

NOOKSACK TRIBAL COURT
NOOKSACK INDIAN TRIBE
AUG 05 2016
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IN THE NOOKSACK TRIBAL COURT OF APPEALS

ELEANOR J. BELMONT, OLIVE T.
OSHIRO, enrolled members of the Nooksack
Indian Tribe, including MICHELLE JOAN
ROBERTS, et al.,

Plaintiffs and Counterclaim
Defendants,

v.

ROBERT KELLY, Chairman of the Nooksack
Tribal Council, et al.,

Defendants and
Counterclaimants,

v.

ELEANOR J. BELMON, OLIVE T.
OSHIRO, enrolled members of the Nooksack
Indian Tribe, including MICHELLE JOAN
ROBERTS, et al.,

Third-Party Defendants.

NO. 2014 -CI-CL-007

DECLARATION OF MICHELLE JOAN
ROBERTS IN SUPPORT OF MOTION
TO EXPAND INJUNCTION

I, Michelle Joan Roberts, hereby depose and state as follows:

1. I am the above-named, enrolled Nooksack Tribal member and a direct descendant of Annie George. I am over the age of 18, have knowledge of the facts herein, and am competent testify. I am one of the named plaintiffs in Case No. 2014-CI-CL-007, pending in Nooksack Tribal Court.
2. Attached as **Exhibit A** is a true and correct copy of the Motion For Injunction and related Declarations I filed with the Tribal Court starting on July 1, 2016.
3. Attached as **Exhibits B and C** are true and correct copies of my recent emails with the Court Clerk, Betty Leathers.

1 4. Attached as **Exhibit D** is a true and correct copy of a Notice of Withdrawal
2 signed by Ray Dodge while he was the new Nooksack Chief Judge. As the appended envelope
3 indicates, the Notice was mailed from the Nooksack Office of Tribal Attorney.

4 5. Attached as **Exhibit E** is a true and correct copy of a letter from our now
5 Nooksack business-licensed lawyers, Garvey Schubert Barer, to Ray Dodge.

6 6. Attached as **Exhibit F** is a true and correct copy of a letter and petition that is
7 being circulated by Defendants, to disenroll me and my family, the Nooksack 306.”

8 7. Attached as **Exhibit G** is a true and correct copy of papers recently filed by
9 Garvey Schubert Barer in support of their March 14, 2016, motion to gain admission to the
10 Nooksack Tribal Bar, in order to represent me and the other Plaintiffs in this action.

11 8. On March 7, 2016, I visited the Nooksack Tribal Court and spoke with Court
12 Clerk Betty Leathers, inquiring about how to become a non-lawyer advocate for the Plaintiffs
13 in this action, as allowed by NTC 10.02.030. Betty referred me to Charity Bernard, the Tribal
14 Council’s Chief-of-Staff. I then went to see Charity, who told me that I would need to receive
15 a Nooksack business license before the Court could consider admitting me as an advocate.

16 9. Although it seemed strange that not owning a business of any kind, I would need
17 to be business licensed, I asked Charity for the business license application form. But she said
18 it was not yet complete; she said it was in draft, with the Office of Tribal Attorney. Charity said
19 until the form was complete, I could not apply for a business license, and until I got a business
20 license, I could not submit the form to become an advocate.

21 10. I later emailed Ray Dodge and Rickie Armstrong, on March 9 and March 16,
22 2016, in request of the business license application form, but neither of them ever emailed me
23 back. Attached as **Exhibit H** is a true and correct copy of my email strand to Ray and Rickie.
24 I have not since been able to get any straight answers about becoming a non-lawyer advocate
25 for myself and the other Plaintiffs in this action.

1 I declare under penalty of perjury under the laws of the Nooksack Tribe and the State of
2 Washington the foregoing is true and correct.

3 Dated this 4th day of August, 2016, at Deming, Washington.

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Michelle J. Roberts, *Pro Se*

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EXHIBIT A

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JUL 13 2016

Office of Tribal Attorney
Nooksack Indian Tribe

personal service

NOOKSACK TRIBAL COURT
NOOKSACK INDIAN TRIBE

JUL 1 2016

11:13 a.m.

REJECTED

CODE: _____ CLERK: *JA*

IN THE NOOKSACK TRIBAL COURT

ELEANOR J. BELMONT; OLIVE T. OSHIRO,
enrolled members of the Nooksack Indian Tribe;
and FRANCINE ADAMS; ANTHONY
ADAMS; BRINA ALDREDGE; BRITTANY
ALDREDGE; NORMA ALDREDGE;
ANGELITA AURE; DOE AURE; CHELSEA
BAKER; KELSEA BAKER; PRICILLA
BAKER; JERIC BAKER; FLORENTINO
BARRIL; CALEB BARRIL-BOTHELL;
CATHALINA BARRILL; BILLIE BARTLE;
ADAM BELLO; EILEEN BELLO; PATRICK
BELLO JR.; ELIZABETH BELLO; PATRICK
BELLO; ELPIDO BELLO JR.; EUGENA
BELLO; JOSEPH BELLO; LUCAS BELLO;
NICHOLAS ELPEDIO BELLO; DOMINIC
BELLO; RICHARD BELLO; DIONNE
BENNETT; OLIVA BOTHELL; KIRK
BROWN; CHRISTINA BUMATAY; ANDREA
BUMATAY; ROBERT BUMATAY; ANDREW
BUMATAY; JAMES BUMATAY; JONATHAN
BUMATAY; BARTON BUMATAY; ANGELA
BUMATAY; NOELANI BUMATAY-
JEFFERSON; MARIAH BUMATAY-
JEFFERSON; CAROL CAILING; DONNA
CAILING; KEITH CAILING; NEVEAH
CAILING; ANITA CAMPBELL;
ALEXANDREA CARR; LEE CARR;
PRICILLA CARR; ROBLEY CARR; ANNA
CARR; QUOLIA CARR; VANESSA
CASIMIR; CHRISSA CASONO; NINA
CHOW; KYLE COBLE; LISA COBLE;
STEVE COBLE; SEAN COLEMAN; GILDA
CORPUZ; PEDRO CORPUZ; VICTORINO
CORPUZ; CHRISTINA CORPUZ-PEATO;
JORDAN CRAIN; ROLAND CUATERO;
NARCISCO CUNANAN; DONALD
EDWARDS; BRIONNA ERICKSON; SETH
ERICKSON; TERESA ERICKSON;

