



Bois Forte

TRIBAL GOVERNMENT

April 24, 2017

VIA EMAIL TO: LegalCounselRules@courts.state.mn.us

Michael B. Johnson, Senior Legal Counsel
State Court Administration
125H Minnesota Judicial Center
25 Rev. Dr. Martin Luther King, Jr. Blvd.
St. Paul, MN 55155

RE: Responses to Supplemental Questions from the Minnesota Supreme Court Advisory Committee on General Rules of Practice ("Committee") on the Petition of the Minnesota Tribal Court/State Court Forum to Amend Rule 10.

Dear Mr. Johnson and Members of the Committee,

As a Judge for both the Bois Forte Band of Chippewa Tribal Court and the Leech Lake Band of Ojibwe Tribal Court, I provided testimony on March 31, 2017 in favor the Petition of the Minnesota Tribal Court/State Court Forum to Amend Rule 10.¹ This letter serves to supplement that testimony.

Responses to the Committee's Questions

What follows are my answers to each of the Committee's supplementary questions.

- 1. Is the proposed change making tribal court orders and judgments presumptively enforceable substantive or procedural, and does it encroach on federal or state legislative authority?**

As evidence that the proposed rule is inherently procedural, the proposed rule amends an existing process encapsulated by the current Rule 10, and the amendments do not shift the rule to

¹ In addition to my service as a tribal court judge, I also served the Regional Native Public Defense Corporation as a public defender for tribal members charged with crimes in state district courts situated in Northern Minnesota.

a substantive one. In addition, I incorporate ¶¶ 51 – 66 of the Petition and otherwise defer to the Petitioners' joint response.

2. Do tribal court civil monetary judgments immediately become liens on real property when filed in MN? (e.g., Wisconsin requires a court to approve it; Iowa says must wait until any filed objections are resolved)?

No, I don't think tribal court civil monetary judgments immediately become liens on real property when filed in Minnesota. In the first instance, the Minnesota Uniform Foreign-Country Money Judgments Recognition Act, Minn. Stat. §§ 548.54-63, itself determines whether tribal court civil monetary judgments immediately become liens on real property when filed in MN—not the proposed Rule 10.01. And under that statute, to enforce a foreign-country judgment, a creditor must first file an action seeking recognition of the judgment.² After being served with notice of the action, the debtor will have the opportunity to show that the judgment should not be recognized before the judgment becomes effective (or lien on the debtor's property). And of course, absent the statute, a creditor with a tribal court monetary judgment must secure recognition under the proposed Rule 10.02 before it becomes effective under Minnesota law.

3. How would the proposed change making tribal court orders and judgments presumptively enforceable, address the problem of law enforcement not honoring lawful tribal court orders when people would still need to get “cover orders” from the state courts?

First, the proposed Rule 10.01 expressly identifies the tribal court orders that must be enforced pursuant to federal law.

As for other orders, the proposed Rule 10.02 process enables people to secure a “cover order” that law enforcement will enforce more quickly than under the current rule. The proposed Rule 10.02 expressly directs state courts to recognize a tribal court order absent objection. So, absent objection, district court judges will issue a “cover order,” rather than analyzing the factors

² Minn. Stat. § 548.59(a).

prescribed under the current Rule 10.02, which requires briefing from the parties on the same. As such, the proposed Rule 10.02 will address the problem contemplated by your question by reducing the time and cost incurred by a party, tribal police officer, or tribal staff to get a tribal court order recognized.

The Bois Forte and Leech Lake Band's Court staff, law enforcement, and child protective services work very closely with their city, county, state, and federal counterparts to deliver justice in northern Minnesota. "[T]he problem of law enforcement [and other state government officers] not honoring lawful tribal court orders [absent] a 'cover order'" is a multifaceted problem with multifaceted solutions, and the proposed Rule 10 is without doubt one important solution. By adopting the proposed Rule 10, Minnesota's Supreme Court will deliver a clear and critical message to state officers that the judiciary considers tribal court orders valid in the first instance. This message itself will help tribal court staff work with their counterparts to protect tribal—and Minnesota—citizens.

