



NATIVE AMERICAN RIGHTS FUND

Annual Report 2023



The Native American Rights Fund Statement on Environmental Sustainability

“It is clear that our natural world is undergoing severe, unsustainable, and catastrophic climate change that adversely impacts the lives of people and ecosystems worldwide. Native Americans are especially vulnerable and are experiencing disproportionate negative impacts on their cultures, health, and food systems. In response, the Native American Rights Fund (NARF) is committed to environmental sustainability through its mission, work, and organizational values. Native Americans and other Indigenous Peoples have a long tradition of living sustainably with the natural world by understanding the importance of preserving natural resources and respecting the interdependence of all living things. NARF embraces this tradition through its work and by instituting sustainable office practices that reduce our negative impact on our climate and environment. NARF is engaged in environmental work and has established a Green Office Committee whose responsibility is to lead and coordinate staff participation in establishing and implementing policies and procedures to minimize waste, reduce energy consumption and pollution, and create a healthful work environment.”

Tax Status: The Native American Rights Fund (NARF) is a nonprofit, charitable organization incorporated in 1971 under the laws of the District of Columbia. NARF is exempt from federal income tax under the provisions of Section 501(c)(3) of the Internal Revenue code. Contributions to NARF are tax deductible. The Internal Revenue Service has ruled that NARF is not a “private foundation” as defined in Section 509(a) of the Internal Revenue Code. NARF was founded in 1970 and incorporated in 1971 in Washington, D.C.

Boulder Office (main)

250 Arapahoe Avenue
Boulder, CO 80302-5821
303-447-8760
www.narf.org

Anchorage Office

745 West 4th Avenue,
Suite 502
Anchorage, Alaska 99501-1736
907-276-0680

Washington DC Office

950 F Street, NW
Suite 1050
Washington, DC 20004-1491
202-785-4166

COVER AND PHOTOGRAPHY

QUANNAH CHASINGHORSE: is a Han Gwich'in and Sicangu/Oglala Lakota land protector, climate justice activist, and fashion model from Eagle Village, Alaska, and the Tribes of South Dakota. Born on the Navajo Nation, she is the daughter of Jody Potts-Joseph and the granddaughter of Mike and Adeline Potts. As a young girl, Quannah lived on Navajo homelands, as her mother finished college, and then Mongolia, before returning to her maternal homelands in Alaska. She was raised hunting, fishing, dog mushing, and living a subsistence lifestyle with her mother and two brothers. Quannah's deep connection to her homelands and her people's way of life is her grounding and guiding force as a land protector and climate justice activist. Quannah is apprenticing as a traditional tattoo practitioner under her mother Jody.

Signing with IMG Models has exponentially increased her platform to uplift Indigenous peoples' representation, beauty, voices, stories, and ways of life on a global stage through fashion and media. Quannah has worked with the top global fashion houses and has graced the covers of Vogue Mexico, Vogue's Climate Issue, Vogue China, Outside Magazine, V Magazine, Elle, Porter Magazine, National Geographic, and Allure's annual Best of Beauty issue. She has appeared in international editions of Harper's Bazaar and Vogue, and has attended the Met Gala three years in a row.

Through all of Quannah's accomplishments and journeys, her most important work is upholding and uplifting her Indigenous values, remaining true to herself, her people, and her homelands. Quannah stays grounded by making time to connect with her family, her people, her homelands, and with her Indigenous colleagues and allies engaged in fashion and activism.

JODY POTTS-JOSEPH: Jody Potts-Joseph is Han Gwich'in and lives in Eagle Village, Alaska, where she serves on the Eagle Tribal Council. She also serves on the Board of Directors of Doyon Limited, a regional Alaska Native Corporation for the Athabaskan people of Interior Alaska. Her career focuses on the well-being

TABLE OF CONTENTS

Executive Director’s Report.....	3
Board Chair’s Message.....	4
Board of Directors.....	5
Introduction.....	6
Preserve Tribal Existence.....	7
Protect Tribal Natural Resources.....	10
Promote Human Rights.....	18
Hold Governments Accountable.....	25
Develop Indian Law.....	27
FY 2023 Financial Report.....	28
Contributions.....	29
NARF Staff.....	34

Cover and Photography (cont.):

of Native peoples, in both the public and private sector. Her work in public safety led her to serve on the Public Safety Program at Tanana Chiefs Conference, as the Vice Chair of the Governor’s Tribal Advisory Council for the State of Alaska, as a board member for the Alaska Council for Domestic Violence and Sexual Assault, and to co-found Data for Indigenous Justice. Her work in protecting Indigenous ways of life led her to serve as a board member for the Alaska Wilderness League and as a member of the Eastern Interior Regional Advisory Council to the Federal Subsistence Board.

Jody is a traditional tattoo practitioner, revitalizing a traditional practice of her people. She has participated in the Indigenous Tattoo Festival and also studied under Keone Nunes in Hawaii. She is an active hunter, fisher, trapper, and dog musher, with her husband and sons on the Yukon River. Potts-Joseph holds a Bachelor of Science in Applied Indigenous Studies and Environmental Management from Northern Arizona University.

SULU’APE KEONE NUNES: As a Native Hawaiian growing up in the 60s, 70s, and 80s Sulu’ape Keone was fortunate to have sat and learned from Kupuna (elders) from his family and the Hawaiian community. Although there were many subjects that were discussed, one focus was the information about Uhi (Hawaiian tattoo). This has been a focus of Keone since the late 1980s. Keone has been doing uhi since 1990 with machines. In 1996, Keone met Su’a Sulu’ape Paulo, originally from Apia, Samoa, but who lived in Auckland, New Zealand. This meeting laid the foundation for Keone to be able to do uhi as it was done for over 1,000 years in Polynesia with traditional tools. Keone studied under Su’a Sulu’ape Paulo until his passing in 1999. He has been doing work exclusively with traditional Polynesian tools since 2000. In 2001, Keone was honored with a title from the family of Su’a Sulu’ape Paulo. He was the first Hawaiian to receive the Sulu’ape title and among the first non-Samoans to receive this prestigious title.

Sulu’ape Keone has been a primary force in the re-establishment of uhi in the Hawaiian community. He has shared his thoughts on designs, techniques, and the cultural importance of Hawaiian uhi in Europe, Asia, Polynesia, and the continental United States. He has worked with the Karuk, Yurok, Tolowa, and Hupa Native American communities in Northern California for nearly 20 years, helping them to recover their tattoo traditions. He has taught, graduated, and mentored Natives of Hawai’i, the Philippines, Taiwan (Paiwan Tribe), Aotearoa (Māori), and Tahiti.

Sulu’ape Keone was named #22 of the 101 Most Influential People in Tattooing in the world in 2012 by the late Bob Baxter former editor for Skin and Ink magazine, and former Editor-in-Chief for Tattooroadtrip.com. Some of Keone’s carvings and tattoo tools have been featured and are in the collections of such institutions as the Bishop Museum, the Smithsonian Institute, Honolulu Art Museum, Oakland Museum of California, and the Museum of New Zealand Te Papa Tongarewa. Along with his passion for uhi, Keone has been a past crewmember and protocol officer for the Polynesian Voyaging Society’s voyaging canoe Hokule’a and Hawai’iloa.

EXECUTIVE DIRECTOR'S REPORT



John E. Echohawk
Executive Director

2023 was the 53rd year that the Native American Rights Fund has served as the national Indian legal defense fund providing legal advice and assistance to Tribes, Native organizations and individuals in cases of major significance across the country. Once again, we were proud to be able to help our Native American clients achieve several significant legal victories and accomplishments during the year.

Council of Native American Churches and the Native American Church of North America for four decades.

The Turtle Mountain Band of Chippewa Indians, the Spirit Lake Nation and Native voters successfully challenged North Dakota's legislative redistricting plan on the basis that it diluted the Native American vote in violation of the Voting Rights Act. A remedial redistricting map has been implemented for the 2024 elections in North Dakota.

The Mandan, Hidatsa and Arikara (MHA) Nation and individual Native voters intervened in a lawsuit by two individuals seeking to eliminate the majority-Native state legislative district encompassing the MHA Nation. The constitutional challenge to this district was dismissed.

The Tohono O'odham, Gila River Indian Community and future Native voters successfully filed a lawsuit that challenged an Arizona law requiring documentary proof of residency to vote. The law had been passed despite the known lack of addressing on homes on tribal lands in Arizona. The court held that the proof of address requirement is preempted under the National Voter Registration Act and that no one is required to have a street address to register in any election.

In Nebraska, the Winnebago and Omaha Tribes successfully challenged the Thurston County Board of Supervisors' redistricting plan that disregarded Native voters, who comprise a majority of the county, by only providing effective Native voter majorities for three of the seven supervisor districts. Under the Voting Rights Act and the U. S. Constitution, a favorable consent decree provided for four majority-Native voter districts.

A settlement agreement in 2015 between some Alaska Native Villages and the State of Alaska required a comprehensive language assistance program to enforce the statutory guarantee of language assistance under Section 203 of the Voting Rights Act. Unfortunately, Alaska has never meaningfully complied with the settlement, so the Villages requested an extension of the settlement agreement and it was extended to 2026.

The Organization of American States (OAS) approved the American Declaration on the Rights of Indigenous Peoples in 2016. We have been representing NCAI and calling for the OAS to fully carry out its plan to implement the American Declaration. The OAS General Assembly recently approved a resolution to create a body to monitor the implementation of the American Declaration.

The U.S. Supreme Court in *Brackeen v. Haaland* upheld the constitutionality of the Indian Child Welfare Act passed by Congress in 1978 to address the mass removal of Indian children from their families, communities, and Tribes. The authority of Congress to pass the Act was challenged by a small coalition of anti-tribal interests.

In Alaska, the Environmental Protection Agency denied a permit for the proposed Pebble Mine at the headwaters of the largest salmon-producing river in Bristol Bay that many Tribes in the area depend on for sustainable salmon runs. On the Arctic National Wildlife Refuge Coastal Plain, many Tribes who depend on the Porcupine Caribou Herd for subsistence were threatened by oil and gas development, but the Department of the Interior announced the cancellation of all remaining oil and gas leases in the Arctic Refuge.

We continue to represent the National Congress of American Indians (NCAI) at the international level through the United Nations Framework Convention on Climate Change. At the recent Conference of the Parties 28, we participated in the Indigenous Caucus preventing the approval of the Article 6.4 market approach where projects threatening Indigenous rights are approved.

After President Biden restored the Bears Ears National Monument, the State of Utah filed suit against him alleging he abused his authority under the Antiquities Act. We intervened in the case on behalf of the Hopi, Zuni and Ute Mountain Ute Tribes and helped get the case dismissed.

After several years of effort, we were able to help the Indigenous Peyote Conservation Initiative acquire 605 acres of land in Texas for use of peyote for religious and ceremonial purposes. We have represented the National

We have been representing the Turtle Mountain Chippewa, Chippewa Cree, White Earth Band of Minnesota Chippewa and the Little Shell Chippewa Tribe for many years in their case against the federal government for misaccounting and mismanagement of their tribal trust fund, the Pembina Judgment Fund. A settlement of \$59 million was finally reached and distributions commenced to the four Tribes and more than 30,000 eligible individuals.

The Sisseton Wahpeton Oyate and Spirit Lake Nation succeeded in bringing the remains of two of their children back to their tribal homelands from the Carlisle Barracks Post Cemetery in Pennsylvania with our assistance. This was accomplished pursuant to a first-of-its-kind, written

and signed agreement with the Army, which was negotiated between the Tribes and the Army in arms-length, government-to-government negotiations.

These legal victories and accomplishments would not have been possible without the contributions and grants from the many supporters of our nonprofit organization. We thank you for your support and hope that your support will continue in 2024 and beyond so we can continue to pursue justice for Native Americans.

John E. Echohawk
Executive Director

BOARD CHAIR'S MESSAGE

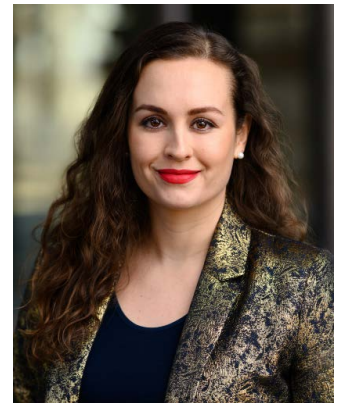
Every year, the Native American Rights Fund (NARF) has a huge impact on Indian Country. From tribal recognition to land rights to hunting and fishing to voting, NARF has consistently helped affirm tribal sovereignty and self-determination over the last 53 years. This year was no exception, in fact this year, in addition to legal wins, NARF also had some notable internal accomplishments.

Most importantly in 2023, NARF contributed to a huge win for Indian Country, in the form of the U.S. Supreme Court's decision in *Brackeen v. Haaland*. The case centered around the constitutionality of the Indian Child Welfare Act (ICWA). Native children have been taken from their homes and communities for centuries in an attempt to erase Native culture; adopting ICWA in 1970 was a legislative attempt to counter that cultural genocide. Recently, entities wanting to erode tribal sovereignty, have aimed their sights on ICWA. For years, while *Brackeen* made its way through the courts, NARF coordinated tribal amicus briefs in support of ICWA at every stage of the case. For the Supreme Court hearing, NARF coordinated a brief that was signed by 497 Tribes and 62 Native organizations—evidence of how important ICWA is for Indian Country and how effective NARF is in representing tribal interests in federal courts.

This sort of high-impact advocacy takes time and effort. It is the sort of work that could not be postponed or rescheduled to accommodate the, not just one, but two office moves that NARF undertook in 2023. After more than fifty years at its original building in Boulder, NARF outgrew its Broadway offices. All of us will miss NARF's storied first home, but the new Boulder office is beautiful and will allow NARF to continue to effectively expand its work on behalf of Tribal Nations and Native people. Meanwhile, NARF's

Washington, D.C., office moved into a new space that is conveniently located near federal legislative and court buildings. Already, the space has proven useful for NARF and its clients as they work with the federal government to effect change.

Finally, one of 2023's highlights happened last August when the American Bar Association awarded NARF Executive Director John Echohawk the incredibly prestigious Thurgood Marshall Award for his lifetime of civil rights advocacy. Having personally witnessed the care and tireless service that John devotes to NARF, Tribal Nations, and all of Indian Country, I was honored to be able to witness him recognized in this way.