NO. 2014-CI-CL-007

MOTION FOR INJUNCTION

Note for motion: July 14, 2014

1 CORPUZ; PEDRO CORPUZ; VICTORINO
CORPUZ; CHRISTINA CORPUZ-PEATO;
2 JORDAN CRAIN; ROLAND CUATERO;
NARCISCO CUNANAN; DONALD
3 EDWARDS; BRIONNA ERICKSON; SETH
ERICKSON; TERESA ERICKSON;
4 MICHAEL FAULKS; VICTORIA FRANZ;
ROMA FURUTA; ELEANOR GABRIEL;
5 JESSICA GABRIEL; ZARIA GABRIEL;
AVRILYN GABRIEL; REGINALD
6 GABRIEL; AYL A GARDIPE; DANCHO
GARDIPE; DAVID GARDIPE; DONNA
7 GASPAR; GUADALUPE GASPAR; JADE
GASPAR; JESUS GASPAR; ASIA GILYARD;
8 LEONARD GLADSTONE; LOIS
GLADSTONE; MIKALA GLADSTONE;
9 RICHARD GLADSTONE; TYRONE
GLADSTONE; MAILE GOMEZ-RABANG;
10 MALAKAI GRIFFETH; MALIA GRIFFETH;
MARIE HADDOW; MIRANDA HADDOW;
11 DOLLY HADDOW; TINA HANCOCK;
AMYA HART; ANITA HART; CHARLOTTE
12 HART; DESTINE HART; EDARAY HART;
JENNIFER HART; KIANA HART; LINDA
13 HART; PHILLIP L. HART; TAYSHUAN
HART; ROSE HERNANDEZ; KIMBERLY
14 ISEDA; AUNDREA JAHR; KAYLEENA-
RAY JAHR; JUANITA JAVIER; MANUEL
15 JAVIER; SATURNINO JAVIER; ANDREW
JEFFERSON; JOSEPH JEFFERSON;
16 KALEIOLANI JEFFERSON; JOHNNY
JENSEN; MAXIMO KAUFFMAN; MARC
17 ANTHONY KAUFFMAN; CAMERON
LAWRENCE; SONIA LOMIELI; ADRIAN
18 LOPEZ JR.; ADRIAN LOPEZ SR.; ARSENIO
LOPEZ; BERTA LOPEZ (RABANG); TRINA
19 LOPEZ (HARO); TRENT LOUGHNANE;
KIYOMIE MARSHALL; CARLOS MIGUEL;
20 LAWRENCE MIGUEL; MATIAS MIGUEL;
RONALD MIGUEL III; RONALD MIGUEL
21 JR.; TONI MIGUEL; JUSTIN MUNDEN;
ANGELINE NARTE; DANTE NARTE;
22 FRAZER NARTE; JAIME NARTE; JENAIA
NARTE; KAILEE NARTE; MARIO NARTE
23 JR.; MARIO NARTE; MICAH NARTE;
RUBY NARTE; ANTONIO NARTE JR.;
24 PHILLIP D. NARTE; ANTONIO NARTE;

1 CALEB NARTE; CODY NARTE; ELISAH
2 NARTE; ANDREW NICOL; TERIA ANN
3 NICOL; ROY NICOL; ALEXANDER NICOL-
4 MILLS; DUSTIN OSHIRO; ELIZABETH
5 OSHIRO; KIYOSHI OSHIRO; MATTHEW
6 OSHIRO; OLIVIA OSHIRO; TIANA
7 OSHIRO; STEVEN PARK; EDMUND PARK;
8 ADELINA PARKER; MALIA PEATO;
9 PATELESIO PEATO; SOFIA PEATO;
10 KUAIKA PELETI; RENE PELETI; TINO
11 PELETI; MORENO PERALTA; ARIEL
12 PHILLIPS; JOSHUA PHILLIPS; SAMSON
13 PHILLIPS; AILINA RABANG; SELIA
14 RABANG; SHALENE RABANG; CLARA
15 RABANG; LEONARD RABANG; MAXINA
16 RABANG; MIANA RABANG; REANNA
17 RABANG; TYRONE RABANG JR.; TYRONE
18 RABANG; WILLIAM RABANG; ANGEL
19 RABANG; ANGELITA RABANG;
20 ANTHONY RABANG; BRIANNA RABANG;
21 DOMINGO A. RABANG SR.; DOMINGO F.
22 RABANG; FRANCISCA L.G. RABANG;
23 FRANCISCA S. RABANG; FRANCISCO A.
24 RABANG; FRANCISCO D.G. RABANG;
25 FRANCISCO RABANG JR.; GINA RABANG;
JAMES RABANG; LAJUNE RABANG;
MARTINO RABANG; MICHAEL RABANG;
QUI-SEENUM RABANG; RACHEL
RABANG; ROBERT JAMES RABANG III;
ROBERT JAMES RABANG JR.; ROBERT
JAMES RABANG SR.; SANTANA RABANG;
TIERRA RABANG; TINA RABANG;
CARCIONE RABANG; SUNSIE RABANG;
WILLIAM RABANG JR.; SHARON
RABANG-BROWN; ALEXINA RABANG-
COLEMAN; ALLEN RAPADA; ANDREW
RAPADA; BART RAPADA; CALVIN
RAPADA; DANIEL FRED RAPADA;
DANIEL FELIX RAPADA; DARRELL
RAPADA; EMILY RAPADA; GERALD
RAPADA; HONORATO RAPADA III;
HONORATO RAPADA; JAMES RAPADA;
KIMBERLY RAPADA; MELISSA RAPADA;
MILDRED RAPADA; RECONAR RAPADA;
RECONAR G.B. RAPADA; SONIA
RAPADA; TIERRA RAPADA; ZACK
RAPADA; NADINE RAPADA; ANGELA

1 RAPADA; BETSIEBO RAPADA; CATALINA
2 RENTERIA; MARCELLINA RENTERIA;
3 SYLVIA RENTERIA; VINCENT RENTERIA;
4 ALLEN RICHAMIRE; VERONICA
5 RICHMIRE; ANGELO RITUALO; DIANA
6 (MONA) RITUALO; FELIPE RITUALO;
7 TERESA RITUALO; BRITTINIE ROBERTS;
8 MICHELLE JOAN ROBERTS; RAFFINAND
9 ROBERTS; DEANNA ROMERO; RUDY
10 ROMERO; EMMANUAL ROMERO-
11 DANCEL; KRISTOFFER SILVA; SEVINA
12 SILVA; TYLER SILVA; ENZO SIOSON;
13 JULIETTE SIOSON; ROCCO SIOSON;
14 DEBBIE SMITH (NARTE); ALEX ST.
15 GERMAIN; BREANNA ST. GERMAIN;
16 RUDY ST. GERMAIN; TAYLOR ST.
17 GERMAIN; TERRY ST. GERMAIN JR.;
18 ROSE TOVAR; AND JOCELYN TOVAR;
19 CHERYL TRAINOR; KRISTAL TRAINOR,
20 individually and on behalf of their minor
21 children, enrolled members of the Nooksack
22 Indian Tribe,

23 Plaintiffs,

24 v.

