



# Legal Review

NATIVE AMERICAN RIGHTS FUND

## NARF’S WORK IN ALASKA OVER THE YEARS

The Native American Rights Fund has provided legal assistance to Tribes in Alaska since NARF’s founding in the early 1970s. In 1984, NARF opened an Alaska office so it could better serve Alaska Native Tribes and individuals. In the 40 years since NARF Alaska opened its doors, the office has litigated some of the most influential cases in the development of federal Indian law in Alaska. Below is an overview of the foundational work that NARF has done with and on behalf of Alaska Native Tribal governments and people.

### NARF’s Early Work in Alaska

Since the early 1970s, NARF has helped Alaska Native people and Tribes protect their rights and assert their sovereignty. Our earliest work in Alaska began in 1972 with assisting an Alaska Native organization and Alaska Native villages with the establishment and defense of the North Slope Borough (*Mobil Oil v. Local Boundary Commission; Edwardsen v. Morton*). Through the establishment of a borough, communities in the region could then tax oil and gas infrastructure as exploration and production began.

In the mid-1970s, NARF also assisted with *Hootch v. Alaska*—a landmark case that challenged the lack of secondary schools in most rural Alaska Native villages and led to the establishment of high schools in many rural communities across the state. NARF also helped with some of the first Self-Determination 638 contracts in Alaska and represented an Alaska Native herder in a challenge to federal taxation of income from the

operation of a reindeer herd held in trust for Alaska Native herders (*Karmun v. Commissioner*).

### Recognition, Tribal Status, and Tribal Rights

Alaska gained statehood in 1959, and in the decades following, the state asserted that no Tribes existed in Alaska. In a broad range of cases, NARF Alaska has helped Tribes assert their sovereignty and fight back against efforts by the state to undermine those rights. NARF’s work on these issues have addressed the existence of Tribes in the state (*Native Village of Noatak v. Blatchford*), the ability of Tribal governments to receive revenue-sharing payments (*Native Village of Akiachak v. Notti*), and that core principles of federal Indian law apply to Alaska Native villages (*Alaska v. Native Village of Venetie*).

In several different instances, NARF Alaska has helped Tribes assert and defend their sovereign immunity. NARF represented the Ivanof Bay Village in a case that affirmed Tribal sovereignty immunity (*McCrary v. Ivanof Bay Village*). And NARF recently represented several Tribes and Tribal Consortia as amici in *Ito v. Copper River Native Association*, which affirmed that Tribal consortiums possess sovereignty immunity—overturning its longstanding precedent that held otherwise.

### Indian Country, Taxation, and Trust Lands

In 1971, Congress enacted the Alaska Native Claims Settlement Act (ANCSA), which terminated all but one reservation in Alaska and transferred millions of acres of land to newly formed for-profit Alaska Native Corporations. In the wake of ANCSA, NARF has helped Tribes navigate the complex issues involving Tribal jurisdiction over lands. For example, NARF helped Tribes assert immunity from municipal taxes (*City of Nome v. Nome Eskimo Community*), navigate the effects of

NARF’S Alaska Work Over the Years .....	Page 1
National Indian Law Library .....	Page 4
Call to Action.....	Page 5
Tribal Supreme Court Project.....	Page 6
NARF .....	Page 7
NARF Board .....	Page 8



Fish rack to dry and preserve fish to last through the winter.

ANCSA on Indian Country status in Alaska (*Alaska v. Native Village of Venetie Tribal Government*) and regulate alcohol sales (*Native Village of Barrow v. City of Barrow*).

Much of NARF Alaska’s work has also focused on undoing Alaska exceptions to various federal policies. After ANCSA, the Department of Interior long held the view that it could not lawfully take land into trust for Tribes in Alaska. This is despite the fact that the Secretary’s authority to acquire lands in trust in Alaska remains in place in the Indian Reorganization Act. NARF has worked with Tribes since the 1990s to undo this Alaska exception, and in 2006, we filed suit against the Department of Interior on behalf of several Tribes in the state (*Akiachak Native Community v. Salazar*). Interior ultimately withdrew regulation containing the bar on fee-to-trust acquisitions in the state. However, since then, Interior has only made two trust acquisitions in Alaska—one during the Obama Administration and one during the Biden Administration. The State of Alaska filed suit to challenge the trust acquisition made by Interior during the Biden Administration (*Alaska v. Newland*). In the district court, NARF represents, as amici, Tribes in Alaska with trust land holdings; an appeal to the Ninth Circuit remains pending.