What I see in court every week underscores this point.³ For example, I currently have numerous custody cases pending before the Leech Lake Tribal Court that involve persons subject to a district court Order for Protection ("OFP) or Harassment Restraining Order ("HRO") that does not address custody.⁴ Often, these tribal court custody petitions are urgent emergency petitions brought by family members in crisis. But because there is no continuity between tribal court and district court orders that relate to the same parties, much less an awareness of this

³ Each court administers busy dockets. The Leech Lake Band exercises civil jurisdiction. In 2014, the Band administered 572 cases, of which 236 were family matters (involving people that would benefit significantly from the proposed Rule 10). The Bois Forte Band exercises civil and criminal jurisdiction. In 2014, the Band's Tribal Court administered 351 cases.

⁴ To give the Committee an idea of how many individuals may be impacted by this circumstance, in 2016 alone, 77 custody actions and 29 petitions for an HRO were filed in the Leech Lake Tribal Court.

disconnect, I cannot know whether the tribal court order I issue would cause someone to violate the district court's OFP or HRO. More than likely, this conflict is mirrored, such that parents subject to a tribal court OFP or HRO have moved a district court to make custody determinations. The proposed Rule 10 offers a simpler, streamlined process that parties, social workers, and court staff can use to ensure that each jurisdiction is aware of overlapping orders from the other jurisdiction.

4. To what extent would there be reciprocal recognition for state court orders in tribal court?

The tribes situated in Minnesota have developed independent processes that govern the recognition of state court orders. For example, the Leech Lake Rules of Civil Procedure generally authorize the Tribal Court to recognize foreign judgments, provided the judge is assured that: (1) the foreign court had jurisdiction over the matter; (2) the judgment is final; (3) the judgment is on the merits and was not procured illegally; and (4) the judgment was procured in compliance with the procedures of the issuing court.⁵ In addition, the Leech Lake Tribal Court has issued an Administrative Order, as authorized by the Leech Lake Judicial Code, to govern discrete issues relative to recognizing state court order that modify child support.⁶

The other tribes in Minnesota that have adopted procedures for recognizing foreign judgments include: Lower Sioux Indian Community in Minnesota;⁷ Prairie Island Indian Community;⁸ Upper Sioux Community;⁹ Grand Portage Band of Lake Superior Chippewa;¹⁰

⁵ Leech Lake Band of Ojibwe Jud. Code, Ti. II, Rule 60, *available at*

http://www.llojibwe.org/court/tcCodes/tc_coTITLE02-RulesofProcedure.pdf.

⁶ Admin. Ord., Modification of Foreign Orders in Family Relations Cases, Leech Lake Band of Ojibwe Tribal Court (DATE), attached as Exhibit 1.

⁷ Lower Sioux Indian Community Jud. Code at § 1.08, *available at* <http://lowersioux.com/wp-content/uploads/2015/11/Judicial-Code-Courts-and-Jurisdiction.pdf>

⁸ Prairie Island Indian Community Jud. Code, Ti. 1, Ch. VIII, § 1, *available at*

<http://prairieisland.org/wp-content/themes/tempera-child/docs/Judicial%20Code%20Title%201%20Courts.pdf>; *see also id.* at Ti. 2, Rule 46

White Earth Nation;¹¹ Mille Lacs Band of Chippewa Indians;¹² Fond du Lac Band's law provides for the automatic enforcement of an OFP by Band police in accordance with the Violence Against Women Act, 18 U.S.C. § 2265;¹³ and the Red Lake Nation provides for the recognition of state child support orders in accordance with the Full Faith and Credit for Child Support Orders Act, 28 U.S.C. § 1738B.¹⁴

Tribal recognition of state court orders is the result of independent governmental decision-making. As the petition articulates in ¶¶ 1 - 14, the 11 federally recognized tribes in Minnesota are sovereign political entities with independent authority to self-govern their citizens and territories. A tribe's decision to recognize a state court order—whether codified in legislation or judicial rulemaking—is an expression of each tribe's independent authority. I respectfully urge the Committee to resist making a recommendation contingent on how any one tribe has expressed that authority, particularly in light of the fact one of the bases for objection to recognition under the proposed Rule 10.02 is reciprocity.

