

FILED

July 13, 2026

SAUK-SUIATTLE TRIBAL COURT

COURT CLERK

IN THE TRIBAL COURT
OF THE SAUK-SUIATTLE INDIAN TRIBE

SAUK-SUIATTLE INDIAN TRIBE)

Plaintiff/Petitioner,

v.

No. SAU-civ-07/26-002

ROBERT FERGUSON, Governor,
State of Washington; **ANGELA**
RAMIREZ, Secretary, or the Acting
Secretary, State of
Washington Department of Social
and Health Services; and **JOHN** and
JANE DOE, employees of the State
Of Washington Department of Social
And Health Services,

Respondents.

**COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF**

INTRODUCTION

This is a complaint in a civil action pursuant to Sauk-Suiattle Indian Tribe Law & Order Code §§ 2.020 and 3.300 seeking a declaration that respondents have unlawfully taken plaintiff's property and converted it their ownership or control in violation of plaintiff's rights and seeking preliminary and permanent injunctions enjoining respondents from taking plaintiff's property.

In support of this complaint, plaintiff alleges as follows.

I. PARTIES

1.A. Plaintiff is the Sauk-Suiattle Indian Tribe, seeking relief for the Tribe.

1 1.B. Respondent Bob Ferguson is the Governor of the State of Washington.

2 1.C. On information and belief Respondent Angela Ramirez is Secretary or Acting
3 Secretary of the State of Washington Department of Social and Health Services.
4

5 1.D. John and Jane Doe are employees or agents of Respondent Ramirez responsible for
6 implementing the taking of Plaintiff's property.

7 II. JURISDICTION

8 2.A. The Court has jurisdiction over this matter pursuant to §§ 2.020 and 3.300 of the Sauk-
9 Suiattle Indian Tribe in that respondents acted contrary to law and are therefore acting *ultra vires*
10 by seizing plaintiff's exclusive tribal property, interfering with internal social relations of the tribe,
11 and impermissibly burdening Plaintiff's free exercise of religion.
12

13 2.B. The Court further has jurisdiction in that the respondents' actions threaten and imperils
14 the health, welfare and economic security of the Sauk-Suiattle Indian Tribe by appropriating tribal
15 property and converting it to their use by reducing respondent's legally required fiscal
16 expenditures.
17

18 2.C. The Court has jurisdiction in that the property taken involves funds generated by
19 plaintiff which respondents intercept and or takes.
20

21 III. FACTUAL ALLEGATIONS

22 3.A. Plaintiff is located in rural North Cascade Mountains, a remote area with limited
23 economic development.

24 3.B. Plaintiff's unemployment and poverty rates are several times the national average.

25 3.C. Plaintiff adheres to customary religion and traditions, which requires:
26
27

1 3.C.a. Participation in ceremonial and funerary events at which plaintiff is obligated
2 to distribute acquired personal property to witnesses.

3 3.C.b. Utilization of property to further the health, welfare, and economic security of the
4 tribe.
5

6 3.C.c. Property distributed by Plaintiff is not the property of an individual but belongs to
7 the tribe to be used for the above purposes.¹ A true copy of a description prepared by former
8 Director of the Washington State Governor's Office of Indian Affairs Willard Bill, Ph.D., is filed
9 herewith as Exhibit A.
10

11 3.C.d. The Potlatch, or "give-away" is a way to accomplish such purposes.

12 3.C.d. Adherents to the customary religion of plaintiff save items of personal property for
13 months or years in order to have an adequate amount to distribute among plaintiff at name-giving,
14 funerals, stone-settings and memorials, and initiations to the longhouse, dance society, and first
15 elk or deer taking. Property is also required to be distributed as honoraria to religious leaders
16 presiding over such events.
17

18 3.C.e. In contemporary times, money or, in plaintiff's language *talə'*, is often used as a
19 substitute or proxy for more tangible physical items.
20

21 3.C.d. Respondents administer programs that contribute funding to low-income eligible
22 state citizens to enable them a bare living to subsist. Most of plaintiff's population are eligible for
23 such program.
24

25
26 ¹ For general description of how property is distributed among Pacific Northwest tribal communities *see* W. Bill,
27 Ph.D., *The Feast System*, (State of Washington Office of Public Instruction) [peunit3thefeastsystem.pdf](#); *See also*,
28 Smithsonian *National Museum of the American Indian*, *Infinity of Nations: Art and History in the Collection of the*
National Museum of the American Indian, [Northwest Coast | Infinity of Nations: Art and History in the Collections](#)
[of the National Museum of the American Indian - George Gustav Heye Center, New York](#)

1 3.C.e. In accordance with the religious beliefs of the tribe, plaintiff periodically distributes
2 nominal property to its citizens of \$300, with the elderly receiving \$450. A true copy of
3 plaintiff's

4
5 X^w salik^w Code is filed herewith as Exhibit B.

6 3.C.f. The property, or *talə'* in lieu of traditional property, is not free for the recipient for
7 their sole and exclusive use, as it is restricted uses authorized by Tribal law and must be used to
8 benefit the community. It is therefore not a "resource" which may be counted against a state
9 citizen's eligibility both because it is so restricted and because it is not a resource available to a
10 participant if expended in the same month.

11
12 3.C.f. Upon learning of receipt of such property, respondents takes it by reducing their
13 eligibility under its program *pro tanto*. On information and belief, respondents do not investigate
14 when or how it is expended.

15
16 3.C.g. The taking of plaintiff's property burdens plaintiff's ability to exercise its religion
17 in that participants in tribal religious practices are unable to afford or accumulate the property
18 necessary to participate in such events.

19
20 IV. CAUSES OF ACTION/CLAIMS FOR RELIEF

21 4.A. Respondents' conduct impermissibly burdens plaintiff's free exercise of religion.

22 4.B. Respondents' conduct threatens and imperils plaintiffs' ability to engage in religion.

23 4.C. Respondents' conduct constitutes theft or conversion of property owned by the tribe.

24 4.D. Respondent's conduct interferes with internal social relations of plaintiff.

25 4.E. The taking of plaintiff's property constitutes unlawful taxing of plaintiff.

1 4.F. Respondent's conduct threatens the health, welfare and economic security of
2 plaintiff's people, reducing them to a discrete level of poverty which plaintiff is attempting to
3 elevate them from as is often done with spot-zoning of neighborhoods.
4

5 V. RELIEF SOUGHT

6 WHEREFORE, plaintiff prays that the Court:

- 7 1. Declare that respondents have violated plaintiff's right to Free Exercise of Religion;
8
9 2. Enter preliminary and permanent injunctions enjoining plaintiff from taking plaintiff's
10 property for respondents' uses described above; and
11
12 3. Enter such other and further relief as is just and equitable.

13 DATED this ____ day of July, 2026.

14 Respectfully submitted,

15 **SAUK-SUIATTLE INDIAN TRIBE**

16 By:

17 S/Dillon Louis Spiess

18 Attorney General

19 S/Jack Warren Fiander

20 Solicitor General

21 Counsel for Plaintiff
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