Lacey A. Horn
Chair, NARF Board of Directors

I hope that you can take a moment with this year's Annual Report. It is a great opportunity to see how your investment in NARF (and in Indian Country) is creating change. I thank you for your support and for being part of this movement.

Wado,
Lacey A. Horn
Chair, NARF Board of Directors

BOARD OF DIRECTORS



The Native American Rights Fund has a governing board composed of Native American leaders from across the country. Board members are chosen based on their involvement and knowledge of Indian issues and affairs, as well as tribal affiliation, to ensure comprehensive geographical representation. The vision of the Board members is essential to NARF's effectiveness in representing its Native American clients.

NARF's Board of Directors: **Lacey Horn, Chair** (Cherokee Nation); **Kenneth Kahn Vice-Chair**, (Santa Ynez Band of Chumash Indians); **Rebecca Crooks-Stratton** Treasurer (Sisseton-Wahpeton Oyate); **Gayla Hoseth** (Curyung Tribal Council); **Rhonda Pitka** (Athabaskan/Inupiaq); **Robert Miguel** (Ak-Chin Indian Community); **Rebecca Miles** (Nez Perce Tribe); **Michael Petoskey** (Grand Traverse Band of Ottawa and Chippewa Indians); **Geoffrey Cravatt Blackwell**, (Muscogee (Creek) Nation); **Louie Ungaro** (Muckleshoot Indian Tribe) *Not pictured:* **Stephanie Bryan** (Poarch Band of Creek Indians); **Camille Kalama** (Native Hawai'ian); **Jamie Azure** (Turtle Mountain Band of Chippewa)



NATIONAL SUPPORT COUNCIL

The National Support Council assists NARF with fundraising and public relations. Some members are prominent in business, entertainment, and the arts. Others are advocates for the rights of the underserved. All are committed to upholding Native American rights.

Lucille A. Echohawk, Pawnee
Eric Ginsburg
Jeff Ginsburg
Rodney Grant, Omaha
Dr. Marion McCollom Hampton
Billy Mills, Oglala Lakota
Pahponee, Kickapoo Tribe in Kansas/Citizen Band Potawatomi

Stephen Pevar
Wayne Ross
Nancy Starling-Ross
Michael G. Sawaya
Ernie Stevens, Jr., Wisconsin Oneida
Verna Teller, Isleta Pueblo
Richard Trudell, Santee Sioux
Rebecca Tsoie, Pascua Yaqui

Aine Ungar
Rt. Rev. William C. Wantland, Seminole
W. Richard West, Southern Cheyenne
Randy Willis, Oglala Lakota
Teresa Willis, Umatilla
Mary Wynne, Rosebud Sioux

INTRODUCTION

The Native American Rights Fund holds governments accountable.

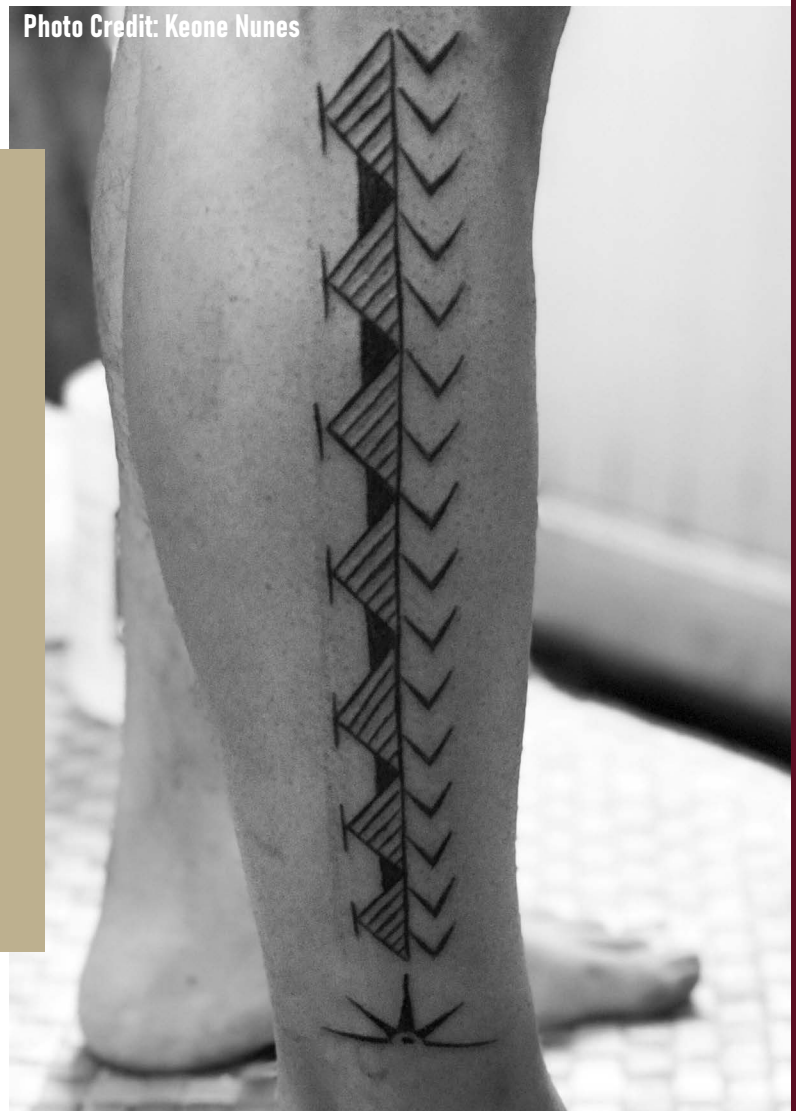
We fight to protect Native American rights, resources, and lifeways through litigation, legal advocacy, and expertise. NARF's first Board of Directors developed five priorities that still lead us today. In this annual report, you will find NARF's recent work within each of these priority areas.

1. **Preserve tribal existence**
2. **Protect tribal natural resources**
3. **Promote Native American human rights**
4. **Hold governments accountable to Native Americans**
5. **Develop Indian law and educate the public about Indian rights, laws, and issues**

IN THIS ISSUE: INDIGENOUS CULTURAL MARKINGS

In the 2023 issue of the Native American Rights Fund Annual Report, we highlight the significance of **Indigenous tattooing** as a pivotal aspect of cultural revitalization. This form of body art serves as a powerful tool for reclaiming cultural identity and asserting Indigenous presence in contemporary society. Through the revival of traditional tattooing practices, communities reconnect with their ancestral roots, fostering a sense of pride, belonging, and continuity. Furthermore, Indigenous tattooing represents a form of cultural resilience and resistance against colonial oppression, reaffirming the enduring spirit and traditions of Indigenous peoples. We'd like to thank **Jody Potts-Joseph, Quannah Chasinghorse, and Keone Nunes** for providing us beautiful photos that share this revitalization in action. Learn more about these artists on pages 1-2.

Photo Credit: Keone Nunes



PRESERVE TRIBAL EXISTENCE

Under the priority to *preserve tribal existence*, NARF supports Tribes' rights to live according to traditions, enforce treaty rights, ensure independence on reservations, and protect their right to self-govern (sovereignty).

TRIBAL SOVEREIGNTY AND JURISDICTION

Tribal Sovereignty Protection Initiative

NARF partners with the National Congress of American Indians (NCAI) on the Tribal Sovereignty Protection Initiative to monitor legislation, judicial appointments, and cases related to tribal interests.

~ Tribal Supreme Court Project (sct.narf.org)

The Tribal Supreme Court Project is based on the idea that a strong, coordinated approach at the U.S. Supreme Court can reduce, and even reverse, the erosion of tribal sovereignty by Justices who are unfamiliar with federal Indian law and the practical challenges tribal governments face. The Project monitors cases at or headed to the U.S. Supreme Court. The Court decided three cases in its October 2022 term:

June 15, 2023: The Court issued its opinion in *Brackeen v. Haaland* (21-380); *Texas v. Haaland* (21-378); *Cherokee Nation v. Brackeen* (21-377); *Haaland v. Brackeen* (21-376) (consolidated). The Court upheld the constitutionality of the Indian Child Welfare Act and rejected all of Petitioners' challenges to the law—some on the merits and others for lack of standing.

June 15, 2023: The Court issued its opinion in *Lac du Flambeau Band of Lake Superior v. Coughlin* (22-227). The Court held that the Bankruptcy Code unambiguously abrogates the sovereign immunity of all governments, including federally recognized Tribes.

June 22, 2023: The Court issued its opinion in *Arizona v. Navajo Nation* (21-1484); *Department of the Interior v. Navajo Nation* (22-51) (consolidated). The Court ruled against the Nation, holding that the Nation could not state an equitable claim for breach of trust against the United States for failing to secure or identify the Nation's federally reserved Winters water rights in the lower basin of the Colorado River.

For October Term 2023, as of this writing, the Court has granted review in *Becerra v. Northern Arapaho Tribe* (22-253) and *Becerra v. San Carlos Apache Tribe* (22-250) (consolidated).

~ Judicial Selection Project

The Judicial Selection Project is about increasing the representation of Native Americans in the federal and state judiciaries, research, and education.

In November 2023, the Senate confirmed Shanlyn Park, who is Native Hawaiian, for a seat on the U.S. District Court for the District of Hawaii. She is the first Native Hawaiian woman to serve as an Article III judge. In December 2023, the Senate confirmed Sara Hill, a citizen of the Cherokee Nation, for a seat on the U.S. District Court for the Northern District of Oklahoma. She is the first Native American woman to serve as a federal judge in Oklahoma, and only the eighth Native American to serve as an Article III judge.



CONNECTION TO ANCESTRY

- >> Indigenous tattooing often serves as a way to connect with one's ancestors and preserve cultural heritage. The designs and techniques used may reflect traditional practices that have been passed down for centuries.



TRADITIONAL TECHNIQUES

- >> Indigenous tattooing often employs traditional techniques passed down through generations. These techniques may include hand-tapping, using bone or wooden needles, or incorporating natural dyes made from plants or minerals.

PROTECT TRIBAL NATURAL RESOURCES

During colonization, Tribes' lands diminished to a mere 2.3 percent of their original size. An adequate land base and control over natural resources are necessary for economic self-sufficiency and self-determination. They are vital to tribal existence. Thus, much of NARF's work is to *protect tribal natural resources*.

INDIAN LANDS

Hualapai Tribe Fee to Trust Applications

NARF represented the Hualapai Indian Tribe of Arizona in applying to transfer eight parcels of land into trust status. Applications were submitted to the BIA, and two new parcels were taken into trust in September 2018. After a long delay, the Cholla Canyon Ranch parcel was approved to be taken into trust in October 2021. In January 2023, the Hualapai Tribe Water Rights Settlement Act of 2022 added Hunt Parcels 1-5 to the Hualapai Reservation. It also directed the Secretary of the Interior to take the Cholla Canyon Ranch Parcels into trust. BIA subsequently transmitted copies of the general warranty deeds for these parcels to the Tribe.

Lands into Trust for Alaska Tribes

The lands into trust issue continues to be hotly debated in Alaska. NARF continues to work with Alaska clients to defend the legality of the trust lands program as well as putting their own fee lands into trust. The Biden Administration took an additional parcel into trust in November 2022. The State of Alaska is again pursuing a legal challenge to the Department of Interior's ability to make trust acquisitions for Alaska Tribes. The Central Council of the Tlingit and Haida Indian Tribes (Tlingit & Haida) intervened in the case. In October 2023, NARF filed an amicus brief on behalf of the Craig Tribal Association and Organized Village of Kake in support of Tlingit & Haida.

HUNTING AND FISHING RIGHTS

Because of their remoteness, no one else in the U.S. continues to be as intimately connected to the land and water, and dependent on natural resources, as Alaska Natives. Tribal hunting and fishing rights are grounded in sovereignty and affirmed in treaties and agreements.

Alaska Department of Fish and Game v. Federal Subsistence Board

In 2020, the State of Alaska filed a complaint challenging three decisions made by the Federal Subsistence Board related to subsistence hunting. (The board is the body responsible for setting all rules and regulations related to

the taking of wild fish and game by qualified subsistence users within Alaska's federal lands.) Alaska alleged that the board acted outside of its authority. NARF filed a motion to intervene on behalf of the Organized Village of Kake to defend the board's authority to authorize emergency hunts.

In December 2021, the court upheld the board's authority in all respects of the case—marking a significant victory for subsistence hunters. The State appealed the decision to the Ninth Circuit, which held recently that the case met a mootness exception and should be reheard by the trial court. On remand, the district court upheld the FSB's authority on all counts. The State again appealed the decision, this time seeking a decision on whether the FSB has authority to open an emergency hunt. NARF is representing the Organized Village of Kake during the appeal.

United States v. State of Alaska

Western Alaska, including the Kuskokwim River, is experiencing a severe, multi-year, multi-species salmon crash. This crisis has been devastating for communities in the region who rely on salmon for nutritional, spiritual, and cultural wellbeing.

In 2021, the United States closed the Kuskokwim River fishery within the Yukon Delta National Wildlife Refuge in response to the ongoing salmon crash, but allowed limited openings only for local, federally qualified users to fish for salmon. This action was taken in an effort to conserve the salmon population for continued subsistence uses, and it fulfilled the federal government's responsibility to provide a rural preference for subsistence users under the Alaska National Interest Lands Conservation Act (ANILCA). However, at the same time, the State of Alaska purported to open the same stretch of the river to fishing by all Alaskans. This caused confusion among residents and interfered with attempts to provide the subsistence priority that is essential to Alaska Natives.

In response, the United States sued Alaska for interfering with ANILCA's rural subsistence preference. On behalf of the Association of Village Council Presidents and two subsistence users, NARF intervened in the case on the side of the United States. In 2022, the court issued a preliminary

PROTECT TRIBAL NATURAL RESOURCES

injunction preventing the state from authorizing fishing on the Kuskokwim River within the refuge. The court concluded that federally qualified subsistence users would be “irreparably harmed” if the state’s openers were allowed.

The federal government and the tribal intervenors filed motions for summary judgment in July 2023. Alaska filed its own cross motion for summary judgment, expanding the scope of the litigation to argue that the Federal Subsistence Board’s entire authority to manage subsistence fishing in the Kuskokwim River was void because the river is not “public land” under ANILCA. Briefing on the motions for summary judgment was completed in December 2023.

