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RECEIVED

SEP 8 2016

Office of Tribal Attorney
Nooksack Indian Tribe

NOOKSACK TRIBAL COURT
NOOKSACK INDIAN TRIBE

SEP 8 2016

8:30am

REJECTED

CODE: _____ CLERK: *[Signature]*

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, BOB KELLY, BOB
SOLOMON, RICK GEORGE, AGRIPINA
SMITH, LONA JOHNSON, and KATHERINE
CANETE, in their official and personal
capacities,

Defendants.

NO. 2016-CI-CL-002

DECLARATION OF GABRIEL S.
GALANDA IN SUPPORT OF MOTION
FOR PARTIAL SUMMARY JUDGMENT

I, Gabriel S. Galanda, declare as follows:

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

2. Attached as **Exhibit A** is an accurate copy of the unsigned, undated Notice of Hearing I received on May 17, 2016

3. The Notice contains several false statements; I provided a written response.

4. I selected Jacob M. Downs, a Washington State Bar Association-licensed attorney, to represent me at this hearing.

5. Mr. Downs was denied a business license when he attempted to represent me at the hearing.

EXHIBIT A



Nooksack Indian Tribe

Sent via Certified Return Receipt Mail No. 7010 1670 0000 5933 5463

Mr. Gabriel Galanda, Esq.
Galanda Boardman
P. O. Box 15146
Seattle, Washington 98115

RECEIVED

MAY 17 2016

Re: NOTICE OF HEARING

Galanda Broadman PLLC

Dear Mr. Galanda:

On February 24, 2016, the Nooksack Tribal Council took emergency action barring you from Tribal lands and Tribal Court due to your failure to have a valid Nooksack Tribal business license and your behavior and practices in Tribal Court. In accordance with Nooksack Tribal Ordinance 10.02.070, the Nooksack Tribal Council will conduct a hearing concerning the issues these matters raise. The hearing will be conducted telephonically on **Thursday, June 9, 2016 at 2:00 p.m.**

Accompanying this Notice of Hearing are the following:

1. a copy of documentation supporting the actions taken by the Tribal Council in adopting Resolution #16-28;
2. a narrative that discusses the issues that your conduct during the representation of your clients before the Nooksack Tribal Court, and other venues, has raised; and
3. a copy of the procedures that will govern the hearing process.

In accordance with the accompanying procedures, you may submit a written response no later than five (5) calendar days prior to the date set for the hearing. Although the procedures provide for a maximum of thirty (30) minutes to present your case by oral argument during the hearing, the Chairman has agreed to allow you sixty (60) minutes, should you need additional time.

You have the option to waive your participation in the hearing, and to rely solely on your written response. If you intend to waive your participation, please indicate that in your response.



Login ID: alice@galandabroadman.com
Login Name: Alice Hall
Customer ID: 948832

Order Number: 1536185
Order Date: 09/06/16
Ship To: My Default
Order Lines: 1

Description	Mfg	Qty	Price	Unit	Extended
HOD26202 Recycled Ruled Monthly Planner, 14-Month Dec.-Jan., 8 1/2 x 11, Black, 2016-2018	House of Doolittle	2	15.80	EA	\$31.60
Subtotal:					\$31.60
Tax:					\$0.00
Shipping:					\$6.95
Total:					\$38.55

Ship To Address:
 Galanda Broadman PLLC
 Alice Hall
 PO Box 15146
 Seattle WA 98115

Credit Card: *****0519
Card Type: Visa

OfficeWorld.com values your business. Thank you for choosing us!

EXHIBIT B



Gabe Galanda <gabe@galandabroadman.com>

Re: telephonic hearing access instructions

1 message

Gabe Galanda <gabe@galandabroadman.com>
To: Charity Bernard <cbernard@nooksack-nsn.gov>
Cc: "Rickie W. Armstrong" <rarmstrong@nooksack-nsn.gov>
Bcc: gabe@galandabroadman.com

Fri, Jun 17, 2016 at 12:14 PM

Ms. Bernard:

When might I be provided the audio recording promised by Bob Kelly during my "hearing" last Thursday? Kindly advise.

Gabriel S. Galanda

On Jun 9, 2016, at 2:25 PM, Gabe Galanda <gabe@galandabroadman.com> wrote:

Ms. Bernard:

As promised by Bob Kelly, please email or mail me the 25 minute audio recording of today's hearing when you can.

Thank you,

Gabriel S. Galanda
Attorney at Law
Galanda Broadman, PLLC
m: 206.300.7801
gabe@galandabroadman.com

CONFIDENTIAL ATTORNEY WORK PRODUCT/ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

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On Tue, Jun 7, 2016 at 2:41 PM, Charity Bernard <cbernard@nooksack-nsn.gov> wrote:

Mr. Galanda:

The Tribe has received your materials in anticipation of the meeting and the timely confirmation of your hearing set for June 9, 2016 at 2:00 p.m. At the scheduled hearing time, you should call into the conference line number and access code listed below.