**Protecting Subsistence Rights**

For decades, a substantial portion of NARF Alaska work has focused on affirming and protecting Alaska Native subsistence rights. From 1985 to 2014, NARF represented Ahtna Elder Katie John in her fight to protect her traditional fishing rights, and the Katie John litigation exemplifies the contentious battle waged between federal, Tribal, and state interests over jurisdiction of Alaska Native subsistence rights.

NARF Alaska has also worked to protect customary and traditional uses of subsistence resources (*Alaska v. Federal Subsistence Board, Feagle & Cheesha-Na Tribal Council; State v. Dementieff & Chistochina Tribe*), affirm that traditional Alaska Native potlaches are a subsistence use of fish and wildlife (*Native Village of Tanana v. Conper*), oppose state regulations eliminating subsistence uses of moose and caribou (*Ahtna Tene Nene’ Subsistence Committee v. Alaska Board of Game*), and challenge state mismanagement of subsistence fisheries (*Elim v. Alaska*). The fight over subsistence rights continues and NARF Alaska currently represents a Tribe, a Tribal Consortia, and two individual subsistence fishers in two separate subsistence cases before the Ninth Circuit Court of Appeals (*Alaska v. Federal Subsistence Board; United States v. Alaska*).

**Subsistence Rights and Aboriginal Title**

NARF Alaska’s subsistence work does not stop at the Alaska border—NARF also has spent considerable time over the course of decades to affirm aboriginal title in the Outer Continental Shelf. For example, in the early 1980s, when the Department of the Interior held oil and gas lease sales in the Northern Bering Sea, Tribes fought to protect their subsistence rights. In a case that lasted for a decade, the U.S. Supreme Court recognized that Alaska Tribes retained aboriginal subsistence rights in federal waters (*Amoco Prod. Co. v. Village of Gambell*). NARF has helped Tribes use the rights affirmed in the Gambell cases to challenge gold mining (*Nome Eskimo Community v. Babbitt*) and assert their rights to fishing quotas (*Native Village of Eyak v. Blank*).

**Traditional Lands, Waters, and Cultural Resources**

Established in 1960, the Arctic National Wildlife Refuge sits at the far northern edge of Alaska and encompasses the traditional lands of the Neets’ąıı Gwich’in. NARF has represented three of the Neets’ąıı Gwich’in Tribes—the Native Village of Venetie Tribal Government, Arctic Village Council, and Venetie Village Council—since 1989 in their fight against oil and gas development in the Refuge. The Refuge is home to the calving grounds of the Porcupine Caribou Herd, which has been a primary source of food for the Gwich’in people for countless generations. For many years now, NARF has worked to help prevent oil and gas development from threatening the Refuge.

Alaska’s Bristol Bay region is home to the largest wild salmon runs in the world. It is also home to the Yup’ik,

Dena'ina, and Alutiiq peoples who depend on the sustainable salmon runs for their subsistence. Since 2013, NARF has worked with the United Tribes of Bristol Bay (UTBB) to address regional large-scale mining proposals threatening salmon rearing streams. One example is the proposed Pebble Mine, which would sit on the headwaters of the largest salmon-producing river in Bristol Bay. NARF has represented UTBB in a number lawsuits and has, for over a decade, worked to secure lasting, permanent protections for the Bristol Bay watershed.

The Bering Sea is an enormous and diverse ecosystem that is home to critical fisheries and seabird habitats, countless species of marine plants and animals, and supports one of the largest marine migrations on Earth.

