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11-04-13 P03:55 IN
Betty Jantzen

COPY

IN THE TRIBAL COURT OF THE NOOKSACK TRIBE OF INDIANS
FOR THE NOOKSACK INDIAN TRIBE

ADAMS, et al.,

Appellants,

No. 2013-CI-CL-004

v.

DECLARATION OF RICK D.
GEORGE, TRIBAL COUNCIL VICE
CHAIRMAN

KELLY, et al.,

Appellees.

I, RICK D. GEORGE, declare under penalty of perjury under the laws of the Nooksack Indian Tribe and the State of Washington that the following is true and accurate to the best of my knowledge:

1. I am over the age of eighteen (18), competent to testify about the matters stated herein, and make this declaration of my personal knowledge.
2. I am a member of the Nooksack Indian Tribe and I am currently the Vice Chairman of the Nooksack Tribal Council ("Council"). My fellow Tribal members first elected me into office in 2000. I have served as Vice-Chairman since 2012.
3. I am a named Defendant in this case and I have received all of the pleadings submitted to the Nooksack Tribal Court to date. I have reviewed those pleadings.

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4. On August 8, 2013, Tribal Council convened a special meeting that I attended to consider the Tribal Council Procedures for Involuntary Disenrollment Meetings and twenty-four (24) separate disenrollments for persons who failed to timely request a meeting with the Tribal Council as required by Title 63.

a. The meeting was held at Tribal Council chambers in Deming, WA and commenced at approximately 5:00 p.m.

b. At the outset of the meeting, Tribal Council considered whether to excuse Michelle Roberts and Rudy St. Germain due to a conflict of interest. The vote passed five (5) in favor and none (0) opposed.

c. Following the vote on the conflict, Tribal Council considered numerous other items, including passage of the Tribal Council Procedures for Involuntary Disenrollment Meetings and twenty-four (24) individual disenrollments. Tribal Council passed the above twenty-five (25) actions by a vote of five (5) for, none (0) opposed, and the Chairman did not vote.

5. On October 8, 2013, Tribal Council convened a special meeting to discuss regular business and a litigation update.

a. During this meeting, Tribal Council discussed the history of the BIA approval process with regards to the hiring of attorneys of record and the incorporation of the BIA approval process within in our Tribal Constitution, Art. VI, §1(D), which states: “[t]o employ attorneys of record or representatives, the choice of counsel and fixing of fees to be subject to the approval of the Secretary of Interior.”

1 b. Tribal Council discussed the fact that federal law no longer requires the
2 BIA to approve attorney contracts and salaries.

3 c. Tribal Council considered a resolution interpreting Article VI, §1(D).

4 Given the change in federal law, Tribal Council approved Resolution No.
5 13-156: Secretarial Involvement in Approval of Choice of Counsel and
6 Fixing of Fees. A true and correct copy of Resolution No. 13-156 is
7 attached hereto as **Exhibit A**.

8 6. On October 21, 2013 at approximately 8:04 a.m., I received a notice from
9 Chairman Kelly of a special council meeting to be held via conference call at
10 11:00 p.m. (sic), to which I immediately confirmed my availability. A true and
11 correct copy of the notice and my response is attached hereto as **Exhibit B and C**.

12 a. On October 21, 2013 at approximately 10:36 p.m. I received notice that
13 Secretary St. Germain requested the full 24-hour notice for calling a
14 meeting. A true and correct copy of the notice is attached hereto as
15 **Exhibit D**.

16 b. On October 21, 2013 at approximately 10:48 p.m. I received notice that,
17 due to the request for the full 24-hour notice for calling a meeting, the
18 meeting would now be called on October 22, 2013 at 11:00 a.m.. A true
19 and correct copy of the notice is attached hereto as **Exhibit E**.

20 c. On October 22, 2013, in preparation for the meeting, I was informed that
21 the agenda for the meeting was to include consideration of the Recall
22 Petition submitted by Honorato Robero "Bo" Rapada III. The subject of
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24

1 the petition was Chairman Kelly, and Chairman Kelly would not appear
2 due to the direct conflict of interest.