Bering Sea Elders Group

The Bering Sea Elders Group (BSEG) is an alliance of 39 Yup’ik and Inupiaq villages that seek to protect the sensitive ecosystem of the Bering Sea, as well as the communities that depend on it. NARF has represented BSEG since 2010. Currently, NARF is working with BSEG and coalition partners to change existing management structures that have failed the people in the region. This includes integrating traditional knowledge into existing federal decision-making processes and building an equitable co-management structure. NARF also assists BSEG with other work, including salmon bycatch issues, the reauthorization of the Magnuson Stevens Act, engaging with federal funding agencies about the need to restructure grant processes to include Tribes, tribal consultations, and other subsistence advocacy efforts.

Pebble Mine

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 sustainable salmon runs. In 2013, NARF helped create the United Tribes of Bristol Bay (UTBB), a consortium formed to address mining proposals threatening salmon-rearing streams.

The proposed Pebble Limited Partnership (Pebble) mine would have sat on the headwaters of the largest salmon-producing river in Bristol Bay. In February 2014, Environmental Protection Agency (EPA) initiated a Clean Water Act 404(c) process for the proposed mine, which could restrict the discharge of material in waters when such disposal would have adverse impacts.

In 2014, Pebble filed a complaint against EPA and

successfully asked the court to put the 404(c) process on hold. Local interests formed the Bristol Bay Defense Alliance, consisting of UTBB, Bristol Bay Native Association, Bristol Bay Regional Seafood Development Association, Bristol Bay Reserve Association and Bristol Bay Economic Development Corporation. The Alliance took legal action on behalf of the people who rely on the Bristol Bay fishery and all it sustains.

The Army Corps ultimately denied Pebble’s permit application because of its deficient compensatory mitigation plan—marking the first permit denial for an Alaska hard rock mine in modern memory. A major milestone in this effort came in January 2023, when the EPA announced its decision to use Clean Water Act Section 404(c) to prohibit the wetlands around Pebble Deposit from being a disposal site for mine fill. This decision marks the culmination of ten years of effort by the Bristol Bay Tribes and NARF.

Arctic National Wildlife Refuge

The Arctic National Wildlife Refuge’s Coastal Plain is home to the calving grounds of the Porcupine Caribou Herd—one of the largest wild herds in the world—and of great cultural importance to the Gwich’in Tribes of Alaska, who refer to the area as Izhik Gwats’an Gwandaii Goodlit (the sacred place where life begins). Since 1980, when the Coastal Plain was first considered for development, the Gwich’in Tribes have worked tirelessly to protect the Refuge and the caribou. NARF represents the Native Village of Venetie Tribal Government, Venetie Village Council, and Arctic Village Council, three federally recognized Gwich’in Tribes, and advises them on their rights and strategic options surrounding proposed development of the Coastal Plain.

In 2017, Congress enacted tax reform legislation that contained a provision opening the Arctic National Wildlife Refuge’s Coastal Plain to oil and gas development. In August 2020, the Bureau of Land Management authorized oil development in the entirety of the Coastal Plain, with few restrictions. However, in January 2021, President Biden placed a moratorium on oil and gas activities in the refuge, and in September 2023, the Department of Interior announced that the agency was cancelling all remaining leases in the Arctic Refuge.

Bering Sea-Interior Tribal Commission

The Bering Sea-Interior Tribal Commission is a tribal consortium of 27 Tribes working to protect traditional

ways of life by advocating for land-use planning processes and sustainable natural resource management decisions that meaningfully reflect member Tribes' values. The commission has participated extensively in the resource management planning processes for the Bering Sea-Western Interior and Central Yukon planning areas. These vast areas of land encompass Tribal Commission member Tribes' traditional lands and contain vital resources, which sustain traditional ways of life.

In 2020, the Bureau of Land Management (BLM) released the Bering Sea-Western Interior Proposed Resource Management Plan. The proposed plan emphasized extractive resource development at the expense of resources and uses important to Tribes. In August 2022, the BLM announced that it would prepare an environmental impact statement to consider the potential impacts of opening lands currently withdrawn under the Alaska Native Claims Settlement Act, including lands within the Bering Sea-Western Interior planning area. In December 2023, the BLM released a draft environmental impact statement, and NARF is working with the Tribal Commission to develop technical comments.

Bay Mills Indian Community Challenge to Enbridge Line 5

NARF and Earthjustice jointly represent the Bay Mills Indian Community to fight a proposed oil pipeline tunnel, which threatens the Community's treaty rights, tribal fisheries, and the environment. As one of the signatories to the 1836 Treaty of Washington, which ceded nearly 14 million acres to the United States for the creation of the State of Michigan, Bay Mills reserved the right to fish, hunt, and gather throughout the territory — including in the Great Lakes and the Straits of Mackinac.

In August 2020, a Michigan Administrative Law Judge granted Bay Mills the right to intervene in an ongoing contested case process pending before the Michigan Public Service Commission (MPSC). After many years of litigation and hearings, in December 2023, the MPSC issued an order approving Enbridge's permit to build a tunnel beneath the Straits of Mackinac. Bay Mills, along with other Tribal intervenors, appealed the decision to the Michigan Court of Appeals. Briefing is scheduled for the Spring of 2024.



Wyoming v. Herrera

Clayvin Herrera, a member of the Crow Tribe of Indians, was charged with taking elk out of season, and Wyoming state courts barred him from asserting his treaty rights in defense. In 2019, the U.S. Supreme Court affirmed the continued existence of the Crow Tribe's right to hunt on unoccupied lands and remanded the case to the Wyoming courts. NARF represented the Crow Tribe as amicus curiae in that case. Back in Wyoming, the state argued that Mr. Herrera was precluded from asserting his treaty rights because the U.S. Court of Appeals for the Tenth Circuit, in *Crow Tribe of Indians v. Repsis*, held that state prosecution of Crow Tribe treaty hunters is warranted. The trial court sided with Wyoming. However, the Wyoming District Court, 4th Judicial District, reversed that decision in December 2021.

The state petitioned for review, but the Wyoming Supreme Court refused to hear the case. In June 2023, the State of Wyoming agreed to dismiss with prejudice its prosecution of Mr. Herrera. The Wyoming Circuit Court, 4th Judicial District, Sherridan County, subsequently vacated Mr. Herrera's conviction, completely ending his case. The Tribal Justice Clinic at the University of Arizona James E. Rogers College of Law and Bailey Lazzari of Lazzari Legal assisted NARF in this matter.

Crow Tribe of Indians v. Repsis

This matter is related to Herrera, above, in which the State of

PROTECT TRIBAL NATURAL RESOURCES



Photo Credit: Kenne Ndnes

Wyoming argued that the judgment in *Crow Tribe of Indians v. Repsis*, a declaratory judgment action decided in Wyoming's favor in the 1990s, precludes the Tribe from making certain arguments today. As a result of the U.S. Supreme Court's decision in *Herrera v. Wyoming*, the Tribe seeks relief from the Repsis judgment pursuant to Rule 60(b) of the Federal Rules of Civil Procedure. If the court grants relief, then the Repsis judgment would have no further force and the State could no longer argue preclusion in the *Herrera* case.

In July 2021, the district court denied the motion—not on the merits, but by concluding that the district court lacked authority to disturb holdings reached by the U.S. Court of Appeals for the Tenth Circuit. The Tribe appealed to the Tenth Circuit, which held oral argument in March 2022. In July 2023, the Tenth Circuit issued its order. The Tenth

Circuit vacated the District Court's decision, holding that the District Court had the authority to vacate the Tenth Circuit's earlier holdings in Repsis, and remanded the case back to the District Court. The case is now back before the District Court, which is considering the merits of the Tribe's motion. We are awaiting a decision. NARF is assisted in the matter by Bailey Lazzari of Lazzari Legal.

WATER RIGHTS

Under federal law, Indian Tribes are entitled to sufficient water for present and future needs. These rights are superior to those created after the Tribes' priority dates. Unfortunately, many Tribes have not used or quantified their reserved water. The current need is to define and quantify the amount of water required.

Agua Caliente v. Coachella Valley Water District

NARF, with co-counsel, represents the Agua Caliente Band of Cahuilla Indians in a 2013 lawsuit in the U.S. District Court for the Central District of California. The Agua Caliente asked the court to declare their water rights senior in the Coachella Valley, quantify those rights, and prevent Coachella Valley Water District and Desert Water Agency from further impairing the quantity and quality of aquifer water. In March 2015, the court ruled largely in the Tribe's favor, holding that the Tribe has a reserved right to water and that groundwater

is a water source available to fulfill that right. Upon appeal, the decision was upheld.

With "phase one" done, the parties addressed "phase two", identifying a method for quantifying the Tribe's water share, the right to water of a certain quality, and whether the Tribe owns the groundwater storage space under its reservation. In April 2019, the court dismissed the claims holding that, since the Tribe could not show that it presently had a shortage of water, it was not sufficiently injured to prove standing. This decision was made despite unrefuted evidence that the aquifer depth underlying the reservation had lowered substantially and the water had been degraded by the water districts' activities.

In July 2020, the Tribe filed an amended complaint, adding allegations relating to the Tribe's injuries and the Tribe's pumping of groundwater, and to more accurately frame the issue of the ownership of the pore space under the reservation. The parties entered into mediation and the case was stayed until October 2023.

Palouse River Basin Adjudication – Nez Perce Tribe Water Rights
NARF represents the Nez Perce Tribe in its water rights claims in the Palouse River Basin Adjudication. An initial hearing was held in 2017. In 2019, the U.S. and the Tribe filed claims for instream flows in 24 reaches of the Palouse River and its tributaries, for nearly 200 springs claims on private and federal lands, and for water for consumptive uses on two allotments in the Palouse watershed. In July 2021, the Idaho Department of Water Resources released its report on all federal/tribal and private Palouse Basin water claims.

In January 2022, the Tribe and United States filed objections to the private land claims filed by landowners, and filed a motion to file late springs claims on an additional ten springs located on private land that was unknown until the private landowners filed their claims. The court granted the motion to file late springs claims. In December 2023, the Special Master treated the Nez Perce Tribe's joinder in the United States claims for springs as a motion and granted

the motion.

Klamath Basin Water Rights

Represented by NARF, the Klamath Tribes' water rights were recognized in 1983 in *United States v. Adair*, but the courts left quantification of the water rights to Oregon's Klamath Basin Adjudication (KBA). After finishing the KBA's 38-year administrative phase, the Tribes were able to enforce their water rights for the first time in 2013. The Klamath County Circuit Court is now reviewing the Oregon Water Resources Department's (OWRD's) Findings of Fact and Order of Determination (FFOD) issued in the KBA.

In 2017 and 2018, the Klamath County Circuit Court resolved jurisdictional and other legal issues as well as general procedural issues. Importantly, the court issued rulings limiting discovery and the introduction of new evidence, preventing a complete do-over of the administrative proceedings. However, the court ruled that a de novo standard of review would apply, in which the court will "look anew" at the determinations of OWRD in the FFOD and may give deference to OWRD's determinations.

Now the KBA is in Phase 3, which addresses the substantive exceptions filed to the individual water right claim determinations in the FFOD. Part 1 of Phase 3 addresses crosscutting legal issues applicable to three claim groups:

COLONIAL IMPACT



Photo Credit: Keri Oberly



The practice of Indigenous tattooing has been impacted by colonialism and Western influence in various regions. In some cases, Indigenous tattooing was suppressed or stigmatized by colonial authorities, leading to a decline in traditional practices.



Photo Credit: Keone Nunes

Indigenous tattoos often hold deep cultural, spiritual, and social significance within their respective communities. They can represent a person's identity, tribal affiliation, social status, life achievements, or spiritual beliefs.

CULTURAL SIGNIFIGANCE

Group A – pre-1909 and non-tribal federal reserved water right claims; Group B – Walton right and Klamath Termination Act claims; and Group C – tribal claims. Phase 3, Part 1, has been completed for all three groups.

KBA Phase 3, Part 2, began in December 2020 to determine exceptions to legal issues or disputed factual issues. The KBA judge retired in April 2021 and a new judge was appointed later that year. The court completed Phase 3, Part 2, for Groups A and B in 2022. Briefing on the Group C tribal claims finished in 2023 with a ruling that none of the Tribal claims were vacated by any previous order of the Court. However, tribal claims were remanded to the OWRD to receive further evidence and argument.

Tule River Tribe

Since 1971 the Tule River Tribe has sought to secure its federally reserved water rights on the South Fork of the Tule River in California through a storage project on its reservation. In 2007, after almost 30 years of advocacy, the Tribe, represented by NARF, successfully settled its water rights claims with the affected state-based parties.

To fully settle the agreement, Congress must ratify it and make its terms federal law. Since reaching the 2007 agreement, the Tribe has sought federal legislation to ratify the agreement and authorize appropriations to create water

storage and delivery infrastructure on the reservation. The effort involved renegotiating the terms of the 2007 Agreement with the Federal government and performing multiple studies, culminating with a 2018 Bureau of Reclamation Technical Evaluation Report and Reservoir Yield Analysis.

In September 2022, Senators Padilla and Feinstein took the notable step of introducing legislation to ratify the settlement. It did not pass, but the bill was re-introduced and passed the Senate Committee on Indian Affairs in March 2023. Tule River is now looking to have the legislation introduced in the House.

Kickapoo Tribe in Kansas

At times in recent decades, the water supply for the Kickapoo Reservation has violated the Safe Drinking Water Act of 1974. Consequently, the Kickapoo people fear to drink, bathe, or cook with tap water. There also is not enough water to provide basic municipal services—the Tribe is not able to provide local schools with reliable, safe running water, and the fire department cannot provide adequate protection. In 2006, the Kickapoo Tribe in Kansas, represented by NARF, filed a lawsuit to enforce express promises made to build a reservoir project (the most cost-effective way to improve the water supply). Despite promises they had made to the Tribe, Nemaha Brown Watershed Joint Board #7, the Natural

Resources Conservation Service of the U.S. Department of Agriculture, and the State of Kansas continued to develop the region's water resources. The result was near depletion of the Tribe's senior water rights. The federal government, state, and local watershed district all concede the existence of the Tribe's senior Indian reserved water rights; the real issue is the amount and source of water needed.

In 2016, the Tribe and state settled water rights for the Tribe and details for the administration of the Tribe's right in the Delaware River watershed. The Tribe, in consultation with the Kansas congressional delegation, developed legislation to approve the negotiated water rights. Over the years, bills were introduced but not enacted. Finally, late in 2020, the Kickapoo Tribe water project study was passed as part of the final omnibus appropriations act. The legislation kicked off a study of the Plum Creek Project. The draft feasibility report was completed in December 2022. Most recently, Kickapoo has been in a multi-year project planning stage leading to the design and construction stages.

