



Legal Review

NATIVE AMERICAN RIGHTS FUND

McGirt v. Oklahoma: **The US Supreme Court's Impact on Indian Country**



Federal courts have an outsized impact on the everyday lives of Native Americans, and none more so than the United States Supreme Court. *Who is an Indian? What is an Indian Tribe? What is the scope*

of tribal governmental authority? These types of fundamental questions are routinely decided by federal courts, and the country's highest court agrees to hear a higher percentage of Indian law cases than most other types of cases.

The recently decided *McGirt v. Oklahoma* is an example of such a case. In this case, the Court corrected the long-held misconception and myth that Oklahoma statehood is incompatible with Indian reservations. It also reaffirmed a central treaty promise made by the United States.

Because the decision in a case like *McGirt* likely will impact all of Indian Country, it is crucial that we have a nationwide, coordinated approach to Indian law cases before the Supreme Court. That effort is embodied in the work of the Tribal Supreme Court Project, which is jointly staffed by attorneys from the Native American Rights Fund (NARF) and the National Congress of American Indians (NCAI). Indian Country's recent win in *McGirt v. Oklahoma* illustrates the Project's successful approach.

Establishing a Homeland

McGirt v. Oklahoma deals with the Muscogee (Creek) Nation's homelands, located in eastern Oklahoma. A little history of the region is required to understand the case. The area that is now Oklahoma was once called the Indian Territory. It was intended to be a homeland for relocated Indian tribes rather than a future state. One of the tribes that relocated to the Indian Territory in the first-half of the 1800s was the Muscogee (Creek) Nation, whose ancestral home was in the Southeast.

Like other tribes in the Southeast at the time, the Creek were under assault from state governments that unlawfully imprisoned people and tried to extinguish Indian title to the land. Faced with this crisis, five tribes (the Creek, Cherokee, Chickasaw, Choctaw, and Seminoles) signed treaties with the United States, which promised homelands in the Indian Territory that would be forever beyond the reach of any state government. Many saw these treaties, and the move to the Indian Territory, as the only hope for their survival as a people.

Although the promise of an undisturbed homeland was reaffirmed in subsequent

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treaties with the United States that were signed after the Creek Nation relocated to Indian Territory, the reality on the ground was different. The non-Indian thirst for land and resources would arrive at Creek borders once again by the late nineteenth century. Non-Indians began squatting in the reservations. Not surprisingly, the United States refused to remove them as the treaties required.

McGirt v. Oklahoma

How does this relate to *McGirt v. Oklahoma*? Mr. McGirt (Seminole) was convicted of criminal felonies by an Oklahoma state court. In his appeal, McGirt argued that his crimes occurred within the boundaries of the Creek reservation. According to his argument, because he was in Indian country, the Major Crimes Act gave the federal government—not the state—jurisdiction over him.

In contrast, Oklahoma argued that the Creek reservation no longer existed. The state contended that the region’s Indian reservations were disestablished to pave the way for Oklahoma’s statehood. More insidiously, the state argued that affirming the Creek reservation would have widespread disruptive consequences for non-Indian residents, who, believing that the reservation was erased more than 100 years ago, would suddenly awaken one morning to find themselves living on an Indian reservation.

In federal Indian law, Congress must express clear intent to remove or reduce the size of an Indian reservation. However, Oklahoma could not point to anywhere in Congressional text where they showed clear intent to shrink or disestablish the reservation. In fact, the Creek Nation’s tribal government retained significant powers after statehood.

Ultimately, the Court sided with Mr. McGirt and held that “the Creek

were promised . . . a ‘permanent home’ that would be ‘forever set apart’” and were “assured a right to self-government on lands that would lie outside both the legal jurisdiction and geographic boundaries of any State.” Nowhere were those treaty promises nullified and so, legally, they were still intact. To allow the state to proceed as it always had, exercising jurisdiction over the tribes despite the clear treaty promises to the contrary “would be the rule of the strong, not the rule of the law.”