Since 2010, NARF has worked with the Bering Sea Elders Group (an organization of thirty-eight member Tribes from Kuskokwim Bay to the Bering Strait), and the Bering Sea Elder Group's Tribal coalition partners to protect the food security of the Yup'ik, Cup'ik, St. Lawrence Island Yupik, and Inupiaq communities that rely on the Bering Sea, advance Tribal co-management of the Bering Sea, and secure lasting protections for the Bering Sea.

Finally, NARF has also represented Tribes in a variety of cultural resources issues, including work under NAGPRA and establishing traditional cultural landscapes.

**Civil Rights**

NARF has helped Alaska Native people protect and defend their civil rights in a number of cases. Since Alaska gained statehood, the state has created two public safety and justice systems—a well-funded and property resourced system for urban Alaska, and an under-funded and ill-equipped system for rural Alaska. In *Alaska Inter-Tribal Council v. Alaska*, NARF challenged this unjust public safety system. NARF also has assisted several Alaska state prison inmate groups in developing and implementing policy changes so that inmates could participate in religious ceremonies, eat traditional Native foods, and participate in cultural activities.

**Voting Rights**

Alaska has the largest land area and lowest population density of any state, has some of the most geographically isolated communities in the

Nation, and is home to more than twenty Indigenous languages. When it comes to access to the ballot box, each of these factors collide with the broader history of racial oppression in Alaska and has led to the persistent disenfranchisement of Alaska Native communities. And yet Alaska Native voters account for over seventeen percent of Alaska's voting population, making up a powerful voting bloc in the state. NARF has played a crucial role in protecting Alaska Native voting, addressing both historical and contemporary barriers. Using the Fourteenth and Fifteenth Amendments, and various sections of the Voting Rights Act, NARF Alaska litigated two important voting rights lawsuits to improve language assistance for Alaska Native voters.

In 2007, NARF Alaska sued the State of Alaska on behalf of four individual Alaska Native voters and four Tribes to protect Yup'ik-speaking voters' right to election materials in their own language. After almost three years of litigation, in February 2010, the State of Alaska settled the case and agreed to translate election materials into Yup'ik and to train bilingual poll workers to help voters.

In 2013, NARF Alaska again successfully sued the state on behalf of two individual Alaska Native voters and four Tribes, for violating the Voting Rights Act by not providing adequate language assistance to Alaska Native language speaking voters. The state remains under federal court jurisdiction and NARF continues to monitor the state's compliance with the court order.



Walking in Alaska.

### Tribal Court Jurisdiction and Tribal Child Welfare

NARF Alaska also has been deeply involved in litigation seeking recognition of Alaska Tribes' sovereignty and exercises of jurisdiction. Because there is almost no reservation land in Alaska, and because of the state's hostility toward Tribal sovereignty, these battles began with foundational questions about whether Alaska Tribes continue exist and, if so, to what extent they have retained power to exercise jurisdiction. NARF Alaska represented amici in the foundational case *John v. Baker*, which established that Alaska Tribes have inherent non-territorial jurisdiction over internal domestic relations matters. NARF Alaska subsequently represented Tribes and Alaska Native individuals in foundation cases that affirmed that Alaska Tribes have retained inherent jurisdiction to initiate cases related to their citizen children (*State v. Native Village of Tanana*; *Hogan v. Kaltag Tribal Council*), established that litigants must exhaust Tribal court remedies before challenging Tribal court decisions collaterally (*Simmonds v. Parks*), and affirmed that Tribes have inherent non-territorial jurisdiction to adjudicate child support matters for tribal families, and that jurisdiction extends to non-member parents (*State v. Central Council of Tlingit and Haida Indian Tribes of Alaska*). Because the Alaska courts have had more opportunities than other courts to explore the nature and scope of extraterritorial jurisdiction, including over non-members, these cases have national importance.