25 ROBERT KELLY, Chairman of the Nooksack
Tribal Council; RICK D. GEORGE, Vice-
Chairman of the Nooksack Tribal Council;
AGRIPINA SMITH, Treasurer of the Nooksack
Tribal Council; BOB SOLOMON,
Councilmember of the Nooksack Tribal
Council; KATHERINE CANETE,
Councilmember of the Nooksack Tribal Council
and Nooksack General Manager; AGRIPINA
"LONA" JOHNSON, Councilmember of the
Nooksack Tribal Council; ELIZABETH KING
GEORGE, Enrollment officer of the Nooksack
Tribal Council; ROY BAILEY, Enrollment
officer of the Nooksack Tribal Council, in their
personal and official capacities,

Defendants.

Nooksack Indian Tribe, a federally recognized
Indian tribal government, Third-Party Plaintiff,

1

v.

2

ELEANOR J. BELMONT; OLIVE T.
3 OSHIRO, enrolled members of the Nooksack
Indian Tribe; and FRANCINE ADAMS;
4 ANTHONY ADAMS; BRINA ALDREDGE;
BRITTANY ALDREDGE; NORMA
5 ALDREDGE; ANGELITA AURE; DOE
AURE; CHELSEA BAKER; KELSEA
6 BAKER; PRICILLA BAKER; JERIC BAKER;
FLORENTINO BARRIL; CALEB BARRIL-
7 BOTHELL; CATHALINA BARRILL; BILLIE
BARTLE; ADAM BELLO; EILEEN BELLO;
8 PATRICK BELLO JR.; ELIZABETH BELLO;
PATRICK BELLO; ELPIDO BELLO JR.;
9 EUGENA BELLO; JOSEPH BELLO; LUCAS
BELLO; NICHOLAS ELPEDIO BELLO;
10 DOMINIC BELLO; RICHARD BELLO;
DIONNE BENNETT; OLIVA BOTHELL;
11 KIRK BROWN; CHRISTINA BUMATAY;
ANDREA BUMATAY; ROBERT
12 BUMATAY; ANDREW BUMATAY; JAMES
BUMATAY; JONATHAN BUMATAY;
13 BARTON BUMATAY; ANGELA
BUMATAY; NOELANI BUMATAY-
14 JEFFERSON; MARIAH BUMATAY-
JEFFERSON; CAROL CAILING; DONNA
15 CAILING; KEITH CAILING; NEVEAH
CAILING; ANITA CAMPBELL;
16 ALEXANDREA CARR; LEE CARR;
PRICILLA CARR; ROBLEY CARR; ANNA
17 CARR; QUOLIA CARR; VANESSA
CASIMIR; CHRISSE CASONO; NINA
18 CHOW; KYLE COBLE; LISA COBLE;
STEVE COBLE; SEAN COLEMAN; GILDA
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CORPUZ; CHRISTINA CORPUZ-PEATO;
20 JORDAN CRAIN; ROLAND CUATERO;
NARCISCO CUNANAN; DONALD
21 EDWARDS; BRIONNA ERICKSON; SETH
ERICKSON; TERESA ERICKSON;
22 MICHAEL FAULKS; VICTORIA FRANZ;
ROMA FURUTA; ELEANOR GABRIEL;
23 JESSICA GABRIEL; ZARIA GABRIEL;
AVRILYN GABRIEL; REGINALD
24 GABRIEL; AYL A GARDIPE; DANCHO

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MOTION FOR INJUNCTION - 5

1 GARDIPE; DAVID GARDIPE; DONNA
GASPAR; GUADALUPE GASPAR; JADE
2 GASPAR; JESUS GASPAR; ASIA GILYARD;
LEONARD GLADSTONE; LOIS
3 GLADSTONE; MIKALA GLADSTONE;
RICHARD GLADSTONE; TYRONE
4 GLADSTONE; MAILE GOMEZ-RABANG;
MALAKAI GRIFFETH; MALIA GRIFFETH;
5 MARIE HADDOW; MIRANDA HADDOW;
DOLLY HADDOW; TINA HANCOCK;
6 AMYA HART; ANITA HART; CHARLOTTE
HART; DESTINE HART; EDARAY HART;
7 JENNIFER HART; KIANA HART; LINDA
HART; PHILLIP L. HART; TAYSHUAN
8 HART; ROSE HERNANDEZ; KIMBERLY
ISEDA; AUNDREA JAHR; KAYLEENA-
9 RAY JAHR; JUANITA JAVIER; MANUEL
JAVIER; SATURNINO JAVIER; ANDREW
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11 JENSEN; MAXIMO KAUFFMAN; MARC
ANTHONY KAUFFMAN; CAMERON
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LOPEZ JR.; ADRIAN LOPEZ SR.; ARSENIO
13 LOPEZ; BERTA LOPEZ (RABANG); TRINA
LOPEZ (HARO); TRENT LOUGHNANE;
14 KIYOMIE MARSHALL; CARLOS MIGUEL;
LAWRENCE MIGUEL; MATIAS MIGUEL;
15 RONALD MIGUEL III; RONALD MIGUEL
JR.; TONI MIGUEL; JUSTIN MUNDEN;
16 ANGELINE NARTE; DANTE NARTE;
FRAZER NARTE; JAIME NARTE; JENAIA
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18 RUBY NARTE; ANTONIO NARTE JR.;
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NARTE; ANDREW NICOL; TERIA ANN
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MILLS; DUSTIN OSHIRO; ELIZABETH
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OSHIRO; OLIVIA OSHIRO; TIANA
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24 PELETI; MORENO PERALTA; ARIEL