What the Decision Is ... and Is Not

While the Court affirmed the continued existence of the Creek reservation specifically, several tribes have similar treaty provisions. There is a strong likelihood that the courts will similarly conclude that the Cherokee, Choctaw, Chickasaw, and Seminole reservations continue to exist. That does not mean chaos is just over the horizon.

This decision does not mean all the Indians convicted of major crimes in eastern Oklahoma go

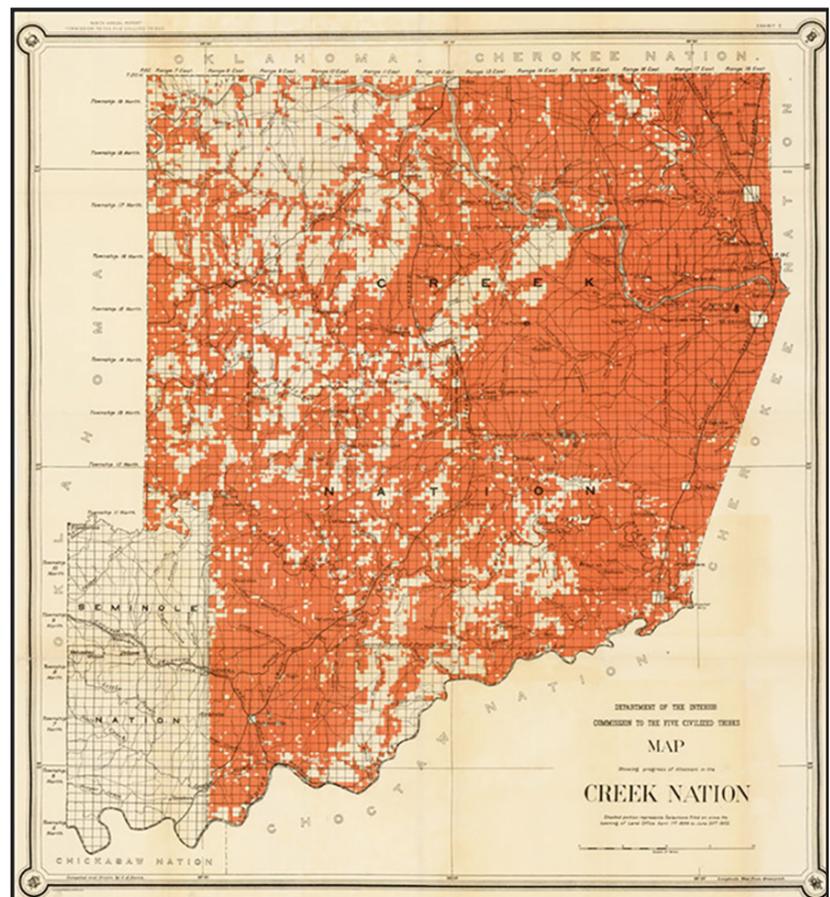




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free. The state, tribal, and federal governments have a shared interest in public safety. Even before *McGirt*, Oklahoma tribes and local jurisdictions entered into cross-deputization agreements. While a reallocation of resources may be called for, the cooperative approach developed over the past several decades can be built upon and expanded to ensure continued public safety.

Nor does *McGirt* change land ownership by converting private property to tribal land. As the opinion emphasizes, private land holdings are common on Indian reservations. While jurisdiction over land may shift, ownership does not.

However, for the Creek Nation, *McGirt* is a profound affirmation of a homeland that their ancestors sacrificed everything to secure. By correcting a false narrative of tribal erasure in Oklahoma, the decision was a victory for all Oklahoma tribes as well. Moreover, coming on the heels of two other treaty rights victories in the past two years, the opinion offers hope for tribes across the country that a Court, often hostile to Indian interests in recent decades, may be poised to enforce their rights more robustly.

Tribal Supreme Court Project's Support in *McGirt v. Oklahoma*

The recent victory in *McGirt v. Oklahoma* is a prime example of how the Tribal Supreme Court Project supports tribal success at the Court. The Supreme Court is a highly specialized institution with a unique set of procedures. Tribal advocacy

in the Court requires a coordinated and structured approach. There are several ways in which the Project supports tribal advocates before the Supreme Court. Often, this assistance begins well before the Court even agrees to hear the case.