Finally, much of NARF's work related to the Indian Child Welfare Act (ICWA) has come out of the Alaska Office. ICWA was intended to disrupt the widespread practice of removing Native children from their families and Tribes but also has become a battleground for fights over sovereignty and the federal government's trust responsibilities. Because Alaska is home to 229 federally recognized Tribes and Alaska Native children are disproportionately overrepresented in Alaska's child welfare system, Alaska's courts have been presented with ample opportunities to interpret and apply ICWA. NARF Alaska has represented amici in key Alaska ICWA cases establishing that Tribes may sue as *parens patriae* on behalf of their members to enforce ICWA's protections (*State v. Native Village of Curyung*), and establishing evidence standards for deviation from ICWA's adoptive placement preferences and clarifying that a preferred placement must be evaluated by the prevailing social and cultural standards of the Indian community (*Native Village of Tununak v. State Department of Health and Social Services I and II*). NARF Alaska has also represented amici in the only ICWA cases to reach the United States Supreme Court in the last several decades: *Adoptive Couple v. Baby Girl* and *Haaland v. Brackeen*, which upheld ICWA's constitutionality. 🙏

## National Indian Law Library

ALASKA NATIVES AND AMERICAN LAWS, THIRD EDITION



When researchers are looking for information related to Alaska Natives, the National Indian Law Library's go-to suggestion is David Case and David Voluck's *Alaska Natives and American Laws: Third Edition*. This treatise is "the Alaskan equivalent of the late Felix Cohen's *Handbook of Federal Indian Law*."<sup>1</sup> Alaska Native legal issues require a different set of laws and strategies from that of the Tribes in the lower 48 states, and this source is a great reference for navigating these considerations.

The publisher, University of Alaska Press, states that the book is "[d]ivided conceptually into four broad themes of indigenous rights to land, subsistence, services, and sovereignty."<sup>2</sup> The first chapter covers the basics of federal

Indian law, international law, and the history of the Alaska Native relationship. Chapter 2 explains the confusing question of Alaska Native land rights based on court interpretations of the 1867 Treaty of Cession between the U.S. and Russia and the extinguishment of claims by the Alaska Native Claims Settlement Act (ANCSA). Chapter 3 discusses the reservation policy that was ended by the passage of Section 19 of ANSCA. Chapter 4 details the history of Native allotments and townsites and introduces the conflicts with the current legislative framework created by ANSCA and the Federal Land Policy Management Act.

Arguably the most important chapter of the treatise is chapter 5, "ANCSA: The Alaska Native Claims Settlement

## CALL TO ACTION

It has been made abundantly clear that non-Indian philanthropy, by itself, cannot sustain NARF’s work. To provide legal advocacy in a wide variety of areas such as religious freedom, the Tribal Supreme Court Project, Tribal recognition, human rights, trust responsibility, voting rights, Tribal water rights, Indian Child Welfare Act, and Tribal sovereignty issues, NARF looks to Tribal Nations to provide the crucial funding to continue our legal advocacy on behalf of Indian Country. It is an honor to list those Tribes and Native organizations who have chosen to share their good fortunes with the Native American Rights Fund and the thousands of Indian clients we have served.

We encourage other Tribes and organizations to become contributors and partners with NARF in fighting for justice for our people and in keeping the vision of our ancestors alive. We thank the following Tribes and Native organizations for their generous support of NARF in the 2025 fiscal year (October 1, 2024 to March 31, 2025):

**To join these Tribes and organizations and support the fight for Native rights and Tribal sovereignty, contact Don Ragona at [ragona@narf.org](mailto:ragona@narf.org)**

**Cow Creek Band of Umpqua Tribe of Indians  
Cowlitz Indian Tribe  
Habematolel Pomo of Upper Lake  
Oneida Nation  
Seminole Tribe of Florida  
Wilton Rancheria**

Act.” Attorney Troy A. Eid states, “the fifth chapter of Case-Voluck is nothing less than required reading for anyone seeking to decipher the Alaska Native Claims Settlement Act.”<sup>3</sup> ANCSA extinguished Alaska Natives’ claims to their land and established corporate governance models that set them apart from the tribal governance systems in the lower 48 states.

The final chapters cover a variety of current issues for Alaska Natives. Chapters 6 and 7 describe services provided to Alaska Natives and entitlements to those services. Chapter 8 provides an overview of subsistence rights. Chapter 9 details the governmental organizations that make up Alaska Native governance. And finally, Chapter 10 makes the case

for Alaska Native self-government and sovereignty. This treatise provides a great starting point for thinking about Alaska Native legal issues and rights.