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- d. On October 22, 2013, I received an electronic mail with an attachment from Chairman Kelly of his response to the Recall Petition. A true and correct copy of Chairman Kelly's written response is attached hereto as **Exhibit F.**
 - e. On October 22, 2013 at approximately 11:00 a.m., Tribal Council convened a meeting via conference call, and all councilmembers were in attendance with the exception of Chairman Kelly.
 - f. At the outset of the meeting, I entertained a motion to send our legal staff, Tribal Attorneys Hurley and Armstrong to the Tribal Council offices with Amiliana Johnny, to open the Recall Petition packet and sort through it. This motion was approved five (5) for, one (1) opposed (Rudy St. Germain).
 - g. At approximately 12:00 p.m., we reconvened the Tribal Council meeting. All members, with the exception of Chairman Kelly, were present (excused/conflict). I entertained a motion to move into executive session.
 - h. During executive session, we discussed the contents of the Recall Petition submission and its defects including the lack of: (1) the mandatory Notice of Petition; (2) a proof of service; and (3) a statement in the rebuttal section of the petition. Tribal Council has previously invalidated petitions for failure to include a Notice of Petition and Proof of Service. Since the

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current Recall Petition submission had several defects, the Tribal Council moved to exit Executive Session.

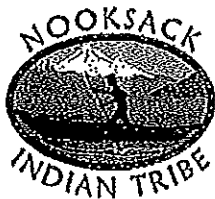
- i. Upon recommencing the regular session, I entertained a motion to reject the Petition for the above-stated reasons and direct that a letter be drafted to the Petitioner, Honorato Robero "Bo" Rapada III. This motion was approved five (5) for, one (1) opposed (Rudy St. Germain).
- j. On October 23, 2013, I signed a Notice of Invalid Petition to be sent to the Petitioner, Honorato Robero "Bo" Rapada III. A true and correct copy of the Notice of Invalid Petition is attached hereto as **Exhibit G**.
- k. To date, the Petitioner, Honorato Robero "Bo" Rapada III, has not filed a written request for reconsideration with the Council.

DATED this 4th day of November 2013, at Deming, Washington.



Rick D. George, Vice-Chairman

Exhibit A



NOOKSACK TRIBAL COUNCIL

4979 MT. Baker Hwy, Suite G.
PO Box 157
Deming, WA 98244

RESOLUTION #13-~~150~~

October 8, 2013

TITLE: SECRETARIAL INVOLVEMENT IN APPROVAL OF CHOICE OF COUNSEL AND FIXING OF FEES

WHEREAS, the Nooksack Tribal Council is the governing body of the Nooksack Tribe of Indians, a recognized tribe under the Treaty of 1855, in accordance with its Constitution and By-Laws approved by the Deputy Assistant Secretary of Indian Affairs on September 24, 1973, and in accordance with the Indian Reorganization Act of June 18, 1934; and

WHEREAS, pursuant to Article VI, Section 1(D) of the Constitution and Bylaws of the Nooksack Indian Tribe, the Council has the power to employ attorneys of record or representatives, the choice of counsel and fixing of fees to be subject to the approval of the Secretary of the Interior; and

WHEREAS, the, prior to 2000, attorney contracts with a tribe had to be in writing and approved in advance by the Secretary of Interior (25 U.S.C. § 81); and

WHEREAS, in the Indian Civil Rights Act, 25 U.S.C. 1331, the Secretary's approval power over attorney contracts was limited so that such contracts were deemed approved if not timely acted upon; and

WHEREAS, Section 16 of the Indian Reorganization Act (IRA) of 1934, 25 U.S.C. 476, under which the Nooksack Constitution was adopted, provides that constitutions under the IRA shall vest in the Tribe the power to employ legal counsel; and

WHEREAS, in 2000, the Indian Tribal Economic Development and Contract Encouragement Act of 2000 replaced Section 81 with a new provision Section 81(2)(f)(1) which repealed the statutory authority and corresponding regulations for approval of attorney contracts; and

