

**Clerk of the Court
United States District Court for the District of Montana
Great Falls Division
125 Central Ave. West
Great Falls, Montana 59404**

RECEIVED
OCT 09 2015
Clerk, U.S. District Court
District of Montana
Great Falls Division

PRO SE

**Enrolled Members of the Blackfeet Tribe
aka Treaty Status Indians**

**Richard Horn U-13814, Duane Many Hides U-11007,
Roy Ingram U-12345, Ernest Olson U-9058,
Larry M. Reeves U-11263**

21 Calico Street
Cut Bank, Montana 59427

Plaintiff

V.

Civil Action no.

CV-15-92-GF-BMM-JTS

Thedus Crowe, BIA Superintendent
Blackfeet Agency
Browning, Montana 59417

Kevin K. Washburn, Assistant Secretary
Bureau of Indian Affairs
12220 Sunrise Valley Drive
Reston, Virginia 20191

Salley Jewell, Secretary of the Interior
United States Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Barack Obama, President of the United States
The White House
1600 Pennsylvania Ave., N.W.
Washington, D.C. 20500

Defendant

**Clerk of the Court
United States District Court for Montana
Great Falls Division**

Complaint

The **petition** by the **Enrolled Members of the Blackfeet tribe aka (Blackfeet Treaty Status Indians)** before the US District Court of Montana are **seeking legal title to all natural resources** on or related to the **Blackfeet Indian reservation**. This **petition** is meant to **stop** all attempts by the above mentioned public officials and/or institutions who **acting in collusion to permit the illegal dispositions** of the **Blackfeet tribal property**. Protecting, preserving and exercising the **Sovereign Status of the Blackfeet tribe is the fundamental trust responsibility** for both the US Federal government and the Blackfeet Tribal Business Council (BTBC) which is **legally required from all trustees** as part of their **oath of office**.

Enrolled Members of the Blackfeet Tribe are the **proprietor owners** of the **Tribal Estate aka Blackfeet Indian reservation** according to the following legal papers. The **Treaty of October 17, 1855** (11 statute 657) (**Blackfeet Treaty of Fort Benton, 1855, article 3** “The Blackfoot Nation consent and agree that all the portion of the country recognized and defined by **treaty of Laramie as Blackfoot territory.**”), the **Executive Order of July 5, 1873** (1 Kappler 855), the Act of April 15, 1874 (18 statute 28), the **Executive Order of August 19, 1874** (1 Kappler 856), the **Executive Order of April 13, 1875** (1 Kappler 856), the **Agreement of the Act of May 1, 1888** (25 statute 113) and the **Agreement of the Act of June 12, 1896** (29 statute 321, 353) (Article 3 of the 1896 Agreement with the **Blackfeet Indians** “this **whole reservation shall continue to be held by these Indians as a communal grazing tract**”).

Other **Blackfeet organic documents** recognizing the **legal ownership** are the **Blackfeet Charter**, section 3 titled **Membership** “The **Blackfeet Tribe** of the Blackfeet Indian reservation shall be a **membership corporation**”. Additional **legal protections** embedded that protect and preserve the natural resources of the **Blackfeet reservation** is section 5 (b) (1) of the corporate **charter** “**no sale or mortgage** may be made by the tribe of any land or interest in **land**, including **water power sites, water rights**, oil, gas and other mineral right now or hereafter held by the tribe within the boundaries of the Blackfeet reservation.”

Established law that **affirms the legal rights** to the **Blackfeet Tribal Water Right** is supported by **Conrad Investment Co. v. U.S. 161 F 829 (9th circuit 1908)** which is the **legal precedence** for all the **Blackfeet Indian reservation** waterways.

The **Blackfeet Tribal Water Right to the Birch Creek** is a federal court decreed water right (**number 720**) and is for **1600 inches** of Birch Creek water. The other reservation **border** water ways (**St. Mary and Milk**) are legally the **mirror image** of the federal court decreed water right for the **Birch Creek**. All **interior** water ways on or passing through the reservation are **solely owned** by the **Blackfeet tribe**.

In addition to the above fact(s), the **constitutional or statutory disclaimers** in **Montana Enabling Act** of February 22, 1889 , 4, 25 stat. 676-677 and the **Montana Constitution**, Ordinance no. 1 (1895) (463 U.S. 545, 557) **prohibit Montana** from exercising adjudicatory jurisdiction over the **Blackfeet Indian reservation** and **Blackfeet tribal Water Right(s)**.

The **Legal Relief** the above mentioned **plaintiff(s)** known as (**Enrolled Members of the Blackfeet tribe aka Blackfeet Treaty Status Indians**) are **seeking** from the United States District Court of Montana at the Great Falls division is for 1) **Legal Ownership** of all tribal **natural resources** titled as the **Tribal Estate aka Blackfeet Indian reservation**, 2) a **Federal Court Decreed Water Rights Certificate/Title** to all water ways originating or passing through the **Blackfeet Indian reservation** and any other kind(s) of water bodies and/or secondary water sources, 3) the **Ownership of all Water Delivery Systems Infrastructure** located on the **Blackfeet Indian reservation** which include but or not limited to appendages and/or improvements to the land like dams, diversions dams, siphons, hydraulic drops, canals, reservoirs, holding ponds or any other kind of natural or man made appendages or improvements that utilize or could be utilized for storage, hydro power, municipal or industrial applications as well as 4) **all current or historic compensatory (money) damages for the illegal capture and utilization of the Tribal Water Right** by the Pondera County Canal and Reservoir Company (PCCRC), Milk River Irrigation Association (MRIA) and the St. Mary River Irrigation Districts (SMRID) of Alberta Canada as well as any other water user(s) or organization(s) using **basin 40** and **basin 41** that are located on the **Blackfeet Indian reservation** including **any claim(s)** that is **not specifically mentioned** in this **petition**.

I do hereby certify to the best of my knowledge, information and belief that this **Complaint** submitted to the **U.S. District Court for the District of Montana** is being done in **Good Faith to Right a Wrong** that has legally, politically and socially injured the **Enrolled Members of the Blackfeet Tribe aka Treaty Status Indians**.

PRO SE
Enrolled members of the Blackfeet tribe
aka Treaty Status Indians
Richard Horn U-13814, Duane Many Hides U-11007
Roy Ingram U-12345, Ernest Olson U-9058
Larry M. Reevis U-11263
21 Calico Street
Cut Bank, Montana 59427

October 8th, 2015
Ernest Olson
Larry M. Reevis

Cc **Theodus Crowe, BIA Superintendent**
Blackfeet Agency
Blackfeet, Montana 59417

Kevin K. Washburn, BIA Assistant Secretary
Bureau of Indian Affairs
12220 Sunrise Valley Drive
Reston, Virginia 20191

Sally Jewell, Secretary of the Interior
United States Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Barack Obama, President of the United States
The White House
1600 Pennsylvania Ave., N.W.
Washington, D.C. 20500