

**ALASKA LEGISLATURE COMMITTEE FILES 1995-1996 8672**

**8997 SENATE RESOURCES**

Shishmaref, Alaska  
March 17, 1992

Honorable Bruce Babbitt, Secretary  
Department of the Interior  
1849 C. Street N.W.  
Washington, D.C. 20240

Dear Mr. Babbitt:

As a reindeer herder in the Seward Peninsula, I am writing you a letter in regards to the Reindeer Industry Act of 1937. Senator Frank H. Murkowski, Senator from Alaska,, has indicated that he is considering offering an amendment to the Reindeer Act. Any amendment to the act would definitely affect the Native family operations we have going at present. We have reindeer herds that support 2 or 3 families, with reindeer income. Along with insufficient funds at support these families, we are faced with high operating cost, different land ownership within our permitted grazing lands, along with no slaughter facilities established.

We the herders supply our villages with red meat, due to the fact beef or pork runs at least \$7.00 a pound. All slaughter done for the villages is open field slaughter due to the fact we have no funds to construct Federal-State approved slaughter facilities. Through the Reindeer Herders Association in Nome, Alaska, we were able to obtain enough funds to provide herds with only building designs that are approved. Although these prints will be available to the herders we do not know where funds will come from to construct these facilities to expand our meat market since village market is very limited.

We the herders are trying to increase our individual herds so that we may attempt to market our meat elsewhere inspection is necessary. At present this is not available.

After what has happened with reindeer on Hagemeister Island (Togiak) by the Alaska Department of Fish & Wildlife, we are concerned as to what will happen to the reindeer industry. The Reindeer Act of 1937 has helped

the natives to be self employed and not dependent on  
State aide.

At present any amendment to the Reindeer Act of 1937 would  
eventually get us back before 1937 when Lomen Brothers  
operation took over the reindeer herds and took away the  
red meat from the villages where natives exists. I,  
therefore, Honorable Babbitt would discourage that any  
amendments be made to the Reindeer Act of 1937.

Sincerely,

Clifford Weyiouanna  
WEYIOUANNA HERD  
Box 74  
Shishmaref, Alaska 99772

KAWERAK, INC., REINDEER HERDERS ASSOCIATION

PETITION TO REFRAIN FROM AMENDING THE REINDEER INUDBTRY ACT

City of Kotzebue, Alaska	9 Signatures
Native Village of Point Hope Point Hope, Alaska	12 Signatures
City of Elim, Alaska	96 Signatures
Brevig Mission Traditional Council Brevig Mission, Alaska	95 Signatures
Shishmaref IRA Council Shishmaref, Alaska	120 Signatures
Native Village of Unalakleet Unalakleet, Alaska	60 Signatures
Native Village of Shaktoolik Shaktoolik, Alaska	89 Signatures
Koyuk IRA Council Koyuk, Alaska	57 Signatures
Native Village of St. Michael St. Michael, Alaska	50 Signatures
Teller Traditional Council Teller, Alaska	50 Signatures
Savoonga IRA Council Savoonga, Alaska	51 Signatures
White Mountain IRA Council White Mountain, Alaska	34 Signatures
People Attending the 3rd Annual BIA Conference - Anchorage 12/93	158 Signatures
Subtotal (1/19/93	881

PLEASE RETURN BY Jan. 5, 1994



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DEC 21 1993

CITY OF KOYUK

return this petition to: Reindeer Herders Association P.O. Box 948 Nome, Ak.99762

PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

We, the undersigned hereby support the 1937 Reindeer Industry Act as written. The Reindeer Act was intended to "establish and maintain for the said natives of Alaska a self-sustaining economy by acquiring and organizing for and on behalf of said natives a reindeer industry or business...by preserving the native character of the said industry or business thus established." There is now an attempt to amend the original act to open the ownership of reindeer to non-Natives. We the Undersigned are opposed to any such amendments and urge Congress, our congressional delegation and the Secretary of Interior to oppose amendments to the Reindeer Act of 1937.

Date	Printed Name	Signed Name	Address
1. 12-21-93	Nancy Nassuk	Nancy Nassuk	PO Box 35, Koyuk AK. 99753
2. 12-22-93	DIANE KIMOKTOAK	Dea E Kimoktoak	PO Box 57 Koyuk AK 99753
3. 12-22-93	Lucille C. Charles	Lucille C. Charles	PO Box 13 Koyuk, Alaska 99753
4. 12-22-93	Floyd Lee	Floyd Lee	Box 13 Koyuk AK 99753
5. 12/22/93	Faverne Kavaitok	Faverne Kavaitok	Box 53 Koyuk 99753
6. 12-22-93	Becky Anasogak	Becky Anasogak	Box 7 Koyuk AK 99753
7. 12-23-93	Leo M. Charles	Leo M. Charles	Box 13 Koyuk AK 99753
8.			
9.			
10.			

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PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

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Date	Printed Name	Signed Name	Address
1/2-17-93	FRED S Dewey	Fred Dewey	AKIS
2/2-17-93	Albert T. Charles	Albert Charles	POB 13
3/2/93	Myles M Henry	Myles Henry	Box 24
4/12/17/93	Charles Ahijis	Charles Ahijis	Box 11
5/2-17-93	Ruby Nassuk	Ruby Nassuk	Box 36
6/2-20-93	Ellen Adams	Ellen Adams	Box 5
7/2-14-93	Arno K Nassuk	ARNO K. NASSUK	Box 25
8/2-18-92	Arthur Kiltell	ARTHUR KILTOLL KIMOKTONG	Box 56
9/2-18-93	Diane Kavaihook	Diane Kavaihook	Box 25
10/2/16/93	Carolyn Dewey	Carolyn Dewey	Box 16



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pg. 2. Reindeer Act Petition

Date	Printed Name	Signed Name	Address	
11. 17 DEC 93	Richard A. Nassuli Sr.	<i>Richard Nassuli Sr.</i>	POB 37	KKA 99753
12-20-93	<del>Kenneth Dewey Sr.</del>	<del><i>Kenneth Dewey Sr.</i></del>		99755 KKA
13. 12-23-93	Danny Adams	<i>Danny Adams</i>	Box 7	Koyuk, AK 99753
14. 12-23-93	William Anliye	<i>William Anliye</i>	Box 96 Shaktolik, AK	99753
15. 12-24-93	Dwayne Charles	<i>Dwayne Charles</i>	Box 13 Koyuk	AK 99755
16. 12-24-93	William Nassuli	<i>William Nassuli</i>	Box 37	Koyuk AK 99755
17. 12-27-93	Dore H. Day	<i>Carl Day</i>	Box 16	Koyuk AK 99753
18. 12-27-93	Lena Henry	<i>Lena Henry</i>	Box 62	KKA 99753
20. 12-27-93	Jeanne Filcher	<i>Jeanne Filcher</i>	Box 53	KKA 99755
21. 12-27-93	Alice Filcher	<i>Alice Filcher</i>	Box 53	Koyuk, AK 99753
22. 12-27-93	Harold Filcher	<i>Harold Filcher</i>	Box 53	Koyuk, AK 99753
23. 12-27-93	RESIGNED M. OKITKON	<i>Foumier M. Obiton</i>	Box 38	KKA 99755
24. 12-27-93	Evelyn M. Obiton	<i>Evelyn M. Obiton</i>	Box 38	KKA 99753
25. 12-27-93	Ariene Charles	<i>Ariene Charles</i>	Box 18	Koyuk 99753
26. 12/27/93	Robert J. Charles	<i>Robert J. Charles</i>	Box 110	Whitemtn 99753
27. 12-27-93	MARY D. CHARLES	<i>Mary D. Charles</i>	P.O. Box 84110	Wm
28. 12-27-93	<del>Mary M. Aook</del>	<del><i>Mary M. Aook</i></del>	P.O. Box #2	Koyuk, AK 99753
29. 12-27-93	BLANCHE DAY	<i>Blanche Day</i>	Box 14	Koyuk AK 99753
30. 12-27-93	RUTH OTTON	<i>Ruth Otton</i>	Box 90	KKA 99753

pg. 3 Reindeer Act Petition

Date	Printed Name	Signed Name	Address
31. 12/27/92	David OTTON, Jr.	David Otton	P.O. Box 27 Koyuk AK
32. 12/27/92	Karen Nassuk	Karen Namik	P.O. Box 28 Koyuk AK
33. 12/27/92	HISIRLY ADAMS HISIRLY ADAMS	Hisly Adams	c/o Box 1 Koyuk, AK
34. 12/27/93	DONNA ADAMS	Donna Adams	Box 1104 Nome
35. 12/27/93	Ethel Adams	Ethel Adams	Koyuk
36. 12/27/93	Alfred Adams	Alfred Adams	Koyuk
37. 12/27/93	Abraham Anasogak Sr	Abraham Anasogak	AK
38. 12-27/93	Lane T Douglas	Lane T Douglas	P.O. 1 - Koyuk AK
39. 12/28/93	Jenny Leonard	Jenny Leonard	Box 31 Koyuk AK.
40. 12/28/93	Raymond C Douglas Sr	Raymond C Douglas Sr	Box 18 Koyuk AK 9975
41. 12/28/93	Oscar Anasogak Sr	Oscar Anasogak Sr	Box 7 Koyuk AK
42. 12-29-93	Oscar Anasogak Jr.	Oscar Anasogak Jr.	Box 7 Koyuk AK
43. 12-28-93	David Anasogak	David Anasogak	
44. 12-28-93	Georgiana Anasogak	Georgiana Anasogak	Box 7 Koyuk AK
45. 12-28-93	Messie M. OTTON	Messie M. Otton	Box 41 Koyuk AK 9975
46. 12-28-93	Wally H. Otton	Wally H. Otton	Box 41 Koyuk AK 99753
47. 12-28-93	Nancy Nassuk	Nancy Nassuk	Box 35, Koyuk, AK 99753
48. 12-28-93	Marie Adams	Marie Adams	Box 9, Koyuk, AK 99753
49. 12-28-93	Flora R Swanson	Flora R Swanson	Box 47 Koyuk, AK 99753
50. 12-28-93	Maryann Charles-Maryann	Maryann Charles-Maryann	Box 3 Koyuk AK 99753

Received 12-10-93



# KAWERAK, INC.

P.O. BOX 948 • NOME, ALASKA 99762

TELEPHONE: (907) 443-5231 • FAX: (907) 443-3708

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- GOLDVIN
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- MARYS IGLOO
- NOME
- SAVOONGA
- SHAR TOOLK
- SHISHMARIEF
- ST. MICHAEL
- TELLER
- UNALASKA
- WHITE MOUNTAIN

return this petition to: Reindeer Herders Association P.O. Box 948 Nome, Ak.99762

## PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

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Signed/ Date	Printed Name	Address
1. <u>Pius Washigt 12-2-93</u>	<u>Pius Washigt</u>	<u>8927 St. Michael Pt 99655</u>
2. <u>Shu Lakot 12-6-93</u>	<u>Shu Lakot</u>	<u>20.8111 St. Michael Ak 99654</u>
3. <u>Willard Johnson 12/6/93</u>	<u>Willard Johnson</u>	<u>220X 113 St. Michael, AK 99659</u>
4. <u>Douline &amp; Otten 12/6/93</u>	<u>Douline &amp; Otten</u>	<u>Box 94 St. Michael, AK 99659</u>
5. <u>Darren Billingsley 12/6/93</u>	<u>Darren Billingsley</u>	<u>Box 41 St. Michael AK</u>
6. <u>Bibiane Billingsley 12-6-93</u>	<u>Bibiane Billingsley</u>	<u>Box 41 St. Michael, AK</u>
7. <u>Carl Otten 12-6-93</u>	<u>CARL OTTEN</u>	<u>St. Michael, AK</u>
8. <u>Victor Joe 12-6-93</u>	<u>VICTOR JOE</u>	<u>St. Michael, AK</u>
9. <u>Victor Joe</u>	<u>Victor Joe</u>	<u>St. Michael</u>
10. <u>William Tim</u>	<u>William Tim</u>	<u>St. Michael, AK</u>



- 31. Mary Long , St. Michael
- 32. Danny Long ,
- 33. Frank B Myomick - Frank B Myomick St. Michael, AK
- 34. Alma Snowball Alma Snowball P.O. Box 98 St. Michael
- 35. Hilary Snowball Hilary Snowball P.O. Box 98 St. Michael
- 36. Flora Blackie SMK
- 37. Virginia Washington Virginia Washington Box 37 St. Michael AK
- 38. Helma Myomick SMK 99659 99659
- 39. Graceless SMK 99659
- 40. John
- 41. Katherine Kabuk
- 42. Lynn M Johanson Sr
- 43. Kelvin Skutvik SMK
- 44. Linda Olen Box 65 St Michael
- 45. Monica Myomick Box 112 St. Michael
- 46. Peter A. Kohl <sup>12-7-93</sup> Box 72 St Michael AK, 99659
- 47. Laura Niksik
- 48. Vera S. Nitsik Box 17 SMK 99659
- 49. Pulvinan Box 30 SMK 99659
- 50. Mike Sheikoff Gen. DEL. St Michael 99659

Received 12-14-93



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- KOYUK
- MARYS GLOO
- NOME
- SAVOONGA
- SHAKTOOLIK
- SHIMANEZ
- SOLOMON
- STEPHENS
- ST MICHAEL
- TALLER
- UNALASKET
- WALES
- WHITE MOUNTAIN