WHEREAS, in Supplementary Information regarding the Final Rule on Approval of Contracts with Indian Tribes (Fed. Reg Vol. 66, NO. 144, Page 38924) the BIA stated that if a tribal constitution requires approval, the Secretary will approve or disapprove attorney contracts, with criteria, if any, set forth in the tribal constitution and any relevant federal law, but the Final Rule itself, in 25 CFR 84.005(g), expressly exempts attorney contracts from approval; and

WHEREAS, the BIA further stated that it will defer to the tribe's interpretation of its own laws regarding such approvals; and

Resolution #13-156

Page 1 of 3

Ph: (360) 592-5164  Fx: (360) 592-4506

WHEREAS, the Indian Self-Determination Act provides, in 25 U.S.C. 4501(e)(b)(15), that approval requirements of the acts noted above do not apply to any tribal contract related to self-determination agreements and functions; and

WHEREAS, federal law makes clear that Secretarial approval of attorney contracts is not required and no longer provides the Secretary with criteria to approve or disapprove a Tribe's choice of attorneys or fees; and Article VI, Section 1(D) of the Constitution and Bylaws of the Nooksack Indian Tribe does not establish any criteria for the Secretary of the Interior to approve the Tribe's "choice of counsel" or the "fixing of fees."

NOW THEREFORE BE IT RESOLVED, that the Nooksack Tribal Council interprets Article VI, Section 1(D) of the Constitution and Bylaws of the Nooksack Indian Tribe as not requiring submission to BIA or Secretarial approval of the Nooksack Indian Tribe's "choice of counsel" and "fixing of fees", because the federal authority to select attorneys has been eliminated, selecting counsel and those fees or salaries are approved and budgeted by the Council through its normal process, and the Nooksack Indian Tribe exercises Self-Determination powers; and

BE IT FURTHER RESOLVED, that this Resolution shall be transmitted to the Bureau of Indian Affairs so that the BIA may be aware of the Tribe's interpretation of the laws applicable to the Nooksack Tribal Council's decision to employ counsel and fixing of fees.

BE IT FURTHER RESOLVED, that the Chairman (or Vice-Chairman in his/her absence) is hereby authorized and directed to execute this resolution and any documents connected here within, and the Vice Chairman (or other councilperson in his/her absence) are authorized and directed to execute the following certification.

CERTIFICATION

I, the undersigned do hereby certify that the Nooksack Tribal Council is composed of eight (8) members, of which 6 were present, constituting a quorum of a duly called meeting thereof held on this 8th day of October 2013, and that the above Resolution #13-156 interpreting Secretarial involvement in approval of choice of counsel and fixing of fees was duly enacted by the Council Members vote of: 5 FOR, 0 OPPOSED, and 0 ABSTENTIONS, and since its approval this resolution has not been altered, rescinded, or amended in any way.

Dated this 8th day of October 2013.

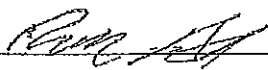

Robert Kelly, Chairman
Nooksack Tribal Council

Resolution #13-156

Page 2 of 3

PH: (360) 592-5164  FX: (360) 592-4506

ATTEST:



Rick D. George, Vice Chairman
Nooksack Tribal Council

Resolution #13- 196

Page 3 of 3

Ph: (360) 592-5164  Fx: (360) 592-4506

Exhibit B

Grett Hurley

From: Bob Kelly
Sent: Monday, October 21, 2013 8:04 AM
To: CouncilMembers
Cc: Grett Hurley; Rickle W. Armstrong
Subject: council meeting

Councilmembers,

I am scheduling a council meeting via conference call for today at 11 pm. This will be an executive session meeting and I will send you the call information before the meeting.

Bob Kelly Jr.
Chairman
Nooksack Indian Tribe
4979 Mt. Baker Highway
PO Box 157
Deming, WA 98244
Office: (360) 592-5164 Cell: (360) 739-4055
Fax: (360) 592-4506
bkelly@nooksack-nsn.gov

Exhibit C

Grett Hurley

From: Rick D. George
Sent: Monday, October 21, 2013 8:05 AM
To: Bob Kelly
Cc: CouncilMembers; Grett Hurley; Rickie W. Armstrong
Subject: Re: council meeting

I'm available

Sent from my iPhone

On Oct 21, 2013, at 8:04 AM, "Bob Kelly" <BKelly@nooksack-nsn.gov> wrote:

Councilmembers,

I am scheduling a council meeting via conference call for today at 11 pm. This will be an executive session meeting and I will send you the call information before the meeting.