5. What model does the current proposal follow and what has been the experience in those jurisdictions?

In response to this question, I defer to the Petitioners' joint response.

(governing the enforcement of child support orders), *available at* <http://prairieisland.org/wp-content/themes/tempera-child/docs/Judicial%20Code%20Title%20%20Rules%20of%20Civil%20Procedure.pdf>.

⁹ Upper Sioux Community Jud. Code, Ti. IV, Ch. VII, § 1.

¹⁰ Grand Portage Band of Lake Superior Chippewa Jud. Code, Ti. III.

¹¹ White Earth Band of chippewa R. Civ. P., Rule XXXIV-XXXV, *available at* http://www.whiteearth.com/data/upfiles/files/jesse@whiteearth_com_20110208_174435.pdf; *see also* White Earth Band Child Sup. Enf. Act, 6-10C-55-57, *available at* [http://www.whiteearth.com/data/upfiles/files/Chap_10C_WEN_Child_Support_Code_revised_4.2016\[2\].pdf](http://www.whiteearth.com/data/upfiles/files/Chap_10C_WEN_Child_Support_Code_revised_4.2016[2].pdf).

¹² Mille Lacs Band of Chippewa Stat. Ann., Ti. 24, Ch. 3, § 2009. At the time of writing, the Mille Lacs Band of Chippewa Indian's official website was not operating, but the Band's statutes can normally be found on the Band's Legislative Branch homepage.

¹³ Fond du Lac Band of Lake Superior Chippewa Ord. # 04/07, §§ 301 – 302, *available at* <http://www.fdlrez.com/government/ords/04-07ord.pdf>.

¹⁴ Red Lake Code, § 801.27.

6. How can a tribal court ordering a civil commitment do so without making the commitment facility a party to the proceedings?

A tribal court has the authority civilly commit a member to a tribal facility. Generally speaking, a tribal court cannot commit a person to the custody of the Commissioner of the Minnesota Department of Human Services (or another state entity) absent a district court order.¹⁵

The circumstance described in ¶ 70 of the Petition is not unique. Tribal courts often issue Guardianship Orders (and/or Civil Commitment Orders) for persons due to persistent and life threatening circumstances. At times, however, the tribe may not have a human or medical service that the person needs. Before a Minnesota Department of Human Services' facility can provide medical treatment to a person who does not request it, the guardian appointed to this person by the tribal court must be recognized by the district court. As a result, a tribe must move a district court under Rule 10 to recognize the tribal court Guardianship Order, which may require full briefing on the factors justifying recognition. In an emergency, the time that it takes to brief this issue and secure a district court order can literally mean life or death.

As noted in my response to question #3, tribal staff currently works closely with their state counterparts to cut down on this delay. But some district court judges, and especially those who work closely with tribes and are familiar with Rule 10, apply the factors under Rule 10 quicker than others. The proposed Rule 10 provides all stakeholders a simpler, uniform process for recognizing a valid tribal court order in district court, regardless of who sits on the bench or works for the Minnesota Department of Human Services, to protect the health and welfare of tribal—and Minnesota—citizens.

¹⁵ See e.g. Minn. Stat. § 253B.

7. How are tribal court judges selected?

Each tribe has its own legally defined process for selecting judges—and guaranteeing the independence of its judiciary.¹⁶ For example, Judges for the Leech Lake Band’s Tribal Court are selected in accordance with the Leech Lake Band Judicial Code.¹⁷ The Judicial Code authorizes the Band’s governing body, the Reservation Business Committee (“RBC”), to appoint a selection committee to screen candidates for the judiciary and make recommendations to the RBC.¹⁸ The RBC then appoints the Judge.¹⁹ Judges serve a defined three-year term and the RBC cannot reduce his or her compensation during that term.²⁰ The RBC can only remove a judge by a super-majority vote for causes expressly defined by the Judicial Code.²¹ The Leech Lake Band has also taken practical steps to protect the judiciary by organizing the Band’s governmental structure so that the Court is independent.²² And in 1989, the Bois Forte Band’s governing body enacted into law its long-standing policy of non-interference to “ensure the impartiality, contribute the longevity and preserve the integrity of the tribal court.”²³ And