The reservation disestablishment question that was decided in *McGirt* first arrived at the Court during the previous term and in a different case, *Sharp v. Murphy*. Identifying *Murphy* as a likely future Supreme Court case, the Project's engagement started early, when a Tenth Circuit panel affirmed the Creek reservation's continued existence and Oklahoma requested rehearing by the full Tenth Circuit.

By the time the Supreme Court agreed to hear *Murphy*, nearly a year later, the preliminary planning for the Project's role in the case was already in place. Little did we know at the time that, with Justice Gorsuch's recusal, the Supreme Court would be unable to decide *Murphy* and would grant *McGirt*, which presented the same issue but did not trigger Justice Gorsuch's recusal. In many ways, all of the preparation and work done in *Murphy* would prove to be a rehearsal for *McGirt*.

Another significant factor in *Murphy* and *McGirt's* success was the top-shelf legal representation of the Creek Nation, Mr. Murphy, and Mr. McGirt. In both cases, the Creek Nation was represented by Riyaz Kanji, a former Supreme Court clerk and widely respected Indian law practitioner, who was instrumental in the Tribal Supreme Court Project's founding. Likewise, Mr. Murphy and Mr.

McGirt were represented by Ian Gershengorn, a former Acting Solicitor General of the United States who also was an early advisor to the Project. These long-standing relationships enabled the Project to work very closely with these attorneys in an especially effective manner.

Working together, we formulated a strategy in *Murphy* that consisted of six amicus (friends of the court) briefs. The Native American Rights Fund and co-counsel filed one of these amicus briefs on behalf of the National Congress of American Indians. These briefs provided critical context and information to the Court, such as the practical consequences of reservation disestablishment, the impacts on Native provisions in the Violence Against Women Act, historical background, and the importance of a stable framework for resolving reservation boundary disputes. As part of the process of developing these briefs we circulated them among the Project's working group for the case. This collective review ensured consistency in the messages and eliminated redundancy between briefs. We repeated the process for *McGirt*, using essentially the same strategy, but refining our work even more. Perhaps the best measure of the effectiveness of the briefs is that the justices brought up points from them during oral argument and cited them favorably in the majority opinion.

Beyond McGirt: Trends at the Supreme Court

Beyond the context of any specific case, for years the Tribal Supreme Court Project has worked hard to educate Supreme Court justices about federal Indian law. In 2001, Justices O'Connor and Breyer took part in an historic visit to Indian country to observe tribal justice systems. Since that time, federal judges from the US Courts of Appeals for the Ninth Circuit, Tenth Circuit, and Eighth Circuit have attended NCAI conferences held in Sacramento, Denver, and Rapid City, respectively. In August 2011, Chief Judge Riley was joined by Justice Alito during the Eighth Circuit Judicial Conference for a tour of the Pine Ridge Indian Reservation—a visit coordinated by NCAI and the South Dakota tribes. Justice Sotomayor visited the Jemez Pueblo, the Santa Domingo Pueblo, the Leadership Institute at the

Santa Fe Indian School, and the University of New Mexico. As new justices join the Court, we will continue to provide opportunities for them to visit and become more familiar with tribal governments and communities.

There is evidence that the Project's efforts are gradually paying dividends. In recent years, we have seen a much more positive trend on the Supreme Court. Since 2015, tribal interests have prevailed in all but one case.