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3 RABANG; MIANA RABANG; REANNA
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4 RABANG; WILLIAM RABANG; ANGEL
RABANG; ANGELITA RABANG;
5 ANTHONY RABANG; BRIANNA RABANG;
DOMINGO A. RABANG SR.; DOMINGO F.
6 RABANG; FRANCISCA L.G. RABANG;
FRANCISCA S. RABANG; FRANCISCO A.
7 RABANG; FRANCISCO D.G. RABANG;
FRANCISCO RABANG JR.; GINA RABANG;
8 JAMES RABANG; LAJUNE RABANG;
MARTINO RABANG; MICHAEL RABANG;
9 QUI-SEENUM RABANG; RACHEL
RABANG; ROBERT JAMES RABANG III;
10 ROBERT JAMES RABANG JR.; ROBERT
JAMES RABANG SR.; SANTANA RABANG;
11 TIERRA RABANG; TINA RABANG;
CARCIONE RABANG; SUNSIE RABANG;
12 WILLIAM RABANG JR.; SHARON
RABANG-BROWN; ALEXINA RABANG-
13 COLEMAN; ALLEN RAPADA; ANDREW
RAPADA; BART RAPADA; CALVIN
14 RAPADA; DANIEL FRED RAPADA;
DANIEL FELIX RAPADA; DARRELL
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RAPADA; HONORATO RAPADA III;
16 HONORATO RAPADA; JAMES RAPADA;
KIMBERLY RAPADA; MELISSA RAPADA;
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ALLEN RICHAMIRE; VERONICA
21 RICHMIRE; ANGELO RITUALO; DIANA
(MONA) RITUALO; FELIPE RITUALO;
22 TERESA RITUALO; BRITTINIE ROBERTS;
MICHELLE JOAN ROBERTS; RAFFINAND
23 ROBERTS; DEANNA ROMERO; RUDY
ROMERO; EMMANUAL ROMERO-
24 DANCEL; KRISTOFFER SILVA; SEVINA

1 SILVA; TYLER SILVA; ENZO SIOSON;
2 JULIETTE SIOSON; ROCCO SIOSON;
3 DEBBIE SMITH (NARTE); ALEX ST.
4 GERMAIN; BREANNA ST. GERMAIN;
5 RUDY ST. GERMAIN; TAYLOR ST.
6 GERMAIN; TERRY ST. GERMAIN JR.;
7 ROSE TOVAR; AND JOCELYN TOVAR;
8 CHERYL TRAINOR; KRISTAL TRAINOR,
9 individually and on behalf of their minor
10 children, enrolled members of the Nooksack
11 Indian Tribe,

12 Third-Party Defendants.

13
14 On April 15, 2016, I filed a motion with the Nooksack Court of Appeals seeking “a writ
15 of mandamus directed to the members of the Tribal Council because the Tribal Council’s failure
16 to appoint a judge to preside over [this] lawsuit.” *Belmont v. Kelly*, No. 2014-CI-CL-007, at 2
17 (Nooksack Ct. App. June 28, 2016) [hereinafter “COA Order”]. The Court of Appeals granted
18 my motion, holding:

- 19 (1) The Defendants’ purported amendment of N.T.C. § 10.00.100(b) “is unconstitutional and,
20 *a fortiori*, without legal effect.” *Id.* at 2.
- 21 (2) If the Tribal Council’s failure to appoint a judge to preside over this lawsuit leads to
22 disenrollment before the Tribal Court has adjudicated and entered a final judgment on the
23 legality of the threatened disenrollment, the Tribal Court’s failure to appoint a judge to
24 preside over this lawsuit would constitute a violation of the Plaintiffs’ rights to equal
25 protection and due process under the Constitution of the Nooksack Indian Tribe. *Id.*
- (3) Plaintiffs threatened with an injury to their constitutional rights of equal protection and
due process as a result of the Tribal Council’s failure to appoint a judge to preside over
this lawsuit are entitled to an injunction. *Id.* at 3.
- (4) A writ of mandamus directed to the Tribal Council is be an appropriate remedy to prevent
Plaintiffs in this suit from being deprived of their constitutional rights of equal protection
and due process. *Id.*

26 The Court of Appeals then issued the following relief to me: “Accordingly, we hereby
27 order that the Tribal Council either appoint in a timely fashion a judge to adjudicate Petitioner’s
28 challenge to her threatened disenrollment or in the alternative to refrain from taking any further

1 action to disenroll her.” *Id.* The Court of Appeals granted this relief because “the Tribal Council
2 is threatening to disenroll the [me] from the Tribe.” *Id.* at 2.

3 Plaintiffs in this action “are 272 enrolled members of the Nooksack Indian Tribe who are
4 subject to disenrollment proceedings” and are similarly threatened with disenrollment. *Belmont*
5 *v. Kelly*, No. 2014-CI-CL-007, at 1 (Nooksack Tribal Ct. Jan. 26, 2016). Thus, all Plaintiffs in
6 this action are entitled to the same relief. *See e.g. LCS Servs., Inc. v. Caperton*, 965 F. Supp.
7 847, 852 (N.D.W. Va. 1997) (“This Court finds that the preliminary injunction encompasses all
8 defendants similarly situated . . .”).²

9 Thus, I respectfully request that this Court issue an injunction that encompasses all
10 persons similarly situated—*i.e.* all Plaintiffs—and that Defendants be ordered “to refrain from
11 taking any further action to disenroll” **all Plaintiffs** until Defendants “appoint in a timely
12 fashion” a judge to adjudicate this action. COA Order, at 3.

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14 _____
15 Michelle Roberts, *Pro Se*
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20 _____
21 ² In addition, currently pending before this Court is Plaintiffs’ Emergency Motion for Mandamus, wherein Plaintiffs
22 request that “the Court issue a writ of mandamus ordering” a constitutionally required election “in an *expeditious*
23 and equitable manner.” Emer. Mot. Writ Mand., *Belmont v. Kelly*, No. 2014-CI-CL-007, at 8 (Nooksack Tribal Ct.
24 Jan. 29, 2016) (emphasis added). On February 12, 2016, this Court held that motion in abeyance “until after the
Court of Appeals disposes of any and all timely requests for interlocutory appeal” related to an Order issued which
upheld Plaintiffs’ right to vote in any election. *Belmont v. Kelly*, No. 2014-CI-CL-007, at 2 (Nooksack Tribal Ct.
Feb. 12, 2016). On April 26, 2016, the Nooksack Court of Appeals disposed of Defendants’ request for
interlocutory appeal, thus terminating the abeyance issued by this Court. *Belmont v. Kelly*, No. 2014-CI-CL-007, at
2 (Nooksack Ct. App. Apr. 26, 2016). In the interim, though, Defendants “removed the presiding trial judge and
ha[ve] thus far failed to appoint a new judge.” COA Order, at 1. Plaintiffs are entitled to the requested relief for this
reason as well.