For additional resources, search the National Indian Law Library catalog. One newer article on Alaska Native sovereignty is by NARF Staff Attorney Mitchell Forbes. His article, “Beyond Indian Country: The sovereign powers of Alaska Tribes without reservations”<sup>4</sup>, advocates that Alaska has recognized a Tribal membership-based jurisdiction even without an “Indian Country.” Forbes applies Alaska’s complex historical legal background to COVID-19 related actions of Alaska Native governments. 🙏

Endnotes

- 1 See Troy A. Eid, Book Review, 30 Alaska L. Rev. 223
- 2 See <https://upcolorado.com/university-of-alaska-press/item/5807-alaska-natives-and-american-laws>, accessed on May 14, 2025.
- 3 See Eid, note 1, at 224.
- 4 See Mitchell Forbes, Beyond Indian Country : The sovereign powers of Alaska tribes without reservations. 40 Alaska L. Rev. 171

# Tribal Supreme Court Project



TRIBAL SUPREME  
COURT PROJECT

The Tribal Supreme Court Project is part of the Tribal Sovereignty Protection Initiative and is staffed by the National Congress of American Indians (NCAI) and NARF. In 2026, the Project will commemorate 25 years of service furthering the interests of Tribal Nations and Native American people as they appear before the U.S. Supreme Court. The Project was formed in 2001 in response to a series of U.S. Supreme Court cases that negatively affected Tribal sovereignty. The Project's purpose is to promote greater coordination and to improve strategy on litigation that may affect the rights of all Tribes. We encourage Tribal Nations and their attorneys to contact us to coordinate resources, develop strategy, and prepare briefs, especially at the time of the petition for a writ of certiorari.

As of this writing, during its October 2024 Term, the U.S. Supreme Court has heard no oral arguments in Indian law cases. Among pending petitions, the Project currently is tracking:


**KANAM V. HAALAND (24-1019)** Kurt Kanam is the Chairman of the Pilchuck Nation. Kanam sued in federal district court to require the U.S. Department of the Interior to add the Nation to the list of federally recognized Tribes. The district court dismissed for lack of subject matter jurisdiction, finding that there was no legal basis conferring the right to the relief sought. The U.S. Court of Appeals for the District of Columbia summarily affirmed.

**MAVERICK GAMING V. UNITED STATES (24-1161)** Maverick Gaming LLC, a private entity, sued the U.S. in federal district court under the Administrative Procedures Act, challenging the Secretary of the Interior's approval of the State of Washington's Tribal-state gaming compacts amendments that allowed for sports betting. The district court granted the Shoalwater Bay Indian Tribe's motion to intervene as a defendant and granted the Tribe's motion to dismiss on the ground that the Tribe is a required party under Federal Rule of Civil Procedure 19 but could not be joined because of its sovereign immunity from suit. The U.S. Court of Appeals for the Ninth Circuit affirmed. Maverick seeks review of whether Rule 19 requires dismissal of its suit.

**SOUTH POINT ENERGY CENTER V. ARIZONA DEPT OF REVENUE (24-952)** South Point Energy Center, a non-Indian private entity, owns and operates a power plant located on trust land of the Fort Mojave Indian Tribe that the Tribe leases to it. The Tribe and the federal government regulate

the power plant. Mohave County, Arizona, imposes state ad valorem property taxes on the power plant. South Point sued the county for a refund, claiming that federal law preempts the county's tax. The court upheld the imposition of the tax. The Arizona Court of Appeals reversed, holding that the Indian Reorganization Act of 1934, 25 U.S.C. § 5108, expressly exempts from tax permanent improvements on Indian trust lands regardless of whether the improvements are Indian owned or non-Indian owned. The Arizona Supreme Court vacated the appeal decision, holding that Section 5108 exempts only Indian owned improvements and remanding to the Court of Appeals to determine whether the tax is impliedly preempted. The Court of Appeals found no implied preemption under the balancing of state, federal, and Tribal interests test as set forth in *White Mountain Apache Tribe v. Bracker*. South Point's petition for a writ of certiorari presents questions of both express and implied preemption.

