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AUG 22 2016

Office of Tribal Attorney
Nooksack Indian Tribe

personal use.

NOOKSACK TRIBAL COURT
NOOKSACK INDIAN TRIBE

AUG 22 2016

11:35 am

REJECTED

CODE: _____ CLERK: *SB*

IN THE NOOKSACK TRIBAL COURT OF APPEALS

DEBORAH EILEEN GLADSTONE
ALEXANDER; ROBERT STANLEY FORBES
GLADSTONE; MARGRETTY (MARJORIE)
LAJUNE RABANG; and BONNIE CLARA
GLADSTONE FORBES RUSSELL,
Plaintiffs,

v.

ROBERT KELLY, Chairman of the Nooksack
Tribal Council; RICK D. GEORGE, former
Vice-Chairman of the Nooksack Tribal Council;
AGRIPINA SMITH, former Treasurer of the
Nooksack Tribal Council; BOB SOLOMON,
Councilmember of the Nooksack Tribal
Council; KATHERINE CANETE, former
Councilmember of the Nooksack Tribal Council
and Nooksack General Manager; AGRIPINA
"LONA" JOHNSON, former 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.

NO. 2014-CI-CL-007

MOTION FOR PERMANENT
INJUNCTION

Defendants purportedly disenrolled me without providing me any opportunity for a hearing or honoring my right to counsel of my choosing, and/or without "any procedural rules governing disenrollment proceedings" having been "approved by the Secretary of Interior as provided for in the Nooksack Constitution." *Roberts v. Kelly*, No. 2013-CI-CL-003, at 9 (Nooksack Ct. App. Mar. 18, 2014).

1
2 Also, Defendants have waited far too long to disenroll me, "for supporting the Plaintiffs
3 subject to disenrollment, who are commonly known as 'the Nooksack 306.'" See Complaint, at
4 4; *id.*, Ex. A; subjoined Declaration, ¶2. *Alexander v. Confederated Tribes of Grand Ronde*, No.
5 A-15-008, at 19 (Grand Ronde Ct. App. Aug. 5, 2016) ("The Tribe is estopped [from
6 disenrollment] after making an initial enrollment decision 27 years ago, continually enrolling the
7 Petitioners/Appellants ever since, and after 27 years of consistently recognizing and stating that
8 these people are [tribal] citizens."); *Stoplman v. St. Croix Chippewa Indians of Wisconsin Tribal*
9 *Council*, No. 16-CV-500, at 19 (St. Croix Tribal Ct. Aug. 11, 2016) (in reversing the
10 disenrollment of members who were re-enrolled in 2013: "Tribal governments and their
11 administrative bodies must be bound to bring their causes of action in a timely manner . . .").

12 Defendants should, therefore, be permanently enjoined from disenrolling me.

13 DATED this ____ day of August, 2016.

14 
15 Margretty Rabang, Pro Se
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DECLARATION

I, Margretty Rabang, say:

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

2. I am an enrolled member of the Nooksack Indian Tribe. I have been continuously enrolled at Nooksack since 1993.

3. Today, I caused the foregoing document to be filed with the referenced court and delivered to to:

Rickie Armstrong
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 ____ day of August, 2016.


MARGRETTY RABANG