DECLARATION OF SERVICE

I, Wilma K. Rabang, say:

1. I am over eighteen years of age and am competent to testify, and have personal knowledge of the facts set forth herein.

2. Today, I caused the foregoing document to be filed with the referenced court and served via U.S. certified mail, and emailed to:

Office of Tribal Attorney
Nooksack Indian Tribe
5047 Mt. Baker Hwy
P.O. Box 63
Deming, WA 98244

The foregoing statement is made under penalty of perjury under the laws of the Nooksack Tribe and the State of Washington and is true and correct.

DATED this 30th day of June, 2016.

 7-1-16
WILMA K. RABANG

RECEIVED

JUL 13 2016

Office of Tribal Attorney
Nooksack Indian Tribe

personal service

NOOKSACK TRIBAL COURT
NOOKSACK INDIAN TRIBE

JUL 13 2016

TIME: 11:50 AM PM
FILED BY: _____ CLERK: *BS2*

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IN THE NOOKSACK TRIBAL COURT

ELEANOR J. BELMONT; et al.,

Plaintiffs,

v.

ROBERT KELLY; et al.,

Defendants.

NOOKSACK INDIAN TRIBE, a federally
recognized Indian tribal government, Third-
Party Plaintiff,

v.

ELEANOR J. BELMONT; et al.,

Third-Party Defendants.

NO. 2014-CI-CL-007

DECLARATION OF WILMA K.
RABANG

I, Wilma K. Rabang, say:

1. I am the above-named wife of an enrolled Nooksack Tribal member who is a direct descendent of Annie George. I am over eighteen years of age, I am competent to testify, and I have personal knowledge of the facts set forth herein.

2. On Friday, ^{*JULY WKR*} ~~June 1~~, 2016 at about 1:30 PM, I attempted to pick up a filed copy of the attached Motion for Injunction with the Tribal Court on behalf of Michelle Roberts. Michelle had left the Motion with the Court Clerk earlier in the day.

DECLARATION OF WILMA K. RABANG - 1

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IN THE NOOKSACK TRIBAL COURT

ELEANOR J. BELMONT; et al.,

Plaintiffs,

v.

ROBERT KELLY; et al.,

Defendants.

NOOKSACK INDIAN TRIBE, a federally
recognized Indian tribal government, Third-
Party Plaintiff,

v.

ELEANOR J. BELMONT; et al.,

Third-Party Defendants.

NO. 2014-CI-CL-007

DECLARATION OF MICHELLE
ROBERTS

I, Michelle Joan Roberts, say:

1. I am the above-named enrolled Nooksack Tribal member and a direct descendent of Annie George. I am over eighteen years of age, I am competent to testify, and I have personal knowledge of the facts set forth herein.

2. On Friday morning, June 1, 2016, I attempted to file a Motion for Injunction with the Tribal Court. I left the Motion with Court Clerk Betty Leathers, and asked Billie Rabang to visit the Courthouse later in the day to see if the Clerk had accepted the Motion.

From: **Michelle Roberts** <michelle.roberts3012@gmail.com>
Date: Fri, Jul 8, 2016 at 10:34 AM
Subject: Re: Hearing date
To: Betty Leathers <bleathers@nooksack-nsn.gov>, "dfrancis@nooksack-nsn.gov" <dfrancis@nooksack-nsn.gov>
Cc: "Rickie W. Armstrong" <rarmstrong@nooksack-nsn.gov>

Betty, Rickie,
I'd like also to have all of my prior pending motions heard (default, election mandamus, injunction, contempt, etc.-- there are at least four others) so please allow enough time.

Those other motions have been on hold since at least March. It seems most efficient to have everything heard at once.

Thanks again.

On Friday, July 8, 2016, Michelle Roberts <michelle.roberts3012@gmail.com> wrote:
Betty just checking in with you to see if you came up with any dates, when we had talked weds you said you were still working on it.

Also, when replying could you also attach a copy of the current Title 10?

I appreciate your time and look forward to hear from you soon.
Michelle Roberts

On Wednesday, July 6, 2016, Michelle Roberts <michelle.roberts3012@gmail.com> wrote:
Could you let me know what date is available for a motion to be heard so Rickie and I could schedule it?

Thank you,
Michelle Roberts

EXHIBIT A

Begin forwarded message:

From: "Rickie W. Armstrong" <rarmstrong@nooksack-nsn.gov>
Date: July 6, 2016 at 7:44:45 AM PDT
To: 'Michelle Roberts' <michelle.roberts3012@gmail.com>
Subject: RE: Hearing date

Hi Michelle,

I am just returning to the office today. The Court date you indicated in your email does not appear to be a regularly scheduled date for motions, was this a date given to you by the clerk's office? If not, please check with the clerk's office for several possible dates and get back to me with those dates in an effort to satisfy the conferral requirement.

Regards,

Thank you,

Rickie Wayne Armstrong

Tribal Attorney

Office of Tribal Attorney

Nooksack Indian Tribe

5047 Mt. Baker Hwy

P.O. Box 63

Deming, WA 98244

Phone: 360-592-4158 Ext. 3352

Fax: 360-592-2227

Cel: 360-303-6738

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From: Michelle Roberts [mailto:michelle.roberts3012@gmail.com]
Sent: Saturday, July 02, 2016 9:35 AM
To: Rickie W. Armstrong
Cc: Deanna Francis; Betty Leathers; Charity Bernard
Subject: Hearing date

Rickie,

Billie is attempting to file a motion for me with the Tribal Court. Betty has rejected the motion, in part because she says we didn't confer with you about our requested hearing date of July 14. In our experience the Clerk typically gives us court dates that we can then confer about with you, so this is a different process. It has also been pretty hard to get any cooperation from your office. Still, we are trying. Let us know about the 14th please. Thank you.

Michelle

EXHIBIT B



Hearing date

1 message

----- Forwarded message -----

From: Betty Leathers <BLEathers@nooksack-nsn.gov>
Date: Mon, Jul 11, 2016 at 7:30 AM
Subject: RE: Hearing date
To: Michelle Roberts <michelle.roberts3012@gmail.com>

We are trying to make arrangements for a pro tem judge to hear these matters. At the present time, we cannot set these matters for hearing.

