NARF NORTH: ALASKA OFFICE OPENS

Editor's Note:
This fall the Native American Rights Fund opened an office in Anchorage, Alaska, to better serve Alaska Natives. The new office was made possible by the transfer of two attorney positions from the main office in Boulder, Colorado. The following article outlines the history of Alaska Natives, the difficulties that they face, and the reasons for NARF's new office. The article was prepared by Charles F. Wilkinson, Of Counsel to NARF and Visiting Professor of Law at the University of Colorado Law School.

A BRIEF HISTORY

The aboriginal inhabitants of Alaska, who first settled there at least 11,000 years ago, can be divided into three groups. Aleuts inhabit the Alaska Peninsula and the Aleutian Islands in southwestern Alaska. Western and northern Alaska is inhabited by Eskimos. Ethnologically, Aleuts and Eskimos are not considered Indians but they have always been treated as such for the purposes of federal Indian policy. The final category of Alaska Natives is comprised of Indians. There are three groups of Indians—Tlingits and Haidas in southeastern Alaska, and Athabascans, who live in interior Alaska.

Exclusive aboriginal possession was not broken until the arrival of the Russians in the mid-1700's. Russia claimed Alaska, but its settlements were always small and scattered. The average Russian population of Alaska was only about 550 persons and the only substantial permanent settlements were at Kodiak and Sitka. The United States succeeded to Russia's interests when Alaska was purchased by the Treaty of 1867. The rights of the aboriginal inhabitants were mentioned only briefly in Article III of the Treaty, which provided that "the uncivilized tribes will be subject to such laws and regulations as the United States may, from time to time, adopt in regard to aboriginal tribes in that country." There was no reference at all to the aboriginal land title of Alaska Natives.

The United States pursued a somewhat different policy in regard to Alaska Natives than it did in regard to Indians in the Lower 48 states. Because of the vast spaces and minimal population pressure, there was no comprehensive attempt to make treaties or otherwise to establish reservations for Alaska Natives. When a civil government was established in Alaska by the Organic Act of 1884, no definitive statement was made as to the rights of Alaska Natives, except that the Natives were not to be disturbed in their occupancy of land. The Annette Island Reserve was created in 1891 for the members of the Metlakatla Indian community. From 1891 through 1936, a number of reserves were established in Alaska by executive order.
Then the Secretary of Interior designated six reserves pursuant to the Indian Reorganization Act (IRA) of 1934, which was made applicable to Alaska in 1936. In all, 23 Native reserves had been established in Alaska by 1943 (as will be noted later, all of these, except the Annette Island Reserve, were revoked by ANCSA in 1971). These reserves, which ranged from about 17 acres to 1,400,000 acres (at Venetie), affected few natives and less than one percent of all aboriginal land in Alaska.

NATIVE TOWNSITES ESTABLISHED AFTER 1926 TOWNSITE ACT

The reserves, therefore, were the exception rather than the rule. In almost all cases, the United States had no formal land dealings with Alaska Natives who, under federal law, held a right of occupancy to the lands on which they lived and hunted. As a House of Representatives Interior Committee report stated in 1971, "the great bulk of the aboriginal titles claimed by the Natives [had] not been taken or extinguished by the United States. The United States [had] simply not acted."

The absence of any federal policy to resolve Alaska Native aboriginal land rights continued even when Alaska achieved statehood in 1959. In the Alaska Statehood Act, Congress gave the new state the right to select 102 million acres of land from the public domain, by far the most generous land grant given any state. The Statehood Act, however, contained no provision concerning Native land rights. In 1966, when state officials began selecting lands to which Alaska Natives claimed a prior right, Secretary of the Interior Stewart Udall imposed a freeze on further land selections by the state. The Statehood Act, however, contained no provision concerning Native land rights. In 1966, when state officials began selecting lands to which Alaska Natives claimed a prior right, Secretary of the Interior Stewart Udall imposed a freeze on further land selections by the state. The controversy intensified in 1968, when the existence of massive oil deposits at Prudhoe Bay was confirmed. In his 1968 "superfreeze," Secretary Udall extended the ban against state selections to all forms of entry, including mineral leases to corporations. These freezes on the public lands, which then constituted over 96 million acres, virtually disposed of until December 18, 1991. On that date all lands held by the village corporations, as well as to land selected by the regional corporations themselves.