Some of this newfound success may be attributable to recent changes in the Supreme Court's make-up. In the early years of the Roberts Court, the Supreme Court lacked an intellectual leader in Indian law. That changed with the confirmation of Sonia Sotomayor in 2009. She spoke of focusing on Indian law as a justice during a visit to pueblos in New Mexico in 2011 and later described how she studied Indian law closely after joining the Supreme Court. Her outstanding Indian law opinions are almost always joined by Justice Kagan, who was confirmed the year after Justice Sotomayor. Justice Kagan has likewise written important opinions supporting tribal sovereignty and has consistently voted in favor of tribal interests. In 2016, Justice Scalia, who voted against tribal interests nearly 87% of the time, was replaced by Neil Gorsuch, a Tenth Circuit judge with significant Indian law background. So far, Justice Gorsuch has voted in favor of tribal interests in all but one case and has lent a compelling voice to Indian law issues in his writings – including authoring the majority opinion in *McGirt*. Thus, in a few years, the Supreme Court gained three important leaders in Indian law.

Conclusion

Over nearly 20 years, the Tribal Supreme Court Project has developed and executed innovative strategies for improving the recent win-loss record of tribes at the Supreme Court. Although tribal interests have achieved significant victories in recent years, often it has been by the slimmest of margins. Successes like *McGirt* demonstrate how we can succeed in this collective effort and the importance of this work in protecting the rights of tribes. 🌟

CASE UPDATES

Obstacles at Every Turn: Barriers to Political Participation Faced by Native American Voters

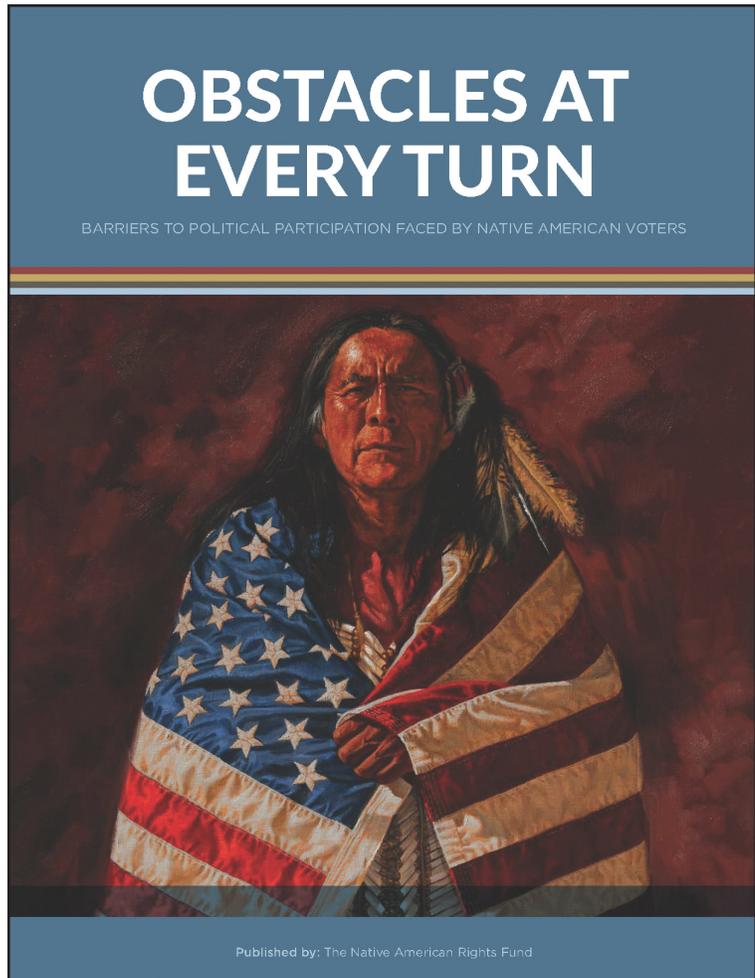
In the United States, power is available through participatory democracy. Native Americans consistently have been denied full access to state and federal democratic systems. If Native Americans can engage fully in the political system—free from the barriers that currently obstruct them—they can reclaim power and participate in America in a way that is fair and just. For a democratic system to be healthy, all voices must be heard. The first people on the land should not be the last to vote.

In 2017 and 2018, the Native American Voting Rights Coalition—founded by the Native American Rights Fund—held nine public hearings to better understand how Native Americans are systemically and culturally kept from fully exercising their franchise. More than 120 witnesses testified from dozens of tribes across the country.