The conference number is: (855) 212-0212

The Access code is: 237-169-185

From: Gabe Galanda [mailto:gabe@galandabroadman.com]
Sent: Monday, June 06, 2016 3:05 PM
To: Nooksack Meetings
Cc: Rickie W. Armstrong; Molly Jones
Subject: Re: Written Statement in Response to Notice of Hearing Re: Banishment of Gabriel S. Galanda Pursuant to Resolution No. 16-28

To Whom It May Concern:

I just attempted to call 360-592-4158 ext. 3357, the number in the new hearing procedures, to further confirm my hearing for this Thursday at 2 PM. But an automated message said that the mail "extension 3357 is not valid," before I was directed to Rickie Armstrong or Sue Gearhart of the Office of Tribal Attorney. I then left a message with Mr. Armstrong, confirming my hearing. Please let me know if I need to do anything more to confirm my hearing, or when I can expect confirmation from the Hearings Office/Legal Department. Also, I await responses to my various procedural queries.

Thank you,

Gabriel S. Galanda

On Sat, Jun 4, 2016 at 5:10 PM, Gabe Galanda <gabe@galandabroadman.com> wrote:

To Whom it May Concern:

Attached please find a slightly revised response statement.

Please disregard the version emailed and U.S. mailed last night, as the response was inadvertently placed on my law firm's letter template for my signature.

The attached version makes clear that my self-representation does not constitute the practice of law or transaction of business at Nooksack. Nothing about my self-advocacy or emails to you should be construed otherwise.

Also, you should have received Appendices/Exhibits A-W by separate emails from Molly Jones. We got an undeliverable response to her emails so let us know if you didn't get any of them. She is resending them now. They were also U.S. mailed.

Gabriel S. Galanda

On Fri, Jun 3, 2016 at 4:08 PM, Gabe Galanda <gabe@galandabroadman.com> wrote:

To Whom It May Concern:

Attached please find my written response. It will also arrive in print copy via U.S. Mail, with Appendices/Exhibits.

Molly will also reply hereto with the various Appendices/Exhibits, possibly in several emails

In addition, I hereby confirm my telephonic attendance on June 9th at 2 PM. Please provide call-in instructions, and I still ask that you respond to each of my queries below.

Gabriel S. Galanda

On Thu, Jun 2, 2016 at 12:52 PM, Gabe Galanda <gabe@galandabroadman.com> wrote:

To Whom It May Concern:

Attached please find my fully signed Representation Form.

I await your response to my inquiries.

Thank you,

Gabriel S. Galanda

On Thu, Jun 2, 2016 at 8:03 AM, Gabe Galanda <gabe@galandabroadman.com> wrote:

To Whom It May Concern:

I await your reply to my inquiries below. I especially require the date of the Notice of Hearing letter so that I know by when I must respond to the allegations appended to the Notice.

Also, I submitted a signed Representation Form, along with my lawyer at Corr Downs. Please advise if Mr. Downs will be able to advocate for me during the hearing.

I hope to hear from you today so I can prepare for my hearing accordingly.

Thank you,

Gabriel S. Galanda

On Tue, May 31, 2016 at 9:59 AM, Gabe Galanda <gabe@galandabroadman.com> wrote:

To Whom It May Concern:

I am in receipt of a letter from the Nooksack Tribe titled "Notice of Hearing." It is an unsigned and undated, one-page letter. So that I know how and when to properly respond to the Notice and its appended allegations, please advise:

1. What is the date of the letter?
2. From whom at the Tribe was the letter sent?
3. Is the Notice letter more than a single page? If so, can you please reply with any additional pages?
4. Was Resolution #16-28, which is mentioned at No. 1 of the Notice letter but not appended, inadvertently omitted from the enclosures? Can you kindly reply with it?
5. Does the Notice pertain to Nooksack Title 54?

If I need to direct these inquiries to somebody else at the Tribe, please let me know.

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

Thank you,

Gabriel S. Galanda

On Thu, May 26, 2016 at 5:00 PM, Nooksack Meetings <meeting@nooksack-nsn.gov> wrote:

From: Gabe Galanda [mailto:gabe@galandabroadman.com]
Sent: Thursday, May 26, 2016 12:41 PM
To: Nooksack Meetings
Cc: Rickie W. Armstrong
Subject: Representation Form

To Whom it May Concern:

9/6/2016

Galanda Broadman Mail - Re: telephonic hearing access instructions

Kindly email me the Representation Form listed as Appendix A to the new Procedures for Tribal Council Hearings. It was not appended to the version of the Procedures that I was furnished. Thank you.

Gabriel S. Galanda