The ALASKA NATIVE CLAIMS SETTLEMENT ACT

ANCSA amounted to one of the greatest land transactions in history. In some respects it is similar to the treaties that tribes in the Lower 48 states executed with the United States: the tribes relinquished aboriginal claims to vast amounts of land and, in return, received title to lesser amounts of land. In some respects, however, the ANCSA transaction is very different from treaty-making in the Lower 48 states. Land title was received, not in trust by Indian tribes with governmental powers, but in fee by corporations. These freezes on the public lands, which then constituted over 96 million acres, virtually disposed of until December 18, 1991. On that date all lands held by the village corporations, as well as to land selected by the regional corporations themselves.

1. Alaska Native Fund was established by ANCSA to distribute $962.5 million to Native corporations. The Fund is comprised of $462.5 million appropriated by Congress over an 11-year period and $500 million from annual revenues collected by the state and federal government from mineral leases on lands in Alaska. Payments from the Alaska Native Fund are made to the regional corporations; pursuant to a detailed formula, approximately 50 percent of all money from the Fund must be redistributed from regional corporations to their stockholders and to village corporations within each region.

2. The regional corporations hold subsurface rights to all lands held by the village corporations, as well as to land selected by the regional corporations themselves.

3. The Alaska Native Fund is comprised of $462.5 million appropriated by Congress over an 11-year period and $500 million from annual revenues collected by the state and federal government from mineral leases on lands in Alaska. Payments from the Alaska Native Fund are made to the regional corporations; pursuant to a detailed formula, approximately 50 percent of all money from the Fund must be redistributed from regional corporations to their stockholders and to village corporations within each region.

4. Each Alaska Native alive on December 18, 1971, the date on which ANCSA was passed, is entitled to own 100 shares in a regional corporation or in the shareholder's corporation. Each Alaska Native shall receive an equal number of shares in each regional corporation based on population. As noted, the Federal law preference for subsistence hunting and fishing.

5. With very limited exceptions, corporate stock in the corporation or in the shareholder's corporation cannot be sold or otherwise disposed of until December 18, 1991. On that date all stock in regional and village corporations will be cancelled and new shares issued. The new stock will be without the restrictions on alienation now required of shares issued under ANCSA. In ANILCA, Congress amended provision to allow corporations to provide for a first right to purchase stock in the corporation or in the shareholder's family.

6. All lands previously set aside for Alaska Natives, except for the Annette Island Reserve of the Metlakatla Indian Community, were revoked by ANCSA.

7. All lands selected by the Native corporations are received in fee simple with few restrictions on alienation. State taxation, however, is limited: lands held by corporations, which are not developed or leased to third parties, are exempt from state and local real property taxes for 20 years. Originally, the period was to expire on December 18, 1991, but in 1980 ANILCA extended the exemption period to 20 years from the vesting of title pursuant to ANCSA or to the date of issuance of an interim conveyance or patent, whichever is earlier.

8. ANCSA expressly provided that "any aboriginal hunting or fishing rights that may exist, are hereby extinguished." Subsistence hunting and fishing, however, is protected by state law that gives subsistence use preference throughout the state. In 1982 Alaska voters rejected a referendum that would have eliminated the state law preference for subsistence hunting and fishing.

9. In 1980, in ANILCA, Congress adopted provisions that establish a preference for subsistence uses on federal public lands in Alaska. These special protections under federal law thus protect Alaska Native subsistence hunting and fishing on most of the lands in the state, whether or not subsistence uses continue to receive priority under Alaska state law.

10. Several specialized federal statutes affect subsistence hunting and fishing by Alaska Natives. The En-
dangered Species Act of 1973 and the Marine Mammal Protection Act of 1972 provide strict protections for animals covered by the Act, but both Acts include provisions allowing for special consideration for Alaska Native subsistence uses. The International Whaling Commission regulates the taking of whales and, again, special provisions have been made for Eskimo whaling. The Migratory Bird Treaties and the Fur Seal Convention also are administered to take account of Native subsistence uses.