As for title 10 you will need to do paper work from the Council House to request the Title 10

From: Michelle Roberts [mailto:michelle.roberts3012@gmail.com]
Sent: Friday, July 08, 2016 10:34 AM
To: Betty Leathers <BLEathers@nooksack-nsn.gov>; Deanna Francis <DFrancis@nooksack-nsn.gov>
Cc: Rickie W. Armstrong <rarmstrong@nooksack-nsn.gov>
Subject: Re: Hearing date

Betty, Rickie,

I'd like also to have all of my prior pending motions heard (default, election mandamus, injunction, contempt, etc.--there are at least four others) so please allow enough time.

Those other motions have been on hold since at least March. It seems most efficient to have everything heard at once.

Thanks again.

On Friday, July 8, 2016, Michelle Roberts <michelle.roberts3012@gmail.com> wrote:

Betty just checking in with you to see if you came up with any dates, when we had talked weds you said you were still working on it.

Also, when replying could you also attach a copy of the current Title 10?

I appreciate your time and look forward to hear from you soon.

Michelle Roberts

On Wednesday, July 6, 2016, Michelle Roberts <michelle.roberts3012@gmail.com> wrote:

Could you let me know what date is available for a motion to be heard so Rickie and I could schedule it?

Thank you,

Michelle Roberts

Begin forwarded message:

From: "Rickie W. Armstrong" <rarmstrong@nooksack-nsn.gov>
Date: July 6, 2016 at 7:44:45 AM PDT
To: 'Michelle Roberts' <michelle.roberts3012@gmail.com>
Subject: RE: Hearing date

Hi Michelle,

I am just returning to the office today. The Court date you indicated in your email does not appear to be a regularly scheduled date for motions, was this a date given to you by the clerk's office? If not, please check with the clerk's office for several possible dates and get back to me with those dates in an effort to satisfy the conferral requirement.

Regards,

Thank you,

Rickie Wayne Armstrong

Tribal Attorney

Office of Tribal Attorney

Nooksack Indian Tribe

5047 Mt. Baker Hwy

P.O. Box 63

Deming, WA 98244

Phone: 360-592-4158 Ext. 3352

Fax: 360-592-2227

Cel: 360-303-6738

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IRS CIRCULAR 230 DISCLOSURE: The views expressed herein or in any attachments hereto are not intended to constitute a "reliance opinion" under applicable treasury regulations, and accordingly are not intended or written to be used, and may not be used or relied upon, for the purposes of (a) avoiding tax-related penalties that may be imposed by the IRS or (b) promoting, marketing or recommending to another party any tax-related matters addressed herein.

From: Michelle Roberts [mailto:michelle.roberts3012@gmail.com]
Sent: Saturday, July 02, 2016 9:35 AM
To: Rickie W. Armstrong
Cc: Deanna Francis; Betty Leathers; Charity Bernard
Subject: Hearing date

Rickie,

Billie is attempting to file a motion for me with the Tribal Court. Betty has rejected the motion, in part because she says we didn't confer with you about our requested hearing date of July 14. In our experience the Clerk typically gives us court dates that we can then confer about with you, so this is a different process. It has also been pretty hard to get any cooperation from your office. Still, we are trying. Let us know about the 14th please. Thank you.

Michelle

EXHIBIT C



Re: Pending motions

1 message

Michelle Roberts <michelle.roberts3012@gmail.com>
To: Betty Leathers <BLEathers@nooksack-nsn.gov>

Mon, Aug 1, 2016 at 2:18 PM

Hi again, Betty.

Are we any closer to getting a pro tem assigned and having our motions heard? It's now been almost two months since Ray became the Chief Judge, on or around June 13 best I can tell, so we don't understand what's taking so long.

Please let me know when you can.

Thanks again,

Michelle

On Tuesday, July 26, 2016, Betty Leathers <BLEathers@nooksack-nsn.gov> wrote:

We are making arrangements for a pro tem judge to hear matters that Ray Dodge is conflicted out of, and we anticipate getting finalization – the matters will be scheduled for hearings soon.

From: Michelle Roberts [mailto:michelle.roberts3012@gmail.com]
Sent: Tuesday, July 26, 2016 12:33 PM
To: Betty Leathers <BLEathers@nooksack-nsn.gov>
Subject: Re: Pending motions

Hi again, Betty.

I've not heard back from you about hearing dates. Again, these motions have now been pending for a really long time. One motion was filed in February. I've communicated with you and Rickie to schedule a hearing now for the last several weeks, but with no success. We also don't know if Ray or somebody else is our Judge. Please reply to let me know if or when these motions can finally be heard, and by who.

Thank you,

Michelle

On Tue, Jul 19, 2016 at 12:37 PM, Michelle Roberts <michelle.roberts3012@gmail.com> wrote:

Betty,

Are you now able to set a hearing on my motions? They have been pending for far too long.

Also, the family and I got withdrawal notices from Ray that were mailed out from the tribal attorney's office.

Is he the new chief judge? Nobody at the court has yet answered this question.

If he is the new judge, and he has now withdrawn as counsel, will he be presiding over our cases?

Please let us know. We need to know who's who and what's what.

Thank you,

Michelle

EXHIBIT D

NOOKSACK TRIBAL COURT
NOOKSACK INDIAN TRIBE
JUL 7 2016
TIME: 2:50 AM (EM)
FILED BY: (M) CLERK: BJR

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

Belmont, *et al.*,

Petitioner,

v.

Kelly, *et al.*,

Respondent.

No. 2014-CI-CL-007

NOTICE OF WITHDRAWAL


TO: THE CLERK OF THE COURT

AND TO: All parties through their counsel of record

PLEASE TAKE NOTICE that effective immediately, Raymond G. Dodge Jr. hereby
withdraws as counsel for Respondents in the above-captioned action.

This withdrawal of counsel shall be effective as of this date.