ENVIRONMENTAL PROTECTION

NCAI Climate Change Matters

The effects of climate change on Indigenous peoples throughout the world are acute and will only get worse. NARF represents the National Congress of American Indians (NCAI) at the international level through the United Nations Framework Convention on Climate Change (UNFCCC). The goal is ensuring Indigenous rights are protected in any international agreement governing greenhouse gas emissions reductions.

In December 2015, the Paris Agreement was adopted. It states that, when taking climate change action, Indigenous peoples' rights must be acknowledged. Also, traditional knowledge shall help guide climate change science. It also recognizes the need to strengthen that knowledge and establishes a platform for sharing information. The International Indigenous Peoples Forum on Climate Change (Indigenous caucus), in which NARF participates, did not achieve all that it sought, but it achieved significant references that can be built on.

Since the Paris Agreement, the Indigenous caucus has worked to make the traditional knowledge platform a reality. In 2018, a working group was established. It met in 2019 with seven country representatives and seven Indigenous representatives. For the first time, Indigenous representatives (chosen by Indigenous peoples) participated on an equal basis with states within a United Nations body.

In 2019, the group prepared a two-year plan that was approved at Conference of the Parties 25 (COP 25) in December 2019.

Because of COVID, COP 26 did not convene until 2021, when it was preceded by the fifth meeting of the working group. Despite shortcomings in negotiations, there was an historic gathering of traditional knowledge holders from around the world, per the working group's plan. The meeting represents growing recognition of the importance of traditional knowledge to addressing climate change.

The UNFCCC resumed in-person intersessional meetings in June 2022. In November 2023, NARF and NCAI attended COP 28. A major accomplishment by the Indigenous Caucus and allies was preventing the approval of the Article 6.4 market approach where projects threatening

Indigenous rights are approved. In side events, the Caucus highlighted the growing danger of the transition to new energy requiring the mining of minerals such as lithium, cobalt, and nickel, all of which pose grave dangers to Indigenous rights.

SYMBOLISM AND MEANING

- >> Indigenous tattoos typically incorporate symbols and designs that carry specific meanings relevant to the culture and beliefs of the community. These symbols may represent elements of nature, animals, ancestral spirits, or mythological figures.



Photo Credit: Keri Oberly

PROMOTE HUMAN RIGHTS

To *promote Native American human rights*, NARF focuses on equal protection and freedom from discrimination in areas such as voting, education, incarceration, and religion. NARF also helps develop laws that provide unique protections for Native collective rights, traditions, culture, and property such as sacred places, peyote, eagle feathers, burial remains, and funerary objects.

RELIGIOUS FREEDOM AND SACRED PLACES

Bears Ears

For years, the Bears Ears Inter Tribal Coalition, a consortium of five sovereign tribal nations (Hopi Tribe, Navajo Nation, Ute Indian Tribe, Ute Mountain Ute Tribe, and Pueblo of Zuni) worked to protect the Bears Ears region, America's most significant unprotected cultural landscape. Located in Utah, the Bears Ears region contains at least 100,000 archaeological sites, some dated back to 12,000 BCE, and remains critical to many Tribes today for spiritual as well as hunting and gathering purposes. In response to tribal efforts, in 2016, President Obama designated the Bears Ears National Monument and established the Bears Ears Commission "to provide guidance and recommendations on the development and implementation of management plans and on management of the monument." The Commission included one elected officer each from the Hopi Nation, Navajo Nation, Ute Mountain Ute Tribe, Ute Indian Tribe, and Pueblo of Zuni.

In 2017, President Trump issued an Executive Order revoking and replacing the national monument. Representing the Hopi, Zuni, and Ute Mountain Ute Tribes, NARF sued the Administration for violations of the Antiquities Act, the Separation of Powers, the Property Clause and the Administrative Procedures Act. Briefing was completed in 2020; however, the incoming Biden administration requested a stay pending a 60-day monuments review. Secretary of Interior Deb Haaland completed the review and submitted recommendations to the president. In October 2021, President Biden restored the Bears Ears National Monument. Tribal leaders from the Bears Ears Coalition hailed the decision and were in attendance at the White House for the signing.

In August 2022, the State of Utah filed suit against President Biden. The state is arguing that President Biden abused his authority in creating Bears Ears and Grand Staircase Escalante and the monuments are too large. The Tribes intervened in the lawsuit in late 2022. The United States and Tribal Nations filed motions to dismiss the cases, and in August 2023, the court granted those motions. The state and mining companies have appealed that decision to the 10th Circuit Court of Appeals.

Standing Rock Sioux Tribe v. Army Corp of Engineers - Amicus Brief Support

NARF and the National Congress of American Indians (NCAI) are assisting the Standing Rock Sioux Tribe and their attorneys to develop and coordinate an effective amicus brief strategy in their lawsuit against the U.S. Army Corps of Engineers in relation to the Dakota Access Pipeline (DAPL). In 2016, the Army Corps determined that further environmental review was warranted before issuing an easement to the Dakota Access Pipeline to cross under Lake Oahe. However, in 2017, the Army Corps reversed course and announced its intention to grant an easement. Both Standing Rock Sioux Tribe and Cheyenne River Sioux Tribe filed amended complaints. NARF and NCAI are coordinating amicus brief strategies to support the Tribes.

When the Tribes filed motions for summary judgment, NARF filed an amicus brief on behalf of 22 Tribes and Native organizations. In March 2020, the court remanded the matter to the Corps for preparation of an Environmental Impact Statement (EIS). The court ordered an additional briefing on whether it should vacate the easement pending completion of the EIS. NARF filed an amicus brief supporting vacatur.

In July 2020, the district court judge ordered that the pipeline be emptied of oil. Dakota Access filed a notice of appeal and the DC Circuit Court of Appeals. NARF submitted an amicus brief on the emergency motion to stay on behalf of several tribal organizations and Tribes. In 2021, the appellate court agreed that the Army Corps needed to perform further environmental review, but reversed the district court's order to shut down the pipeline. NARF and NCAI continue to work with the Tribes' attorneys and coordinate amicus strategy as requested.

Apache Stronghold v. United States of America - Amicus Brief Support

In January 2023, NARF and co-counsel filed an amicus brief on behalf of Tohono O'odham Nation, Tonto Apache Tribe, San Juan Southern Paiute, the Association on American Indian Affairs, and the National Association of Tribal Historic Preservation Officers in this case.

PROMOTE HUMAN RIGHTS

The brief urges the U.S. Court of Appeals for the Ninth Circuit to recognize the protections of the Religious Freedom Restoration Act (RFRA) to prevent a foreign mining company, Resolution Copper, from destroying a sacred place the Apache call Chí'chil Bildagoteel, which translates into English as "Oak Flat." In an unusual turn of events, on January 19, 2023, the Ninth Circuit struck the brief from the record, "Pursuant to FRAP 29(a)(2)." Oral argument was heard on March 21st, 2023. A decision may be issued in 2024.

Indigenous Peyote Conservation Initiative

NARF has represented the National Council of Native American Churches and the Native American Church of North America (NACNA) for four decades. Most recently, NARF has been working to develop and support access to and the use of peyote for religious and ceremonial purposes.

In 2017, NARF closed on the purchase of 605 acres of Texas land, made possible by a grant from the RiverStyx Foundation of California. A nonprofit organization—the Indigenous Peyote Conservation Initiative (IPCI)—was created to hold the land's title and put a peyote conservation project on the land. An adobe duplex, two bathhouses, and a peyote nursery were built on the land. Most recently, IPCI received its final 501c3 non-profit status determination from the Internal Revenue Service. By close of 2023, NARF had transferred all funds and title for the Texas land to IPCI.

Graduation Eagle Feather and Regalia Project

Every spring, NARF is contacted by Native American students from across the country who are being prohibited from wearing eagle feathers at graduation ceremonies. By and large, once schools come to understand the religious and cultural significance of eagle feathers, they make accommodations and exceptions for Native American students. Unfortunately, there are a handful of school districts that persist in restricting Native American religious liberty and speech. This insistence on uniformity puts Native American students in the position of having to choose between celebrating with their classmates or following their religious and cultural traditions. When appropriate and as resources permit, NARF may send a letter to the school explaining the religious significance of eagle feathers, and how both federal and state law protects their use. Additionally, we are exploring the viability of targeted legislative campaigns that could lead to a "fix" on a state-by-state basis.

On occasion, NARF pursues litigation on behalf of affected students. For example, in May 2023, NARF, assisted by local counsel, filed a new action in Oklahoma state court alleging that Broken Arrow Public School District violated the rights of a student during her Broken Arrow High School graduation ceremony. That case is now in discovery phase.

INDIAN EDUCATION

Tribal Education Departments National Assembly

NARF founded the Tribal Education Departments National Assembly (TEDNA) in 2003 with funding from the U.S. Department of Education to start a national membership organization for Tribal Education Departments (or Agencies). NARF continues to represent TEDNA on national legislative and administrative matters and provides training and technical assistance regarding TEDs to TEDNA and its partner organizations. NARF continues to represent TEDNA primarily on national legislative and administrative matters, including direct federal appropriations for TEDs, substantive provisions in legislation and regulations, and other negotiations. For example, in 2023 NARF continued work to bolster state consultation with Tribes as required by the 2015 Every Student Succeeds Act.

Yellow Kidney v. Montana Office of Public Instruction, et al.

In July 2021, NARF, along with co-counsel, filed a new action in Montana district court alleging that state agencies and officials have failed to implement the Montana provisions known as "Indian Education for All," which state that all Montana public school students will be instructed in American Indian cultural heritage in cooperation with Montana Tribes. Despite years of funding for the provisions, the state is not implementing the provisions. This action seeks to ensure future compliance. The plaintiffs are Montana public school students and their guardians (both Indian and non-Indian) and six Montana Tribes: the Fort Belknap Indian Community, the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Northern Cheyenne Tribe, the Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation, the Little Shell Tribe of Chippewa Indians of Montana, and the Crow Tribe. In 2022, the presiding judge recused himself. In January 2023, the case was reassigned to a new judge. In April 2023, the motion to dismiss was heard and denied. Further oral argument was held in October 2023, and a same-day decision granted class certification. There are now multiple pre-trial actions and preparations in anticipation of a trial set for July 2024.

Leech Lake Band of Ojibwe Education Code

NARF represents the Leech Lake Band of Ojibwe in drafting a comprehensive education code. Development continues with community meetings upcoming.

INDIAN CHILD WELFARE ACT DEFENSE

The Indian Child Welfare Act (ICWA) was passed in 1978 in response to the disproportionate numbers of Native children being removed from their families by state agencies and courts and placed in non-Native homes or residential institutions. Congress found that many of these removals and placements were due to state officials' inability or unwillingness to understand tribal cultures and societies. The removals were extremely detrimental to the children, their families, and Tribes. The past decade has seen a dramatic increase in the number of legal challenges brought by opponents of ICWA, with the goal of undermining ICWA and tribal sovereignty. The most high-profile and potentially consequential case was *Haaland v. Brackeen* (formerly *Brackeen v. Zinke* and *Brackeen v. Bernard*).

In October 2018, Judge Reed O'Connor of the U.S. District Court for the Northern District of Texas ruled that ICWA and ICWA regulations issued in 2016 were unconstitutional. The Fifth Circuit overturned the district court's opinion and affirmed the constitutionality of ICWA. Plaintiffs successfully petitioned the Fifth Circuit to rehear the case en banc. The appeals court decision was issued April 2021. Although the court generally upheld the authority of Congress to enact ICWA and held that ICWA's definition of "Indian child" did not operate based on race, it also found certain sections of ICWA to be unconstitutional. In September, the Department of Justice, intervening Tribal Nations, as well as Texas and individual plaintiffs all asked the U.S. Supreme Court to review the decision. In February 2022, the Supreme Court granted all petitions and consolidated the case under *Haaland v. Brackeen*. In June 2023, the Supreme Court issued its decision, a full-throated, 7-2 opinion affirming the constitutionality of the Indian Child Welfare Act.

At all phases of this case, NARF, along with co-counsel, filed amicus briefs on behalf of federally recognized Tribes and Native organizations. The tribal amicus brief filed in August 2022 was signed by 497 Tribes and 62 Native organizations—to our knowledge, the largest show of Indian Country support for any brief before the U.S. Supreme Court.

VOTING AND CIVIL RIGHTS

Rosebud Sioux Tribe v. Barnett

In September 2020, NARF filed suit on behalf of Rosebud Sioux and Oglala Sioux in federal district court in South Dakota alleging violations of the National Voter Registration Act, also known as the Motor-Voter law, which allows voters to register at motor vehicle departments and public assistance offices. After winning a motion to dismiss and partial summary judgment, the Tribal Nations negotiated a comprehensive settlement agreement. NARF and co-counsel continue to work with the state on failures to collect, analyze, and report data.

Western Native Voice v. Jacobsen

In May 2021, NARF filed this case on behalf of the Blackfeet Nation, Confederated Salish and Kootenai Tribes of the Flathead Reservation, Fort Belknap Indian Community, and the Northern Cheyenne Tribe. It challenges two discriminatory voting laws: HB 176 and HB 530. HB 176 seeks to end same-day registration, which reservation voters have relied on in Montana since 2005. HB 530 attempts to block ballot collection, in spite of a similar law being ruled unconstitutional in NARF's 2020 case *Western Native Voice v. Stapleton*. In September 2022, the court issued an order in plaintiff's favor on all counts. The court also found evidence of racial discrimination given this pattern of denying access to Native Americans. The state filed an appeal with the state Supreme Court, which has been fully briefed.

Turtle Mountain Band of Chippewa Indians v. Jaeger

The Turtle Mountain Band of Chippewa Indians, the Spirit Lake Nation, and Native voters brought this suit to challenge North Dakota's legislative redistricting plan on the basis that it dilutes the Native American vote in violation of the Voting Rights Act. The trial took place during the week of June 12, 2023. In November 2023, the court found a violation of the Voting Rights Act and gave the state until December 22, 2023 to submit a remedial redistricting map. When the state failed to submit a remedial map, the court implemented a fair map for the 2024 elections in North Dakota. The case is currently pending appeal in the Eighth Circuit.