11. ANCSA is ambiguous concerning the nature of the relationship between the United States and Alaska Natives. The Act states that it is not intended to establish any "permanent racially defined institutions" or "lengthy wardship or trusteeship," but those phrases are not elucidated elsewhere in ANCSA or in the legislative history. Although all reserves except one were revoked, no attempt was made in ANCSA to limit the authority of the many Native villages that had organized pursuant to the IRA or their inherent tribal authority. In any event, ANCSA is apparently premised on the idea that the federal-Indian trust relationship, which existed before ANCSA as to Alaska Natives, was to continue in effect: the provisions of ANCSA "constitute compensation for the extinguishment of claims to land, and shall not be deemed to substitute for any governmental programs otherwise available to the Native people of Alaska as citizens of the United States and the state of Alaska." Since ANCSA, federal agencies such as the Bureau of Indian Affairs and the Indian Health Service have continued to provide special Indian services to Alaska Natives. Further, in all new major Indian legislation since ANCSA, Congress has specifically included Alaska Natives, villages and corporations among those Indian entities eligible for programs. Thus, the special federal-Indian relationship applies to Alaska Natives, but its exact application is uncertain.

In summary, it is probably correct to say that the most spectacular aspect of the ANCSA is its focus on the corporate ideology. At the same time, elements of traditional federal Indian policy and law remain. Land title may be in corporate ownership, but the Native governments which predated ANCSA remain in existence. Special hunting and fishing rights have been created, not be a reservation system or an amalgam of state and federal statutes. Federal services are provided to Alaska Natives in much the same manner as they are provided to Indians in the Lower 48 states. Nevertheless, as discussed in the next section, Native villages cannot yet define their post-ANCSA status with much certainty: several of the crucial elements of this unique legal system remain undefined.

While NARF has always performed some services for Alaska Natives, work in Alaska has typically been on important issues, but it has remained relatively small as a percentage of NARF's total national effort. NARF was instrumental in representing Alaska Natives in the establishment of the North Slope Borough. And in the area of education, NARF represented Alaska's interests in the revision of the Johnson-O'Malley regulations in the mid-1970's. Currently, among other projects, NARF is representing Alaska Natives seeking to establish federal tax exemptions under the Reindeer Industry Act of 1937. And, at the request of the Alaska Native Review Commission, NARF recently sent two attorneys to Anchorage to participate in the Commission deliberations on alternative means for protecting Native land ownership after 1991.

In spite of these and other efforts, involvement in Alaska thus far has been far more limited than is needed. With issues such as the status of IRA and traditional governments unresolved under ANCSA and Native dependence upon subsistence hunting and fishing constantly under attack by non-Native commercial and sports interests, NARF has perceived an urgent need for legal assistance to these goals. And, as a result, the ANCSA corporations and the traditional Alaska Native governments relate to the existing Alaska Native governmental structures. As a result, the ANCSA corporations and the traditional Alaska Native governments exist side by side. To date there has been no resolution of the overriding question of how the traditional and IRA Alaska Native governments relate to the new corporations, to the state of Alaska, and to the United States.

Alaska Natives in the villages have been presented with a host of arguments and options. Some advocates believe that the traditional and IRA Native governments have no powers at all—that state law provides the exclusive source
of police power in Alaska's rural areas. Others argue that Alaska Native villages are "Indian country" because they are "dependent Indian communities" within the meaning of current federal law; that being the case, they assert, state law generally does not apply and the traditional and IRA villages' governments have regulatory jurisdiction in the villages and surrounding areas. Still others argue that the safest course is for villages, and perhaps regional, corporations to transfer land to existing (or newly formed) IRA corporations and for the IRA corporations then to transfer the land to the United States in trust for the villages. The trust lands would then constitute Indian reservations and would be Indian country under federal law; this would allow the exercise of jurisdiction by the IRA governments.