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Signed/ Date	Printed Name	Address
1. <u>Isaac Okbark</u>	Isaac Okbark Jr.	Teller, Alaska 99778
2. <u>Jan C Okbark</u>	Jan C Okbark	Teller, AK 99778
3. <u>Dan Topkok</u>	DAN Topkok	
4. <u>E. Munnellball</u>		Selma
5. <u>Alyce Walluk</u>	Alyce Walluk	Teller 99778
6. <u>Ron C Okbark</u>	Ron C Okbark	Box 501 TLA
7. <u>Alice J. Okbark</u>	Alice J. Okbark	Box 551 Teller, Alaska
8. <u>Rodney Kugzruk</u>	RODNEY KUGZRUK	12-05-93 Teller, AK 99778
9. <u>Vern Kugzruk</u>	Vernon Kugzruk	P.O. Box 580, Teller, AK 99778
10. <u>Roy Foster</u>	Roy Foster	P.O. Box 580 Teller

pg. 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
11.	<u>Gertrude Foster</u>	<u>Gertrude Teller Alaska 99778</u>
12.	<u>Lola Kugyuk</u>	<u>IDA Teller Alaska</u>
13.	<u>Rhonda I Komok</u>	<u>Teller AK</u>
14.	<u>Charles W. Okselak</u>	<u>Okselak Teller AK</u>
15.	<u>Morris T. Kugyuk</u>	<u>Box 583 Teller AK 99778</u>
16.	<u>Theresa M. Kugyuk</u>	<u>Theosam Kugyuk</u>
17.	<u>Patrick Puskak</u>	<u>Patrick Puskak Teller AK</u>
18.	<u>St Olaf's Apostolic</u>	<u>PO Box 515 TELLER, ALASKA 99778</u>
20.	<u>James E. Noyakuk</u>	<u>Box 521 TLA</u>
21.	<u>Robert Dickson</u>	<u>Box 508 Teller AK 99778</u>
22.	<u>Buddy Foster</u>	<u>Buddy Foster Teller AK 99778</u>
23.	<u>Marilyn A. Dickson</u>	<u>Marilyn A. Dickson 508 Teller 99778</u>
24.	<u>Maxim L. Okselak</u>	<u>Maxim L. Okselak 571 Teller AK 99778</u>
25.	<u>Justina Pate</u>	<u>Justina Pate 573 Teller AK 99778</u>
26.	<u>Cathy Kerkuk</u>	<u>Cathy Kerkuk Box 570 Teller AK 99778</u>
27.	<u>Linda Topokak</u>	<u>Linda Topokak Box 524 Teller AK 99778</u>
28.	<u>Hennessy Noyakuk</u>	<u>Hennessy Noyakuk PO Box 521 - AK 99778</u>
29.	<u>William J. Blotzoff</u>	<u>P.O. Box 532 Teller AK UT</u>
30.	<u>James P. Okselak</u>	<u>P.O. Box 563 Teller AK 99778</u>

pg. 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
11/12-10-93	Margaret S. ...	SKK
12-10-93	Edgar M. Jackson	... AK
12/20/93	MARY KATHRYN	Box 23 SKK AK 99771
12/20/93	EDNA SAUETLIK	Box 14 Shaktolik AK 99771
12-20-93	CARL W. TAKAK	Box 44 " " 99771
12-20-93	Helen L Jackson	Box 26 " " " "
12-21-93	Ellen F Huat	Box 42 Shaktolik AK 99771
	Edgar Jackson Jr.	Edgar Jackson Jr. Box 26 SKK, AK 99771
	William Takak	William TAKAK Box 17 SKK, AK 99771
12-21-93	Myrna Sauetilik	Box 48 SKK, AK 99771
12/21/93	Lena Sauetilik	Box 48 SKK AK 99771
12-21-93	Fredrick Pack	Box 18 Shaktolik AK 99771
12-21-93	Alia ...	Box 51 SKK AK 99771
12-21-93	ALEX Sookiyak	Box SKK AK 99771
12-21-93	Daniel ...	Box 15 SKK, AK 99771
12-21-93	Lucy L. Sauetilik	Box 15 SKK, AK 99771
12-21-93	Floyd Sockmaluk	Box 08 SKK
12-21-93	Lizzie Pearson	Box 08 SKK, AK
12-21-93	Betty L. Jackson	Box 04 Shaktolik AK 99771

31. Ang Myaluk Tanykpaale 103 Box 563 Teller Alaska 99778
32. Maria Omiah MARIA Omiale Box 520 TELLER AK 99778
33. Edna Oonluk Edna Oonluk Box 512 Teller AK 99778
34. Robert Noyakul Robert Noyakul Box 521 Teller AK 99778
35. Robert Tokennua Robert Tokennua Box 584 Teller AK 99778
36. Stella Okmaok Stella Okmaok Box 526 Teller AK 99778
37. Kevin Isabell Kevin Isabell Box 593 Teller AK 99778
38. Kathleen Castel Kathleen Castel Box 591 Teller AK 99778
39. Pavel Soalok Pavel Soalok Box 510 TELLER AK 99778
40. Theresa Soalok Theresa Soalok Box 510 TELLER AK 99778
41. Mary Herman Mary Herman Box 577 Teller AK 99778
42. Royce Wiyama Royce Wiyama Box 522 Teller AK 99778
43. John Dolekpaok John Dolekpaok Box 561 Teller AK 99778
44. Madge K Royce Jr. Madge K Royce Jr. Teller AK 99778
45. Alvin Topsek Alvin Topsek Box 524 TLA 99778
46. Walter Lee Walter Lee Box 562 TLA 99778
47. Edna Kuyuk Edna Kuyuk Box 50 TLA 99778
48. Fred Kuyuk Fred Kuyuk Box 589 TLA 99778
49. Walter Weyama Walter Weyama TLA 99778
50. Amye Noyakul Amye Noyakul Box 521 Teller AK 99778

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- KOYUK
- MARY S. GLOO
- NOME
- SAVOONGA
- SHAKTOOLIK
- SHIMAREP
- SOLDMON
- STEBBINS
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Signed/ Date	Printed Name	Address
1. Peter Jackson 12-02-93	Peter Jackson	Box 94 Unalakleet AK 99764
2. Elizabeth Towarak 12-02-93	Elizabeth Towarak	Box 264 UNK AK 99762
3. Ebba Jackson 12-2-93	Ebba Jackson	Box 94 Unk AK 99684
4. Dooling Whitney 12/2/93	Dooling Whitney	Box 1861 Nome AK 99762
5. Larry Eggart 12/2/93	LARRY EGGART	Box 1561 NOME AK 99762
6. Reuben Gorman 12/10/93	Reuben Gorman	Box 95 Sh. H. Lik AK 99762
7. Eva Bardson 12/10/93	EVA BARDSON	Box 123 S. H. Lik AK 99762
8. Emma Sampson 12/10/93	EMMA R. SAMPTON	Box 53 SKK AK 99762
9. Saul C. Panethluk 12/10/93	Saul C. Panethluk	Box 54 SKK AK 99762
10. Arnold Takak 12/10/93	ARNOLD TAKAK	Box 44 SKK AK 99762
Bruce Sookiyak 12/10/93	Bruce Sookiyak	Box 44 SKK AK 99762

31. Lynn Takak Sr. 12-21-93 Lynn Takak St. Box 4
32. ~~Sharon a Takak~~ 12-21-93 ~~Hannah ... Takak~~ Box 44
33. ~~George Schak~~ 12-21-93 ~~Leonard Takak~~ Box 44
34. Carl R Takak Jr 12-21-93 Carl R Takak Box 23
35. ~~Marie A Katchatag~~ 12-21-93 ~~Marie A Katchatag~~ Box 63
36. ~~Clarence Katchatag~~ 12-21-93 ~~Clarence Katchatag~~ Box 63 SKK
37. ~~Thomas Sampson~~ 12-21-93 ~~Thomas Sampson~~
38. Sheryl A Taylor 12-21-93 Sheryl A Taylor Box 76
39. Matilda Handy 12-21-93 Matilda Handy Box 76
40. Ebba Panipchuk 12-21-93 Ebba Panipchuk Box 25
41. ~~Jessie Panipchuk~~ 12-21-93 ~~Jessie Panipchuk~~ Box 25
42. Chris Panipchuk 12-21-93 Chris Panipchuk Box 25
43. Helen Katchatag 12-21-93 Helen Katchatag Box 34
44. ~~Clarence A Katchatag~~ 12-21-93 ~~Clarence A Katchatag~~ Box 34 SKK
45. Gary Pradley 12-21-93 Gary Pradley
46. Timothy Katchatag 12-21-93 Timothy Katchatag Box 34 SKK
47. Timothy Sagonick 12/21/93 Timothy Sagonick Box 27 SKK
48. Mary A. Sagonick 12/21/93 Mary A. Sagonick Box 27 SKK
49. Lewis Nakakke 12/21/93 Lewis Nakakke Box 55 SKK, ARKT
50. Gregg Rock 12/21/93 Gregg Rock Box 103 SKK, AR

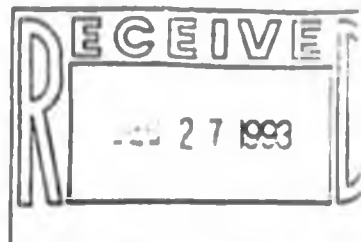
pg. 4 Reindeer Act Petition

51. Vernon C Rock 12-21-93 Vernon C. Rock Box 103
52. Dianne Paupitchuk 12-21-93 Dianne Paupitchuk Box 54
53. Edith Sookiyak 12-21-93 Edith Sookiyak Box 22
54. George Sookiyak 12-21-93 & George Sookiyak Box 22
55. Paul Asicksik Jr. 12-21-93 Paul Asicksik Jr. Box 62
56. Mary Asicksik 12-21-93 Mary Asicksik Box 62
57. Mrs Marilyn Asicksik 12-21-93 Mrs Marilyn Asicksik Box 62
58. Charlotte Sookiyak 12-21-93 Charlotte Sookiyak Box 66
59. Michael S. Sookiyak 12-21-93 Michael S. Sookiyak Box 66
60. Henry Sookiyak 12-21-93 Henry Sookiyak Box 11
61. Clara Mae Sagoonick 12-21-93 Clara Mae Sagoonick Box 12 SKK
62. Tony Sagoonick 12-21-93 Tony Sagoonick Box 12 SKK
63. Harvey Sookiyak 12-21-93 Harvey Sookiyak Box 13 SKK
64. Ed Beck 12-21-93 Ed Beck Box 93
65. Betsy Amalukilil 12-21-93 Betsy Amalukilil - Box 93
66. Fred Paupitchuk Jr. 12/21/93 Fred Paupitchuk Jr. Box 03
67. Lynn L Jackson 12/21/93 Lynn L Jackson Box 04
68. Eugene Asicksik 12/21/93 Eugene F. Asicksik Box 24
69. Percy Nekaruk 12/21/93 Percy Nekaruk Box 102
70. Rhoda C Asicksik 12/21/93 Rhoda C Asicksik Box 24

pg. 5 Reindeer Act Petition

71. David Bonilla 12/21/93 David Bonilla Box 43 Shaktoolik AK
72. Lila Bonilla 12/21/93 Lila Bonilla Box 74 SKK
73. Gary Bekoolok 12/21/93 Gary Bekoolok Box 32 SKK
74. Elmer Bekoolok 12/21/93 Elmer Bekoolok Box 32 Shaktoolik
75. Marta Bekoolok 12-21-93 Marta Bekoolok Box 32
76. Colleen Z, Rock 12-21-93 ~~Elmer~~ Colleen Rock  
CAROLE SOOKIYAK Box 18
77. Carole Jackson 12-21-93 P.O. Box 51 SKK, AK 99771  
Helen C. Jackson  
P.O. Box 56  
Shaktoolik, AK. 99771-0056
78. Helen C Jackson 12-21-93 Helen C Jackson  
Box 52  
Shaktoolik AK 99771
79. James Hunt 12-21-93 James Hunt  
Box 52  
Shaktoolik AK 99771
80. William Takak 12-21-93 William Takak Jr Box 17 SK
81. Newman M. Savetilik 12-22-93 Newman M Savetilik Box:
82. Thomas E. Sagonick 12/23/93 Thomas E. Sagonick Box 0.
83. Dean Sockpooluk 12/23/93 P.O. Box 67002 Golovin, A
84. Guustoff Sagonick 1/3/94 P.O. Box 21, SKK
85. Dina Sagonick 1-3-94 - P.O. Box 21, SKK
86. Genevieve Nakarak 1-3-94 Genevieve Nakarak Box 55 SKK, AK 99771
87. Fred N. Sagonick 1-3-94 Fred Sagonick Box 45
88. Richard Takak 1-3-94 Richard Takak Box 44
90. \_\_\_\_\_

PLEASE RETURN BY Jan. 5, 1994



return this petition to: Reindeer Herders Association P.O. Box 948 Nome, Ak.99762

PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

We, the undersigned hereby support the 1937 Reindeer Industry Act as written. The Reindeer Act was intended to "establish and maintain for the said natives of Alaska a self-sustaining economy by acquiring and organizing for and on behalf of said natives a reindeer industry or business by preserving the native character of the said industry or business thus established." There is now an attempt to amend the original act to open the ownership of reindeer to non-Natives. We the Undersigned are opposed to any such amendments and urge Congress, our congressional delegation and the Secretary of Interior to oppose amendments to the Reindeer Act of 1937.