Walen v. Burgum

In March 2022, the Mandan, Hidatsa and Arikara Nation (MHA) and individual Native American voters filed a motion with the United States District Court for the District of North Dakota to intervene in *Walen v. Burgum*. This lawsuit was brought by two individuals seeking to eliminate the

PROMOTE HUMAN RIGHTS

majority-Native state legislative subdistrict encompassing the Fort Berthold reservation in North Dakota. The tribal government and Native voters seek to defend the subdistrict, which ensures MHA tribal members have an opportunity to elect a candidate that represents their interests to the North Dakota State House. The 2022 election, resulted in the MHA Nation's district being represented by an MHA tribal member for a first time. In November 2023, a three-judge panel granted MHA Nation's motion for summary judgment, dismissing the case. The case is currently pending appeal in the U.S. Supreme Court.

Lower Brule v. Lyman County

In May 2022, the Lower Brule Sioux Tribe and three enrolled members filed a lawsuit to prevent Lyman County from postponing compliance with the Voting Rights Act. After the Tribe won a preliminary injunction to a limited extent and the county lost two motions to dismiss, the parties negotiated a settlement. The settlement immediately provided the Tribe with one appointed seat on the commission and a second elected seat in 2024. The parties also agreed that the court would retain jurisdiction until 2034.

Spirit Lake Tribe v. Benson County

The Spirit Lake Nation and two tribal members sued Benson County, North Dakota, to challenge the redistricting plan for the county's Board of Commissioners. The county adopted a discriminatory at-large commissioner map, even though it was prohibited from enacting at-large elections in a 2000 consent decree in a prior Voting Rights Act case. The parties reached a settlement that will essentially provide everything that was requested by the plaintiffs in the complaint. Once the new plan is fully implemented, Native voters will have the opportunity to elect their candidates of choice for a majority of the commission.

Tohono O'odham Nation v. Brnovich (consolidated under Mi Familia Vota v. Fontes)

The Tohono O'odham Nation, Gila River Indian Community, and future Native voters filed a lawsuit challenging an Arizona law that could have made it difficult to impossible for many tribal citizens to vote. Under the new law, individuals must provide documentary proof of residence to vote. The requirements were passed despite the known lack of addressing on homes on tribal lands in Arizona. In a partial summary judgement order, the District Court held that the proof of address requirement is preempted under the National Voter Registration Act and

that no one is required to have a standard street address to register in any election.

Winnebago and Omaha v. Thurston County

This case challenges the Thurston County Board of Supervisors' redistricting plan. Despite Native voters comprising a majority of the County, the Board disregarded tribal testimony when adopting a supervisor map that only provided effective Native voter majorities for three of the seven supervisor districts. The plaintiffs brought a challenge under the Voting Rights Act and U.S. Constitution, including a claim of intentional discrimination. A favorable consent decree and new redistricting plan were negotiated in November 2023. The new plan will provide the four majority Native voter districts that the Tribes sought.

Arctic Village Council v. Beecher

During the June 2022 special primary election, the Alaska Division of Elections rejected more than 7,500 ballots,

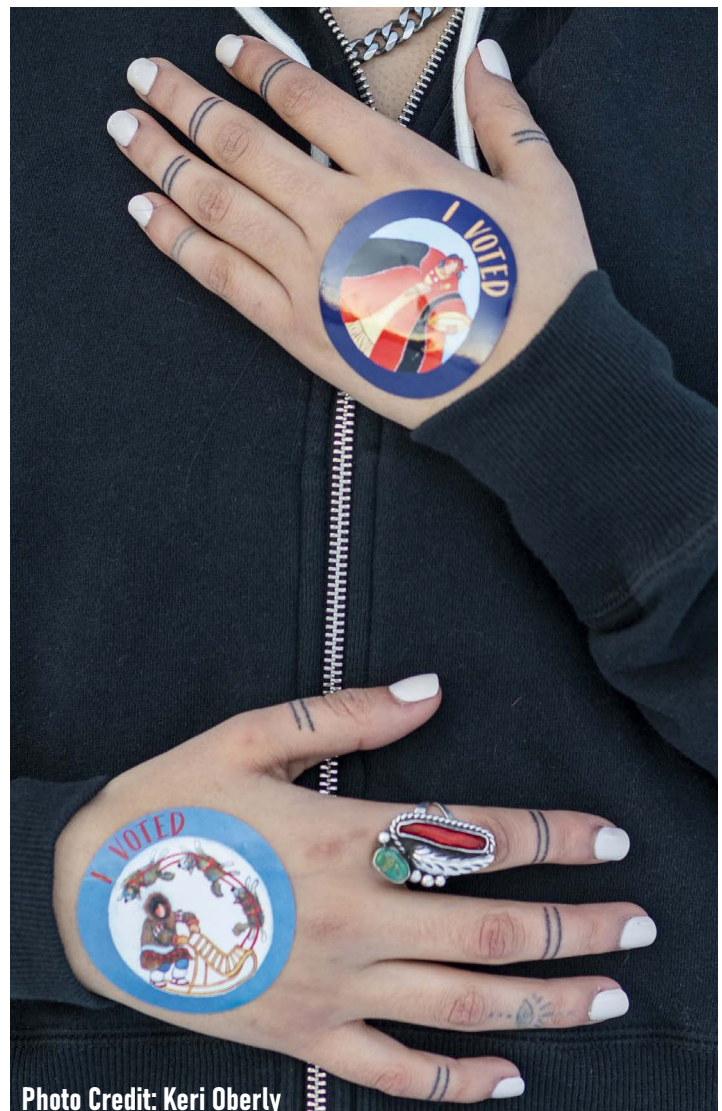


Photo Credit: Keri Oberly

constituting more than 4.5% of votes statewide. Of the ballots rejected, about 3% were rejected because of ballot defects that could have been corrected if voters had been notified, such as a missing witness signature, voter identifier, or voter signature. Though Alaska is a no-excuse absentee state, permitting anyone to request and vote absentee, the Division of Elections has no procedure in place to notify voters of ballot defects. The state does not notify voters that their absentee ballot has been rejected until after election day and does not allow voters to correct any deficiencies. The ballot rejection rate was significantly higher in rural Alaska, with an outsized impact on Alaska Native voters. The four majority-Alaska-Native house districts experienced rejection rates in the double digits. In the Bethel and Lower Kuskokwim region, the rejection rate was a staggering 16.5%. In the Bering Straits/Nome/Yukon Delta region, the rejection rate was more than 14%. For the Arctic/Utqiagvik/Kotzebue region, it was more than 12%, and in the Bristol Bay/Aleutians/Dillingham/Unalaska region it was just less than 11%.

In July 2022, NARF, ACLU of Alaska, and Lawyers' Committee for Civil Rights sent a letter to the Division of Elections requesting an opportunity to cure absentee ballot defects in future elections. After the state refused to address the ballot curing issues, NARF and co-counsel filed suit on behalf of Arctic Village Council, League of Women Voters, and two individual voters. In July 2023, the court heard oral argument on Alaska's motion to dismiss. The court issued its Order Denying Motion to Dismiss in early January 2024.

Toyukak v. Dahlstrom

In 2013, Arctic Village Council, Native Village of Hooper Bay, Traditional Village of Togiak, Venetie Village Council, and two individual Alaska Native voters, represented by NARF and co-counsel, sued the Alaska Division of Elections and Alaska Lieutenant Governor to enforce the statutory guarantee of language assistance under Section 203 of the Voting Rights Act (VRA) and the voting guarantees of the Fourteenth and Fifteenth Amendments of the United States Constitution. For decades, the state failed to provide language assistance to Alaska Native voters as required by the VRA. Plaintiffs were unable to meaningfully participate in the electoral process because of it.

In a 2014 trial, the court held that Alaska had violated the VRA. Alaska had improperly relied on what it called "outreach workers" in Alaska Native communities to translate the election pamphlet, even though the workers had never been asked to do so. The end result was an absence of preelection information such as candidate statements

and ballot measures available to English speaking voters. The court ordered translation of all pre-election materials distributed in English and posting of bilingual translators at all polling places.

In September 2015, the court approved a settlement agreement that provided broad relief in the form of a comprehensive language assistance program. Unfortunately, Alaska has never meaningfully complied with the stipulated order. After reviewing the federal observer reports from the 2022 elections, as well as the State of Alaska's 2022 Elections Report, NARF sent a notice letter outlining the state's continued non-compliance and requesting an extension of the settlement agreement. In August 2023, the court approved the parties' agreement and entered a new order extending the settlement to a new end date of December 31, 2026.

NATIVE AMERICAN VOTING RIGHTS PROJECT (VOTE.NARF.ORG)

The goal of the Voting Rights Project is Native political power. What would that look like? (1) Every Tribe has polling places as needed. (2) Those polling places are open at the same times as polling places in non-Native communities. (3) Every Tribe's members can easily register to vote and are actually able to vote. (4) Voter turnout is high because tribal members have confidence that their vote will count and that make a difference. (5) Tribal members are able to elect representatives that advocate for them and their interests. (6) Those representatives pass laws that improve the lives of tribal members. That is the vision.

The Project consists of:

1) **Litigation:** Voting cases challenging a law or practice are highlighted above.

2) **Coalition:** In 2015, NARF created the Native American Voting Rights Coalition to organize those working on voting in Indian Country so we could share information and resources, and create a nationwide strategy.

3) **Advocacy and Projects, including:**

-- *Polling Places*

NARF is working toward securing polling places for reservations and tribal communities. The vast majority of Native voters have to leave their reservations to vote, and voter services can be as much as 98 miles one way. This is one of the most common ways to suppress the vote. We are analyzing where there are reservations in need and reaching out to affected communities.

PROMOTE HUMAN RIGHTS

-- *Addressing*: This project focuses on securing more post office boxes and determining new criteria for home addresses. Post office boxes and other non-traditional addresses make it very difficult for reservation residents to register to vote if their state requires a street address. The same problems carry over when voters need absentee ballots, such as during the pandemic.

-- *Redistricting*: Census undercounts and gerrymandered voting districts lead to diluted voting power. Once a Tribe has been gerrymandered into an unfavorable district where they are a minority, they cannot elect candidates to represent their interests. When the barriers are removed and participation increases, Native communities can elect representatives that are responsive to their concerns. We successfully worked to defend against gerrymandered maps across Indian Country and are pursuing litigation in numerous states as detailed above.

-- *Indian Country Election Protection*: NARF has created the first ever Election Protection Project to cover Indian Country at large. Project goals include: (1) Preparing voters to navigate election barriers. (2) Removing as many election barriers as possible by securing voting and registration opportunities. (3) Planning for election-day monitoring and data collection.

-- *203 Language Assistance*: Native American language assistance must now be provided in 94 political subdivisions in 12 states under Section 203 of the Voting Rights Act. Our 203 Project provides: (1) notice letters to covered jurisdictions; (2) outreach to Native communities in covered jurisdictions to educate them about 203 requirements; (3) outreach to covered jurisdictions and their election officials; (4) garnering resources to assist with translations; and (5) litigation.

4) Legislation: The Frank Harrison, Elizabeth Peratrovich, and Miguel Trujillo Native American Voting Rights Act of 2021 (“NAVRA”) was introduced in August 2021. The legislation is intended to address the unique challenges Native Americans face when exercising their right to vote. We are continuing to push for NAVRA in Congress

Executive Order : In 2021, President Biden issued an Executive Order directing all federal agencies to accept provide registration opportunities under the National Voter Registration Act when possible. We have been working with a partnership coalition to push Indian Health Services to accept registration designation. We are also encouraging Tribes that compact IHS service under Public Law 93-638 to accept designation at their facilities. In September 2023, the Shingle Springs Rancheria in California accepted designation for their health facility.

INTERNATIONAL RECOGNITION OF INDIGENOUS PEOPLES

United Nations Declaration on the Rights of Indigenous Peoples
Since 1999, NARF has represented the National Congress of American Indians (NCAI) in the international arena to protect Indigenous rights. In September 2007, the United Nations adopted the Declaration on the Rights of Indigenous Peoples (Declaration). The Declaration sets minimum standards for the treatment of Indigenous Peoples and can serve as the basis for the development of customary international law.

Until now, Indigenous Peoples have had to appear in most UN bodies as non-governmental organizations, which is precisely what they are not. In 2018, the Human Rights Council began to establish an appropriate status for Indigenous Peoples representatives and institutions to participate. After a couple of years of being on the back burner, there was a meeting in December 2022 to restart the discussion on the status of Indigenous Peoples at the UN. There were four areas of discussion: where and how would enhanced participation be allowed and what are the criteria to qualify and the process for determining eligibility for the enhanced status. NARF submitted a concept paper prior to the event. Subsequently, this matter is receiving serious consideration in the Human Rights Council which passed a resolution calling for consultations on this issue to take place in 2024 at the Human Rights Council.

The Implementation Project
(un-declaration.narf.org)

NARF and the University of Colorado Law School (CU Law) have initiated The Implementation Project to guide the implementation of the United Nations Declaration on the Rights of Indigenous Peoples (Declaration) in the United States. Guided by traditional values, contemporary challenges in Indian Country, and the needs of future generations, the goal of the project is to realize the promises of the Declaration in the U.S. In 2023, project actions included two side events at the April UN Permanent Forum on Indigenous Issues, preview and debrief sessions for the Permanent Forum, participation in the Expert Mechanism on the Rights of Indigenous Peoples, two sessions at the NCAI convention, and a new initiative on “Operationalizing Free Prior and informed Consent in the Context of Conservation and Development.”



Photo Credit: Keone Nunes



In some Indigenous communities, there has been a resurgence of interest in traditional tattooing practices. Efforts are being made to revive and preserve these practices as a means of cultural revitalization and reclaiming cultural identity.

REVIVAL AND PRESERVATION EFFORTS

Organization of American States Draft Declaration on the Rights of Indigenous Peoples

The Organization of American States (OAS) approved the American Declaration on the Rights of Indigenous Peoples in 2016. The United States commented it had been a persistent objector to the text and could not be bound by it. NARF, representing NCAI, joined a coalition of Indigenous representatives calling for the OAS to fully carry out its plan to implement the American Declaration. NARF made a statement at the 52nd session held in September 2022. Subsequently, at its 53rd session in June 2023, the General Assembly approved a resolution calling for the creation of a body to monitor the implementation of the American Declaration.