The final report of the findings from those hearings, *Obstacles at Every Turn: Barriers to Political Participation Faced by Native American Voters*, was released June 4, 2020, and provides detailed evidence that Native people face obstacles at every turn in the electoral process: from registering to vote, to casting votes, to having votes counted.

Some of these findings affect non-Natives as well. Many are particular to the Indian Country experience in 2020. Some were put in place specifically to suppress turnout.

Difficulties in voting—the very foundation of democracy—are not new for Native Americans. It is part of the legacy



of genocide and racism the continent’s first peoples have fought for more than 500 years. But just as it is not new, this problem also is not unsolvable. Politicians would do well to note the impact of their Native American constituents. The Native vote regularly decides elections in the Dakotas, Alaska, and parts of the Southwest.

Simply put: the first people on the land should not be the last to vote.

Download the full report and find summaries and recommendations for a way forward at <https://vote.narf.org/obstacles-at-every-turn/>.

Court Permanently Strikes Down Montana Law That Restricts Native Voting Rights



On September 25, 2020, a Montana court permanently struck down a state law that severely restricted the right to vote for indigenous people living on rural reservations.

The case, *Western Native Voice v. Stapleton*, was filed in March on behalf of the Assiniboine & Sioux Tribes of Fort Peck, Blackfeet Nation, Confederated Salish and Kootenai Tribes of the Flathead Reservation, Crow Tribe, and Fort Belknap Indian Community (all represented by NARF) as well as Western Native Voice and Montana Native Vote, Native American-led organizations focused on getting out the vote and increasing civic participation in the Native American community (represented by the American Civil Liberties Union, and ACLU of Montana). The suit challenged the so-called Montana Ballot Interference Prevention Act (BIPA), a law that imposed severe restrictions on ballot collection efforts, which are critical to Native American voters living on rural reservations.

The law set an arbitrary limit on the number of ballots an individual could collect and restricted the categories of individuals permitted to collect ballots. These limitations were intended to suppress turnout on rural reservations, where

geographic and socioeconomic barriers to voting make ballot collection even more critical.

In the introduction of the order the court wrote, “the questions presented cannot be viewed through the lens of our own upbringings or own life experiences, but through the lens of the cold, hard data that was presented at trial about the clear limitations Native American communities in Montana face, and how the costs associated with ... (“BIPA”) are simply too high and too burdensome to remain the law of the State of Montana.”

In a state where the majority of individuals vote by mail, rural tribal communities—who often lack home mail service—work with get-out-the-vote organizers who collect and transport ballots to election offices that would otherwise be inaccessible because of distance, lack of access to transportation, or other socio-economic barriers. Ballot collection efforts are often the only way Native Americans living on rural reservations can access the vote.

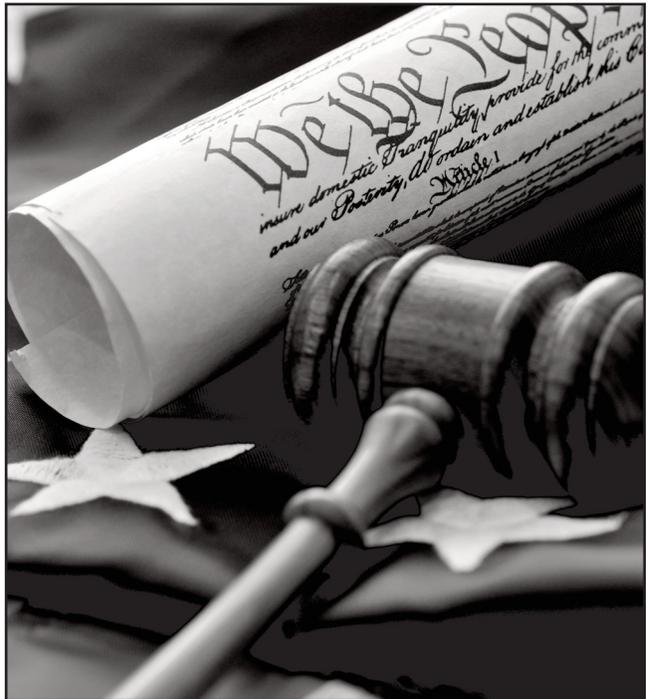
BIPA would have effectively ended ballot collection and disenfranchised Native American voters en masse. The court’s decision is one step forward in the fight to protect the Native vote.