Date	Printed Name	Signed Name	Address
1/21/93	Kenneth Kingsook	Kenneth Kingsook	P.O. Box 195 Savoonga AK 99762
2. "	Francis D. Wahyeyi	Francis D. Wahyeyi	" " " "
3. "	Rudolph Nongwuk	Rudolph Nongwuk	" " " "
4. "	MILTON NONGWUK	Milton Nongwuk	Box 149 Savoonga AK 99762
5. 12-21-93	Town Akuya		Box 107 SVA AK
6.	JERRY WING	Jerry Wing	Box 10 Savoonga AK 99762
7.	Yea Kingsook	Yea Kingsook	Box 238 SVA AK 99762
8.	Martin Kingsook	Martin Kingsook	" " " "
9.	Julian Kipile	Julian Kipile	Box 149 " " " "
10.	Robert Anogizuk	Robert Anogizuk	Box 82 Savoonga, Ak. 99762

PLEASE RETURN BY Jan 5, 1994

pg. 2. Reindeer Act Petition

Date	Printed Name	Signed Name	Address
11. 12-21-93	SANDRA ANNOGIYUK	Jordie Annogiuyuk	
12. 12-21-93	BRYAN ROOKER SR.	Bryan Rooker Sr.	PO BOX 1 3VA AK 99769
13. 12-21-93	Jane Rooker	Jane Rooker	
14. 12-21-93	Floyd Kingakuk	Floyd Kingakuk	
15. 11/10/11	Auelia Kingakuk	Auelia Kingakuk	
16. 12/21/93	Elwin Kingakuk	Elwin Kingakuk	
17. 12/21/93	Ang Washuq	Ang Washuq	
18. 12/21/93	Carolyn Kava	CAROLYN KAVA	Box 93 SVA, AK
19. 12/21/93	Macees Toolie Sr.	Macees Toolie Sr.	Box 116 SVA AK
20. 12/21/10	Alice Kulowiyi	Alice Kulowiyi	
21. 12/22/93	Irving Kava	Irving Kava	P.O. Box 102 Savona, Alaska
22. 12/22/93	Thomas Kava	Thomas Kava	Box 154 Savona, Alaska
23. 12/22/93	Charlotte T. Kava	Charlotte T. Kava	Box 154 SVA, AK
24. 12-22-93	Wayne Demeyak	Wayne Demeyak	Box 99 SVA AK
25. " " "	Walter Toolie	Walter Toolie	Box 9 SVA AK 99769
26. 12-22-93	Preston Rooker	Preston Rooker	Box 198 SVA AK 99769
27. 12-22-93	Carlen Kava	Carlen Kava	Box 114
28. 12/22/93	Regina Kava	Regina Kava	" "
29. 12/22/93	Lacey Kava	Lacey Kava	" "
30. 12/22/93			

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pg. 3 Reindeer Act Petition

31. 1/22/93 Crystal L. Murdock ~~Crystal L. Murdock~~ P.O. Box 154
32. 12/22/93 Leah Lynn Leah Lynn Box 25
33. " " Kim Lynn Kim Lynn 25
34. 12/22/93 Howard King ~~Howard King~~ P.O. Box 73 SVA AK 997
35. Rudi Oromani 12-22-93
36. Dean Kubwini 12-22-93
37. Linda & Akya Linda J Akya 12-22-93 Box 189 SVA AK 99769
38. Frank Wapfisi 12/22/93
39. Noma Jolu
40. Mui Seppu Box 172 SVA AK 99769
41. Buelgi Shygan Box 115 SVA AK 99769
42. 12/22/93 Cilam ~~Cilam~~ Box 74 SVA AK 99769
43. Russel & Soloyan Box 73 SVA AK 99769
44. 12-22-93 Janet Naongwook Box 124 Savoyak
45. " " " P. Naon Box 1 Savoyak
46. Relind Chusa Box 8 Savoyak 99769
- 12/22/93
47. Thor Naongwook P.O. Box 72 Savoyak, AK
48. Ataling Soloyan Box 188 SVA
49. Norman Chusa Box 192 SVA
- 12/22/93
50. Ada Nipit Box 5, Savoyak Ak. 99769
51. Adeline Shyganji 77 " "

PLEASE RETURN BY JAN. 5, 1994

return this petition to: Reindeer Herders Association P.O. Box 948 Nome, Ak. 99762

PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

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Date	Printed Name	Signed Name	Address
1. 1/4/94	Tom Brown, Jr	Tom Brown	Wino, AK
2. 1/4/94	Dorothy Barr	Dorothy Barr	Wino, AK
3. 1-4-94	Donald Jones	Donald R. Jones	Wino, AK
4. 1-4-94	Robert Owen	Robert Owen	Wino, AK
5. 1-4-94	COLIN C. LINCOLN	Colin C. Lincoln	
6. 1-4-94	Lincoln M. Simon	Lincoln M. Simon	Wino AK 99762
7. 1-4-94	Ernest L. Oksatocuk	Ernest L. Oksatocuk	Wino, AK 99762
8. 1-4-94	Willa Ashenfelter	Willa Ashenfelter	Wino, AK
9. 1-4-94	Robert Owen	Robert Owen	Wino, AK
10. 1-4-94	Robert Owen	ROBERT OWEN	Wino, AK

PLEASE RETURN BY Jan 5, 1994

pg. 2. Reindeer Act Petition

Date	Printed Name	Signed Name	Address
11. 1-4-94	BRUCE ROBERTS	Bruce Roberts	White Mt.
12. 1-4-94	MARY D CHARLES	Mary D Charles	White Mt.
13. 1-4-94	John L. Kiocher	John L. Kiocher	White Mt.
14. 1-4-94	Ida E. Buck	Ida E. Buck	White Mt.
15. 1-4-94	Jane Brown	Jane Brown	White Mt., AK
16. 1-4-94	John Brown	John Brown	White Mt., AK
17. 1-4-94	Kevin Brown	Kevin Brown	White Mt., AK
18. 1-4-94	AARON SIMON	Aaron Simon	
20. 1-4-94	Ruth M SIMON	Ruth M Simon	
21. 1-4-94	Jakeen Fagundes	Jakeen Fagundes	
22. 1-4-94	Lisa ASHENFELTER	Lisa Ashenfelter	WMO, AK
23. 1-4-94	Mary Lou Gray	Mary Lou Gray	White Mt. Alaska
24. 1-4-94	John Brown	John Brown	White Mt., AK
25. 1-4-94	Laverne Amaktoolik	Laverne Amaktoolik	WMO, AK
26. 1-4-94	Alex Ashenfelter II	Alex Ashenfelter	WMO, AK
27. 1-4-94	Steve Buffas	Steve Buffas	WMO, AK
28. 1-4-94	Alfred Brown	Alfred Brown	WMO, AK
29. 1-4-94	TOM GRAY	Tom Gray	WMO, AK
30. 1-4-94	Sally M. Anglinga	Sally M. Anglinga	WMO, AK 99784

PLEASE RETURN BY Jan. 5, 1994

pg. 3 Reindeer Act Petition

DATE	Printed & Signed Name	Village Address.
31. 1-4-94	Steven G. Agloinga <i>Steven G. Agloinga</i>	WMO, AK
32. 1-5-94	Frank Oksohtaruk <i>Frank Oksohtaruk</i>	WMO, AK. 99
33. 1/5/94	T. Aiah Oksohtaruk <i>T. Aiah Oksohtaruk</i>	White Mt. AK. 99784
34. 1/5/94	SADIE KOMACHUK <i>Sadie Komachuk</i>	White Mt. AK. 99784
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Received 12-16-93

PLEASE RETURN BY JAN. 5, 1994

return this petition to: Reindeer Herders Association P.O. Box 948 Nome, Ak.99762

PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

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Date	Printed Name	Signed Name	Address
1. 12/7/93	John Erlich	John Erlich	Box 1054, Kotzebue, AK 99752
2. 12/7/93	Herb Smelcer	Herb Smelcer	P.O. 33542, Juneau, AK 99801
3. 12/7/93	Christine Tanape	Christine Tanape	ANC, AK
4. 12/7/93	FRANK MOONIN	Frank Moonin	3501 E 42nd
5. 12/7/93	Floyd H. Guthrie	Floyd H. Guthrie	POB 703, NER/ALASKA AK 99726
6. 12/7/93	Fritz George	FRITZ GEORGE	Box 20, Kotzebue, AK 99751
7. 12/7/93	Ann Armstrong	Ann Armstrong	Box 33399, Nome, AK
8. 12/7/93	Annie Phillips	Annie Phillips	Box 811, Chukchuk, AK
9. 12/7/93	William T. Brady	William Brady	SITKA Tribe, AK
10. 12/2/93	Kenneth L. Green	Kenneth L. Green	RA Box 412, Hoonah, AK 99829

pg. 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
	Flora Lehnoff	2430 Chandler Dr Anchorage, AK 99504
12.	Katie George	PO Box 67 AKiackak 99551
13.	GORDON JACKSON	8413 Aurora Dr Tularem, AK 99501
12-7-93 14.	Moses Toqukak Sr.	Box 30 Manakotab Alaska 996
15.	John Park	P.O. Box 30 Manakotab Alaska 99628
16.	Eleanore Demant	Box 14 Cantwell, AK 99729 P.O. Box 112
17.	Tommy Raitt Sr.	Jelavik, AK 99770
12-9-93 18.	Jack Fuscusson	Box 1 Golovin Alaska 9970
20.	John P. Jones	Box 626 Barrow, AK 99503
21.	ANTHONY ANGLIAN	Box 23 Tunuvak, AK. 99681
22.	ROBERT L. BENS SR.	Box 32007 Mt. Vernon, AK 99652
12/9/93 23.	GERALD HOPE	PO Box 7576 KATCHIKAN, AK 9970
24.	Walter Foster	Box 34 Sand Point AK 9996
25.	Roxanne Frank	164 Syracuse #2 Fairbanks, AK 9970
12-9-93 26.	Paul Joe Paul Joe	Box 90021 Niglkavak & Aie 99690
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Received 12-16-93

PLEASE RETURN BY JAN. 5, 1994

return this petition to: Reindeer Herders Association P.O. Box 948 Nome, Ak. 99762

PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

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Date	Printed Name	Signed Name	Address
1. 12-7-93	Phyllis Evan	Phyllis Evan	P.O. Box 42 L. Kalskagak 99762
2. 12-7-93	Barb Pungowiyi	Barb Pungowiyi	Box 1627 Nome 99762
3. 12-7-93	Evelyn FRANKSON	Evelyn Frankson	Box 91 Pruit Hope, Ak 99766
4. 12-7-93	ADAM T. PROTOGROUNO	Adam T. Protoprouno	2200 Katlian St. Prudhoe Bay 99702
5. 12-7-93	RALPH KOWCHER	Ralph Kowcher	1010 TYPEN #5 AK
6. 12-7-93	Frank Pariot, Jr	Frank Pariot, Jr	P.O. Box 3277 Fairbank AK
7. 12-7-93	Theodore C. Solbridge	Barbridge	SITKA ALASKA 99762 432 KATLIAN ST.
8. 12-7-93	James Kuumme	Kuumme	P.O. Box 127 Ukiah Alaska 99551
9. 12-7-93	Thomas Pungalik	Tom Pungalik	Box 41 Upernivik Ak 99762
10. 12-7-93	ANITA ANDREWS	Anita Andrews	P.O. Box 3236 Mt. Village AK

pg. 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
11. 12/7/93	Harold P. M... & ...	3800 ALBINUS DR. JUNEAU, AK 99801
12. 12-08-93	Frances Frankson	P.O. Box 235 Point Hope Ak 99766
13. 12/8/93	Elmer E. Frankson	P.O. Box 235 Point Hope, AK 99766
14. 12/8/93	Willie Kasayulie	Box 70 AKIACHAK, AK 99555
15. 12/8/93	ARTHUR J. LAKE	Box 49 Kwigillingak 99660
16. 12/8-93	Senny G. Jackson	Box 2160 AKIAK AK 99552
17. 12.8.93	James Kraso	Box 8006 Nanwalek Ak. 99603
18. 12/8/93	Arnold Brower Jr.	Box 1157 Barrow, AK 99703
20. 12/8/93	Willie M. Andrew	P.O. Box 2354 Bethel AK 99559
21. 12/8/93	FELIX P. HESS	P.O. Box 32209 Mt. Village, AK 99602
22. 12/8/93	William A. Pirt	P.O. Box 822 Bethel, AK 99559
23. 12/8/93	Walter C. Pirt	Box 254 Yakutat, AK 99685
24. 2-9-93	Verna J. Henniger	Box 275 Yakutat, Ak 99680
25. 2/9/93	Clarence Alexander	Box 42 Ft. Yukon, AK 99746
26. 12/9/93	Mike Williams	Box 122 AKIAK AK 99552
27. 9 Dec 93	F. B. Stern	Box 113 Tazewell 99755
28. 12/9/93	Jimmy Phillips	2806 Aspen Drive Anchorage AK 99517
29. 12/9/93	Charles Pantan	St. Mary's AK 99658
30. 12/9/93	Taman A. Lodi	Chavak AK. 99523