World Intellectual Property Organization

NARF represents NCAI in the ongoing negotiations at the World Intellectual Property Organization (WIPO) Intergovernmental Committee on Intellectual Property and Genetic Resources, Traditional Knowledge and Folklore (IGC) for an international instrument to protect intellectual property, including Traditional Knowledge, Genetic Resources and Associated Traditional Knowledge (GRAATK), and Traditional Cultural Expressions (TCE). NARF attended IGC 46 in February 2023 and IGC 47 in June 2023. At the IGC 47, NCAI sponsored a side event panel on “Indigenous Peoples’ Participation in the

UN: Models and Guidelines for Promoting Effective Participation of Indigenous Peoples at WIPO.” At the WIPO General Assembly in July 2023, NARF delivered two interventions on behalf of NCAI. In September 2023, NARF attended a WIPO Special Session and two days of Indigenous Caucus meetings focused on refining the version of the Genetic Resources text.

HOLD GOVERNMENTS ACCOUNTABLE

Within the unique trust relationship between the United States and Native nations is the inherent duty for all levels of government to recognize and enforce the laws and regulations applicable to Native peoples. NARF commits to *hold governments accountable* to Native Americans.

TRUST FUND MATTERS

Pembina Chippewa v. United States

NARF represents the Turtle Mountain Chippewa, Chippewa Cree, White Earth Band of Minnesota Chippewa, and Little Shell Chippewa Tribe in this case against the federal government for misaccounting and mismanagement of their tribal trust fund, the Pembina Judgment Fund. Starting in August 2007, the parties engaged in alternative dispute resolution proceedings in the Court of Federal Claims. In July 2015, the parties reached agreement on a monetary amount for a potential settlement. In March 2018, the parties reached agreement on the non-monetary components of a potential settlement. In June 2021, the U.S. District Court for the District of Columbia granted final approval of the \$59 million settlement. In September 2023, distributions commenced to the four Tribes and more than 30,000 eligible individuals. The entire process is likely to take up to 12 months to complete.

Intertribal Council of Arizona v. United States

In April 2015, NARF filed on behalf of the Intertribal Council of Arizona (ITCA) a breach of trust case against the United States seeking damages for mismanagement of the Arizona Intertribal Trust Fund (AITF). The AITF was established by Congress in 1988 to compensate Arizona Tribes for the closure of the Phoenix Indian School, which allowed the Department of the Interior to exchange the school's land for privately owned lands of the Barron Collier Company in Florida. The Phoenix lands were more valuable, and Congress approved the exchange only if the difference in value of the properties went to the AITF and a trust fund for the Navajo Nation. Collier partially paid the property value, but then gave notice that they would no longer make payments. The lawsuit seeks to hold the United States liable for the remaining payments into the AITF. ITCA filed an amended complaint in April 2018. The court dismissed all but a portion of one of ITCA's claims. In 2019, ITCA appealed to the U.S. Court of Appeals for the Federal Circuit, and the court heard oral argument. In April 2020, they decided that two ITCA claims were properly dismissed, but a third claim, that the United States failed to hold sufficient security for the trust fund payments, should go forward. In December 2022, the case was reassigned to a new judge after the death of the presiding judge. The parties have submitted a briefing schedule on simultaneous

motions for summary judgment. After full briefing on the motions, the court heard oral argument in August 2023 and denied ITCA's summary judgment motion and denied in part and granted in part the United States' motion. In December 2023, the parties proposed a briefing schedule for another round of simultaneous summary judgment motions.

Yvonne Ito v. Copper River Native Association

NARF represents Arctic Village Council, the Alaska Native Tribal Health Consortium, the Council of Athabaskan Tribal Governments, Manilaq Association, the Southeast Alaska Regional Health Consortium, and the United Tribes of Bristol Bay as amici curiae, in *Ito v. Copper River Native Association*, a tribal sovereign immunity case currently pending before the Alaska Supreme Court. This case centers on whether tribal consortia—organizations comprised of and directed by sovereign Tribes to carry out essential governmental functions—may assert the sovereign immunity of their member Tribes. This is a particularly important question in Alaska, where Alaska Native Tribes often work collaboratively to take advantage of economies of scale while providing essential government services to their citizens, including social, educational, advocacy, and health services. The Alaska Superior Court concluded that Copper River Native Association (CRNA) is a tribal consortium and could assert the sovereign immunity of its member Tribes. CRNA had not waived its sovereign immunity or consented to be sued, and therefore the Superior Court dismissed Ito's lawsuit.

The Superior Court also concluded that CRNA was shielded by sovereign immunity under existing Alaska law as laid out in *Runyon v. Association of Village Council Presidents*, which established a single-factor test for determining whether a consortium could assert sovereign immunity. Runyon is out of step with the federal courts of appeal, which have adopted a multi-factor test for determining if a consortium can assert tribal sovereign immunity. Tribal amici's brief to the Alaska Supreme Court urges them to bring state law into alignment with federal law and adopt the multi-factor test. The Alaska Supreme Court heard oral arguments in the case during the summer of 2022. We still await the court's decision.

Carlisle Cemetery Reparations – Sisseton Wahpeton Oyate, Spirit Lake Nation

NARF has succeeded in assisting Sisseton Wahpeton Oyate and Spirit Lake Nation to bring the remains of two of their children, Amos LaFromboise and Edward Upright, back to their tribal homelands from the Carlisle Barracks Post Cemetery. This was accomplished pursuant to a first-of-its-kind, written and signed agreement with the Army, which was negotiated between the Tribes and the Army in arms-length, government-to-government negotiations.

In October 2023, the Winnebago Tribe of Nebraska requested the repatriation of the remains of their two children, Samuel Gilbert and Edward Hensely, from the Carlisle Cemetery pursuant to NAGPRA. In December 2023, the Army refused to comply with the law and denied Winnebago's request. Winnebago seeks to enforce its plainly apparent rights under NAGPRA.

rites of passage



Tattooing ceremonies are sometimes associated with important rites of passage, such as coming-of-age rituals or initiation ceremonies. These ceremonies mark significant milestones in an individual's life within the community.



Photo Credit: Keone Nunes

DEVELOP INDIAN LAW

NARF is firmly committed to sharing its legal expertise in support of Indian rights. NARF maintains several projects to *develop Indian law and educate the public about Indian rights, laws, and issues*. NARF staff also participates in numerous conferences and events to share their knowledge and expertise in Indian law.

INDIGENOUS PEACEMAKING INITIATIVE (peacemaking.narf.org)

Indigenous peacemaking is a community-directed conflict resolution process that addresses the concerns of all interested parties and uses traditional rituals to involve the parties to a conflict, their supporters, elders and interested community members. Within the circle, people can speak from the heart in a shared search for understanding of the conflict, and together identify the steps necessary to assist in healing all affected parties and to prevent future occurrences and conflicts. The mission of NARF's Indigenous Peacemaking Initiative (IPI) is to promote and support Native peoples in restoring sustainable traditional dispute resolution practices. Based on surveys of tribal justice system professionals, our priorities are: (1) distributing peacemaking materials; (2) providing technical assistance to Tribes; (3) training on tribal peacemaking; and (4) advocating for tribal peacemaking. The project is guided by an advisory committee of traditional peacemaking experts and practitioners. In 2023, IPI held trainings/technical assistance with multiple Tribes in California and Oregon. IPI also presented to the California Tribal-State Judicial Collaborative and California State University in Fresno's International Social Welfare conference.

THE NATIONAL INDIAN LAW LIBRARY (nill.narf.org)

The National Indian Law Library (NILL) is the only publicly available law library in the United States devoted to Indian law. In addition to the service that it provides to NARF's attorneys, the library is an invaluable resource supporting Indian Law and educating the public on Indian Law issues. Each week, NILL provides free updates to more than 7,500 subscribers of the Indian Law Bulletins. Recently, NILL has been doing outreach about the library's resources with several presentations in 2023. Also this year, the library moved more than 1,000,000 boxes and files to the new NARF Boulder office!

CULTURAL DIVERSITY



Indigenous tattooing practices vary widely among different Indigenous cultures around the world. Each community has its own unique traditions, designs, and techniques that reflect their distinct cultural identity.



Photo Credit: Keri Oberly

FY 2023 FINANCIAL REPORT

Based on our audited financial statements for the fiscal year ending September 30, 2023, NARF reports total revenue and net assets of \$23,505,096 and \$67,860,513, respectively. Due to presentation requirements of the audited financial statements in terms of recognizing the timing of certain revenues and expenses, they do not reflect the fact that based on NARF's internal reporting, revenue exceeded expenses and other cash outlays resulting in an increase of \$12,011,793 to the reserve fund.

When compared to fiscal year 2022: The increase in public contributions is attributed to two large bequests. The decrease in foundation grants is due to the additional new (or renewed) grants we received in prior years, restricted to our important projects and cases (many of these grants are multi-year). The increase in tribal contributions is mostly due to a large, restricted, two-year grant from a Tribe that we've had a long-standing relationship with. The decrease

in legal fees is mostly related to two large settlements received in FY22 and the reduced needs for two of our largest clients in FY23. Along with the overall market, NARF's investments experienced a significant resurgence. "Other" revenue reflects income including honorariums, sales of goods and publications and reimbursements.

Note: This summary of financial information has been extracted from NARF's audited financial statements which received an unmodified opinion by the accounting firm of FORVIS, LLP. Complete audited financials are available, upon request, through our Boulder office, or at www.narf.org.

SUPPORT AND REVENUE COMPARISON

	2023		2022	
	\$	%	\$	%
Public Contributions	\$11,495,909	48.9%	\$ 6,867,998	117.2%
Foundation Grants	4,695,734	20.0%	6,812,031	116.2%
Tribal Contributions	1,747,850	7.5%	1,162,350	19.8%
Legal Fees	757,586	3.2%	960,813	16.4%
Return on Investments	4,751,728	20.2%	(9,942,415)	-169.6%
Other	56,289	0.2%	1,201	0.0%
TOTALS	\$23,505,096	100.0%	\$5,861,978	100.0%

EXPENSE COMPARISON

	2023		2022	
	\$	%	\$	%
Litigation and Client Services	\$12,683,944	68.9%	\$9,174,910	63.9%
National Indian Law Library	536,267	2.9%	385,186	2.7%
TOTAL PROGRAM SERVICES	13,220,211	71.8%	9,560,096	66.6%
Management and General	1,700,973	9.2%	1,307,582	9.1%
Fundraising	3,503,763	19.0%	3,487,069	24.3%
TOTAL SUPPORT SERVICES	5,204,736	28.2%	4,794,651	33.4%
TOTALS	\$18,424,947	100.0%	\$14,354,747	100.0%

NARF ACKNOWLEDGEMENT OF CONTRIBUTIONS:

FISCAL YEAR 2023

NARF's success relies on the generosity of our donors throughout the nation. We invite you to learn more about the benefits associated with each program listed below, please contact our Development Department at 303-447-8760. **We gratefully acknowledge these donors for fiscal year 2023 (October 1, 2022 through September 30, 2023).**

TRIBES AND NATIVE ORGANIZATIONS

AMERIND, Buena Vista Rancheria of Me-wuk Indians, Chickasaw Nation, Colusa Indian Community Council, Confederated Tribes of Siletz Indians, Cow Creek Band of Umpqua Tribe, Cowlitz Indian Tribe, Foxwoods Resort Casino, Hualapai Indian Tribe, Indian Gaming Association, Jamestown S'klallam Tribe, Keweenaw Bay Indian Community, Muckleshoot Indian Tribe, Oneida Nation, Poarch Band of Creek Indians, San Manuel Band of Mission Indians, Seminole Tribe of Florida, Shakopee Mdewakanton Sioux Community, Tanana Chiefs Conference Inc., Tulalip Tribes of Washington, United Tribes of Bristol Bay, Yavapai-Prescott Indian Tribe, Yocha Dehe Wintun Nation

FOUNDATIONS, CORPORATIONS, AND LAW FIRMS

444S Foundation, Agua Fund Inc., Alaska Venture Fund, Barrett Outdoor Communications Inc., Bay and Paul Foundations, Bia-Echo Foundation, Bloomberg Philanthropies, Building Back Together, Center for Secure and Modern Elections, Chorus Foundation, Christensen Fund, Clc-dew Foundation, Common Cause Education Fund, David and Lucile Packard Foundation, Democracy Fund, Edgerton Foundation, Edward & Verna Gerbic Family Foundation, Etsy Impact Fund, Ford Foundation, Foundation to Promote Open Society, Good Shepherd Fund, Grove Foundation, Henry Luce Foundation, Inatai Foundation, JPB Foundation, Ladybug Foundation, Lannan Foundation, Laughlin-Beers Foundation, Life Comes From It/Tides, Macy's, MALDEF, Manatt, Phelps & Phillips, LLP, Margaret A. Cargill Foundation, Mennen Environmental Foundation, Middle Road Foundation, Molson Coors Beverage Company, Morton K. and Jane Blaustein Foundation, NEO Philanthropy, New Venture Fund, Nia Tero Foundation, Noon Whistle Fund, Oak Foundation, Ocean Conservancy, Inc., Okta For Good Fund, Padosi Foundation, The Pew Charitable Trusts, Philanthropiece, Powdr, Roaring Brook Family Foundation, Rockefeller Brothers Fund, SalmonState/New Venture Fund, Sirius XM Cares Foundation, Solidarity Giving, Steiner Family Foundation, The Schmidt Family

Foundation, The Wilderness Society, The William & Flora Hewlett Foundation, Tides Foundation, Toyota North America, True North Foundation, Wallace H. Coulter Foundation, Warner Media, Wellspring Philanthropic Fund, W.K. Kellogg Foundation, Anonymous

LIVING WATERS ENDOWMENT – *The Living Waters Endowment allows donors to honor friends and loved ones by making an endowment gift of \$10,000 or more, where the principal is invested and interest income is used for NARF's programs. By designating a gift to endowment, contributions generate annual funds and provide legal representation to our tribal clients in perpetuity.*

Elwood H. Brotzman Memorial Fund, Jerome Davis Living Waters Endowment Fund, Kathleen & Ruth Dooley Family Fund, Susan K. Griffiths Memorial Fund
The Robert & Joy Hanson Leland Endowment, Dr. Yvonne LeMelle, Frank J. McCormick Family Fund, Marvin W. Pourier Jr. & Donna M. Deans Memorial Fund
Mary Lou Mosca Ragona Memorial Fund, Ernest L. Schusky Endowment, The Sahsen Fund, The Snoqualmie Indian Tribe, Helen & Sidney Ungar Memorial Endowment Fund, Dan & Beth Whittemore, Anonymous

