

SUPREME COURT
FILED

IN THE MUSCOGEE (CREEK) NATION SUPREME COURT

DISTRICT COURT
FILED *sw*

DEC 18 2025

CITIZENSHIP BOARD OF THE
MUSCOGEE (CREEK) NATION,

2025 DEC 18 A 11: 37

Appellant,

MUSCOGEE (CREEK) NATION
CYNTHIA FREEMAN
COURT CLERK

CONNIE DEARMAN *lm*
MUSCOGEE (CREEK) NATION
COURT CLERK

vs.

) Case No: SC-2023-10
) (District Court Case No.: CV-2020-34)
)
)
)
)

RHONDA K. GRAYSON and
JEFFREY D. KENNEDY,

Respondents.

Respondents' Objection and Motion for Leave to Respond

This Court's July 23, 2025 Order and Opinion unambiguously instructed the Citizenship Board to issue Respondents' citizenship cards on remand: "The matter is **REMANDED** to the Appellant, Citizenship Board, who is directed to apply the Treaty of 1866 and issue citizenship to the Respondents, and any other future applicant who is able to establish a lineal descendant on the Creek By Blood Dawes Roll, or the Creek Freedmen Dawes Roll." July Opinion at 23.

In fact, this Court's Order and Opinion declared "any reference to 'by blood' citizenship in the 1979 Muscogee (Creek) Nation Constitution to be **UNLAWFUL** and **VOID AB INITIO**," meaning the by blood references were invalid from their inception—as if they never existed.

Therefore, any amendment to the Nation's Constitution, statutes, or regulations is completely unnecessary to carry out this Court's Order and Opinion. Chief Hill's unlawful Executive Order No. 25-05 obstructs and delays enforcement of this Court's decision. It undermines this Court's authority and violates the separation of powers.

Respondents should not have to initiate new litigation to challenge the constitutionality of Executive Order No. 25-05 to secure their citizenship cards—this Court’s Order and Opinion does that without more. Nor should Respondents have to return to the federal courts to seek enforcement of this Court’s Order and Opinion—this Court is the final arbiter of Muscogee (Creek) Nation laws and has spoken. Any effort by the Executive to delay, reinterpret, or disregard a final judgment threatens the rule of law and weakens the constitutional framework that binds the Nation together. If a Principal Chief can openly obstruct compliance with a Court ruling, it invites further erosion of public trust in the independence of the Muscogee (Creek) Nation courts and encourages future executive overreach. Indeed, being allowed to substitute executive will for a judicial mandate undermines the legal system’s ability to function, causing the balance of powers to collapse and executive dominance to replace constitutional governance.

As it stands now, there is no constitutional crisis. But this Court’s orders must be obeyed, and when they are not, the Court must swiftly enforce compliance to protect this Court’s authority, integrity, and independence. Separation of powers principles embedded in both the Muscogee (Creek) Nation and Mvskoke tradition demand it.

To preserve the record on this issue, Respondents respectfully submit this Objection to the continued submission of monthly status reports by the Citizenship Board and request leave of Court to respond fully to the Citizenship Board’s continued delay. Good cause exists for a renewed motion to compel given the position of the Principal Chief.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jana L. Knott", is written over a horizontal line.

Jana L. Knott, MCN #1320
BASS LAW

252 NW 70th St.
Oklahoma City, OK 73116
(405) 262-4040 – Phone/(405) 262-4058 – Facsimile
jana@basslaw.net

Damario Solomon-Simmons, MCN # 354
SOLOMONSIMMONSLAW, PLLC
601 S. Boulder Ave., Ste. 602
Tulsa, Oklahoma 74119
918-551-8999 – Phone/918-558-8039 – Facsimile
dss@solomonsimmons.com

M. David Riggs, MCN # 1239
RIGGS, ABNEY, NEAL, TURPEN ORBISON & LEWIS, P.C.
502 West 6th Street
Tulsa, Oklahoma 74119
(918) 587-3161 – Phone/(918) 587-9708 – Facsimile
driggs@riggsabney.com

Attorneys for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of December 2025, I caused the foregoing *Respondents' Objection and Motion for Leave to Respond* to be transmitted to the following counsel of record via U.S. Mail, postage prepaid:

Rod W. Wiemer
114 North Grand
Okmulgee, OK 74447
Tulsa, OK 74120
rwattys@sbcglobal.net

Geri Wisner
Clinton A. Wilson
Jeremy Pittman
THE MUSCOGEE (CREEK) NATION
OFFICE OF THE ATTORNEY GENERAL
P.O. Box 580
Okmulgee, OK 74447
gwisner@mcnag.com
cwilson@mcnag.com
jpittman@mcnag.com



Jana L. Knott