None of these issues has yet been resolved by the courts or by Congress. Perhaps more importantly, Alaska Natives have not yet settled on the wisdom of these and other alternate courses of action. These are complicated issues involving a unique blend of Indian law and the special statutes relating to Alaska. Reasoned explication of the alternatives is at a premium and NARF can play a valuable role in helping to disseminate information and representation to those Native villages which are financially unable to hire counsel.

II. "1991 Issues"

The year 1971 was an epochal year for Alaska Natives, and 1991 may prove to be equally monumental. Already the number "1991" has taken on an ominous meaning among Alaska Natives: it is in that year that stock in both regional and village corporations is eligible to go on the market according to the terms of ANCSA. Obviously, there is the greatest potential for the transfer of both land and corporate control away from Alaska Natives to non-Indian interests. Forty million acres of Native land are at stake.

Once again, a host of options are being discussed. The 1991 deadline can be left undisturbed. It could be extended, either indefinitely or for a fixed term. The shares could be made permanently non-transferable. Each individual corporation could be given the power by Congress to decide for itself whether it wished to restrict the transferability of its stock permanently, or for a fixed term. These are among the choices presented.

Each of the alternatives in turn raises legal and policy issues of the greatest magnitude. Arguably, shares of the stock have a vested right to their stock and the right to transfer it in 1991; thus, there may be constitutional issues involved in any alteration of the 1991 deadline. Further, a distinction can be made between equity ownership in the corporations and voting power; perhaps transfer of the financial interest in the corporation should be allowed, but Alaska Natives should retain the power to guide the future policies of the corporations by their votes. Once again, it is Native Alaskans in rural areas who are most beset by the intricacies of these seemingly imponderable questions. Careful research, explanation of the alternatives, and advocacy of the alternatives selected by our clients in rural Alaska is a major goal of NARF's as the 1991 deadline approaches.

C. Subsistence Issues

Subsistence hunting, fishing and trapping remains a way of life for most Alaska Natives in most rural villages. It has a wide range of social and economic impacts. Hunting and fishing often entails a series of rituals that are central to a community's way of life. The Alaska Supreme Court has found that in some cases traditional hunting practices include the free exercise of religion protected by the First Amendment.

The economic impact of subsistence hunting and fishing is far greater than is commonly appreciated. One study estimates that it would cost $19,000 annually to replace the protein obtained through subsistence hunting and fishing by a single Native household of four in rural north and northwest Alaska. Further, subsistence uses meet so many social and economic needs of rural Alaska Natives that they allow the ANCSA regional corporations to concentrate on economic development. If subsistence were not available to meet these needs of rural Alaska Natives, serious pressures would be placed on the regional corporations. The president of the Northwest Alaska Native Association Regional Corporation called the maintenance of subsistence "the single most important need of all the people."

Subsistence hunting, fishing and trapping is often a way of life for most Alaska Natives in rural areas. They have a vested interest in protecting their subsistence rights. The economic impact of subsistence hunting and fishing is far greater than is commonly appreciated. One study estimates that it would cost $19,000 annually to replace the protein obtained through subsistence hunting and fishing by a single Native household of four in rural north and northwest Alaska. Further, subsistence uses meet so many social and economic needs of rural Alaska Natives that they allow the ANCSA regional corporations to concentrate on economic development. If subsistence were not available to meet these needs of rural Alaska Natives, serious pressures would be placed on the regional corporations. The president of the Northwest Alaska Native Association Regional Corporation called the maintenance of subsistence "the single most important need of all the people."

Issues involving the protection of subsistence uses arise in a variety of contexts. Negotiations and advocacy need to be conducted with state officials and with federal agencies who have authority to allow limited Native harvesting under laws such as the Endangered Species Act and the Marine Mammal Protection Act. In some cases the disputes and negotiations are at the international level, as with the harvesting of bowhead whales, which fall under the jurisdiction of the International Whaling Commission. There are also international ramifications to the harvesting of seals and of animals in the Porcupine caribou herd, which migrates between the United States and Canada. In some instances commercial development has caused severe impacts on the salmon runs or on the habitat of moose and caribou herds.
NARB LEGAL DEVELOPMENTS

SUPREME COURT WILL REVIEW BLACKFEET AND KLAMATH CASES

In the new term of the U.S. Supreme Court, which began October 1, certiorari was granted in two NARB cases. In both instances, the Court will review Court of Appeals decisions which are favorable to the tribes involved.