Tribal Supreme Court Project

The Tribal Supreme Court Project is part of the Tribal Sovereignty Protection Initiative and is staffed by the National Congress of American Indians and the Native American Rights Fund. The Project was formed in 2001 in response to a series of US Supreme Court cases that negatively affected tribal sovereignty. The purpose of the Project is to promote greater coordination and to improve strategy on litigation that may affect the rights of all Indian tribes. We encourage Indian tribes and their attorneys to contact the Project to coordinate resources, develop strategy and prepare briefs, especially at the time of the petition for a writ of certiorari, prior to the Supreme Court accepting a case for review. You can find copies of briefs and opinions on the major cases we track on the NARF website (<https://sct.narf.org>).

On October 5, 2020, the U.S. Supreme Court began its October Term 2020. On the opening day of the term, the Court issued an order list from its “long conference,” which was held on September 29, 2020. Among the more 1,000 petitions for review that were denied were three Indian law matters: *Nobles v. North Carolina* (20-87) (challenging state court conclusion that defendant was not Indian for purposes of the Major Crimes Act); *In re: Scott Louis Youngbear* (20-78) (habeas corpus petition by Native American inmate); and *Native Wholesale Supply Company v. California* (19-985) (state regulation of Indian-owned business). In addition, in a case involving an Indian’s challenge to his Oklahoma state court conviction on the grounds that the crime occurred in Indian country, the Court granted, vacated, and remanded for reconsideration in light of its decision in *McGirt v. Oklahoma*.

President Trump has nominated Judge Amy Coney Barrett of the Seventh Circuit Court of Appeals to the seat on the U.S. Supreme Court opened by the death of Justice Ruth Bader Ginsburg in September 2020. NARF has prepared a memorandum examining her Indian law background and experience, which is available at the Project website.



INDIAN LAW CASES DECIDED BY THE SUPREME COURT

The Court has decided one Indian law case in the October 2020 term:

WILSON V. OKLAHOMA (19-8126): Grant, vacate, and remand (October 5, 2020) based on *McGirt v. Oklahoma*. Petitioner is an Indian convicted of first degree murder in Oklahoma state court. He asserted that the location where the crime occurred was “Indian Country,” and therefore the state court was without authority to convict him of the offense. The Supreme Court summarily granted the petition, vacated the lower court’s decision, and remanded for further consideration in light of *McGirt v. Oklahoma*.

PETITIONS FOR A WRIT OF CERTIORARI PENDING

The following petitions for a writ of certiorari have been filed in Indian law and Indian law-related cases and are pending before the Court:





YSLETA DEL SUR PUEBLO V. TEXAS (20-493): The State of Texas sued the Ysleta Del Sur Pueblo to enjoin certain gaming operations. The district court issued summary judgment in favor of Texas, holding that the Pueblo’s settlement act, not the Indian Gaming Regulatory Act, governed the Pueblo’s gaming activities.

MUCKLESHOOT INDIAN TRIBE V. TULALIP TRIBES (20-195): Two tribes brought action in a subproceeding of *United States v. Washington* seeking additional usual-and-accustomed fishing grounds and stations (U&A) in saltwater of Puget Sound. The Ninth Circuit Court of Appeals affirmed dismissal of the case because a previous court order had determined the scope of the plaintiff Tribes’ U&A.

UNITED STATES V. COOLEY (19-1414): A non-Indian motorist was charged with federal narcotics offenses as result of evidence discovered by Crow Tribe police officer after conducting a safety check of the vehicle parked on the side of a state roadway crossing the reservation. The trial court granted his motion to suppress evidence obtained by the Tribal police officer. The Ninth Circuit held that the non-Indian was held by the Tribal police officer in violation of the Indian Civil Rights Act where he formed the opinion that the person was non-Indian and subsequently determined that it was “apparent” that a federal crime was being committed. A Ninth Circuit panel held that the non-Indian was seized and searched in violation of the Indian Civil Rights Act, and that evidence obtained as a result was inadmissible in a federal court prosecution.