12-9-93 Kay D. Borbridge Kay D BORBRIDGE Box 6272  
SITKA 99835

12-9-93 32. Donna Finkle DONNE FINKLE BOX 33 McGRATH, AK

33. Earl R. Chase EARL R CHASE NUNAPITUK AK - 99641-

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Received 12-16-93

PLEASE RETURN BY JAN. 5, 1994

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Date	Printed Name	Signed Name	Address
1. 12-7-93	ANDREW EBO 11A	Andrew Ebo	P.O. BOX 22129 TUNEAU, AK 99802
2. 12-7-93	PAUL SWETZOF	Paul Swetzof	P.O. Box 103922 ANCHORAGE, AK 995039
3. 12-8-93	Charlene Jaciamana	Charlene Jaciamana	Box 188 NOME AK 99762
4. 12/9/93	Herman Borge Jr.	Herman Borge Jr.	Box 682 OTZ AK 99752
5. 12/9/93	Melody Barger	Melody Barger	OTZ AK 99752
6. 12/9-93	Man, Edwardson	Man, Edwardson	Box 211 Barrow ak 99723
7. 12/9-93	Charles Edwardson	Charles Edwardson	Box 211 Barrow, ak 99723
8. 12/9/93	Jan on Campbell	Jan on Campbell	Box 1191 Barrow AK 99723
9. 12/9/93	Allen Ticket	Allen Ticket	Box 4 Selawik, AK 99770
10. 12/9/93	Gilda Shultz	Gilda Shultz	Box 35, Fair Post 99583

pg. 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
12/9/93	Henry J Hunter Sr	P.O. Box 632 Bethel AK 99551
12-9-93	Frank Miyasato	525 My Franklin Tundra, AK 99801
12-9-93	Edwin L. Adams Sr.	P.O. Box 9 Shelton AK 99666
12-9-93	Barbara M. Rice	208 W. 10th St. Anchorage AK 99510
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Received 12-16-93

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Date	Printed Name	Signed Name	Address
12-7-93	Shelley Trainor	Shelley Trainor	211 McCarrey #16 Anch. Ak 99508
12/7/93	Charles E. Carter, Jr.	Charles E. Carter, Jr.	Box 11 P.O. Box 32473 JUNEAU, AK 99803
12/7/93	William Allen	William Allen	JUNEAU, AK 99803
12/7/93	Thomas K. ...	Thomas K. ...	
12/7/93	Paul White, Jr.	Paul White, Jr.	P.O. Box 22356 Juneau 99800 P.O. Box 244834 Anchorage 99524-4834
12/7/93	Debbie Kellogg	Debra L. Kellogg	Anchorage 99524-4834
12/7/93	Tim Deasis	Tim Deasis	9371 Rivercrest Way, Juneau
12/7/93	Melvin Trefon	Melvin Trefon	P.O. Box 055 Nondleton, AK 9964
12/7/93	V. Absiret	V. Absiret	P.O. Box 244 Anchorage, AK 99508
12/07/93	Chester Ballot	Chester Ballot	

pg. 2. Reindeer Act Petition

- | Signed/Date              | Printed Name                       | Address                                      |
|--------------------------|------------------------------------|--|
| 11. <del>Jan Pilot</del> | <del>Grant H. Keith</del>          | <del>P.O. Box 708 Kotzebue AK 9</del>        |
| 12. 12/7                 | Geraldine James Geraldine James    | 410 Patterson St. Anch. AK 99501             |
| 13. 12/7                 | Paul Passnika Paul Passnika        | P.O. Box 224 Atkasook, AK 99557              |
| 14. 12/7/93              | Bruce W. James Bill James          | Box 310 Dlg 99576<br>BOX CW                  |
| 15. 12/7/93              | Darlene Peterson Darlene Peterson  | Chuathbaluk AK 99557-8999                    |
| 16. 12/7/93              | Alfreda Tate                       | Mt. Iliamna, AK                              |
| 17. 12/7/93              | Lisa Sue Lisbeth Tate              | 455-3rd Ave #734 Fairbanks, AK 99701         |
| 18. 12-8-93              | Inez L. CURRAN                     | Box 1-3 Nome, AK 99762<br>260 Kenty Ct       |
| 19. 12/8/93              | Joyce W. Mark Birdlingwood         | 500 Wilma St. Anchorage AK 995               |
| 20. 12/8/93              | Jonathan Salomon Jonathan Salomon  | Box 8<br>Siyukon, Alaska 997                 |
| 21. 12/8/93              | Mildred Akpik                      | NVOB<br>Box 1139<br>Baru, AK 99723           |
| 22. 12/8/93              | Perry R. A. Goseak Perry R. Ahoyak | 122 First Ave<br>Fairbanks AK<br>Box 3 99701 |
| 23. 12/8/93              | Tony Parker Tony Parker            | Kungliluk, AK 99722                          |
| 24. 12/8/93              | Wm. P. Friday Wm. P. Friday        | Gen. Del. Chevak, AK 99563                   |
| 25. 12/8/93              | Phillip J. Anders Phillip Anders   | PO Box 28 Ektla Falls AK<br>99722            |
| 26. 12/8/93              | Jerry Isaac Jerry Isaac            | TANACROSS, AK 99776                          |
| 27. 12-8-93              | Rose Kozyura Rose Kozyura          | 4600 Scheldt Street Anchorage                |
| 28. 12-9-93              | Elaine Suiyon Elaine Suiyon        | 52150<br>Fairbanks AK 99586                  |
| 29. 12-9-93              | Maria J. Green Maria Green         | Box 302<br>Iktika, AK 99752                  |

pg. 3 Reindeer Act Petition

- 31. 12/9/73 DAN SINDLER JR Dan Sandler Jr. P.O. Box 326  
Ketchikan AK 99901
- 32. 12/19/73 Dirce E. Benson & Ann E. Benson P.O. Box 770369  
Fogel River AK 99577
- 33. 12-1-73 Tom Dark - Donald Dark 10000 Little Dr 375  
Healy AK 99525
- 34. Ted Angerson Ted Angerson P.O. Box 70190  
So. Wnek AK 99670
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# KAWERAK, INC.

P.O. BOX 948 • NOME, ALASKA 99762

TELEPHONE (907) 443-5231 • FAX: (907) 443-3708

- SERVING THE VILLAGES OF
- BREVIG MISSION
- COUNCIL
- DOMEDIC
- ELIM
- GAMBELL
- GOLDVON
- KING ISLAND
- KOYUK
- MARYS GLOD
- NOME
- SAVOONGA
- SHAR TOOLIK
- SHISHMARDET
- SOLOMON
- STEBBINS
- ST MICHAEL
- TELLER
- UNALASKET
- WALE
- WHITE MOUNTAIN

return this petition to: Reindeer Herders Association P.O. Box 948 Nome, Ak.99762

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Signed/ Date	Printed Name	Address
1. 12-2-93	Rosch & Timbers	Box 243 Nome,
2. 12-2-93	Lincoln Mike Simon	Box 33 Wmo, AK
3. 12-2-93	Genuine B Nakarak	Genuine B Nakarak Box 55 SKK, AK
4. 12-2-93	Roy P. OTTON	Koyuk, AK BORN
5. 12-2-93	LUTHER C KOMONASAK	P.O. Box 551 WALE AK 99783
6. <sup>12-2-93</sup> <del>12-2-93</del>	Mary Miller	MARY MILLER P.O. Box 598 Nome AK 99762
7. <sup>12-2-93</sup> <del>12-2-93</del>	Robert A Keith	P.O. B 44 ELIM AK 99739
8. <sup>12-2-93</sup> <del>12-2-93</del>	Pius Washington	Box 37 St. Michael AK 99659
9.	Sarah Kook	Sarah Kook Box 578 Teller, AK 99778
10.	Tina Henderson	Box 1884 Nome

pg. 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
11. <i>Francis A. Pollock</i>	Francis A. Pollock Sr.	Stellhorn Pt. Ak.
12. <i>Thy... 12-21</i>	Thy... & Sons...	Nome
13. <i>Robert Back Sr.</i>	Robert Back Sr.	Brevig Mission Box 181
14. <i>Jerry Joe Zeller</i>	Martyn Kammuna-Treku	Nome, Ak. 9976
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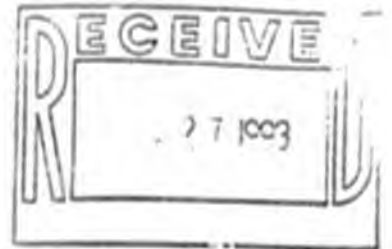
PLEASE RETURN BY Jan. 5, 1994

return this petition to: Reindeer Herders Association P O Box 948 Nome, Ak. 99762

PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

We, the undersigned hereby support the 1937 Reindeer Industry Act as written. The Reindeer Act was intended to "establish and maintain for the said natives of Alaska a self-sustaining economy by acquiring and organizing for and on behalf of said natives a reindeer industry or business by preserving the native character of the said industry or business thus established." There is now an attempt to amend the original act to open the ownership of reindeer to non-Natives. We the Undersigned are opposed to any such amendments and urge Congress, our congressional delegation and the Secretary of Interior to oppose amendments to the Reindeer Act of 1937

Date	Printed Name	Signed Name	Address
1. 1-5-94	CAROL J ASOBYA	Carol Johnson	Box 948 Nome
2. 1-4-94	Nancy E Green	Nancy E Green	Box 1301 Nome Ak
3. 1-5-94	Charles H Johnson	Chad	Box 948 Nome Ak
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Date	Printed Name	Signed Name	Address
1. 12/10/93	Jeanine Kennedy	Jeanine Kennedy	1200 I St. Anchorage AK 99501
2. 12/10/93	Eric Smith	Eric Smith	4440 Upper Myline Eagle River AK 99577
3. 12-10-93	Philip M Owens	Philip M Owens	P.O. Box 10-7774 Anchorage AK 99510
4. 12/10	Susie R DeGrace	Susie R DeGrace	7110 De Bear Rd #2 Wasilla AK 99508
5. 12-10	Katherine McKinley	Katherine McKinley	PO Box 4 Copper Center, AK 99
6. 12-10	Jonathan Solomon	Jonathan Solomon	6099 E. Yukon AK 995
7. 12/10/93	Polly Wheeler	Polly Wheeler	PO Box 82291, Fairbanks 99708
8. 12-10-93	Carol Tozson	Carol Tozson	1558 Thurgood Ave Anchorage, AK 995
9. 12/10/93	Charles D. Brewer	Charles D. Brewer	PO Box 625 Barrow, Alaska 972
10. 11/15/93	Calvin Simon	Calvin Simon	PO Box 214 Barrow, AK 99557

(14)

pg. 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
11.	Burton Reeford	Burton Reeford AEWJC
12.	Myra J. Olson	Myra J. Olson Box 74, Papeete, TK 100577
13.	Caleh Pungawiyi	Caleh Pungawiyi ICC 3201 C St. Anchorage
14. 140ec93	Carl M. Hill	1238 F St Anchorage AK 99501
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Date	Printed Name	Signed Name	Address
1. 12/7/93	LEE Stephen	Lee Stephen (Native Village of Ektara)	2634 E. Wilgus Rd Chukchi, AK 99587
2. 12/2/93	Anthony Urvina	Anthony Urvina	3012 N. Woodland Ave, Jc
3. 12/8/93	Chemi Edmiston	Chemi Edmiston	403 5th Ave, Kotzebue AK 99755
4. 12-93	Sue Norton	Sue Norton	3011 1st St of 2, AK
5. 12/8/93	BEN ATOZUK	Ben Atozuk	Box 73 Niina AK 99749
6. 12/8/93	Frank Adams	Frank Adams	Box 51 N. Nome AK 99762
7. 12/8/93	Leslie Charles	Leslie Charles	4137 Dorothy Dr. Anchorage AK 99506
8. 12/8/93	Randall DENEU	Randall Deneu	909 Chugach Way #27 Anch. AK 99503
9. 12-08-93	Rachel Kavairiak	Rachel Kavairiak	909 Chugach Way #27 Anch. AK 99503
10. 12-08-93	Simon Bekoulak Jr	Simon Bekoulak Jr	Shaktovik AK Box 22 Nome AK 99762

pg. 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
11. <del>12/18/93</del> <del>12/18/93</del>	<del>12/18/93</del> Peggy Frankson	Box 136 PT HARBOR AK 9977
12. 12/18/93	James Sigurd	Box 1142 Dillingham, AK 9957
13. 12/18/93	MARCIN T PAULSEN	Box 66 ELIM AK
14. 12/18/93	Caroline Kinast	P.O. Box 134 Pt HARBOR AK 99766
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Date	Printed Name	Signed Name	Address
1.	ROBERT WELLS	Robert Wells	P.O. Box 68 Noonvik, Ak 99762
2.	Mabel A. Hess	Mabel A. Hess	40. 51. 5225 Mtn. Village, Ak. 99682
3.	Oscar Larsen	Oscar Larson	Box 34 Kwethluk, Ak 9962
4.	JAMES LUKA	James Luka	PO Box 32009 Mtn. Village, Ak 99682
5.	Nellie Dale Dale	Nellie Dale	Box 193 V. 21. 1. 2. AK. 99687
6.	CLIFFORD MARON ENEUSHAU	Clifford Maron Eneushau	Box 24452 N. 21. 1. 2. AK. 99524
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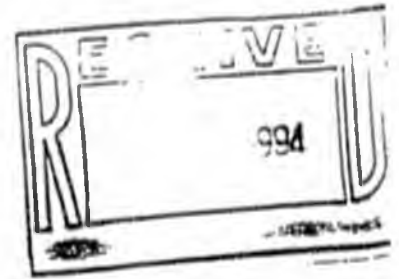
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Date	Printed Name	Signed Name	Address
	1. Nathan Kotch, Jr.	<i>Nathan Kotch</i>	<i>Kotzebue</i>
	2. Frank P. Greene	<i>Frank P. Greene</i>	<i>KOTZEBUE AK</i>
	3. John Baker	<i>John Baker</i>	<i>Kotzebue</i>
	4. Pierre Loneyolf	<i>Pierre Loneyolf</i>	<i>Kotzebue</i>
	5. Eugene Smith	<i>Eugene Smith</i>	<i>Kotzebue</i>
	6. Jordan Ito	<i>Jordan Ito</i>	<i>Kotzebue</i>
	7. Jeff Smith	<i>Jeff Smith</i>	<i>Kotzebue</i>
	8. Judith Bennett	<i>Judith Bennett</i>	<i>Kotzebue</i>
	9. Sally J. Melton	<i>Sally J. Melton</i>	<i>Kotzebue</i>
	10.		