Bob Kelly Jr.
Chairman
Nooksack Indian Tribe
4979 Mt. Baker Highway
PO Box 157
Deming, WA 98244
Office: (360) 592-5164 Cell: (360) 739-4055
Fax: (360) 592-4506
bkelly@nooksack-nsn.gov

Exhibit D

Grett Hurley

From: Rudy ST Germain
Sent: Monday, October 21, 2013 10:36 AM
To: Bob Kelly
Cc: CouncilMembers; Grett Hurley; Rickle W. Armstrong
Subject: Re: council meeting

I am available, would like to have liked 24 hr notice. I would request that we meet in person rather than over the phone.

Sent from my iPhone

On Oct 21, 2013, at 8:04 AM, "Bob Kelly" <BKelly@nooksack-nsn.gov> wrote:

Councilmembers,

I am scheduling a council meeting via conference call for today at 11 pm. This will be an executive session meeting and I will send you the call information before the meeting.

Bob Kelly Jr.
Chairman
Nooksack Indian Tribe
4979 Mt. Baker Highway
PO Box 157
Deming, WA 98244
Office: (360) 592-5164 Cell: (360) 739-4055
Fax: (360) 592-4506
bkelly@nooksack-nsn.gov

Exhibit E

Grett Hurley

From: Bob Kelly
Sent: Monday, October 21, 2013 10:48 AM
To: CouncilMembers
Cc: Charity Bernard
Subject: Council meeting

Councilmembers,

I apologize for the confusion, but I had hoped that we could have met today for an emergency meeting, but I have one council member that stated that they would have preferred to have had 24 hour notice of the meeting. Therefore, I am calling an executive session meeting of the Tribal Council for 10/22/2013, at 11am via conference call.

You will be receiving the call information for tomorrow's meeting later today.

Bob Kelly Jr.
Chairman
Nooksack Indian Tribe
4979 Mt. Baker Highway
PO Box 157
Deming, WA 98244
Office: (360) 592-5164 Cell: (360) 739-4055
Fax: (360) 592-4506
bkelly@nooksack-nsn.gov

Exhibit F

Bob Kelly Jr.

4979 Mt. Baker Highway, Deming, WA 98244
Phone: (360) 739-4055 bkelly@nooksack-nsn.gov

Date: October 22, 2013

Nooksack Tribal Council
4979 Mt. Baker Highway
Deming, WA 98244

Dear Councilmembers,

You are meeting today in my absence to review a recall petition and I would like to focus your attention to section 60.02.030, which is the Notice section in the Title 60 Constitutional Petition Ordinance.

60.02.030 Notice of Petition.

An individual circulating a Petition shall provide the council member subject to recall with notice of the Petition.

- A. The notice must be in writing and provide an exact duplicate of the Petition with the statement described in Section 60.02.020(E). The notice shall also include a copy of Title 60 and clearly inform the council member that he or she has fourteen (14) calendar days from the date of receipt to provide a rebuttal and failure to provide a rebuttal within the timeline provided will result in the Petition being circulated without the council member's rebuttal. The notice shall also contain the Petitioner's return physical and/or mailing address for the council member to serve the rebuttal.

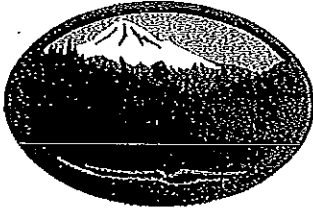
The recall packet that I was served with did not contain a written notice as is required in section 60.02.030 in the ordinance. The packet did not contain a letter or memo that clearly informs me what I am required to do with the many pages of information that I was served with. For the reason stated, I believe that the recall petition is not fit to form and the recall petition should be rejected.

