Cc:** Deanna Francis; Betty Leathers; Charity Bernard  
**Subject:** Hearing date

Rickie,

Billie is attempting to file a motion for me with the Tribal Court. Betty has rejected the motion, in part because she says we didn't confer with you about our requested hearing date of July 14. In our experience the Clerk typically gives us court dates that we can then confer about with you, so this is a different process. It has also been pretty hard to get any cooperation from your office. Still, we are trying. Let us know about the 14th please. Thank you.

Michelle

LOCAL JULY 5, 2016 4:28 AM

# Judges threaten to jail Nooksack court clerk in disenrollment cases

## HIGHLIGHTS

Nooksack Tribal Court clerk could face jail if documents are not filed by July 6

Tribe also ordered to appoint a judge to lower court soon, or halt disenrollment proceedings

Panel says appearing to interfere with court's independence could undermine sovereignty of tribes



adiply

**EXHIBIT D**

BY SAMANTHA WOHLFEIL  
[swohlfeil@bhamherald.com](mailto:swohlfeil@bhamherald.com)

Attorneys representing roughly 300 people who face disenrollment from the Nooksack Indian Tribe received a major victory as the tribe's court of appeals ordered jail time for a court clerk if she does not file their paperwork.

Nooksack Tribal Court Clerk Betty Leathers has until Wednesday, July 6, to return paperwork that was filed by attorneys Gabriel Galanda, Anthony Broadman, and Ryan Dreveskracht to a file that was created in March.

Otherwise, the three-judge panel on the Nooksack Tribal Court of Appeals has ordered the Nooksack police chief to arrest and hold her in jail in contempt of court until she does so.

The June 28, order came after the appeals court already had warned Leathers she could face jail time if she did not give them an explanation or file the paperwork from the three attorneys and others in the Galanda Broadman firm, which has been representing roughly 300 members who could be removed from the Nooksack tribe's membership rolls.

The filing in question involves the Nooksack Tribal Council's February decision to disbar or block the three attorneys from practicing in Nooksack Tribal Court without giving them the chance to defend themselves. The three were trying to set a hearing to argue their case and receive due process.

“

**THE FAMILY DOES NOT GLOAT IN SOMEBODY ELSE HAVING THAT PRESSURE PUT ON THEM. ...WE DON'T WANT ANYBODY TO GO TO JAIL, WE DON'T WANT ANYBODY TO GET HURT, WE DON'T WANT ANY OF THAT STUFF.**

Michelle Roberts, one of those facing disenrollment, on the fact that the court clerk could face jail

Also on June 28, in a separate case, the panel ordered the tribe to either hire a judge to get the lower court functioning again, or halt disenrollment proceedings in the meantime.

The tribe fired tribal court judge Susan Alexander after she issued a ruling against the tribal council in March, and the 306 have not been able to move forward with their case since that time.

The appellate court panel for these two cases is made up of two people who serve as judges for other tribes in Washington state and a law professor.





Galanda said the rulings were gratifying.

“We and our clients have been in purgatory for over four months,” Galanda wrote in an email. “It is assuring to know that three judges from beyond Deming see the injustice we have all suffered for what it is. They plainly see the subversion of justice caused by Nooksack politicians, lawyers, and court staff. We will continue to expose that injustice in every way possible.”

That said, Michelle Roberts, one of those facing disenrollment, said she and her family thought it was unfortunate that the court clerks had been put in the middle of everything.

“They shouldn’t have to be put in that position,” Roberts said. “The family does not gloat in somebody else having that pressure put on them. ... We don’t want anybody to go to jail, we don’t want anybody to get hurt, we don’t want any of that stuff.”

Nooksack Chairman Bob Kelly said the recent orders were invalid.

“The Constitution of the Nooksack Tribe differs from the Constitution of the United States in that there is not a separation of powers within the Tribal government,” Kelly wrote in an email. “The Nooksack Court of Appeals was established through legislation by the Tribal council and is done so through a contract with a pool of lawyers from the Northwest Intertribal Court System to provide court services. The rules and procedures for the court are promulgated by the Tribal Council and they have the force and effect of law.”

### ‘Appearance of interfering’

Most of the council members who voted to disbar the Galanda Broadman attorneys are named defendants in the cases that the firm had been working on with the group of potential disenrollees, who call themselves the Nooksack 306.

Although Leathers signed and dated their filings, and assigned them case numbers on March 24, the three attorneys got an unsigned letter April 1 telling them their filed documents had been rejected.

“Somewhat suspiciously, it is as if whoever is responsible for the letter is attempting to cloak their identity,” the appellate panel said of the unsigned letter.