¹⁶ Other tribes’ laws providing for the judicial selection process include: Lower Sioux Community in Minnesota Jud. Code, §§ 1.09 - 1.19; Prairie Island Mdewakanton Dakota Community Jud. Code, Ti. 1, Ch. III, *available at* <http://prairieisland.org/wp-content/themes/tempera-child/docs/Judicial%20Code%20Title%201%20Courts.pdf>; Upper Sioux Community Jud. Code, Ti. 1, Ch. III; Grand Portage Band of Chippewa Jud. Code, Ti. 1, Ch. III; White Earth Band of Ojibwe Jud. Code, Ti. 1, Ch. III, *available at* <http://www.whiteearth.com/data/upfiles/files/JudicialCode.pdf>; Mille Lacs Band of Chippewa Stat. Ann., Ti. 5, Ch. 1, § 5.

¹⁷ *See* Leech Lake Band Jud. Code, Ti. 1, Part III, *available at* http://www.llojibwe.org/court/tcCodes/tc_coTitle1-Judicial.pdf.

¹⁸ *Id.* at § 4.

¹⁹ *Id.* at § 5.

²⁰ *Id.*

²¹ *Id.* at § 6.

²² LLBO Revised Organizational Chart, last revised March 2007, attached as Exhibit 2.

²³ Bois Forte Reservation Business Committee Res. #85-89 (April 6, 1989), attached as Exhibit 3.

notably, judges for both the Bois Forte Tribal Court and the Leech Lake Tribal Court must be licensed to practice in the highest court of any state.

8. What meets the burden to “demonstrate” one of the veto items, such as lack of jurisdiction? I was never there, I was never served, you have the wrong Mike Johnson?

Under the proposed Rule 10, a state district court judge enjoys the discretion necessary to determine whether a party opposing recognition meets their burden. As the Committee suggests, if a respondent produces concrete evidence that the tribal court lacked personal jurisdiction, the district court will probably deny the petitioner’s request to enforce the tribal court order under proposed Rule 10.02(a). Other courts have determined what evidence a party must produce to successfully object to the recognition of a tribal court judgment.²⁴ Minnesota’s judges will do the same.

9. Are tribal court records public so that litigants can verify what is and is not there?

Except for records in child welfare and juvenile matters, both Bois Forte and Leech Lake Tribal Courts’ records are open to the public. I also serve as a Judge for the Fond du Lac Band of Chippewa Appellate Court and I have practiced before the Red Lake Band of Chippewa Tribal Court and the White Earth Band of Chippewa Tribal Court. Those courts’ records are also public (except for child welfare and juvenile matters). And as in state district court, the clerks of court for each tribal court are an invaluable resource for assisting parties and the public access public records.

²⁴ See e.g. *Wilson v. Marchington*, 127 F.3d 805 (9th Cir. 1997) (listing various grounds for rejection, which included those listed in the proposed Rule 10.02, and deciding not to recognize a tribal court judgment because the tribal court lacked subject matter jurisdiction); see also *State ex re. Olson v. Harrison*, 627 N.W.2d 153, 157 (2001) (applying N.D.R.Ct. 7.2, the court held that “the presumption the Tribal Court had personal jurisdiction has been overcome”).