SUBMITTED this 7th day of July, 2016



Raymond G. Dodge Jr., WSBA # 16020

Office of Tribal Attorney
P.O. Box 63
Deming, WA 98244

pickup



*REC'D
7/14/2016*

Florentino Barril 0930

Anthony Adams 0816

Francine Adams 0814

Tyrone Rabang 0824

Tyrone Rabang 0872

P.O. Box 545
Deming, WA 98244-0545
USA

982440545 B007

EXHIBIT E



SEATTLE OFFICE
eighteenth floor
second & seneca building
1191 second avenue
seattle, washington 98101-2939
TEL 206 464 3939 FAX 206 464 0125

anchorage, alaska
beijing, china
new york, new york
portland, oregon
washington, d.c.
GSBLAW.COM

GARVEY SCHUBERT BAREF

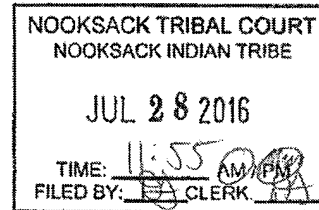
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

Please reply to JUDITH A. ENDEJAN
jendejan@gsblaw.com
TEL EXT 1351

VIA HAND DELIVERY AND U.S. MAIL

July 28, 2016

Ray Dodge
Nooksack Tribal Court
4971 Deming Road
Deming, WA 98244



Re: *Belmont v. Kelly*, No. 2014-CI-CL-007
Kelly v. Kelly, No. 2016-CI-CL-001
Tageant v. Kelly, No. 2016-CI-CL-003
Galanda v. Bernard, No. 2016-CI-CL-002
Gladstone v. Kelly, No. 2016-CI-CL-004

Dear Mr. Dodge:

We plan to represent the plaintiffs in *Belmont v. Kelly*, No. 2014-CI-CL-007, once we are admitted to practice before the Nooksack Tribal Court. David Smith and I have applied for admission to the Nooksack Tribal Court and have fulfilled the admission prerequisites, including obtaining a business license. On July 12, 2016, we supplemented our initial Motion for Admission to the Nooksack Tribal Court Bar, originally filed on March 14, 2012, to supply our business license and to request a hearing date. We are awaiting a hearing date from the Nooksack Tribal Court on this Motion, as well as all of the pending Motions in *Belmont*.

We have learned that you have been appointed as the Chief Judge of the Nooksack Tribal Court. Prior to this appointment, you were the Senior Tribal Attorney for the Nooksack Tribe and Tribal Council and represented or counseled the named defendants in the five actions cited above. All of these cases are interrelated and deal with the Nooksack Tribal Council's efforts to disenroll Nooksack Tribal members and/or retaliate against those Tribal members who support the targets of the Tribal Council's unlawful disenrollment actions. Indeed, you recently filed a withdrawal notice in a couple, but not all, of these actions in which you were involved or orchestrated as Senior Tribal Attorney. Curiously, you did so while you were the Chief Judge, yet through the Nooksack Office of Tribal Attorney.

We are, therefore, writing to request that you formally recuse yourself from any involvement in the above-cited five cases, including administrative involvement. You are disqualified from assuming any role, or responsibility, in these cases according to the Washington Code of Judicial Conduct as well as the Tribal Code of Judicial Conduct.



Your recusal is required under the Washington Code of Judicial Conduct, Rule 2.11(A)(1) and (6). Rule 2.11(A)(6) requires a judge to disqualify himself if

- (a) [the judge] served as a lawyer in the matter in controversy or was associated with a lawyer who participated substantially as a lawyer for material witness in the matter during such association;
- (b) served in governmental employment, and in such capacity participated personally and substantially as a public official concerning the proceeding, or has publicly expressed in such capacity an opinion concerning the merits of the particular matter in controversy.

Rule 2.11(A)(1) requires disqualification if “[t]he judge has a personal bias or prejudice concerning a party or a party’s lawyer, or personal knowledge of facts that are in dispute in the proceeding.”

Based upon your conduct while serving as Tribal attorney and advocate for the defendants there can be no question that you have a personal bias or prejudice against all of the plaintiffs named in the above-cited five cases or that you have personal knowledge of facts that are in dispute in this proceeding. Furthermore, the model Tribal Code of Judicial Conduct, produced by the National Tribal Justice Center, states in Judicial Rule 3 that “**a judge shall perform the duties of judicial office impartially and diligently.**” Subsection (E)(1) of Rule 3 states:

A judge shall disqualify himself or herself in a proceeding in which the judge’s impartiality might reasonably be questioned, including but not limited to instances where:

- (a) the judge has a personal bias or prejudice concerning a party or a party’s lawyer or has personal firsthand knowledge of disputed evidentiary facts concerning the proceeding;
- b) the judge served as a lawyer in the matter in controversy or a lawyer with whom the judge previously practiced served during such association as a lawyer concerning the matter, or the judge has been a material witness concerning it.

Given your extensive involvement with crafting the defendants’ positions and, advising them and directing the course of this litigation, the plaintiffs were alarmed to learn of your appointment as the Chief Judge of the Nooksack Tribal Court and the possibility that you might make decisions that impact them and their cases. Therefore, your recusal is essential in the above-cited five cases.

Our clients are troubled that during the last six weeks you have been back at the Nooksack Tribal Court, they have been unable to schedule any hearing in *Belmont*, even before a Nooksack Judge Pro Tem. It seems to them that you are working with the former Nooksack Tribal Council to delay the assignment of a Pro Tem, just like you worked with the former Tribal Council to delay the March 19, 2016, election.

Your failure to recuse from all aspects of the five cases, including administrative aspects, would perpetuate the denial of due process and lack of justice accorded to the plaintiffs by the former Council and its Court, which now appears to be nothing but a puppet of that Council. If you do not expressly recuse yourself from each of the above-cited five actions, we will bring this failure to recuse to the



GARVEY SCHUBERT BARER

Ray Dodge
July 28, 2016
Page 3

attention of the Nooksack Court of Appeals, the Washington State Commission on Judicial Conduct and the disciplinary authorities at the Washington State Bar Association.

Accordingly, we request written evidence from the Nooksack Tribal Court that shows you will adhere to the Judicial Codes of Conduct referenced above and have and will not have any involvement whatsoever in any of the five cases that are pending before Nooksack Tribal Court.

Very truly yours,

GARVEY SCHUBERT BARER

Judith A. Endejan

cc: David Smith
Gabe Galanda
Michelle Roberts
Carmen Tageant
Deborah Alexander
Robert Gladstone

EXHIBIT F

Dear Nooksack Tribal Member,

Are you tired of the 306 disenrollment issue dragging on for more than three years in tribal court? Do you want to bypass the court case and bring the 306 disenrollment issue before the Nooksack people to resolve by membership vote?

The enclosed petition is being circulated to gather signatures so we can bring the 306 disenrollment to a before the tribe's membership of the Nooksack Tribe. We currently have about 100 signatures and if we get 522 people to sign the petition we can have an election to vote on disenrolling the 306.