Sincerely,



Bob Kelly Jr.
Chairman
Nooksack Indian Tribe

Exhibit G



Nooksack Indian Tribe

October 23, 2013

Honorato Robero "Bo" Rapada III
2537 Mariah Place
Everson WA 98247

Re: NOTICE OF INVALID PETITION

Dear Mr. Rapada,

On September 20, 2013, you submitted to the Nooksack Tribal Council Secretary two receipts for certified mail and fourteen (14) separate packets containing a "Statement of Basis for Recall of Nooksack Tribal Council Chairman Robert Kelly" each stapled to a "Nooksack Tribal Recall Petition" that contained signatures.

On Tuesday, October 22, 2013, the Council reviewed your petition. The Council, as the petition review board must review the sufficiency of the petition and it has determined the petition does not meet the requirements of Title 60 for the following reasons:

1. Your petition did not contain the statement required by Title 60, Section 60.02.050, if no rebuttal is attached to the petition.

Title 60, Section 60.02.050 "Circulating the Petition" requires the following:

After the time period for a rebuttal has expired, if the Petitioner received a rebuttal, the Petitioner shall place the rebuttal as provided by the council member, in the Petition in the space provided. Additional sheets may be attached if necessary in order to provide the full rebuttal. *If no rebuttal is provided, the Petitioner shall state that no rebuttal was received in the time required by law.* Thereafter, the Petitioner may begin circulating the Petition to tribal members. (Emphasis added).

When no rebuttal is submitted, Title 60 requires the petitioner to state on the petition form that "no rebuttal was received in the time required by law." Your petition did not contain a rebuttal provided by the council member in the petition and it did not contain the statement specifically required by Title 60, Section 60.02.050 in the absence of a rebuttal. The requirement of Title 60, Section 60.02.050 was not met.

2. Chairman Kelly did not receive proper notice as required by Title 60.

Title 60, § 60.02.030(A) "Notice of Petition" requires the following:

An individual circulating a Petition shall provide the council member subject to recall with notice of the Petition.

- A. The notice must be in writing and provide an exact duplicate of the Petition with the statement described in Section 60.02.020(B). The notice shall also include a copy of Title 60 and clearly inform the council member that he or she has fourteen (14) calendar days from the date of receipt to provide a rebuttal and failure to provide a rebuttal within the timeline provided will result in the Petition being circulated without the council member's rebuttal. The notice shall also contain the Petitioner's return physical and/or mailing address for the council member to serve the rebuttal.

On October 22, 2013, the Council received a letter from Chairman Kelly, the council member subject to your recall petition. The letter states that Chairman Kelly did not receive the written notice mandated by § 60.02.030(A) and "[t]he packet did not contain a letter or memo that clearly informs me what I am required to do with the many pages of information that I was served with." A true and correct copy of the letter is enclosed with this notice.

Your petition did not establish that you provided Mr. Kelly the written notice required by Title 60 § 60.02.030. Nowhere in your petition is there proof that Chairman Kelly was served with the written notice required by Title 60, Section 60.02.030(A) that clearly informs Mr. Kelly of the time frame to respond, the consequences of not responding in a timely manner, how he is to serve a rebuttal along with an exact duplicate of the Petition with the statement described in Section 60.02.020(B) and a copy of Title 60.

Based on the letter from Chairman Kelly and the lack of any proof the written notice as required by Title 60 was delivered to Chairman Kelly, the mandatory notice provisions of Title 60, § 60.02.030(A) were not met.

3. Proof of service was not provided at the time the petition was returned.

Title 60, Section 60.02.030 (B) states:

- B. The notice of the council member subject to the recall shall be personally served or sent certified mail, return receipt requested. The individual circulating the notice shall provide a proof of service at the time the Petition is returned to the Tribal Council Secretary.

Section 60.02.030(B) requires proof of service to be returned with your petition. Proof of service was not provided when your petition was returned. Your petition only contained: (1) two receipts evidencing that a certified mail was purchased and addressed to Robert Kelly Jr. and (2) incomplete petitions. Based on what was returned, the Council is unable to determine if and/or when you served Chairman Kelly with any notice, more importantly, the proper and legal notice

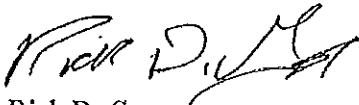
as required under Title 60, Section 60.02.030(A). Proof of service as required under Title 60 was not met.