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Date	Printed Name	Signed Name	Address
1. 12/9/93	Dana B. Butler	Dana B. Butler	P.O. Box 90152 Anch. AK 99509
2. 12/14/93	Carl Heetch	Carl Heetch	P.O. Box 23 Point Hope AK 99766
3. 12/16/93	Jack Frankson	Jack Frankson	P.O. Box 22 Point Hope AK 99766
4. 12/16/93	Jack Frankson	Jack Frankson	P.O. Box 22 Point Hope AK 99766
5. 12/17/93	James Sears	James Sears	Box 228 Pt Hope AK 99766
6. 12/21/93	Julia Kaiser	Julia Kaiser	P.O. Box 106 Pt Hope AK 99766
7. 12-20-93	Harold E. Teavoumek	Harold E. Teavoumek	P.O. Box 67 Point Hope AK
8. 12-20-93	Nina Oviok	Nina Oviok	P.O. Box 134 Pt Hope AK
9. 12-20-93	Ronald W. Oviok	Ronald W. Oviok	P.O. Box 134 Pt Hope AK 99766
10. 12-20-93	Francis E. Schaefer	Francis E. Schaefer	Box 213, 933 Ippik St. Pt Hope, AK 99766

pg. 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
11. 1-5-94	Klu - A Re-Tussock	Box 50 211st Nixon
12. 1-5-94	Klu - A Re-Tussock	Box 10 211st
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Date	Printed Name	Signed Name	Address
1. 1-8-94	[Handwritten Name]	[Handwritten Name]	[Handwritten Address]
2. 1-8-94	Kathleen E. Fecchia	Kathleen E. Fecchia	Box 17, Elm AK
3. 1-8-94	[Handwritten Name]	[Handwritten Name]	[Handwritten Address]
4. 1-8-94	Edwin Kotovyan	[Handwritten Name]	PO Box 39058, Elm, AK
5. 1-8-94	[Handwritten Name]	[Handwritten Name]	[Handwritten Address]
6. 1/8/94	Maurice Wunoff	[Handwritten Name]	Box 55, Elm, AK 99756
7. 1/3/94	[Handwritten Name]	[Handwritten Name]	[Handwritten Address]
8. 1-8-94	Christine Murray	Christine Murray	P.O. Box 41, Elm, AK 99754
9. 1-8-94	Selma Willoya	Selma Willoya	PO Box 11, Elm, AK 99759
10. 1-8-94	Martha Paul	[Handwritten Name]	Box 66, Elm AK 99759

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pg. 2. Reindeer Act Petition

Date	Printed Name	Signed Name	Address
11. 11/2/94	Harold ...	Harold ...	Elim
12. 1/2/94	Li ...	Li ...	Elim
13. 1/2/94	Harold ...	Harold ...	Elim
14. 1/2/94	Harold ...	Harold ...	Elim
15. 1-8-94	ANGIE ...	ANGIE ...	Elim AK
16. 1/2/94	...	...	Elim
17. 1/2/94	...	...	Elim
18. 1/2/94	Josiah ...	Josiah ...	Elim
20. 1/2/94	...	...	Elim
21. 1/2/94	...	...	Elim 9973
22. 1-5-94	Kenneth ...	Kenneth ...	Elim
23. 1-5-94	Plaza ...	Plaza ...	P.O. Box 36 Elim AK 94
24. 1-8-94	...	...	Elim 99737
25. 1/5/94	BEAT ...	BEAT ...	Elim 9973
26. 1-8-94	Ruth Daniels	Ruth Daniels	P.O. Box 33 Elim AK 9973
27. 8-1-94	Frederick B Murray	Frederick B Murray	Elim
28. 1-5-94	CAROL ANN DANIELS	CAROL ANN DANIELS	Elim
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Date	Printed Name	Signed Name	Address
1. 12/23/93	Joseph H Murray	<i>[Signature]</i>	PO Box 31014 Elim, AK 99739
2. 12/23/93	ELISE N. NAGIRUK	<i>[Signature]</i>	PO Box 48 Elim AK 99739
3. 12/27/93	Karen T. Toland	<i>[Signature]</i>	Box 21 Elim AK 99739 P.O. Box 246
4. 12-22-93	KAYAKTU KATONGA	<i>[Signature]</i>	Elim AK 99739
5. 12-22-93	Helen Johnson	<i>[Signature]</i>	Box 15 Elim AK 99739
6. 12/23/93	LUTHER NAGIRUK	<i>[Signature]</i>	Box 48 Elim, AK 99739
7. 12/23/93	Donald CLEMENAK	<i>[Signature]</i>	Box 39025 Elim AK 99739
8. 12/23/93	WILLIE SEGLES	<i>[Signature]</i>	Box 35045 Elim AK 99739
9. 2/23/93	Dora E Smith	<i>[Signature]</i>	Box 39096 Elim AK 99739
10. 12/23/93	Ronald D. Iva-Tunguk	<i>[Signature]</i>	Box 39096 Elim AK 99739

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pg. 2. Reindeer Act Petition

Date	Printed Name	Signed Name	Address
11. 12/23/93	...	...	Elim AK 99739
12. 27 DEC 93	SHEILA I KATKATAK	Jill Kelt	Box 39027 ELIM, AK 997
13. 27 Dec 93	John Jemowak	CHAK JEMOWAK	Box 046 Elim AK 997
14. 12-27-93	Darlene Jemowak	Kate U Jemowak	Box 39046 Elim AK 997
15. 12-27-93	PAUL & MIKON SR	Paul & Mikon	Box 19 Elim AK 990
16. 12-27-93	Al P Sackeus	Al P Sackeus	POB 35 Elim AK 997
17. 12-27-93	Thomas F Sackeus	Thomas F Sackeus	Box 4 Elim
19. 12-27-93	MARLENE T PAUL SR	MARLENE T PAUL SR	Box 66-EL- 997
18. 12-27-93	Michael G Sackeus Sr	Michael G Sackeus Sr	Box 92 Elim 997
20. 12-27-93	Ellen J vanuff	Ellen J vanuff	Box 55 Elim AK
21. 12-27-93	Charles F Sackeus	Charles F Sackeus	Elim AK 997
22. 12/27/93	Tessie Amaktoolik	Jessie Amaktoolik	Box 56 Elim AK 997
23. 12-27-93	Thomas H Sackeus	Thomas H Sackeus	Elim Box 57
24.	HANS JEMOWAK	Hans Jemowak	
25.	Ellen M. Daniels	Ellen M. Daniels	Box 43 Elim
26. 12-27-93	Ernest Sackeus	Ernest Sackeus	Box 5702
27. 12-27-93	CHRISTINE AMAKTOOLIK	CHRISTINE AMAKTOOLIK	Box 25 Elim AK 99739
28. 12-27-93	Martha Paul	Martha Paul	Box 66 Elim AK 99739
29. 12/27/93	Paul T Navares	Paul T Navares	P.O. Box 48 Elim AK 99739
30. 12/27/93	Morris Nakrea	Morris Nakrea	P.O. Box 61 Elim AK 99739

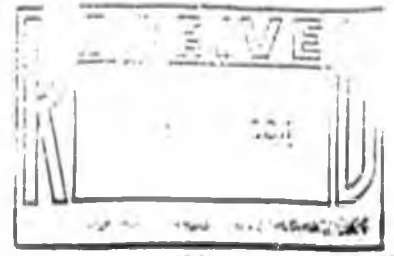
pg. 3 Reindeer Act Petition

- 31. 12-27-93 Lenwood M. Secheus 2070 Sparrows Ct. Palmer AK.
- 32. 12-27-93 M. Schac Moses 39075 - Elim, AK 99737
- 33. 12-27-93 JACKIE Amaktolik 39056 Elim, AK 99739
- 34. 12-27-93 Harry A DANIELS 39087 ELIM, AK 99737
- 35. 12-27-93 Amaktolik 39025 Elim AK 99739
- 36. 01-04-94 Ernest Nelson 39032 Elim AK 99739
- 37. 01-04-94 ANDREW NAKARAK 39051 ELIM AK 99739
- 38. Ida Ruth Nakarak
- 39. 1-04-94 David A NAKARAK David Nakarak Elim AK 99739
- 40. 1-04-94 Solomon M Nakarak Solomon M Nakarak 99739
- 41. 1-4-94 La Esmeralda Saccheus Box 39038 Elim, AK 99739
- 42. 1-4-94 Paul A NULIN Paul O. Taylor P.O. Box 39038 Elim, AK 99739
- 43. 1/4/94 Gary L NULIN Man & Mahunk P.O. Box 76 Elim AK 99739
- 44. 1/4/94 ELIZABETH KOTENICH Elim, AK 99739
- 45. 1-4-94 HENRY Secheus Elim AK 99739
- 46. JOSEPH MURRAY JR
- 47. 1-5-94 Ruth A. Moses Box 39075 Elim, AK 99739
- 48. 1-5-94 Clarence E. Secheus P.O. Box 17 Elim AK 99739
- 49. 1-5-94 Elim
- 50. 1-5-94 Joseph Nakarak Elim

pg. 2. Reindeer Act Petition

Date	Printed Name	Signed Name	Address
5X1.	Anna Aukon	Anna A. Aukon	Elim
5X2.	01/05/94 Colleen Aukonrak	Colleen S. Aukonrak	Elim
5X3.	1/5/94 Shelton Nagoruk	Sheldon Nagoruk	Elim
5X4.	1/5/94 Lillie J. Saccheus	Lillie J. Saccheus	Elim
5X5.	1/5/94 Lillian J. Saccheus	Lillian J. Saccheus	Elim
5X6.	1-5-94 RALPH N SACCHEUS	Ralph Saccheus	Elim
5X7.	1-5-94 RALPH N SACCHEUS SR	Ralph N. Saccheus Sr.	Elim, AK
5X8.	1-5-94 ELEANOR M SACCHEUS	Eleanor M. Saccheus	Elim, AK
620.	1-5-94 David Wilby	David Wilby	Elim
621.	1-5-94 Josephine Kaleuc	Josephine Kaleuc	Box 17 Elim, AK 99739
622.	1-5-94 Esther Murray	ESTHER MURRAY	Box 39016 Elim, AK
623.	1-5-94 Paul Hancock		Box 31017 Elim, AK 99739
624.	1-5-94 DAVID R Saccheus	David R. Saccheus	Box 17 Elim, AK 99739
625.	1-5-94 Carolyn Dredley	Carolyn Dredley	Box 39015 Elim, AK
626.	1-5-94 Evelyn A. Kaitl	Evelyn A. Kaitl	Box 39014 Elim, AK 99739
627.	1-5-94 Marjorie Saccheus	Marjorie Saccheus	Elim, AK 99739
628.	1-5-94 Charles Saccheus	Charles Saccheus Jr	Elim,
629.			
730.			

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Date	Printed Name	Signed Name	Address
1. 12-20-93	S. J. ...	...	...
2. 12-20-93	...	...	...
3. 12-31-93	...	...	...
4. 12-20-93	...	...	...
5. 12-30-93	Henry ...	...	...
6. 12-20-93	...	...	...
7. 12/20/93	...	...	...
8. 12/2/93	...	...	...
9. 12/30/93	...	...	...
10. 12-30-93	...	...	...

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pg. 2. Reindeer Act Petition

Date	Printed Name	Signed Name	Address
11.12.30.43	Reindeer Act	Reindeer Act	Box 11, Fairbairn
12.11.30.43	Linda M. Kucera	Linda M. Kucera	K.T.C.
13.11.30.43	Michael G. Gannon	Michael G. Gannon	Herst. Basin
14.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
15.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
16.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
17.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
18.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
20.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
21.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
22.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
23.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
24.12.13.02	Linda M. Kucera	Linda M. Kucera	Box 11, Fairbairn
25.12.13.02	Reindeer Act	Reindeer Act	K.T.C.
26.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
27.12.13.02	Helen M. Gannon	Helen M. Gannon	Box 11, Fairbairn
28.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
29.12.13.02	Ernest W. Gannon	Ernest W. Gannon	Box 11, Fairbairn
30.12.13.02	Ruth Ann Rock	Ruth Ann Rock	Box 11, Fairbairn

pg. 3 Reindeer Act Petition

- 31. 12-1-77 George A. Sutherland Barrow AK 99755
- 32. 12-1-77 George A. Sutherland Barrow AK 99755
- 33. 12-1-77 George A. Sutherland Barrow AK 99755
- 34. 12-1-77 George A. Sutherland Barrow AK 99755
- 35. 12-30-77 Barrow Barrow Mission AK 99755
- 36. 12-30-77 Barrow Barrow Mission AK 99755
- 37. 12-30-77 Barrow Barrow Mission AK 99755
- 38. 12-30-77 Barrow Barrow Mission AK 99755
- 39. 12-30-77 Barrow Barrow Mission AK 99755
- 40. 12-30-77 Barrow Barrow Mission AK 99755
- 41. 12/30/1977 Alfred & Katherine
- 42. 12-30-77 Stella Barrow AK 99755
- 43. 12-30-77 Thomas J. Bean Brevig Mission AK 99755
- 44. 12-30-77 Barrow Barrow Mission AK 99755
- 45. 1-3-78 Annie Marie Cenger Barrow AK 99755
- 46. \_\_\_\_\_
- 47. \_\_\_\_\_
- 48. \_\_\_\_\_
- 49. \_\_\_\_\_
- 50. \_\_\_\_\_



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return this petition to: Reindeer Herders Association P O. Box 948 Nome, Ak 99762

## PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

We, the undersigned hereby support the 1937 Reindeer Industry Act as written. The Reindeer Act was intended to "establish and maintain for the said natives of Alaska a self-sustaining economy by acquiring and organizing for and on behalf of said natives a reindeer industry or business by preserving the native character of the said industry or business thus established." There is now an attempt to amend the original act to open the ownership of reindeer to non-Natives. We the Undersigned are opposed to any such amendments and urge Congress, our congressional delegation and the Secretary of Interior to oppose amendments to the Reindeer Act of 1937.