Among dismissed petitions, a case of note:

**APACHE STRONGHOLD V. UNITED STATES (24-291)** Oak Flat is a significant and unique sacred site for Western Apache people and is located on federal land within Western Apache ancestral territory and the State of Arizona. In 2015, legislation authorized the United States to transfer Oak Flat to Resolution Copper Mining, LLC. The proposed copper mine will completely and permanently destroy Oak Flat. The nonprofit, Apache Stronghold, sued the U.S. and Resolution Copper challenging the land transfer and destruction of Oak Flat under the Religious Freedom Restoration Act of 1993 (RFRA), which requires strict scrutiny of government action that would substantially burden religious exercise, and the Constitution Free Exercise Clause which requires heightened scrutiny when the government substantially burdens religious practice. The district court denied Apache Stronghold's requested preliminary injunction. In an en banc review by an 11-judge Ninth Circuit panel Apache Stronghold's claims again were rejected, with seven opinions issued in 246 pages. After Apache Stronghold's petition for en banc review by the full Ninth Circuit was denied, Apache Stronghold filed its petition for a writ of certiorari. Following multiple distributions for conference, the petition was denied on May 27, 2025. Justice Gorsuch, joined by Justice Thomas, dissented from the denial of certiorari. They were of the opinion that in this case of exceptional importance, the Ninth Circuit misinterpreted the substantial burden test and RFRA 

# The Native American Rights Fund

The Native American Rights Fund (NARF) is a Native-led, nonprofit legal organization defending and promoting the legal rights of Native American people on issues essential to our Tribal sovereignty, natural resource protections, and human rights.

Since 1970, we have provided legal advice and representation to Native American Tribal Nations, individuals, and organizations on high impact issues. Our early work was instrumental in establishing the field of Indian law. NARF—when very few would—steadfastly stood for religious freedoms and sacred places, subsistence hunting and fishing rights, as well as basic human and civil rights. We continue to take on complex, time-consuming cases that others avoid, such as government accountability, climate change, voting rights, and the education of our children. We have assisted more than 300 Tribal Nations with critical issues that go to the heart of who we are as sovereign nations.

NARF's first Board of Directors developed five priorities to guide the organization. Those priorities continue to lead NARF today:

- Preserve Tribal existence
- Protect Tribal natural resources
- Promote Native American human rights
- Hold governments accountable to Native Americans
- Develop Indian law and educate the public about Indian rights, laws, and issues

Under the priority to preserve Tribal existence, NARF

constructs the foundations to empower Tribes to live according to their traditions, enforce their treaty rights, ensure their independence on reservations, and protect their sovereignty.

An adequate land base and control over natural resources are central to economic self-sufficiency and self-determination. They are vital to the very existence of Tribes. Thus, much of NARF's work aims to protect Tribal natural resources.

In order to promote human rights, NARF strives to enforce and strengthen laws that protect the rights of Native Americans to exercise their civil rights, practice their traditional religion, use their languages, and enjoy their culture.

Contained within the unique trust relationship between the United States and Tribal Nations is the inherent duty for all levels of government to recognize and responsibly enforce the laws and regulations applicable to Native people. NARF will hold governments accountable to Native Americans.

For the continued protection of Indian rights, we must develop Indian law and educate the public about Indian rights, laws, and issues. This priority includes establishing favorable court precedents, distributing information and law materials, fostering relevant legal education, and forming alliances with Indian Law practitioners and other organizations.

Requests for legal assistance should be addressed to NARF's main office at 250 Arapahoe Ave, Boulder, CO, 80302. NARF's clients are expected to pay what they can toward the costs of legal representation.

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**[www.narf.org](http://www.narf.org)**

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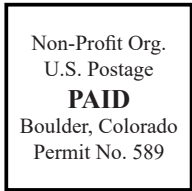
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