The Council, acting as the petition review board, must reject your petition for the above stated reasons. The Council does not make any decision on the sufficiency of the remainder of your petition.

Title 60, § 60.03.050(A) describes the procedures for when a petition is deemed invalid and how to request a reconsideration of the decision. It states:

If the Council determines the Petition does not meet the requirements of this Title, the Petition will be deemed invalid. The Petitioner will be notified of the decision and reasons for the determination within five (5) calendar days. The Petitioner may file a written request to the Council for reconsideration. The request must be made within five (5) calendar days of receipt of the notification of an invalid Petition. The request must offer specific reasons supported by evidence as to why the Council should reconsider its decision. Any decision by the Council will be final. (Emphasis added).

Sincerely,



Rick D. George
Vice-Chairman

Encl: Chairman Kelly Letter dated October 22, 2013

Cc: Chairman Robert Kelly, Jr.

Bob Kelly Jr.

4979 Mt. Baker Highway, Deming, WA 98244
Phone: (360) 739-4055 bkelly@nooksack-nsn.gov

Date: October 22, 2013

Nooksack Tribal Council
4979 Mt. Baker Highway
Deming, WA 98244

Dear Councilmembers,

You are meeting today in my absence to review a recall petition and I would like to focus your attention to section 60.02.030, which is the Notice section in the Title 60 Constitutional Petition Ordinance.

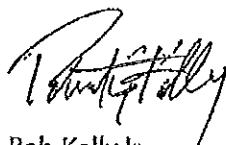
60.02.030 Notice of Petition.

An individual circulating a Petition shall provide the council member subject to recall with notice of the Petition.

- A. The notice must be in writing and provide an exact duplicate of the Petition with the statement described in Section 60.02.020(E). The notice shall also include a copy of Title 60 and clearly inform the council member that he or she has fourteen (14) calendar days from the date of receipt to provide a rebuttal and failure to provide a rebuttal within the timeline provided will result in the Petition being circulated without the council member's rebuttal. The notice shall also contain the Petitioner's return physical and/or mailing address for the council member to serve the rebuttal.

The recall packet that I was served with did not contain a written notice as is required in section 60.02.030 in the ordinance. The packet did not contain a letter or memo that clearly informs me what I am required to do with the many pages of information that I was served with. For the reason stated, I believe that the recall petition is not fit to form and the recall petition should be rejected.

Sincerely,



Bob Kelly Jr.
Chairman
Nooksack Indian Tribe

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IN THE TRIBAL COURT OF THE NOOKSACK TRIBE OF INDIANS FOR THE
NOOKSACK INDIAN TRIBE

Case No. _____

DECLARATION OF SERVICE

I Declare:

That I am over the age of 18 years and competent to be a witness.

On October 24, 2013, I duly mailed by first class mail, certified return receipt requested, the original NOTICE OF INVALID PETITION to Galanda Broadman PLLC, Attn: Gabriel Galanda, P.O. Box 15146, Seattle, WA 98115. A true and correct copy of said NOTICE is attached hereto.

I declare under the penalty of perjury, under the laws of Nooksack Indian Tribe, that the foregoing is true and correct.

Signed at Deming, Washington on October 24, 2013.

Charity Bernard
Charity Bernard, Paralegal
Office of Tribal Attorney
Nooksack Indian Tribe



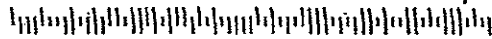
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Nooksack Indian Tribe
Office of Tribal Attorney
Attn: Charity Bernard
P.O. Box 63
Deming, WA 98244

recall petition

44006363



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature X <i>Micahell</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Alice Hall</i></p> <p>C. Date of Delivery <i>10/25/13</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Galandia Broadman PLLC Attn: Gabriel Galanda P.O. Box 15146 Seattle, WA 98115</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (transfer from service label)</p>	<p>7011 1570 0002 2985 8532</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-11-1540</p>	

7011 1570 0002 2985 8532

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only, No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.11

Stamp: DEMING WA 98244, 00242013

Sent To: Galandia Broadman PLLC
Attn: Gabriel Galanda
P.O. Box 15146
Seattle, WA 98115

PS Form 3810, August 2009