BEQUESTS AND TRUSTS

Rose Marie Baab, Sylvia K Brown, Mrs. Kathleen Carney Ms. Diane D. Delp, Carolyn Ferriday, William Guimond Trust, Homer Gurtler, Kellen Haak, Dr. Barbara H. Handmacher, James Edward Hudock Trust, Doreen Miao, Elinor K. Ogden, Linda Oleno, Joan M. Seiger, Peter L. Sheldon, John L. Vaupel, Stephen L. Wasby

PETA UHA – *Peta Uha in the Lakota (Sioux) language means firekeeper, an individual who makes a solemn commitment to ensure that the sacred flame—source of light, heat, and energy for the people—will be kept burning. Peta Uha is a membership program for donors making substantial annual commitments to NARF. Like the firekeepers of old, members of the Peta Uha Council demonstrate constancy and vigilance to ensure the protection of justice for Native Americans.*

PETA UHA PIPESTONE

Rachel Albright, Anne Anderson, Kristi Bennewitz, Glenn Bigonet, Mark & Deborah Blackman, Steven & Gloria Foster, Peter Gerbic, Lucile Hamlin, Kinetik S.a.r.l., Jill Kirshner, Bill & Ildiko Knott, Lasky-Barajas Family, Ben Lewis, Frances Marzec, Miriam Merin, Ruth Perry, Arthur & Maria Richmond, John Rogers, Richard Weaver



Photo Credit: Keone Nunes

PETA UHA TURQUOISE

Reagan Hedlund, Jay Bortz, R. Reuss, Dayna Sowd, Derek Valdo, Bartow Van Ness III, Keith W. Cowan & Linda N. Walsh, Ken Holm, Jereme Palos, Bob Vandiver, Acorn Hill Foundation, Beane Family Foundation, Lucille A. Echohawk, Margaret L.J. Hayes, Michelle Heredia, Fiona Hill, Anne Humes, Josephine & Louise Crane Foundation Inc, Julia Kisla, Marion McCollom Hampton, Robert Nevil, AEN Foundation, Bryce H & Margaret A Purdy, Adina & Adam Rose, Lori Rosenblum, Michael G. Sawaya, Elizabeth Steele, Terpenning Fund, Bryan K. & Christine L. White, Dan & Beth Whittemore, Naomi W. Wolf

PETA UHA GRANITE

Cooper Allebrand, Jerry & Betty Arca, William & Alice Anne Barbo, Mr. & Mrs. David Boerner, Mary Barlow, Richard Barna, Arnold Battise, Bill Besenhofer, Robert Blair, David Boerner, William Briggs, Gary Brune, Susan Okie Bush, Candelario & Elizabeth Celio, Thrivent Charitable Impact & Investing, Nathan Culberson, Eric Dahlstrom, Danielle Danese, Katherine Emerson, Weinstein Family, Laura Fino, Franklin Philanthropic Foundation, David Gundy, William Harley, Eleanor Huffines, Alexander Julie, Karen Kehoe, Sue Klau, Heather Kline, Grant Laughlin, Marley Lerner, Paul & Eileen LeFort, Virginia Lincoln, Edith Macguire, Rose Marie Baab, Stephen Marino, Josephine Merck, Peter Middleton, Jeff Mitchell, Louis Monti, David Mortman, William Neiman, Joe Paduda, Dorothy Parris, David & Dorothy Parris, Michael Pfeffer, Helene Presskreischer,

Chase Prikkel, Rosse Family Charitable Foundation, Margaret Sass, Merrill Schneider, Richard Spitz, Jennifer Stanley, Livia Stone, Michael Taron, Wendy White, Charles Wilkinson, Julian and Stacy Yochum, Mary Zerby, Steven Zuckerman

PETA UHA FLINT

Michael Abramowitz, Marissa Ahern, W. Ron Allen, Frank Amodio, Joan Anderson, Michele Anderson, Nichole Ash, Jami Attenberg, Selma Attride, Kent Bach, Bill Bajari, David Barnard, William Bennett, Joanne Berghold, Benjamin Blonder & Charlotte Wang, Abigail Bloom, Mitchel Bollag, Josh Bornstein, Laura Borst, Mr. David Boyd & Ms. Misae Nishikura, Anna Bradberry, Sybil Breece, Kenneth Brenner, Jody & Sheila Breslaw, Leslie Brown, Jane Brown, Stephanie Brown, Ralph Brown, Sean Buffington, Lindsay Burtchell, Michael Campbell, Janet Campbell, Deborah Carstens, Jessica Cattelino, Elizabeth Cazden, Petra Chacon, Barbara Chapman, Gene Chavez, Janet Chisman, Tim Clarke, Henry Clayton, Charles Cole, Michael Colmone, Amy Coronado, Catherine Coyle, David Crane & Elizabeth Dang, Brett Critchlow, Phillip & Julie Croll, Karen Crook, Toni Crowley, Lauren Cutuli, Dino J. & Elizabeth Murfee DeConcini, Dana Dedrick, Jean Del Vecchio & Lenora Egli, Margaret deRivera, Juliane Diamond, Isaac Dietzel, David Doht, Bob Dougan, Megan Draheim, Neville & Doreen D'Souza, Show-Hong Duh, Craig DuPrey, Stephanie Dutchen, Bert & Jo Ann Eder, Edwards Mother Earth Foundation, Daren &

Amy Eilert, Courtney Ek, Shane & Monica Evangelist, Mb Fafunwa, Lenore Feigenbaum, David Fell, Dawn & Dustin Flay, John Folse, Leslee Fournier, Ann Francis, Peter Frank, Andrew & Audrey Franklin, Elizabeth Fray, Daniel French & Rosann Tung, Jacqueline Frouin, Iqeq Fund Services, Isabel Gable, Larry & Mary Galligan, Choudary Ganga, Mary Gerber, Duff & Marion Gerrish, Ann Getches, Paige Gillies, Rita Giovannelli, Sara Givens, Andy Gleisner, Patricia Goecker, Steven Goldberg & Frazer Goldberg, Susan Goldschmidt, MaryAnn Gore, Gwendolyn Gottlieb, Peter & Lana Graff, Grace Graham, Zach Grandin, Scott Greenwald & Isabella Greenwald, Laura Grossman, The Pivot Group, Peter Haiman, Joseph Hanley, David Headley, Jennifer Hecht, Heimbinder Family Foundation, June & Frank Heintz Charitable Fund, Rachel Henriques, Robert Henry, Alison Herschede, Brian Highland, Marcia Hobart, Alison Holman, Erik Thompson & Kate Holmes Thompson, Raymond Honeywell, Mark & Theresie Houghton, Jim Hudson, Wayne Hyatt, M. Johnson, Mike Johnson, Deborah Johnson, Debby Johnston, Harriett Jones, Kenneth Kahn, Phillip Katzen & Joan Kleinberg, Arleene Fox Keller, For The Environment, Kevin Hannon, Robert Kipper, Jim and D'Arcy Kirkland, Alex Kline, Richard Knutson, Ricki & Scott Kresan, Alex Krist, Mrs. T.G. Labrecque, Gary Lawrence, Yvonne LeMelle, Perry & Diane Lericos, Lester Poretsky Family Foundation, Joshua & Rebecca Levinson, Erika Lewis, Liz Lucke, Charles & Jean Luckhardt, Janet Lynch, Melody MacKenzie, Kallarin Mackey, Alexander Macnow & Nathan Renner Johnson, Luisa Magarian, Nancy Main, Peyton Mays, James McCalla, Eric McCracken, Mary McGee, Myra McKenzie & Scott Boi, Vicky McLane, Fara McMullen, Anthony Meadow, Barbara Meislin, Mendenhall Family, Carolyn Merryman, Clark & Jane Moeller, Soccer Mommy Music Inc, Richard Monkman, Denise Moore, Melvin and Ellen Moore, Dan Morrow, Cassandra Naylor, Willa Nehlsen, Sara Nerken, Evelyn Newell, Marianne Nick, Kesaya Noda, Christopher Oberg, Jean Lee Obrien, Samuel Obstfeld, Gail Osherenko & Oran Young, Sara Oursler, David Owens, Aylin Ozgener, Mr. & Mrs. Greg Pallansch, Joaquim Panozzo, Peer Pedersen, Beth Peisner, Bogdan Pesut, Jeffrey & Joan Petertil, Carol Phelps, David R. Pokross Jr. & Laurie S. Gill, Noelle Poncelet, Anne Powell, Karen Pearce Raley, Nancy Ramsey, William Rand, Danielle Randhawa, Meghan Rapp, Mary Rapp, Myung Raymond, Marlys Rechkemmer, Danielle Redmond, Trevor Reid, Lauren Reliford, Mr. & Mrs. James Rettig, Mark Richardson, Jeffrey & Teme Ring, Arlene Roberston, Karen Robertson, John A. Rodgers, Jr. Foundation, Faith Roessel & Matthew Slater, Peter Roeth-McKay, David Rohr, Kevin Rooney, Jane Root, Alyssa Rose, Lorna Rose-Hahn, John & Carolyn Rosenblum, Caitlin

Ross, Anthony E. & Jane Rothschild, Andrew Rowen, Ann Ruchthoft, Wesley Ruttle, Zoe Saldana, Arlene Salkow, Julia Salzman, San Francisco Foundation, Erin Schifeling, Robert Schmidt, Celia & Lenny Schuchman, Jeanette Scott, Suzanne Seubert, Saurin Sunny Shine, Audra Simpson, Avner Skolnik, Susan Slaughter, Helen Slusher, Creighton Smith, Izetta Smith & Ellen Goldberg, Isadora Snyder, Brian & Kathleen Spear, Mary Gabrielle Sprague, Tom & Diane St John Fund, Mr. & Mrs. David Stang, Michael Steffen, Sally Lee Stewart, Will Stoddard, Matthew Swan, Catherine Syrett, Daniel Taaffe, Stephen and Cecelia Tait, Florence Taitel, George Taylor, Melanie Taylor, Cole Taylor, Samuel Taylor, Richard Tecube, Beverly Terry, The Schneider Family Foundation, The ZIP Foundation, William Thorne, Timberwolf Welding Inc., Jennifer Tipton, Tithing Fund, Travis Memorial Fund, Tom Tremaine, Sheila Tuffanelli, Alice Turak, Annie & Christopher Umbricht, Anna Valdez, Brian Van Buren, Margaret Verble, Amalia Vidas, Stephen Waldman, Bryan Wallace, Linda and Chris Warren, Kevin & Libby Washburn, Mike Watkins, Jerry Wayne, Francine Weaver, Jay Weiner, Anthony Weiss, Alexander Weiss, Ronald Welch, Josh Wells, Aaron Wernham, Ann Whittemore, Peter Wiley, Rick & Sally Williams, Tamar Diana Wilson, Gayle Wilson, Alice Wilson, Emma Wohlgemuth, Ann and Alan Woods, Wrocklage Family, Harry & Belle Yaffe, Jeanne Zasadil

PETA UHA OBSIDIAN

Sharon Albrecht, Irvin Allison, Alisa Freeman Alvarez, Leonard Ambos, Tarang Amin, Victor Ancer, Tove Andvik, Nimra Azmi, Dian Bailey, Randall Barbis, Peggy Barrett, Carlin Barton, Patrick Basile, Heather Basile, Audrey Bass, Chelsea Batavia, Abraham Bauer, Kenneth Baughman, Daniel Baumann, Karen Benjamin, Mary Bennett, Eric Bentley, Robert & Ellie Bernstein, Lee Bernstein, Mary BerryHill, Larry Berryman, Alan Best, Elizabeth Bettenhausen, Lawrence Bilstein, Christine Bishop, Benny Bissonette, Robert Blaha, Nora Boedecker, Marsha Boettger, Elise Bornstein, John Bourdette, Alison Boyce, Alice Bragg, Bernd & Erika Brand, Sierra Brashear, Kristin Briggs, Jennifer Bright, Yaniv Bronshtein, Markel Brooks, Rebecca Brown, Mike Brown, Zoe Brown, Mary Bucholtz, Stewart Burchard, Kaitlin Burkard, George Burton, Cristina Campbell, Alex Carr, Lawrence Carroll, David & Rosemary Carson, Alex Carther, Mr. & Mrs. Thomas Caruso, Charles Castleman, Robert Cathcart, Lisa Chamoff, James Chandler, Marcelle Chase, Kavitha Chekuru, Paul Chrostowski, Karen Clays, James Clark, Thomas & Bonnie Clarke, Edgeworks Climbing, Kiersten Clingersmith, Nancy Colalillo, Mary Collier, Elaine Cook, Samuel Cook, Merissa Cope, Lamot Copeland, Adam

Corbin, Roger Coupal, Barry & Regina Crisman, Rebecca Crooks-Stratton, Jai Cross, Martha Crothers, Colette Crouse, Carolyn Crutchfield, John Cunningham, Jo Anna Dale, Carol Daley, Servais Daligou, Alex Dang, Robert Daniel, Charles Davis, Bruce DeBell, Alvin DeMaria, Murray Denofsky, George Desmond, George Dewey, Katie Dickson, Henry Dombrowski, Bonnie Douglas, Kimberley Drexler, Terese Dudek, Kathryn Dunham, Susan Dunlap, Deanna Durham, Isabelle Dyck, Sue Dye, Patrick Dyer, Mia Edidin, Anne Ehrlich, Henry & Susan Eichhorn, Sarah Elwood, Robert Endres, Mattias Eng, Mark & Joan Erhardt, Lazaro Estrada, Erin Euser, Brian Ewert, Marie Fabian, Carol Farthing, Benedict & Mary Feinberg, Stephanie Fenwick, Jeff Ferguson, Thomas Ferguson, Suzy Filbert, Bobbi Firebush, Deena & Jordan Fischer, Terry Fisk, Elizabeth Fleisig, Susan Ford, Fia Forsstrom, Frank Fortunato, Patricia Foschi, Elizabeth Foster, Alix Foster, Sunshine Foundation, John Fowler, Robert Fox, Paul Finley & Lisa Foxwell, Kristina Frank, Greg & Amanda Friedman, Ethelyn Fulton, Nat Furman, Greta Gadbois, Aditya Gaddam, Corrine Garza, The Lawrence Geller Family, Erin Gendron, Marianne Germond, Eric & Jennifer Ginsburg, Samuel Gluskin, Randall Goetzl, Bruce Golden, Margery Goldman, Thomas Goldsmith, Seth Goldstein, Jimmy Goodman, Pamela Gordon, Ruben Grado, Edward Graves, Rob Greene, Martin Griffith, Adam Gronewold, Carol Gross, Clara Guellil, David Haden, P. Jane Hafen, Stephanie Hamilton, Robert Hammond, Collier Hands, James Hannah, Nur-ul- Haq, Margaret Harris, Maria Louise Harris, Patrick Hart, Martin Harwit, Melissa Haskell, David Hausam, Maryann Heard, Eileen Heaser, Robert Hefter, Ralph Helms, Matthew Highland, Nell Highleyman, R. Hillian, Gilbert Ho, Larry Hoellwarth, Bruno Hofmann, Maya Honda, Lisa Honig, Lacey Horn, James Houlahan, Regina Hovet, Patricia Howard, Patricia Howes, Robert Hunter, Marilyn Hunwardsen, Michael Hupy, Liz Hurkes, Nathan & Irene Idicheria Tiller, Jose Jacobs, Patricia Janesh, Kristina Jensen, Tobias Jensen, Roberta Johnson, Keith Johnson, Christine Jones, Linda Kacser, Mark Kadzielski, Camille Kalama, Nancy Kalina, Mark Kalmansohn, Arvind Kannan, Neal Kass, Jean Keskulla, Bradley Kessler, Wesley Kevelson, KyungMann Kim, J. A. Kim, Andrea Kirsh, Adam Klepper, Roger & Lalah Kline, Melissa Kling-Newberry, Abi Knight, Sharon Kniss, Leo Korein, Bonnie Krafchuk, Andrew & Susan Kramer, Shelley Krause & Terri Riendeau, Diane Krueger, Karen Krueger, Peter Krug, Laine Kuehn, Adela Kuehn, Nickola Kuhn, Edward Kukla, A. Kuntze, Barbara Lacey, Richard Lagerstrom, Alice LaMoree, Henry Landau, Timothy Lane, James Lang, Renee Latiolais, William Lawrence, Adam Lawthers, Deborah Lee, James & Cynthia Leonard, Richard Leslie, Linda Ligon, Chad