In the first case, Blackfeet v. Croft, the Ninth Circuit Court of Appeals ruled in an en banc decision that the State of Montana has no authority to tax tribal royalties from reservation oil and gas production. The en banc decision represented an unusual rehearing of a three-judge panel decision in the same case, which had earlier ruled against the Tribe.

The case involves the relationship between a 1924 statute which authorizes state taxation and a 1938 statute which was intended to comprehensively govern leasing on Indian lands, but which does not mention taxation. The majority of the Blackfeet leases were executed under the 1938 act and only a few were executed under the 1924 act. The Ninth Circuit held that pre-1938 leases are subject to state taxation because the 1924 tax consent was not repealed by the 1938 Indian Mineral Leasing Act. However, leases made after 1938 are not taxable because the 1938 act did not carry forward or incorporate the tax consent.

The case, which was filed in 1978, will likely affect the taxation of tribal royalty interests of all tribes, and may have an impact on the issue of state taxation of producers' interests from oil and gas production. Oral argument is scheduled for January 15, 1985. In the Supreme Court, the case name will be Montana v. Blackfeet Tribe.

In the second case, Klamath Tribe v. Oregon Department of Fish and Game, the Ninth Circuit upheld Klamath hunting, trapping and fishing rights on almost 700,000 acres of off-reservation land which had been ceded in 1901. The March 27, 1984 decision affirmed a federal district court decision which held that the Tribe's 1901 cession agreement with the United States did not abrogate the Tribe's treaty rights to hunt, fish and trap free of state regulation. Originally, the area had been erroneously excluded from the reservation boundaries due to survey errors. The Tribe later agreed to cede the area and received compensation for it, but the compensation did not cover the loss of hunting, fishing and trapping rights.

This case is unique because most courts have been reluctant to find that hunting and fishing rights continue to exist on ceded or off-reservation lands without an express statement to that effect. The Court said the treaty rights are not necessarily incident to ownership of the land; they can continue to exist despite loss of title. Oral argument in the case will probably be scheduled for February 1985, in the Supreme Court, the case name is Oregon Department of Fish and Game v. Klamath Tribe.

FLORIDA COURT RULES IN FAVOR OF SEMINOLE TRIBE

In a longstanding NARB case, the Florida State Court recently ruled it had no jurisdiction to hear the State of Florida's case against the Seminole Tribe which sought to apply state sales tax to tribally-owned businesses on the reservation.

In the alternative, the Court also ruled that the State has no authority to impose such taxes. The case had been pending in the Court for several years before the recent ruling.

LACOURTE ORIELLES FERC CASE IS SETTLED

Settlement was recently reached by all parties in a case before the Federal Energy Regulatory Commission involving the application of Northern States Power Co. (NSP) for a new license for the Chippewa Reservoir Project located on the Chippewa River. The project inundated important fishing lands of the Lac Courte Orielles Band, and a license was therefore opposed by the Band. The settlement provides for:

1) conveyance of 4,500 acres of land by NSP to the Band and payment of $250,000; 2) conveyance of a perpetual flowage easement over 325.5 acres to the Band; and 3) conveyance by the Band to NSP of any obligation to pay annual charges, and 3) authorization for the Band to construct and operate a hydro-electric power plant at the dam and establishment of NSP's obligation to buy the power output from the plant for a minimum of thirty years.