Two Clarifications

To close, I wish to quickly address two issues. First, the relationship between the Minnesota Chippewa Tribe (“MCT”) and its six member tribes deserves clarification. The Bois Forte Band of Chippewa and the Leech Lake Band of Ojibwe are two of six members of the MCT,²⁵ with the MCT serving as the centralized governmental authority for the six constituent Bands and functioning under a revised constitution first adopted pursuant to federal law.²⁶ But each Band pre-dates the MCT by centuries. Moreover, each Band enjoys independent authority to govern on their respective reservations.²⁷

Although each Band has two specified officers who also sit on the governing body of the MCT—the Tribal Executive Committee (“TEC”)—the MCT, the federal government, and the State of Minnesota²⁸ treat each Band as an independent, autonomous tribe.²⁹ The MCT has recognized each Band’s independence in a variety of ways, including by passing MCT Resolution No. 2-80 (submitted to the Committee), which expressly recognizes the right of each Band to operate an independent court. The Committee should also treat each Band as an independent, autonomous tribe. As such, the Committee should evaluate the testimony and submissions provided by each tribe, its officers, and its members independently.

²⁵ The remaining four Bands are: Fond du Lac Band of Superior Chippewa, Grand Portage Band of Lake Superior Chippewa, Mille Lacs Band of Chippewa, and the White Earth Band of Chippewa. See MCT Tribal Government at <http://www.mnchippewatribe.org>. The other Chippewa Band situated in Minnesota, the Red Lake Band, organized separately on its own lands.

²⁶ See MCT Constitution at arts. II – IV, available at <http://thorpe.ou.edu/constitution/chippewa/>.

²⁷ *Id.* at arts. II and IV.


²⁸ See e.g. *Gayle v. Little Six, Inc.*, 555 N.W.2d 284, 288 (Minn. 1996); Exec. Order No. 03-10, 28 Minn. Reg. 57 (July 10, 2003), available at https://mn.gov/governor/assets/EO-13-10.pdf_tcm1055-92492.pdf.

²⁹ See MCT Constitution at art. VI.

Second, contrary to statements made by individual tribal members during the public hearing, neither a referendum nor a convention on the MCT's Constitution has anything to do with the Committee's decision to adopt the proposed rule. Indeed, there was unanimous consent on this point from those who testified. Mr. Kevin DuPuis, who spoke solely on behalf of the MCT as the President of the MCT's TEC, agreed that the MCT should not be formally involved in this Committee's decision to amend Rule 10, as did both Mr. Leonard Roy and Mr. Dale Greene. Moreover, MCT tribal law, as expressed in TEC Resolution 1-80 (submitted to the Committee), dictates that the TEC is the exclusive body with authority to interpret the MCT Constitution. The prospect of a "convention" to revise the existing MCT Constitution would not inform how the MCT's Constitution relates to the proposed rule (and vice versa). Certainly, nothing in the MCT Constitution—or that of any other tribe—should have a bearing on the Committee's deliberation and ultimate recommendation.

Conclusion

I respectfully urge the Committee to recommend that the Minnesota Supreme Court grant the Petition and adopt the proposed Rule 10, as it will significantly increase access to justice for the people who appear before the Bois Forte and Leech Lake Tribal Courts.



Judge Megan Treuer



**LEECH LAKE BAND OF OJIBWE
IN TRIBAL COURT**

**MODIFICATION OF FOREIGN ORDERS
IN FAMILY RELATIONS CASES**

Case No. ADM-10-0005

ADMINISTRATIVE ORDER

WHEREAS, Leech Lake Tribal Council has enacted Title 6: Family Relations Code, providing for divorce and child custody cases to be filed in Leech Lake Tribal Court; and

WHEREAS, Title 6: Family Relations Code, is silent on modification of custody, parenting time, and child support orders issued by other jurisdictions; and

WHEREAS, the Leech Lake Tribal Court has received numerous requests for modification of custody, parenting time, and child support orders issued by other jurisdictions, making it necessary to clarify the types of foreign orders that can be modified by Leech Lake Tribal Court; and

WHEREAS, the Leech Lake Judicial Code, Title 1, Part VII, Section 6, provides that where an issue arises in an action that is not addressed by the written laws or custom and traditional law, the court may apply the law of any tribe, the federal government, or any state; and

WHEREAS, the Uniform Child Custody Jurisdiction and Enforcement Act (“UCCJEA”) provides that once a custody determination has been made by a court with jurisdiction, another court does not have authority to modify the determination, unless the court with jurisdiction determines that it no longer has jurisdiction, or the court determines that the child, parents, and any acting parents do not reside in the state which currently has jurisdiction; and