The letter gave three reasons why the filings had been rejected, but the appeals court ruled that none of those “stand a moment’s scrutiny.”



**THE PERVERSION OF JUSTICE THAT THIS REPRESENTS SHOULD BE PATENTLY OBVIOUS EVEN TO THOSE UNTRAINED IN THE LAW.**



## Nooksack Tribal Court of Appeals, in a June 28 decision

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. “That a court clerk or any other administrative personnel of the Tribal court could so subvert the judicial process of the Court that they are charged with protecting and facilitating is mind-boggling,” the panel wrote.

For all they know, the judges wrote, the clerk could have consulted the attorney for defendants in a lawsuit to ask whether their adversaries should be allowed to file a complaint.

“The perversion of justice that this represents should be patently obvious even to those untrained in the law,” they wrote.

The court initially gave Leathers until June 3 to return the documents to their file or tell the court why she shouldn't do so.

After that date came and went without a response, the June 28 ruling explains, the judges received an unsolicited letter from Chairman Kelly.

The court was troubled, the order states, by two passages in Kelly's letter, referring to the court's two previous orders requiring the court clerk to accept and file the paperwork or show why she shouldn't have to.

Kelly stated the court would not do either thing, and that tribal court clerks would not be accepting the Galanda Broadman documents for filing.

“This Court fears that these two statements could be read to suggest (sic) that the Chairman and the Tribal Council are attempting to improperly influence the course of a lawsuit in which they have an interest and that was properly filed and is currently pending before the Nooksack Tribal Court,” the decision states.

Leathers did not respond to requests for comment for this story.

The panel proceeded to give Kelly the benefit of the doubt, and point out that appearing to interfere with the independence of the court could have negative ramifications on the sovereignty of tribes around the country.

“While this Court is certain that the Chairman would not deliberately coerce or intimidate the Court Clerks into violating the lawful orders of this Court, it fears that others may not be so generous,” the panel continues. “To give the appearance of interfering with the proper operation

of the Nooksack Tribe's justice system undermines the sovereignty of all tribes across the nation because it suggests to those who would curtail and thwart the progress we have made as Indians over the last forty years that we are still not able to operate an independent judiciary."

In an email, Kelly said, "The Northwest Intertribal Court System is attacking the sovereignty of the Nooksack Tribe with their paternalistic attempts at creating a second independent branch of government not provided for in the Nooksack Constitution."

He said the absence of a separation of powers in the tribe's constitution does not provide the Northwest Intertribal Court System "with the authorization to disregard legislation created by the governing body of a sovereign like the Nooksack Tribe."

Roberts said she thought the court was being "a bit nice" in saying they didn't think Kelly meant to interfere with the court system.

"We're happy this happened, that they've seen what they're doing and understand the process was corrupt," Roberts said. "I thought that was kind of a nice comment on their part for him."

**This story was updated at 9:50 a.m. Tuesday, July 5, 2016, to add comments received from Chairman Bob Kelly.**

*Samantha Wohlfeil: 360-715-2274, @SAWohlfeil*



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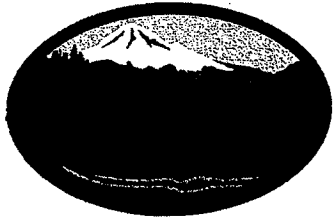
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EXHIBIT E



# Nooksack Indian Tribe

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July 7, 2016

Galanda Broadman  
Attn: Anthony Broadman  
P.O. Box 15146  
Seattle, WA 98115

*Certified Return Receipt No.*  
*7015 0640 0003 8499 4653*

---

**Re: *Notice of Final Determination***

Dear Applicant,

On May 2, 2016, the Tribal Administrative Office received your Business License application. On May 16, 2016, I denied your request for a business license as more fully set out in the Notice of Denial. Pursuant to Title 54.02.050, you requested the denial of your license be reconsidered and on June 30, 2016, I convened a hearing on your matter.

I have considered your original application materials, the written materials filed in support of your request for reconsideration, your past unlicensed business practices within the Nooksack Tribal jurisdiction, and your oral testimony. Given the above information, I uphold the earlier denial of your application for a business license.

Should you desire to appeal this Final Determination, you must file a written Notice of Appeal with the Tribal Council prior to August 2, 2016, the date of the next regularly scheduled Tribal Council meeting. You must attach copies of your original request for reconsideration and supporting documents presented at the hearing. Documents should be directed to:

Nooksack Tribal Council  
P.O. Box 157  
Deming, WA 98244

Regards,

Katherine Canete, MPA  
General Manager

**EXHIBIT F**