The settlement which was entered into among the Band, NSP, and the Secretary of the Interior, the Secretary of Agriculture, and the Wisconsin Department of Natural Resources, was approved by the Federal Energy Regulatory Commission which also exempted the Project, including the Band's hydro facilities, from a FERC license.
COLORADO SUPREME COURT Declines Review of ICWA Case

The Colorado Supreme Court declined to review a lower court decision which held that the Indian Child Welfare Act did not apply to a proceeding involving a child eligible for enrollment in the Ogala Sioux Tribe. The issue in the case was what constitutes "subsequent proceedings" within the meaning of the Indian Child Welfare Act. Initial proceedings were begun in the case prior to the effective date of the act. However, additional proceedings were begun after the effective date of the act. NARF represented the Ogala Sioux Tribe which sought jurisdiction over the subsequent proceedings. Denial of certiorari effectively ends the case, Gillespie v. Colorado.

COURT RILES in Favor of Muckleshoot Tribe on Several Motions

The district court in Washington recently ruled in favor of the Muckleshoot Tribe in several pending motions involving collateral estoppel and discovery issues in the Tribe's water rights case against Puget Sound Power & Light Co. The favorable rulings mean that Puget cannot reiterate the issues in United States v. Washington concerning the Tribe's treaty status. The favorable discovery ruling means that the Tribe is entitled to certain discovery. A number of substantive summary judgment motions are now being addressed by the parties.

TRIBES DENIED RELIEF AGAINST DEPARTMENT OF LABOR

The district court for the District of Columbia granted summary judgment in favor of the defendant Department of Labor in Northern Cheyenne Tribe v. Donovan. The ruling constitutes a decision on the permanent injunction sought by several tribes to keep the Department of Labor Indian field offices open. The Tribe had won a temporary restraining order, then lost a preliminary injunction and now the permanent injunction. The Court ruled against the Tribe on the issues of the necessity of consulting with tribes prior to closing the offices, and the tribes' challenge to the competence of the central office staff to handle Indian issues. Upon weighing the chance of success on appeal, and after consultation with the plaintiff tribe, no appeal from the decision was taken.

NARF PUBLICATIONS AND RESOURCES

The National Indian Law Library

The National Indian Law Library (NILL) is a resource center and clearinghouse for Indian law materials. Founded in 1972, NILL fulfills the needs not only of NARF but of people throughout the country who are involved in Indian law. NILL's services to its constituents throughout the country comprise a major segment of meeting NARF's commitment to the development of Indian law.

The NILL Catalogue

NILL disseminates information on its holdings primarily through its National Indian Law Library Catalogue: An Index to Indian Legal Materials and Resources. The NILL Catalogue lists all of NILL's holdings and includes a subject index, an author-title table, a plaintiff-defendant table, and a numerical listing. It is supplemented periodically and is designed for those who want to know what is available in any particular area of Indian law (1,000+ pgs. Price: $75).

Expanded and Revised Bibliography on Indian Economic Development

Designed to provide aids for the development of essential legal tools of the protection and regulation of commercial activities on Indian reservations. The enlarged edition includes, in addition to all previously published material, many recently published articles, books, tribal codes, ordinances, conference materials, sample contracts and agreements, and titles of newsletters.

The format has been completely revised for use by those with both legal and nonlegal backgrounds. Material has been arranged into chapters which reflect major interests such as:

1. Business organization, planning and implementation of goals and programs;
2. Financial concerns, credit and loans;
3. Natural resources, taxation and zoning;
4. governmental-tribal relations and tribal administration and regulation of reservation development;
5. Cultural and socioeconomic considerations of reservation development.

Annotations have been expanded and updated, references for individuals who have contributed to our project are included as well, as are annotations for volumes 36 through 43. An index to the entire collection is also provided, as well as an index to the volumes and sections of NILL's holdings. (250 pgs. Price: $30)

Indian Claims Commission Decisions

This 43-volume set reports all of the Indian Claims Commission decisions. An index through volume 36 is provided, and an additional index to volume 43 is in process. The index contains subject, tribal, and docket number listings. (43 volumes. Price: $820 (Index price: $25)

Indian Rights Manuals

A Manual On Tribal Regulatory Systems. Focusing on the unique problems faced by Indian tribes in designing and implementing ordinances which comport with federal and tribal law, this manual provides an introduction to the law of civil regulation and a checklist of general considerations in developing and implementing tribal regulatory schemes. It highlights those laws, legal principles, and unsettled issues which should be considered by tribes and their attorneys in developing civil ordinances, irrespective of the particular subject matter to be regulated (110 pgs. Price: $25).