WHEREAS, the UCCJEA was enacted, in part, to avoid jurisdictional competition and conflict between courts in matters of child custody which have in the past resulted in the shifting of children from jurisdiction to jurisdiction with harmful effects on their well-being; to discourage the use of forum shopping for continuing controversies over child custody; to avoid relitigation of custody decisions made by other


jurisdictions; and to facilitate the enforcement of custody decrees of other jurisdictions;
and

WHEREAS, the Leech Lake Judicial Code, Title I, Chapter VII, Sections 2 and 4, provide that the Chief Judge of the Tribal Court may establish and promulgate rules of procedure for the conduct of proceedings, and that the Court may adopt any suitable process or mode of proceeding which appears to the Court to be fair and just and most consistent with Band law;

IT IS HEREBY ORDERED, that the Leech Lake Tribal Court shall not modify a custody, parenting time, or child support order issued by another Court unless that Court has determined that it no longer has jurisdiction; or the parents, acting parents, and child(ren) no longer reside in the state which currently has jurisdiction; or if the parties have agreed that jurisdiction should be transferred from the issuing Court to the Leech Lake Tribal Court and the issuing Court thereafter relinquishes jurisdiction and transfers the case to Leech Lake Tribal Court.

Dated: 2/19/10

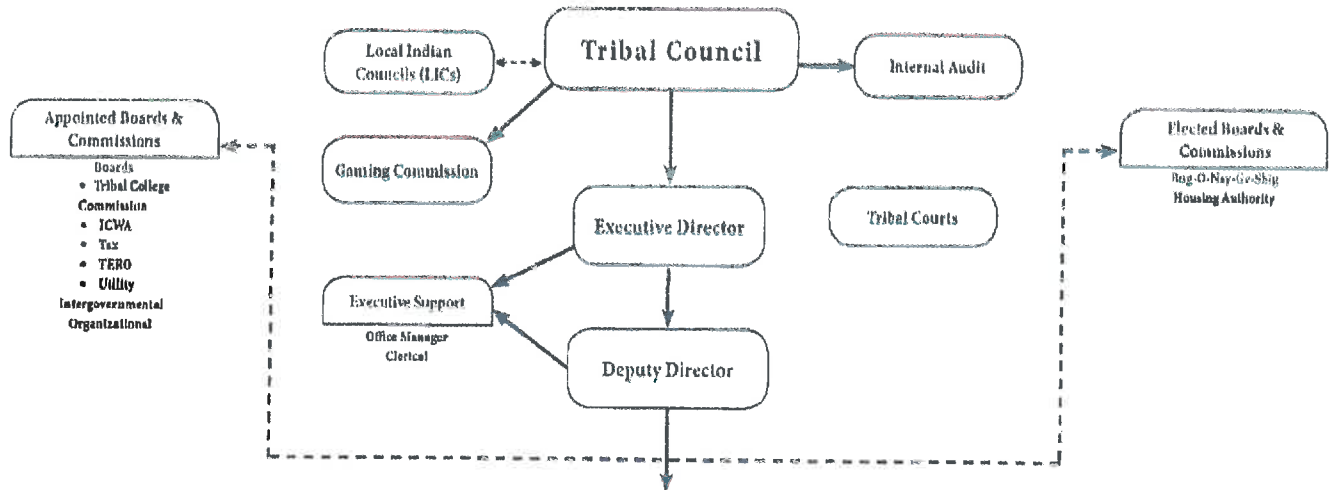
BY THE COURT,


The Honorable Joseph Plumer
Chief Judge of the Leech Lake Tribal Court

LLBO Revised Organizational Chart

LEECH LAKE BAND OF OJIBWE

GOVERNMENTAL STRUCTURE
Rev. 01/17



Administrative Divisions

General Administration	Reservation Services	Roads & Construction	Public Safety	Tribal Development	Resource Management	Human Services	Health Services	Education
<ul style="list-style-type: none"> Accounting Risk Mgmt Director Fleet Govt Relations Human Resources Legal Meet Offices Duluth Twin Cities MIS Self Governance Public Relations Events Newspaper Radio Webelic Purchasing Property Admin Records Mgmt Archives Enrollment Records 	<ul style="list-style-type: none"> Constituent Services Public Works Comm Services Facilities Sanitation Solid Waste SVRP/SHIP O & M 	<ul style="list-style-type: none"> Administrative Staff Civil Engineering Survey Heavy Equipment Public Transportation Road Maintenance 	<ul style="list-style-type: none"> DMV Emergency Management Fire (Contracts) Security Tribal Police 	<ul style="list-style-type: none"> Economic & Community Development Assisted Living Small Business/Enterprise Tourism Wild Rice Information Management Office Contracts Data Collection Grant & Contract Compliance Grant Research Grant Writing Capital Improvement/Infrastructure 	<ul style="list-style-type: none"> Fish Hatchery Forest Development & Mgmt G.I.S Heritage Sites Invasive Species Control