Signed/ Date	Printed Name	Address
1. Fred O. Claman 12-22-92	Fred O. Claman	Box 112, Nome, Alaska
2. [Handwritten]	[Handwritten]	[Handwritten]
3. [Handwritten]	[Handwritten]	[Handwritten]
4. [Handwritten]	[Handwritten]	[Handwritten]
5. [Handwritten]	[Handwritten]	[Handwritten]
6. [Handwritten]	[Handwritten]	[Handwritten]
7. [Handwritten]	[Handwritten]	[Handwritten]
8. Paulie Claman 12-22-92	Paulie Claman	Nome, Alaska 99762
9. [Handwritten]	[Handwritten]	[Handwritten]
10. [Handwritten]	[Handwritten]	[Handwritten]

pg 2. Reindeer Act Petition

Signed/Date	Printed Name	Address
11. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
12. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
13. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
14. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
15. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
16. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
17. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
18. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
20. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
21. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
22. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
23. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
24. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
25. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
26. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
27. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
28. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
29. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>
30. <u>[Signature]</u>	<u>[Signature]</u>	<u>[Address]</u>

pg. 3 Reindeer Act Petition

- 31. James Kukonuk "White" - Brevig Mission AK 99785
- 32. James Kukonuk "White" - Brevig Mission AK 99785
- 33. James Kukonuk "White" - Brevig Mission AK 99785
- 34. James Kukonuk "White" - Brevig Mission AK 99785
- 35. James Kukonuk "White" - Brevig Mission AK 99785
- 36. James Kukonuk "White" - Brevig Mission AK 99785
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- 38. James Kukonuk "White" - Brevig Mission AK 99785
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- 42. James Kukonuk "White" - Brevig Mission AK 99785
- 43. James Kukonuk "White" - Brevig Mission AK 99785
- 44. James Kukonuk "White" - Brevig Mission AK 99785
- 45. James Kukonuk "White" - Brevig Mission AK 99785
- 46. James Kukonuk "White" - Brevig Mission AK 99785
- 47. James Kukonuk "White" - Brevig Mission AK 99785
- 48. James Kukonuk "White" - Brevig Mission AK 99785
- 49. James Kukonuk "White" - Brevig Mission AK 99785
- 50. James Kukonuk "White" - Brevig Mission AK 99785

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PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

We, the undersigned hereby support the 1937 Reindeer Industry Act as written. The Reindeer Act was intended to establish and maintain for the said natives of Alaska a self-sustaining economy by acquiring and organizing for and on behalf of said natives a reindeer industry or business by preserving the native character of the said industry or business thus established. There is now an attempt to amend the original act to open the ownership of reindeer to non-Natives. We the Undersigned are opposed to any such amendments and urge Congress, our congressional delegation and the Secretary of Interior to oppose amendments to the Reindeer Act of 1937.

Date	Printed Name	Signed Name	Address
1/12-27-93	Davis Sulek	<i>[Signature]</i>	Box 65
2/2-27-93	John Frings	<i>[Signature]</i>	Box 12209
3/3/27/03	William [unclear]	<i>[Signature]</i>	Box 72007
4/12/27/92	Frank G. [unclear]	<i>[Signature]</i>	POB 48
5/12-27-93	Edgar Thompson	<i>[Signature]</i>	POB 41, Shishmaref
6/12-27-93	[unclear]	<i>[Signature]</i>	Box 3 Shishmaref AK 99762
7/12-27-93	William [unclear]	<i>[Signature]</i>	Box 46 Shishmaref AK 99762
8/12-27-93	[unclear]	<i>[Signature]</i>	Box 14 Shishmaref AK
9.			
10.			

1000

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~~PLEASE NOT TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT~~

We, the undersigned hereby support the 1937 Reindeer Industry Act as written. The Reindeer Act was intended to "establish and maintain for the said natives of Alaska a self-sustaining economy by acquiring and organizing for and on behalf of said natives a reindeer industry or business by preserving the native character of the said industry or business thus established." There is now an attempt to amend the original act to open the ownership of reindeer to non-Natives. We the Undersigned are opposed to any such amendments and urge Congress, our congressional delegation and the Secretary of Interior to oppose amendments to the Reindeer Act of 1937.

Date	Printed Name	Signed Name	Address
1/7-27-93	Davis Seckpick	<i>[Signature]</i>	Box 65
2/2-27-93	J. E. Enig...	<i>[Signature]</i>	Box 12...
3/12/93	John I. ...	<i>[Signature]</i>	Box 79...
4/2/93	...	<i>[Signature]</i>	...
5/17-27-93	...	<i>[Signature]</i>	...
6/12-27-93	...	<i>[Signature]</i>	...
7/...	...	<i>[Signature]</i>	...
8/...	...	<i>[Signature]</i>	Box 14 Nome, AK
9/...	Mina Wigoria	<i>[Signature]</i>	Box 79 SHH AK 99772
10/...	Judie Seckpick	Judie Seckpick	Box 65

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pg. 2. Reindeer Act Petition

Date	Printed Name	Signed Name	Address
11. 12-24-93			Box 20
12. 12 30.93	Tom...		
13. 12-24-93	Tom...		Box 79
14. 12/29/93	Sam ...	Sam ...	Box 720-12
15. 12/21/93	Gene ...	Gene ...	Box 76
16. 12/21/93	Steen ...	Steen ...	Box 70
17. 12/21/93	Yvonne ...	Yvonne ...	Box 46
18. 12/29/93	Dale ...	Dale ...	Box 72008
20. 12/30/93	...	...	Box 720096
21. 12/30/93	G. ...	G. ...	Box 72090
22. 12-30-93	...	...	Box 72096
23. 12/30	Earl ...	Earl ...	Box 108
24. 12-30-93	...	...	Box 72070
25. 12/30	Stella ...	Stella ...	Box 92
26. 12/30	...	...	Box 91
27. 12/30	...	...	Box 78
28. 12/30	...	...	Box 80
29. 12/30	...	...	Box 126 KOTZ.H
30. 12/30	...	...	Box 19, Shulman, etc

pg. 3 Reindeer Act Petition

- 31. John K. Johnson P.O. Box 10
- 32. John Johnson POB 72078
- 33. Frank C. Johnson G.W. Dr. Shishmaref AK 99772
- 34. Dennis Johnson Shishmaref AK 99772
- 35. John Johnson P.O. Box 78 Shishmaref AK 99772
- 36. John Johnson Shishmaref AK 99772
- 37. John Johnson Shishmaref AK 99772
- 38. Roy J. Weyouanna Shishmaref AK 99772
- 39. Amith M. Weyouanna P.O. Box 78 Shishmaref AK 99772
- 40. John Weyouanna P.O. Box 78 Shishmaref AK 99772
- 41. Nancy Kokeak Nancy Kokeak Box 71
- 42. Frankie Kuznetsov Box 25
- 43. Frankie Kuznetsov 1501 72076
- 44. Frankie Kuznetsov 5194 AK 72076
- 45. Flora Kuznetsov Florence Kuznetsov Box 72014 Shh.
- 46. Rene Kuznetsov Box 27, Shishmaref
- 47. Anna Kuznetsov Anna Kuznetsov Box 91 SHH AK 99772
- 48. Laura Kuznetsov Laura Kuznetsov P.O. 77 SHH
- 49. \_\_\_\_\_
- 50. \_\_\_\_\_

2/13/93



# KAWERAK, INC.

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- PREVIOUS
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- YOLA
- YAK
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## PETITION TO REFRAIN FROM AMENDING THE REINDEER INDUSTRY ACT

We, the undersigned hereby support the 1937 Reindeer Industry Act as written. The Reindeer Act was intended to "establish and maintain for the said natives of Alaska a self-sustaining economy by acquiring and organizing for and on behalf of said natives a reindeer industry or business...by preserving the native character of the said industry or business thus established." There is now an attempt to amend the original act to open the ownership of reindeer to non-Natives. We the Undersigned are opposed to any such amendments and urge Congress, our congressional delegation and the Secretary of Interior to oppose amendments to the Reindeer Act of 1937.

Signed/ Date	Printed Name	Address
1. Isabelle A Ryan 12-13	Isabelle A Ryan	Box 951 Utk AK 99684
2. Keith Tawarik 12/1/93	Isaiah Tawarik	Box 40 Utk ak 99684
3. Natalin Tu		Box 138 Utk ak 99684
4. Keith Anagish		Box 139 Utk ak 99684
5. Brenda H. Ivanoff	Brenda Ivanoff	Box 102 Utk 99684
6. Carla R. Ivanoff	Carla R. Ivanoff	Box 46 Utk AK 99684
7. Ronald D. Ivanoff	RONALD D. IVANOFF	Box 4 Utk 99684
8. Doris M. Saverik	Doris M. Saverik	Box 103 Utk 99684
9. Karen Nancuk	Karen Nancuk	P.O. Box 982 Utk ak 99684
10. Lass A. Lutzak		P.O. Box 1? Utk ak 99684

Signed/Date	Printed Name	Address
11 <u>Henry D. Johnson Jr</u>	Henry D. Johnson Jr	Box 56 Unk. AK 99689
12 <u>Paul F. ...</u>	Paul F. ...	Box 6, Unk. AK 99689
13 <u>Earl Toskanik</u>	EARL TOSKANIK	Box 32 Unk AK 99689
14 <u>William Johnson</u>	William Johnson	Box 222 Unk, AK 99689
15 <u>Genevieve D. ...</u>	Genevieve D. ...	Box 11 Unk AK 99689
16 <u>Jeanette A. ...</u>	Jeanette A. ...	Box 153 Unk AK 99689
17 <u>Ebba J. ...</u>	Ebba J. ...	Box 131 Unk AK 99689
18 <u>Stella ...</u>	Stella ...	Box 115 Unk AK 99689
20 <u>Frances ...</u>	Frances Dugan	Bx 33 Unk AK 99689
21 <u>Don Dugan</u>	Don Dugan	Box 33 Unk AK 99689
22 <u>Charles B. ...</u>	Charles B. ...	Box 180 Unk AK 99689
23 <u>Julie ...</u>	Julie ...	Box 72 Unk AK 99689
24 <u>Velma Johnson</u>	VELMA JOHNSON	Box 233 Unk AK 99689
25 <u>Jerry Daniels</u>	Jerry Daniels	Box 209 Unk 99689
26 <u>Tim Towarak</u>	Tim Towarak	Box 89 Unk 99689
27 <u>Rose Towarak</u>	Rose Towarak	Box 89 Unk 99689
28 <u>Arlene ...</u>	Arlene ...	Box 173 Unk AK
29 <u>Elizabeth R. ...</u>	Elizabeth R. Towarak	Box 264 Unk AK 99689
30 <u>Paul Agibnik</u>	Paul Agibnik	Box 137 Unk AK 99689

pg. 3 Reindeer Act Petition

- 31 Phil Hartman PHILIP L. HARTMAN Box 52 UNK AK 99684
- 32 Carl Ryzandy FRED RYMAN JK UNK
- 33 Henry Ryzandy Henry Ryzandy UNK
- 34 Joe Ryan Joe Ryan Box 111 UNK AK 99684
- 35 Joe Ryan Joe Ryan Box 111 UNK
- 36 Joseph Platt Joseph Pleasant Box 156
- 37 Elliott Eckerson Elliott Eckerson Box 162
- 38 Jean Button JEAN BUTTON Box 114 UNK
- 39 Merlin Johnson MERLIN JOHNSON Box 233 UNK
- 40 Tony Hanger Tony Hanger Box 82 UNK AK 99684
- 41 Mary Jane Hanger Mary Jane Hanger Box UNK AK 99684
- 42 Luc C Baker LUC C BAKER Box 15 UNK AK
- 43 Pat Lin Pat. Dill Box 355 UNK AK 99684
- 44 Elliott Bradley Sr. Elliott Bradley Sr. UNK AK 99684 <sup>P.O. Box 92</sup>
- 45 George H. Lockwood George H. Lockwood Sr. UNK AK 99684 <sup>P.O. Box 84</sup>
- 46 Karen Brindley Karen Brindley Box 71 UNK AK 99684
- 47 Doug Katchak Doug Katchak UNK
- 48 Wesley Etzick Wesley Etzick Box 69 UNK
- 49 Bill Katchak Bill Katchak Box 224 UNK AK 99684
- 50 William Katchak William Katchak Box 155 UNK AK 99684

2/13/93

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return this petition to: Reindeer Herders Association P O Box 948 Nome, AK 99762

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Signed/ Date

Printed Name

Address

1. \_\_\_\_\_
2. Apr 3 8 1/2 Francis E Soxie Sr. Box 1 Unalakleet - 99684
3. Arthur J. Smith Burtin L. Smith Box 181 Nome AK 99684
4. Jaweevunagoch Lowell V. Anagoch Box 185, Unalakleet AK 99684
5. Ronald Sogounick Ronald Sogounick Box 7 Unk, AK 99684
6. William J. Hillis Anthony J. S. Hillis Box 7 Unk AK 99684
7. David Bowling David Bowling Box 235, Unalakleet, AK 99684
8. Mary L. Soxie Mary L. Soxie Box 106 Unalakleet AK 99684
9. Evelyn M. Koutchak Evelyn M. Koutchak Box 106 Unk AK 99684
10. Clarence G. Bohr Clarence G. Bohr Box 15, Unalakleet, AK 99684