A Manual For Protecting Indian Natural Resources. Designed for lawyers who represent Indian tribes or tribal members in natural resource protection matters, the focus of this manual is on the protection of fish, game, water, timber, minerals, grazing lands, and archeological and religious sites. Part I discusses the application of federal and common law to protect Indian natural resources. Part II consists of practice pointers: questions to ask when analyzing resource protection issues; strategy considerations; and the effective use of law advocates in resource protection (151 pgs. Price: $25).

A Self-Help Manual For Indian Economic Development. This manual is designed to help Indian tribes and organizations on approaches to economic development which can ensure participation, control, ownership, and benefits to Indians. Emphasizing the differences between tribal economic development and private business development, the manual discusses the task of developing reservation economies from the Indian perspective. It focuses on some of the major issues that need to be resolved in economic development and identifies options available to tribes. The manual begins with a general economic development perspective for Indian reservations: how to identify opportunities, and how to organize the internal tribal structure to best plan and pursue economic development. Other chapters deal with more specific issues that relate to the development of businesses undertaken by tribal government, tribal members, and by these groups with outsiders (Approx. 300 pgs. Price: $35).

Handbook of Federal Indian Education Laws. This handbook presents provisions of major federal Indian education programs in terms of the legislative history, historic problems in implementation, and current issues in this radically-changing field (130 pgs. Price: $15).


Films and Reports

"Indian Rights, Indian Law." This is a film documentary, produced by the Ford Foundation, focusing on NARF, its staff, and certain NARF cases. The hour-long film is rented from: Association Films, Ford Foundation Film, 866 Third Ave., New York, New York 10022 (212-935-4210). (16mm, FF10-350.00).

ANNUAL REPORT, This is NARF's major report on its programs and activities. The Annual Report is distributed to foundations, major contributors, certain federal and state agencies, tribal clients, Native American organizations, and to others upon request.

INDIVIDUALS MAKE THE DIFFERENCE

Recently, NARF hosted a special reception at its national headquarters in Boulder to thank its current area contributors for their support and to seek new prospective members. The occasion was a private sale and preview reception in conjunction with NARF's annual VISIONS OF THE EARTH Indian art show that was held on November 16, 17 and 18.

Historically, NARF's support has been through grants and contributions from government, foundations and national corporations, especially eastern ones which traditionally have had an interest in funding national programs such as NARF's. However, particularly in the last several years, it has been essential to seek other sources of support from the private sector. NARF now has almost 30,000 contributors to our program and to seek new prospective members. The occasion was a private sale and preview reception in conjunction with NARF's annual VISIONS OF THE EARTH Indian art show that was held on November 16, 17 and 18.

Historically, NARF's support has been through grants and contributions from government, foundations and national corporations, especially eastern ones which traditionally have had an interest in funding national programs such as NARF's. However, particularly in the last several years, it has been essential to seek other sources of support from the private sector. NARF now has almost 30,000 contributors to our program and to seek new prospective members. The occasion was a private sale and preview reception in conjunction with NARF's annual VISIONS OF THE EARTH Indian art show that was held on November 16, 17 and 18.

Recently, NARF hosted a special reception at its national headquarters in Boulder to thank its current area contributors for their support and to seek new prospective members. The occasion was a private sale and preview reception in conjunction with NARF's annual VISIONS OF THE EARTH Indian art show that was held on November 16, 17 and 18.

Historically, NARF's support has been through grants and contributions from government, foundations and national corporations, especially eastern ones which traditionally have had an interest in funding national programs such as NARF's. However, particularly in the last several years, it has been essential to seek other sources of support from the private sector. NARF now has almost 30,000 contributors to our program and to seek new prospective members. The occasion was a private sale and preview reception in conjunction with NARF's annual VISIONS OF THE EARTH Indian art show that was held on November 16, 17 and 18.