FMC V. SHOSHONE BANNOCK TRIBES (19-1143): This case arises from FMC Corporation’s (“FMC”) operation of an elemental phosphorus plant on fee land within the Shoshone-Bannock Fort Hall Reservation. FMC’s operations produced enormous amounts of hazardous waste that is stored on the reservation. In 1990, the U.S. Environmental Protection Agency (“EPA”) declared FMC’s plant and storage area a Superfund site. A subsequent consent decree settling an EPA suit against FMC required the company to obtain permits from the Shoshone-Bannock Tribes. FMC agreed to pay \$1.5 million per year for a tribal use permit allowing storage of hazardous waste, and paid the fee from 1998 to 2001. FMC refused to continue paying in 2002 when it ceased plant operations, but it nevertheless still stores hazardous waste on the reservation. During federal court proceedings initiated by the Tribes to enforce the consent decree, FMC applied for tribal permits and eventually challenged the Tribes’ regulatory jurisdiction in tribal court. The Tribal Appellate Court held that the Tribes possessed adjudicatory and regulatory jurisdiction over FMC pursuant to the second Montana exception. FMC then challenged the tribal court’s jurisdiction in federal court, which ruled in favor of the Tribes. On appeal, the Ninth Circuit concluded that tribal jurisdiction existed under both *Montana* exceptions.

CONTRIBUTIONS TO THE TRIBAL SUPREME COURT PROJECT

NCAI and NARF welcome general contributions to the Tribal Supreme Court Project. Please send any general contributions to the NCAI Fund, attn: Kurt Sodee, 1516 P Street, NW, Washington, DC 20005. **Please contact us if you have any questions or if we can be of assistance: Derrick Beetso, NCAI General Counsel, 202-630-0318, dbeetso@ncai.org; or Joel West Williams, NARF Senior Staff Attorney, 202-785-4166, williams@narf.org.** 🌟

National Indian Law Library (NILL)

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Current Awareness in Your Inbox

Each week, the National Indian Law Library (NILL) provides free updates on Indian law through the Indian Law Bulletins. Almost nine thousand patrons receive the free weekly updates by email, while others access them through the NILL website or NARF's Facebook page. The Indian Law Bulletins are the only regularly published updates on Indian law covering tribal courts, federal and state courts, federal agencies, US legislation, law review articles, and news.

Curated Results from NILL's Researchers

It's easy to get overwhelmed by the sheer amount of information available on the internet, and not all of that information is complete and accurate. NILL staff and volunteers research new developments in Indian Law each week and select only timely and relevant information to include in the Indian Law Bulletins. You can feel confident that the information you receive includes what you need to know to stay up-to-date. This current awareness service is provided free of charge, and the library can provide additional information relating to your topic if needed.

Free Searchable Database of Indian Law and News

Besides the weekly updates and emails, content from the Indian Law Bulletins is archived on the

NILL website. The archived collection serves as a searchable database of Native American law and legal news. To begin researching a topic, type your search term into the search box on the right side of the Indian Law Bulletins page. (www.narf.org/nill/bulletins) You can search by Indian law topic or case name, just as you would in Google. Your search results will be organized under nine tabs that represent each of the individual bulletins.

Most of the materials that are covered in the bulletins are available online. If the item you would like to see is not available online, you can contact the library (www.narf.org/nill/asknill.html) to request a copy of the item as well as additional information on your topic.