Walter T. Featherly  
KOVAL & FEATHERLY, P.C.  
301 W. Northern Lights Blvd., Suite 405  
Anchorage, Alaska 99503  
(907) 258-6600

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

THOMAS E. WILLIAMS, ALASKA )  
REINDEER, INC., AND REINDEER )  
HERDERS ASSOCIATION, INC., )  
 )  
Plaintiffs, )

vs. )

BRUCE BABBITT, in his capacity as )  
THE UNITED STATES SECRETARY )  
OF THE INTERIOR, AND NILES CESAR, )  
in his capacity as JUNEAU AREA )  
DIRECTOR OF THE UNITED STATES )  
BUREAU OF INDIAN AFFAIRS )

CASE NO. A94-0245 CV (JWS)

Defendants. )

BRIEF OF THE PLAINTIFFS IN SUPPORT OF  
THE ENTRY OF SUMMARY JUDGMENT IN THEIR FAVOR

OF  
KOVAL & FEATHERLY  
A PROFESSIONAL CORPORATION  
301 WEST NORTHERN LIGHTS BOULEVARD  
SUITE 405

ANCHORAGE ALASKA 99503

TELEPHONE (907) 258-6600 TELECOPIER (907) 278-7873

TABLE OF CONTENTS

I. INTRODUCTION ..... 1

II. THE STANDARDS APPLICABLE TO MOTIONS FOR SUMMARY JUDGMENT .. 3

III. THIS COURT SHOULD REVERSE THE DECISION OF THE IBIA THAT THE REINDEER ACT TOTALLY BANS THE COMMERCIAL OWNERSHIP OF REINDEER BY NON-NATIVES IN ALASKA, REGARDLESS OF THE ORIGIN OF THE REINDEER ..... 4

    A. Standard of Judicial Review ..... 4

    B. The IBIA's Interpretation of the Reindeer Act as Totally Banning Non-Native Entry into the Reindeer Industry in Alaska, Regardless of the Source of the Reindeer Involved, Is Erroneous ..... 5

        1. Under the plain and unambiguous language of 25 U.S.C. § 500i, the importation of live reindeer by non-Natives into Alaska is not prohibited. .... 5

        2. Even if the language of 25 U.S.C. § 500i were less than plain, the section should be strictly construed in favor of Mr. Williams ..... 7

        3. That § 500i does not prohibit the purchase of reindeer that are not descendants of Alaska reindeer, follows from the principle that where a statute forbids certain things, it is to be construed as excluding from its effect all things not expressly mentioned ..... 9

        4. This is not one of the "rare cases" in which the literal application of § 500i will produce a result demonstrably at odds with the intention of the drafters ..... 11

            a. The language of the Reindeer Act cannot be interpreted as prohibiting the importation by non-Natives of reindeer having no prior connection with Alaska ..... 11

            b. Nothing in the Reindeer Act or the legislative history supports the conclusion that it was Congress' intent to ban the importation by non-Natives of live reindeer, where those deer have no connection with the reindeer purchased by the Government or owned by Natives in Alaska ..... 12

(1)	That the entire reindeer industry in Alaska be permanently and exclusively Native-owned is not a purpose of the Reindeer Act .....	13
(2)	Even if a purpose of the Act were that the entire reindeer industry in Alaska be permanently and exclusively Native-owned, it was not Congress' intent to include in the Act a total ban on the ownership by non-Natives of non-Alaska reindeer as one of the means for accomplishing the Act's purpose .....	17
c.	The Area Director's interpretation, that the Reindeer Act does not prohibit the importation of foreign deer by non-Natives, is not in conflict with the Department of Interior's initial or any previous position .....	25
d.	Even if one could conclude that a prohibition on the purchase of foreign deer by non-Natives in Alaska was a possible interpretation of the Reindeer Act, that interpretation should not be adopted because the IBIA made no findings of fact that the opposite interpretation would thwart the purpose of the Reindeer Act .....	27
5.	No basis exists for concluding that Congress reserved the entire reindeer industry to the Natives .....	28
a.	The Reindeer Act cannot be interpreted as creating a reservation for Natives in Alaska .....	28
b.	Even if Congress had intended to reserve the reindeer industry in Alaska for non-Natives, Congress lacked the power to do so .....	31
6.	The IBIA's Interpretation of the Reindeer Industry Act Violates the Equal Protection Component of the Due Process Clause of the Fifth Amendment .....	35
7.	The IBIA's Interpretation of the Reindeer Act Deprives the Plaintiffs of Their Rights under the Privileges and Immunities Clause of Article IV, § 2 .....	41
8.	The IBIA's Interpretation of the Reindeer Industry Act Violates Plaintiffs' Fundamental Rights to Travel and Resettlement .....	43

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IV.	THE PLAINTIFFS ARE ENTITLED TO A DECLARATION THAT THEY ARE NOT PRECLUDED FROM FARMING REINDEER IN ALASKA WITH REINDEER IMPORTED FROM OUTSIDE OF ALASKA .....	45
V.	THE REINDEER ACT IS INVALID FOR THE REASON THAT IT VIOLATES THE UNITED STATES CONSTITUTION .....	45
VI.	THE IBIA ERRED IN RULING THAT THE REINDEER ACT WAS NOT REPEALED, AT LEAST IN PART, BY THE ALASKA STATEHOOD ACT AND THE ALASKA OMNIBUS ACT .....	45
VII.	CONCLUSION .....	45

TABLE OF AUTHORITIES

Cases

*Alaska Pacific Fisheries v. United States*,  
248 U.S. 78, 39 S.Ct. 40, 63 L.Ed. 138 (1918) ..... 29, 30, 31, 32, 42, 46

*Anderson v. Liberty Lobby*,  
477 U.S. 242, 249, 106 S. Ct. 2505, 91 L.Ed.2d 202 (1986) ..... 17

*Bouie v. City of Columbia*,  
S. C., 378 U.S. 347, 84 S.Ct. 1697, 12 L.Ed.2d 894 (1964) ..... 21

*Brannan v. Stark*, 185 F.2d 871, 87 U.S. App. D.C. 388 (D.C. Cir. 1950),  
affirmed 342 U.S. 451, 72 S.Ct. 433, 96 L.Ed. 497 (1952) ..... 18

*Celebrezze v. Kilborn*, 322 F.2d 166 (5th Cir. 1963) ..... 18

*Celotex Corp. v. Catrett*, 477 U.S. 317, 323, 106 S. Ct. 2548,  
91 L.Ed.2d 265 (1986) (quoting Rule 56) ..... 17

*City of Richmond v. J.A. Croson Co.*,  
488 U.S. 469, \_\_\_ 109 S.Ct. 706, 102 L.Ed.2d 854 (1989) ..... 50, 51

*County of Yakima v. Confederated Bands & Tribes of the  
Yakima Indian Nation*, 502 U.S. 251, 112 S.Ct. 683, 116 L.Ed.2d 687 (1992) ..... 44

*Delaware Tribal Business Committee v. Weeks*,  
430 U.S. 73, 97 S.Ct. 911, 51 L.Ed.2d 173 (1977) ..... 52

*Doe v. Bolton*, 410 U.S. 179, 93 S.Ct. 739, 35 L.Ed.2d 201 (1973) ..... 56

*Dunn v. Blumstein*,  
405 U.S. 330, 92 S.Ct. 995, 31 L.Ed.2d 274 (1972) ..... 58

*Federal Aviation Administration Administrator v. Robertson*,  
422 U.S. 255, 95 S.Ct. 2140, 45 L.Ed.2d 164 (1975) ..... 24

*First National Bank of Arizona v. Cities Service Co.*,  
391 U.S. 253, 288-89, 88 S. Ct. 1575, 20 L.Ed.2d 569 (1968) ..... 17, 41

*Folsom v. Pearsall*, 245 F.2d 562 (9th Cir. 1957) ..... 18

*Fullilove v. Klutznick*, 448 U.S. 448, 100 S.Ct. 2758, 65 L.Ed.2d 902 (1980) ..... 50, 51

*Hammond v. Hoffbeck*, 627 P.2d 1052 (Alaska 1981) ..... 49

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<i>Hampton v. Mow Sun Wong</i> , 426 U.S. 88, 96 S.Ct. 1895, 48 L.Ed.2d 495 (1976), .....	48
<i>Livingston v. Ewing</i> , 455 F. Supp. 825 (D. N.M. 1978), affirmed 601 F.2d 1110 (10th Cir. 1979), cert. denied 444 U.S. 870, 100 S.Ct. 147, 62 L.Ed.2d 95 (1979) .....	54
<i>Louis K. Liggelt Co. v. Baldridge</i> , 278 U.S. 105, 49 S.Ct. 57, 73 L.Ed.2d 204 (1928) .....	49
<i>Memorial Hospital v. Maricopa County</i> , 415 U.S. 250, 94 S.Ct. 1076, 39 L.Ed.2d 306 (1974) .....	57, 58
<i>Morton v. Mancari</i> , 417 U.S. 535, 94 S.Ct. 2474, 41 L.Ed.2d 290 (1974) .....	52, 53
<i>National Bank v. County of Yankton</i> , 101 U.S. 129, 133, 25 L.Ed. 1046 .....	46
<i>New State Ice Co. v. Liebmann</i> , 285 U.S. 262, 52 S.Ct. 371, 76 L.Ed. 747 (1932) .....	47, 48
<i>North Dakota State Board of Pharmacy v. Snyder's Drug Stores, Inc.</i> , 414 U.S. 156, 94 S.Ct. 407, 38 L.Ed.2d 379 (1973) .....	49
<i>Oregon v. Mitchell</i> , 400 U.S. 112, 238, 91 S.Ct. 260, 27 L.Ed.2d 272 (1970) .....	58
<i>Pascual v. O'Shea</i> , 421 F.Supp. 80 (D. Hawaii 1976) .....	18
<i>Pelletier v. Federal Home Loan Bank of San Francisco</i> , 968 F.2d 865 (9th Cir. 1992) .....	49
<i>Regents of the University of California v. Bakke</i> , 436 U.S. 265, 289-90, 98 S.Ct. 2733, 57 L.Ed.2d 750 (1978) .....	51
<i>Regents of the University of California v. Bakke</i> , 438 U.S. 265, 304 n.42, 98 S.Ct. 2733, 57 L.Ed.2d 750 (1978) .....	53
<i>Reindeer Herders Association v. Cesar</i> , No. A91-511 Civ. (D. Alaska) .....	16
<i>Reindeer Herders Association v. Juneau Area Director</i> , <i>Bureau of Indian Affairs</i> , IBIA 92-182-A, 23 IBIA 28, November 13, 1992 .....	16, 18
<i>Shapiro v. Thompson</i> , 394 U.S. 618, 89 S.Ct. 1322, 22 L.Ed. 600 (1969) .....	57, 58

<i>Shively v. Bowlby</i> , 152 U. S. 1, 47-48, 58, 14 Sup. Ct. 548, 38 L. Ed. 331 .....	46
<i>Supreme Court of New Hampshire v. Piper</i> , 470 U.S. 274, 105 S.Ct. 1272, 84 L.Ed.2d 204 (1985) .....	56
<i>Supreme Court of Virginia v. Friedman</i> , 487 U.S. 59, 108 S.Ct. 2260, 101 L.Ed.2d 56 (1988) .....	56
<i>Sutherland Statutory Construction</i> § 46.01 at p.81 (5th Ed. 1992) .....	19
<i>Toibb v. Radloff</i> , 501 U.S. 157, _____, 111 S.Ct. 2197, _____, 115 L.Ed 2d 145 (1991) .....	24
<i>Trailer Train Co. v. State Board of Equalization</i> , 697 F.2d 860, 866 (9th Cir. 1983), cert. den. 464 U.S. 846, 104 S.Ct. 149, 78 L Ed 2d 139 (1983) .....	27, 41
<i>Truax v. Raich</i> 239 U.S. 33, 36 S.Ct. 7, 60 L.Ed.131 (1915) .....	47, 48
<i>U.S. v. Goldenberg</i> , 168 U.S. 95, 18 S.Ct. 3, 42 L.Ed. 394 (1987) .....	24
<i>U.S. v. Public Utilities Commission of Cal.</i> , 345 U.S. 295, 73 S.Ct. 706, 97 L.Ed. 1020, reh. den. 345 U.S. 961, 73 S.Ct. 935, 97 L.Ed. 1380 (1953) .....	19
<i>U.S. v. Public Utilities Commission of Cal.</i> , 345 U.S. 295, 73 S.Ct. 706, 97 L.Ed. 1020, reh. den. 345 U.S. 961, 73 S.Ct. 935, 97 L.Ed. 1380 (1953) .....	19
<i>U.S. v. Ron Pair Enterprises, Inc.</i> , 489 U.S. 235, 109 S.Ct. 1026, 1031, 103 L.Ed.2d 290 (1989) .....	25
<i>U.S. v. Verdugo-Urquidez</i> , 494 U.S. 259, 110 S.Ct. 1056, 108 L.3d 2d 222 (1990) .....	55
<i>Udall v. Tallman</i> , 380 U.S. 1, 16, 85 S.Ct. 792, 13 L.Ed 2d 616 (1965) .....	40
<i>Union Bank v. Wolas</i> , 502 U.S. 151, 112 S.Ct. 527, 531, 116 L.Ed 2d 514, (1991), citing <i>Toibb v. Radloff</i> , 501 U.S. 157, _____, 111 S.Ct. 2197, _____, 115 L.Ed 2d 145 (1991) .....	24
<i>United States v. Clark</i> , 912 F 2d 1087 (9th Cir. 1990) cert. denied 498 U.S. 1037, 111 S Ct 705, 112 L Ed 2d 695 (1991) .....	54