Lindner, Jason Linzer, Abigail Lo, Tyler Lobdell, Judith Longcore, Bruce Loughry, Mr. & Mrs. A. Lowry, Reed Loy, Jennifer Lucero, Carol Ludwig, Nicole Luensman, Brett Lyon, Adrianna Maberry, Stewart Macaulay, Annalisa Maceda, Deirdre MacGuire, Margo MacVicar-Whelan, Kevin Madsen, Margarita Maestas, Michael Makley, Joan Makurat, Cassidy Mannier, Joelna Marcus, Karen Markert, Kathleen Marquardt, Andrew Martin, Sunaina Martin, Lawrence Martin, Kimberly Mason, Ichiro Matsumura, Peter Mayer, William & Eileen McCarron, Michael McHenry, Morgan McIntosh, Catherine McKesson, Susan McKim, Carole McKinney, Hannah McMullen, Jean McNamara, William McReynolds, Helen McRoberts, Josh Meltzer, Amy Messer, Jessica Milavitz, Cindy Miller, Million Dollar Baby Co., Roxanne Mintz, Mary Miratrix, Alan Moeller, Gwen Moffat, John Montgomery, Janet Moore, Mary Ann Moran, Mr. & Mrs. Patrick Morrissey, Charles Moses, Lawrie Mott, Ms. Lou Moyer, Julia Munckafrosenschold, Barbara J Musicus, Alan Myerson, Sara Narva, Iris Nelson, Scott & Jean Nelson, Martha Newell, Dawn Noggle, David Novello, Kelsey Nussenfeld, James Oates, Thomas Ogle, Rex A Okakok Sr, Lynn Olson, Thomas O'Neal, Oregon Historical Society, Calvin Pagel, Gina Pasquale, Maureen Patrick, Linda Patterson, T. H. Paul, Sylvia Perera, Johnny Perna, Sandra Petersen, Bob Peterson, Michael Petoskey, Anthony Pires, Douglas Plante, Michael and Ruth Podolin, Patrick Pollard, Dee Price, Guy Pry, Rory Pulvino, Leon Rabinowitz, Mary Rapczynski, RBC, Asha Reddy, Barbara Reilly, David Rhoades, Anthony Ricci, Walter Richardson, Maria Riolo, Nicholas Robinson, Ron Rohde, Scott Rose, Hazel Rose, Edward Rosen, Carol Rosenberg, Jon Rosenfield, Robert Rothhouse, Mark Rowell, Joe Rushka, Peggy Russell, Salvatore Salorenzo, Kelly Sanford, Marjorie Sarbaugh-Thompson, Mark & Lucia Savage, Julie Schatz, Melanie Schoenberg, Kathleen Schoenhard, Barbara Schubart, Karl Schults, Deborah Schwartz, Tanya Segel, Elaine Semancik, Kristyn Sessions, Lori Severson, Rose Shannon-Rule, Jonathan & Catherine Shapiro, Mark Shapiro, Elvera Shappirio, Keith Shattenkirk, Noel Sheer, Ann Sherman, Richard Shirley, Susan Sihler, Laura Simcox, Harold Simon, Karalyn Siner, Dorothy Sisk, Christopher Skinner, Daniel Slichter, Terri Slivka, Simon Smith, Don Smith, Astrograph Software, Inc, Christina Sonas, David Souers, John Squires, Rosemary Stanko, Kelley Stanley, George Starzmann, Sophie Staton, Jacqueline Stauffer, Anne Steele, Christine Stehman, Joan Steitz, Jack Stephens, Denise Sterchi, Patrick Stollenwerk, Carla Stroh, Wes Studi, Michelle Subart, Pavur Sundaresan, Olivia Taber, David & Dana Taft, Matthew Taverni, Jessica Taylor, Dennise Templeton, Christian Termyn, Robert Thenhaus, Marian Tieh, Jennifer Tiffany, Stephen Tiwald,

Patricia Tomasik, Elise Tripp, Kate Trujillo, Laura Twichell, Vincent Uihlein, Clo Ulrich, Ron Urban, Ellic & Jeanine Vaden, Amanda Van Hoesen, Kim Van Savage, Michael Vanderbilt, Carmen Velasquez-Bales, Charles Vetzner, John Vickery, Jake Vinson, John & Stephanie Volkman, Tom & Blondie Vucich, Patricia Wainwright, Carey Walker, Carmen Waller, Lisa Walsh, Marion Walton, Phillip Wankat, Rev. William Wantland, Chris Ware, Charles S. Warren, Donna Waterman, Suzanne Way, Michael Weier, Barbara Weigel, William & Sharon Weisman, Karen Welmas, Cynthia Werner, Liesl WestHolmes, Tahja Whiteley, Williard & Katharine Wilcox, Paul Wilhite, Annski E. Williams, Vanessa Williams, Katherine Williams, Danielle Wilmot, Mary Wilner, Aletta Wilson, Kirsten Wilson, Kathleen Winder, David Winston, Christine Witschi, Robert Wolf, Sharon Wolfe, Savannah Wood, Elisabeth Wood, Marilyn E. Wood, David Woolverton, Alisa Yaffa, James Young, Kristen Young, Suzanne Zilber & Adin Mann, Gregory Zimmerman, Beatrice Zizlavsky

CIRCLE OF LIFE – *The circle is an important symbol throughout Native American cultures, representing unity, strength, and the eternal community of life. NARF's Circle of Life Donors provide lasting legacy to the Native American Rights Fund by including NARF in estate planning or deferred gifts.*

Catches Bear & Judy Adams, Rodney Addison, Theodora Barychewsky, Diane BenAri, Nanette Bohren, Nina Brill, Broaddus/Jensen, Larry Cooper, Katherine Curtis, Gary Dickerhoof, Henry & Susan Eichhorn, James Fee, Pete Floros, Paul Finley & Lisa Foxwell, Jan Freeman, Louise Gomer Bangel, Lydia Grimm, Merrill Hakim, Michael Hall, Margaret Hartnett, Karin Holser, Barbara Humes, Harriett Jones, Vusama Kariba, Phillip Katzen, Betty Kleczy, Mary Klinkel, Edward Kriege, Sharon Laughlin, Ingrid LeBlanc, James Lehnerer, Jane Libby, Rima Lurie, William & Eileen McCarron, Marion McCollom Hampton, William Milligan, Gary Montgomery, Leila Moore, Jeanne Moskal, Karen NoLand, Nancy O'Neal, Anthony Pampena, Moses Peter, Randall Petersen, Denise Pfalzer, Casey Portnoy, Andrea Robinsong, June Rosenthal, William Rozier, Mrs. B.W. Sampson, Michael Seeley, Charlotte Selver, Kirk Sperry, William Steib, James & Patricia Straus, Michael & Carol Sullivan, Louis Tabois, Valeria Tenyak, Charlotte Thompson, Rene Vivo, Tim Wernette, Dan & Beth Whittemore, Karen Williams-Fast Horse, Van Yasek

MATCHING GIFTS

Bank of America, BD, Caerus Operating LLC, Casey Family Programs, Circle of Service Foundation, Eldora Play Forever Fund, Fidelity Brokerage, Gordon and Betty Moore Foundation, Heising-Simons Foundation, J.P.

Morgan Chase Foundation, Jackson Healthcare, Kirkland & Ellis LLP, Multiplan, Inc., PEW Charitable Trusts, Qualcomm, Salesforce.com, Synchrony Foundation, Texas Instruments, The Ford Foundation, U.S. Bank Foundation, Vision Ridge Partners LLC, William Penn Foundation, W.K. Kellogg Foundation

IN-KIND DONATIONS

Alec Peters, Rachael Gessert, Benson James, Kramer Levin -Kramer Levin Law Firm, Natasha Rigg – Heirloom Films & Photography

BOULDER-DENVER ADVISORY COMMITTEE

Lucille A. Echohawk, Thomas W. Fredericks, Ava Hamilton, Jeanne Whiteing

OTHER WAYS TO SHOW YOUR SUPPORT FOR THE RIGHTS OF NATIVE PEOPLES

Tsanáhwit Circle – Tsanáhwit is a Nez perce word meaning equal justice. Tsanáhwit Circle members recognize the constant need to stand firm for justice by making monthly contributions. With cases that can span years, monthly ongoing contributions make a real difference for protecting the rights of the Tribes we serve. Visit our online donation page at www.narf.org to pledge your monthly support.

Otu'han – Otu'han is the Lakota (Sioux) word translated as giveaway. Otu'han gifts are memorial and honoring gifts modeled after the tradition of the Indian giveaway in which items of value are gathered over a long period of time to be given away in honor of birthdays, marriages, anniversaries and in memory of a departed loved one. Visit our online donation page at www.narf.org to make a tribute gift.

Follow us – Sign up at www.narf.org for our e-news or like and follow us on social media. These are both great way to get case updates, calls-to-action, special events information, and invitations. Your e-mail address is confidential and we will not share it with any outside sources.

Facebook: Native American Rights Fund

X: @NDNRights

Instagram: @NativeAmericanRightsFund

LinkedIn: Native American Rights Fund

NARF STAFF

CORPORATE OFFICERS

John E. Echohawk (Pawnee) - Executive Director/Attorney

Matthew Campbell (Native Village of Gambell) - Deputy Director/Attorney

Michael Kennedy - Chief Financial Officer

Donald M. Ragona (Matinecock) - Director of Development/ House Counsel

Sarah Palacios (Pueblo of Pojoaque) - Director of HR & Office Administration

BOULDER STAFF

David Gover (Pawnee/Choctaw) - Boulder Managing Attorney

Mark Carter - (Citizen Potawatomi Nation) - Attorney

Michael Carter (Citizen Potawatomi Nation) - Attorney

Jacqueline De León (Isleta Pueblo) - Attorney

Kirsten Gerbatsch - Legal Fellow

Malia Gesuale (Native Hawaiian) - Blaustein Fellow

K. Jerome Gottschalk - Attorney

Noah Lee (Ho-Chunk Nation) - Wilderness Society Fellow

Melody McCoy (Cherokee) - Attorney

Steven C. Moore - Attorney

Thomas Murphy - Attorney

Allison Neswood (Navajo) - Attorney

Sue Noe - Attorney

Jason Searle - Attorney

Brett Lee Shelton (Oglala Lakota) - Attorney

Ada Montague Stepleton - Attorney

Joe M. Tenorio (Santo Domingo Pueblo) - Attorney

Beth M. Wright (Pueblo of Laguna) - Attorney

Nate Ahrens - Systems Administrator

Kevin Cheng - Paralegal

Amy M. Echo-Hawk (Yakama/Pawnee) - Communications Manager

Erin Elliott - Assistant Controller

Mason Estes (La Jolla Band of Luiseno Indians) - Project Coordinator, The Implementation Project

Patrick Hampton - Online Fundraising Manager

Kristin Hoerter - Paralegal

Julia Manypenny - Director of Major Gifts

Mireille Martinez - Annual Giving Director

Dallin Maybee (Northern Arapaho/Seneca) - Assistant Director of Development

Mauda Moran - Director of Communications

Sarah Ortegon Highwalking (Eastern Shoshone/Northern Arapaho) - Executive Legal Assistant

Jennifer Redbone (Apache/Comanche/ Kiowa) - Donor Information/Gift Processing Manager

Nova Rodriguez - Office Services Assistant/Receptionist

Jeff Schmidt - Paralegal

Lilia Shahbandeh (Chickasaw/Choctaw) - Communications Specialist

Laurie Stirling - Paralegal

Debbie Raymond-Thomas (Navajo) - Controller

Jennie Tsikewa (Zuni) - Accountant

NATIONAL INDIAN LAW LIBRARY

Anne Lucke - Director, National Indian Law Library

Rachel G. Nelson (Navajo) - Law Librarian

Hannah Evans - Technical Services Librarian

ANCHORAGE STAFF

Erin C. Dougherty Lynch - Anchorage Managing Attorney

Heather Kendall-Miller (Athabaskan) - Attorney

Megan Condon - Attorney

Wesley J. Furlong - Attorney

Matthew Newman - Attorney

Sydney Tarzwell - Attorney

Jill Rush - Office Manager/ Legal Assistant

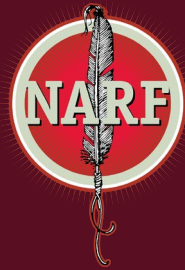
WASHINGTON D.C. STAFF

Samantha Kelty - D.C. Managing Attorney

Morgan Saunders - Attorney

Mariah Thompson (Euchee/Muscogee Nation) - Attorney

Trenton Osborne (Sitka Tribe of Alaska) - Paralegal/Office Administrator



250 Arapahoe Ave | Boulder, CO 80302
303-447-8760
www.narf.org