Support the National Indian Law Library

Your contributions help ensure that the library can continue to supply unique and free access to Indian law resources and that it has the financial means necessary to pursue innovative and groundbreaking projects to serve you better. We are not tax-supported and rely on individual contributions to fund our services. Please visit www.narf.org/nill/donate for more information on how you can support this mission. 🌟



CALL TO ACTION

It has been made abundantly clear that non-Indian philanthropy cannot sustain NARF's work. Federal funds for specific projects also have been reduced. To provide legal advocacy in a wide variety of areas such as religious freedom, the Tribal Supreme Court Project, tribal recognition, human rights, trust responsibility, voting rights, tribal water rights, Indian Child Welfare Act, and tribal sovereignty issues, NARF looks to the tribes to provide the needed funding. It is an honor to list those tribes and Native organizations who have chosen to share

their good fortunes with the Native American Rights Fund and the thousands of Indian clients that we serve.

We encourage other tribes and organizations to become contributors and partners with NARF in fighting for justice for our people and in keeping the vision of our ancestors alive. We thank the following tribes and Native organizations for their generous support of NARF in the 2020 fiscal year (October 1, 2019 to September 30, 2020):

Affiliated Tribes of Northwest Indians
Agua Caliente Band of Cahuilla Indians

Ak-Chin Indian Community

Amerind Risk

Chickasaw Nation

Confederated Tribes of Siletz Indians

Cow Creek Band of Umpqua Tribe of Indians

Mooretown Rancheria

Muckleshoot Indian Tribe

Nome Eskimo Community

Poarch Band of Creek Indians

Redding Rancheria

Rosebud Sioux Tribe

San Manuel Band of Mission Indians

Seminole Tribe of Florida

Tanana Chiefs Conference

United Tribes of Bristol Bay

Yocha Dehe Wintun Nation



THE NATIVE AMERICAN RIGHTS FUND

The Native American Rights Fund (NARF) is the oldest and largest nonprofit legal organization defending and promoting the legal rights of Indian people on issues essential to their tribal sovereignty, natural resources, and human rights.

Since 1970, we have provided specialized legal advice and representation to Native American tribes and organizations on issues of major importance. Our early work was instrumental in establishing the field of Indian law. NARF—when very few would—steadfastly took stands for Indian religious freedom and sacred places, subsistence hunting and fishing rights, as well as basic human and civil rights. We continue to take on complex, time-consuming cases that others avoid, such as government accountability, voting rights, climate change, and the education of our children. We have assisted more than 300 tribal nations with critical issues that go to the heart of who we are as sovereign nations.

NARF's first Board of Directors developed priorities to guide the organization in its mission to preserve and enforce the legal rights of Native Americans. Those five priorities continue to lead NARF today:

- Preserve tribal existence
- Protect tribal natural resources
- Promote Native American human rights
- Hold governments accountable to Native Americans
- Develop Indian law and educate the public about Indian rights, laws, and issues

Under *preserving tribal existence*, NARF works to construct the foundations that empower tribes to live according to their traditions, enforce their treaty rights, insure their independence on reservations, and protect their sovereignty.

An adequate land base and control over natural resources are central components of economic self-sufficiency and self-determination, and are vital to the very existence of tribes. Thus, much of NARF's work involves *protecting tribal natural resources*.

Although basic human rights are considered a universal and inalienable entitlement, Native Americans face the ongoing threat of having their rights undermined by the United States government, states, and others who seek to limit these rights. Under the priority of *promoting human rights*, NARF strives to enforce and strengthen laws that protect the rights of Native Americans to practice their traditional religion, use their languages, and enjoy their culture.

Contained within the unique trust relationship between the United States and Indian nations is the inherent duty for all levels of government to recognize and responsibly enforce the laws and regulations applicable to Indian peoples. Because such laws impact virtually every aspect of tribal life, NARF is committed to *holding governments accountable* to Native Americans.

Developing Indian law and educating the public about Indian rights, laws, and issues is essential for the continued protection of Indian rights. This primarily involves establishing favorable court precedents, distributing information and law materials, encouraging and fostering Indian legal education, and forming alliances with Indian law practitioners and other Indian organizations.

Requests for legal assistance should be addressed to NARF's main office at 1506 Broadway, Boulder, CO 80302. NARF's clients are expected to pay what they can toward the costs of legal representation.

NARF 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.

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