To learn more about the 306 issue, please click the following link and read the inspiring comments left by Nooksack Tribal members who have been dealing with the 306's fraudulent enrollment for the past 30 years. <https://www.change.org/p/nooksack-tribe>

Be a part of Nooksack history and sign the enclosed petition and mail it back to us in the self-addressed return envelope. Please contact us at nooksacktribe@gmail.com if you have any questions.

Thank you for your support!

Nooksack Strong Referendum Committee

... have been asked informing them that they do not meet the membership criteria outlined in the constitution. Instead of providing the tribe with the requested documentation needed to show that they are of Nooksack descent, the 306 chose to sue our tribe and stall the issue. The only thing that has been proven in court is that the 306 lied on their enrollment forms and that they are not Nooksack people who they do not descend from.

EXHIBIT G

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IN NOOKSACK TRIBAL COURT
NOOKSACK INDIAN TRIBE
DEMING, WASHINGTON

ELEANOR J. BELMONT, et al.,

Plaintiffs and Counterclaim
Defendants,

vs.

ROBERT KELLY, Chairman of the Nooksack
Tribal Council, et al.,

Defendants and
Counterclaimants.

NO. 2014-CI-CL-007

**SUPPLEMENT TO MOTION, ORDER
AND ADVOCATE'S OATH TO ADMIT
TO THE NOOKSACK TRIBAL COURT
BAR**

REQUEST FOR HEARING

**REQUEST FOR COPY OF CURRENT
NOOKSACK TRIBAL COURT RULES**

On March 14, 2016, Judith A. Endejan and David Smith filed a Motion, Order and Advocate's Oath to Admit to the Nooksack Tribal Court Bar and the Declaration of Judith A. Endejan that explained why her firm, Garvey Schubert Barer ("GSB"), was unable to obtain a business license to provide services on the Nooksack Reservation ("License").

As soon as it was possible to apply for a License, GSB did so. Attached is a true and correct copy of the License issued on July 6, 2016.

Therefore, all prerequisites for admission to the Nooksack Tribal Bar have been satisfied, and Mr. Smith and Ms. Endejan request that their March 14, 2016, Motions be scheduled for hearing. If no hearing is necessary, they request that their Motions to Admit be granted.

Further GSB requests a copy of the current Title 10, which governs Nooksack Tribal Court. GSB understands that Title 10 was amended in February and April 2016. GSB wishes

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to ensure compliance with all "applicable tribal laws" and therefore needs a copy of all such laws.

DATED: July 12, 2016

Respectfully submitted,
GARVEY SCHUBERT BARER

By: *Judith A. Endejan*
Judith A. Endejan, WSBA #11016
David Smith, WSBA #10721
1191 2nd Ave., Ste. 1800
Seattle, WA 98101
206-464-3939
jendejan@gsblaw.com
dsmith@gsblaw.com

1 **CERTIFICATE OF SERVICE**

2 I hereby certify under penalty of perjury under the laws of the Nooksack Tribe and the
3 State of Washington that:

4 1. I am over the age of 18 and have knowledge of the facts stated herein;

5 2. On the date below I caused the foregoing Supplement to Motion Supplement To
6 Motion, Order And Advocate's Oath To Admit To The Nooksack Tribal Court Bar; Request
7 For Hearing; And Request For Copy Of Current Nooksack Tribal Court Rules to be filed with
8 the referenced court; and

9 3. I caused the same document to be served on the following parties in the manner
10 indicated:

11 Rickie Armstrong, Tribal Attorney
12 Nooksack Indian Tribe
13 Office of Tribal Attorney
14 PO Box 63
15 5047 Mt. Baker Hwy
16 Deming, WA 98244
17 Email: ramstrong@nooksack-nsn.gov

Via Email and Regular U.S. Mail

18 Thomas P. Schlosser
19 Morisset Schlosser Jozwiak
20 801 2nd Ave
21 Seattle, WA 98104-1576
22 Email: t.schlosser@msaj.com

Via Email

23 DATED July 12, 2016, at Seattle, Washington.

24 
25 Judith A. Endejan
26



ATTACHMENT



NOOKSACK INDIAN TRIBE
BUSINESS LICENSE

Business Name: Garvey Schubert Barer

License Number: 2016-BL701-A

Trade Name(s):

Business Address: 1191 Second Ave., Ste. 1800
Seattle, WA 98101

Period of Validity:

July 6, 2016—July 7, 2017

TERMS OF LICENSE: Licensee shall comply with all applicable tribal laws; Licensee consents to jurisdiction of Nooksack Tribal Court as to any cause of action in connection with the transaction of business conducted (or tortious acts committed) on tribal lands; Licensee consents to service of process pursuant to Nooksack Tribal Code, Title 54.

Issued this 6th day of July, 2016.



Katherine Canete, General Manager
Nooksack Indian Tribe

EXHIBIT H



Re: draft form and follow up question

1 message

Michelle Roberts <michelle.roberts3012@gmail.com>

Thu, Mar 17, 2016 at 11:04 AM

To: Ray Dodge <rdodge@nooksack-nsn.gov>, "Rickie W. Armstrong" <rarmstrong@nooksack-nsn.gov>

Ray & Rickie,

Could you verify that you have received my email, it has been 8 days since I asked about the status of the business form. Also I wanted to ask how can the Council pass a resolution without having a process in place to allow for members and businesses to adhere to?

I understand that you work for the Tribe as a whole to protect the integrity of the legal process and advise the Council accordingly, so my question is; did you advise them on what the correct and ethical process would be? This action appears to be discriminating to a select group and needs to be remedied as soon as possible.

I appreciate your prompt attention to my question and concerns.

Best regards,
Michelle Roberts

On Wed, Mar 9, 2016 at 2:58 PM, Michelle Roberts <michelle.roberts3012@gmail.com> wrote:

Good afternoon,

I am following up with you as Charity said that you guys were still drafting the business license form, I understand from her that it has been in draft form for 4 months now and was curious as to when you think it will be available for members and businesses to apply for this license. Also can you tell me if every business on Nooksack land has to have a business license, I am unclear on who needs one and who is exempt.

Also she said that the Advocate/Spokesperson form no longer is processed through her and that she thought it would go through your office still. Just want to get the proper procedures on how to apply and if it is necessary for a business license. I really don't understand why a "business" license is needed to be an Advocate/Spokesperson in looking at the definition of *business*, it states "a person's regular occupation, profession, or trade" for profit or payment and this is not my occupation, profession or trade and not being paid. Maybe you can help clarify the need for this license in this case.

I appreciate your time and help with my questions.

Michelle Roberts