Recently, NARF hosted a special reception at its national headquarters in Boulder to thank its current area contributors for their support and to seek new prospective members. The occasion was a private sale and preview reception in conjunction with NARF's annual VISIONS OF THE EARTH Indian art show that was held on November 16, 17 and 18.

Historically, NARF's support has been through grants and contributions from government, foundations and national corporations, especially eastern ones which traditionally have had an interest in funding national programs such as NARF's. However, particularly in the last several years, it has been essential to seek other sources of support from the private sector. NARF now has almost 30,000 contributors to our program and to seek new prospective members. The occasion was a private sale and preview reception in conjunction with NARF's annual VISIONS OF THE EARTH Indian art show that was held on November 16, 17 and 18.

Recently, NARF hosted a special reception at its national headquarters in Boulder to thank its current area contributors for their support and to seek new prospective members. The occasion was a private sale and preview reception in conjunction with NARF's annual VISIONS OF THE EARTH Indian art show that was held on November 16, 17 and 18.

Historically, NARF's support has been through grants and contributions from government, foundations and national corporations, especially eastern ones which traditionally have had an interest in funding national programs such as NARF's. However, particularly in the last several years, it has been essential to seek other sources of support from the private sector. NARF now has almost 30,000 contributors to our program and to seek new prospective members. The occasion was a private sale and preview reception in conjunction with NARF's annual VISIONS OF THE EARTH Indian art show that was held on November 16, 17 and 18.
each other firsthand provides the kind of intangible support that helps NARF continue in its mission to Native Americans nationwide.

The endorsement of area public officials and corporate contributors who take the time to acknowledge and support our work goes a long way to help us do an even better job for our clients. To all of those involved in this first special event in Boulder, a special thank you from the entire NARF staff and Steering Committee.

Logistics simply do not allow us the opportunity to meet—and thank—most of NARPs individual donors throughout the country as we would like. Whether you send us $5, $10, $100 or $5,000, you can feel assured that each and every one of our donations is sincerely appreciated. Now, more than ever, we need your continued—and where possible increased—support.

As time and budget allow, we anticipate expanding the opportunity to arrange area functions for major donors to NARF. Initially, we anticipate events in Los Angeles and New York City. The goal is to allow the donor the opportunity to meet NARPs leadership and address your concerns firsthand to our staff.

From all of us at NARF, thank you for your very important support during 1984. We wish each of you the very best in the year ahead.

Otu'han

Otu'han, a Lakota word meaning "give-away," describes the age-old Sioux custom of giving gifts in the names of those they wish to honor. The Native American Rights Fund has developed the Otu'han memorial and tribute program to encourage our donors to continue this Indian tradition by recognizing and honoring friends and loved ones through gifts to NARF.

We have received recent contributions in memory of:

- Gertrude Ascher—from Else A. Reisner
- Marshall W. Mayer—from Margaret Butcher
- William E. Sacher—from Alicia D. Sacher
- Helen Pep Grodka—from Sonia Blumenthal
- Annora C. McGann—from David W. McGann
- Eileen E. Page—from Howard W. Page
- Elizabeth A. Morris—from M. C. Morris
- Martha H. Embry—from Catherine M. Hoagland
- Ruth Clifton—from Jean & W. Lester Higgins
- Anna F. Young—from Mildred L. Young
- Anna W. & Harold L. Ickes—from Raymond W. Ickes
- Maurice Memard—from Andy & Mary Beltramello
- Agnes Scott Donaldson—from Molly M. Leffler
- Ben Campbell—from Chen Sun Campbell
- Laurinia Cornelius—from Srs. of the Holy Nativity

We were pleased to accept the gift in memory of Helen Pep Grodka. Ms. Grodka was a long-time friend and supporter of the Native American Rights Fund. A memorial gift to NARF serves as a meaningful tribute to an individual who supported our efforts during his or her lifetime.

NARF is also receiving large numbers of gifts in honor of friends or relatives on birthdays and special anniversaries.

For further information on the Otu'han memorial and tribute program contact Marilyn Pourier c/o NARF or return the attached business reply envelope with the appropriate box checked.