Land Management Land Registration Conservation Natural Disasters Water Resource Mgmt Wild Life Enhancement Wildfire Protection 	<ul style="list-style-type: none"> Addictions & Dependency Adol Outpatient Anti/Inabte BI-Ma-Dix Assessment Family Viol. Prevention Halfway Mens Halfway Womens Mens Outpatient Women's Svcs Behavioral Health Admin ARMS Child MH O.S Contracts CTSS MH TCMH Centralized Billing Child Welfare Admin Child Protection Family Preservation Poster Care Intake Twin Cities ICWA Opiate TAP Energy Assistance Extraordinary Assist. Homeless Shelter Veterans Services 	<ul style="list-style-type: none"> Ambulance C.H.H. Clinics Community Promotion Diabetes Elders & Handicap Services Food Distribution Health Administration Nutrition Public Health W.I.C. 	<ul style="list-style-type: none"> Education Early Childhood Head Start JOM Post Secondary Scholarships TED/SIE Workforce Dev MFP/NEW TSP TFCO WIOA Youth Employment Youthbuild Youth Programs Health & Recreation Eye-Fitness SAMSBA Sports Sports & Fitness Tobacco Prevention YCIPP



Bois Forte Reservation Business Committee

Nett Lake, Minn. 55772

RESOLUTION #85-89

WHEREAS, the Bois Forte Reservation Business Committee is the governing body of the Bois Forte Reservation, and

WHEREAS, the Bois Forte Reservation Business Committee is authorized by the Minnesota Chippewa Tribal Constitution "to preserve and maintain justice for its members", Article I, Section 3, and

WHEREAS, the Bois Forte Reservation has successfully retroceded Public Law 280 with regard to criminal jurisdiction and maintains a tribal court which adjudicates criminal matters, and

WHEREAS, the Bois Forte Reservation Business Committee seeks to maintain the integrity of the governing body of the Band, and

WHEREAS, the Bois Forte Reservation Business Committee seeks to insure the impartiality, contribute to the longevity and preserve the integrity of the tribal court, and

WHEREAS, the Bois Forte Reservation Business Committee views tribal court as an important exercise of its sovereignty and self-governing powers over the lands and people of the reservation.

NOW THEREFORE BE IT RESOLVED, that the Bois Forte Reservation Business Committee hereby establishes a policy of non-interference in tribal court matters, and

BE IT FURTHER RESOLVED, that the Bois Forte Reservation Business Committee and its staff shall refrain from contacting judges, prosecutors or other tribal court personnel for the purposes of influencing individual court cases.

We do hereby certify that the foregoing resolution was duly presented and enacted upon by a vote of 4 for, 0 against, 0 abstaining, at a regular meeting of the Bois Forte Reservation Business Committee, a quorum being present, held on April 6, 1989, at Nett Lake, Minnesota.

Eugene A. Boshey, Sr., Chairman

Lester E. Drift, Sr., Secretary/Treasurer

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