<i>United States v. Tropiano</i> , 418 F.2d 1069 (2nd Cir. 1969), cert. denied 397 S.S. 1021, 90 S.Ct. 1255, 25 L.Ed.2d 530 (1970) .....	48
<i>United States v. Winans</i> , 198 U.S. 371, 383, 25 Sup. Ct. 662, 49 L. Ed. 1089 .....	46
<i>Ward v. Maryland</i> , 79 U.S. (12 Wall.) 418, 20 L. Ed. 449 (1870) .....	56
<i>Wait v. Alaska</i> , 451 U.S. 259, 272-73, 101 S.Ct. 1673, 3 L.Ed.2d 80 (1981) .....	40
<i>Winters v. United States</i> , 207 U.S. 564, 28 S.Ct. 207, 52 L. Ed. 340 (1908) .....	42
<i>Wygant v. Jackson Board of Education</i> , 476 U.S. 267, 279-80, 285-86, 106 S.Ct. 1842, 90 L. Ed.2d 260 (1986) .....	50, 51
<i>Yates v. U.S.</i> , 354 U.S. 298, 77 S.Ct. 1064, 1 L. Ed.2d 1356 (1957) .....	21
<i>Yick Wo v. Hopkins</i> , 118 U.S. 356, 6 S.Ct. 1064, 30 L. Ed. 220 (1886) .....	55

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Pursuant to the Report of the Parties' Planning Meeting dated October 7, 1984, the plaintiffs, Thomas E. Williams, Alaska Reindeer, Inc. and the Reindeer Herders Association, Inc. (hereafter collectively referred to as "Mr. Williams"), hereby submit their brief in support of the entry of summary judgment in their favor on all nine of the claims for relief contained in their complaint in this action.

#### I. INTRODUCTION

In December of 1986, plaintiff, Thomas E. Williams, a non-Native resident of Alaska, informed the Area Director of the United States Bureau of Indian Affairs that he intended either directly or through plaintiff, Alaska Reindeer, Inc., to purchase reindeer outside of the state of Alaska, import them into the state of Alaska, and establish a private herd for commercial purposes. At the same time, Mr. Williams requested an opinion from the Area Director as to whether his proposed actions would be prohibited, restricted or regulated in any way under the Reindeer Industry Act of 1937, 25 U.S.C. §§ 500-500(n) (1988) (the "Reindeer Act").

In January of 1987, the Area Director responded to Mr. Williams, through the United States Regional Solicitor. The response stated, in part, the Area Director's opinion that, "there is nothing in the 1937 Reindeer Act to prohibit a non-Native such as Mr. Williams from importing live reindeer from outside of the State of Alaska and raising them within the State as either a hobby or a business."

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The statements set out in this introduction are drawn from the allegations contained in paragraphs 6 through 24 of the complaint. With minor qualifications, all of these allegations were admitted by defendants, Bruce Babbitt and Niles Cesar (the "federal defendants"), and intervenor-defendant, Kawerak Reindeer Herders Association ("Kawerak").

On March 19, 1987, Mr. Williams reported to the Area Director that he had imported 19 reindeer from Canada. He stated that the reindeer were owned by plaintiff, Alaska Reindeer, Inc.

In 1989, the Area Director requested the Regional Solicitor to reconsider his opinion of January of 1987 concerning the interpretation of the Reindeer Act as it applied to the plaintiffs' importation of reindeer to Alaska. On May 11, 1989, the Regional Solicitor responded to this request, stating, in part, "we remain unpersuaded of the necessity for revision of our prior opinion."

In March of 1990, Mr. Williams imported an additional 179 reindeer from Canada. In August of 1991, Mr. Williams reported that Alaska Reindeer, Inc. owned 248 reindeer.

In 1991, an unincorporated association calling itself the "Reindeer Herders Association," which was alleged to be an association of 17 Alaska Native reindeer herders whose herds are located on or near the Seward Peninsula, filed suit against the Area Director, challenging his interpretation of the Reindeer Act as described in the preceding paragraphs. Reindeer Herders Association v. Cesar, No. A91-511 Civ. (D. Alaska). Thereafter, the Reindeer Herders Association agreed to pursue an administrative appeal to the Department of Interior Board of Indian Appeals (the "IBIA"), and on June 8, 1992, the RHA filed a notice of appeal before the IBIA. On July 28, 1992, Mr. Williams filed a motion to intervene in the appeal to the IBIA, which motion was granted by the IBIA.

On November 19, 1992, the IBIA issued a written opinion in the case, Reindeer Herders Association v. Juneau Area Director, Bureau of Indian Affairs, IBIA 92-182-A, 23 IBIA 28, November 13, 1992. In its decision, the IBIA reversed the decision of the Area Director and held

that "Congress intended to reserve the reindeer industry exclusively to Natives and to exclude non-Natives from the industry."

## II. THE STANDARDS APPLICABLE TO MOTIONS FOR SUMMARY JUDGMENT

Rule 56(c) of the Federal Rules of Civil Procedure allows a party to obtain judgment by showing there are no genuine issues of material fact appropriate for trial and that the moving party is entitled to judgment as a matter of law. The non-moving party must do more than state specific facts showing there is a genuine factual dispute, but must produce evidence on every essential element of its case.

[A] complete failure of proof concerning an essential element of the non-moving party's case necessarily renders all other facts immaterial. The moving party is "entitled to judgment as a matter of law" because the non-moving party has failed to make a sufficient showing on an essential element of her case with respect to which she has the burden of proof.

*Celotex Corp. v. Catrett*, 477 U.S. 317, 323, 106 S. Ct. 2548, 91 L.Ed.2d 265 (1986) (citing Rule 56).

Moreover, the non-moving party must do more than assert the existence of a triable and material issue of fact or provide only a scintilla of evidence on its version of the asserted triable, material issue. "[T]here is no issue for trial unless there is sufficient evidence favoring the non-moving party for a jury to return a verdict for that party." *Anderson v. Liberty Lobby*, 477 U.S. 242, 249, 106 S. Ct. 2505, 91 L. Ed.2d 202 (1986), (citing *First National Bank of Arizona v. Cities Service Co.*, 391 U.S. 253, 288-89, 88 S. Ct. 1575, 20 L. Ed.2d 569 (1968), rehearing denied 393 U.S. 901 (1968)).

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III. THIS COURT SHOULD REVERSE THE DECISION OF THE IBIA THAT THE REINDEER ACT TOTALLY BANS THE COMMERCIAL OWNERSHIP OF REINDEER BY NON-NATIVES IN ALASKA, REGARDLESS OF THE ORIGIN OF THE REINDEER

A. Standard of Judicial Review

The IBIA held that the "Reindeer Act must be construed to prohibit non-Native entry into the reindeer industry in Alaska, regardless of the source of the reindeer involved." *Reindeer Herders Association v. Juneau Area Director, Bureau of Indian Affairs*, IBIA 92-182-A, November 13, 1992, 23 IBIA 69 (hereafter 23 IBIA \_\_\_\_). Thus, the IBIA's determination was an act of statutory interpretation. It is well-settled that the interpretation of statutes including those which govern administrative agencies, is a question of law that is determinable by the judiciary. *Pascual v. O'Shea*, 421 F.Supp 80 (D. Hawaii 1976). The reviewing court is not bound by an administrative interpretation and application of a statute, even if long standing, but is free to substitute its own judgment for the judgment or conclusion of the agency. *Folsom v. Pearsall*, 245 F.2d 562 (9th Cir. 1957). *Brannan v. Stark*, 185 F.2d 871, 87 U.S. App. D.C. 388 (D.C. Cir. 1950), affirmed 342 U.S. 451, 72 S.Ct. 433, 96 L.Ed. 497 (1952). Any administrative efforts to either enlarge or restrict the application of a statute are subject to close judicial scrutiny. *Celebrezze v. Kilborn*, 322 F.2d 166 (5th Cir. 1963). In reviewing questions of law, the standard of review is the complete substitution of the court's judgment; the substantial evidence test, manifest error doctrine, and rational basis test are not applicable.

B. The IBIA's Interpretation of the Reindeer Act as Totally Banning Non-Native Entry into the Reindeer Industry in Alaska, Regardless of the Source of the Reindeer Involved, Is Erroneous

1. Under the plain and unambiguous language of 25 U.S.C. § 500i, the importation of live reindeer by non-Natives into Alaska is not prohibited.

The fundamental rule of statutory construction, to which all other rules are subordinate, is to ascertain and, if possible, give effect to the intention or purpose of the legislature as expressed in the statute. The intention of the legislature is to be ascertained primarily from the language used in the statute. 2A Sands, *Sutherland Statutory Construction* § 46.01 at p.81 (5th Ed. 1992) (hereafter "*Sutherland*"). Where the language of the statute is plain and unambiguous, there is no occasion for construction. *U.S. v. Public Utilities Commission of Cal.*, 345 U.S. 295, 73 S.Ct. 706, 97 L.Ed. 1020, reh. den. 345 U.S. 961, 73 S.Ct. 935, 97 L.Ed. 1380 (1953). This is true even though other meanings of the language employed could be found. Compare *Sutherland*, § 46.01 at p. 83.

The provisions of § 500i are plain and unambiguous:

Live reindeer in Alaska, and the increase thereof, acquired by the Secretary of the Interior pursuant to this subchapter, and live reindeer in Alaska, and the increase thereof, owned by the said natives of Alaska or corporations, associations, or other organizations of said natives, however acquired, shall not be sold or transferred, by descent, devise, or in any other manner whatsoever, to anyone other than the said natives of Alaska, the United States for and on behalf of said natives, or corporations, associations, or other organizations of said natives, except with the consent in writing of the Secretary of the Interior or his duly authorized agent, stating that such consent is given upon the condition that the reindeer, and any increase thereof, sold or otherwise transferred with said consent, shall either be butchered in the Territory of Alaska within thirty days or shipped out of said Territory and never brought back alive into said Territory. (emphasis added)

Thus, while § 500i clearly prohibits the purchase by a non-Native in Alaska of reindeer that were physically located within the Territory of Alaska at the time the Reindeer Act was passed, that section just as clearly does not prohibit the purchase by a non-Native in Alaska of reindeer that were neither physically located within the Territory of Alaska at the time the Reindeer Act was passed, nor later descended from animals that were.

The IBIA acknowledges that the Reindeer Act does not prohibit the purchase by Mr. Williams of such reindeer: "[N]o provision in the Reindeer Act explicitly prohibits the importation of reindeer into Alaska or explicitly precludes a non-Native from entering the reindeer business, using imported reindeer." 23 IBIA 51. However, the IBIA then declares, inconsistently with this acknowledgment, that the legislative history of the Reindeer Act "created" an ambiguity regarding what reindeer are covered in the prohibition against purchase by non-Natives in Alaska:

The Board cannot agree with the Regional Solicitor's statement that "there is no particular ambiguity on the face of the [Reindeer Act]." There is neither a specific prohibition of, nor a specific allowance of, importation of foreign reindeer for commercial purposes. The lack of any explicit provision concerning this matter, in the face of the overall purpose expressed in the Act, creates a significant ambiguity. To resolve this ambiguity, it is both appropriate and necessary to employ the principle discussed.

23 IBIA 67. The "principle discussed" that the IBIA was referring to was a rule of statutory construction governing the interpretation of statutes enacted for the benefit of Indians. 23 IBIA 62.

However, in reaching to other principles of statutory construction to create an ambiguity where none exists, the IBIA was in error. An ambiguity in a statute cannot be created by

dissecting parts and words of the statute and then applying various canons of construction. See *Sutherland*, § 46.05 at p. 103.

Because § 500i is unambiguous in prohibiting only the purchase by non-Natives in Alaska of live reindeer and their increase that were (a) acquired by the Secretary or (b) owned by natives of Alaska, this court need not and, indeed, should not, reach for any principles of statutory construction to "give effect to the intention and purpose of" Congress in passing the Reindeer Act. For this reason, the IBIA's decision interpreting the Reindeer Act as prohibiting Mr. Williams and other non-Natives in Alaska from owning reindeer from any source should be reversed.

2. Even if the language of 25 U.S.C. § 500i were less than plain, the section should be strictly construed in favor of Mr. Williams.

It is a fundamental rule in the construction of statutes that penal statutes must be construed strictly in favor of the persons sought to be subjected to their operations. *Yates v. U.S.*, 354 U.S. 298, 77 S.Ct. 1064, 1 L.Ed.2d 1356 (1957); *Sutherland*, § 59.03 at p. 102. The rule of strict construction means that such statutes will not be enlarged by implication beyond the fair meaning of the language used, or what their terms reasonably justify, and will not be held to include offenses and persons other than those which are clearly described and provided for, although the court in interpreting and applying particular statutes may think Congress should have made them more comprehensive. *Bouie v. City of Columbia, S.C.*, 378 U.S. 347, 84 S.Ct. 1697, 12 L.Ed 2d 894 (1964); see also *Sutherland*, § 59.03 at 102-105.

Section 500i of the Reindeer Act is a penal statute. Penal statutes are all statutes that command or prohibit certain acts and establish penalties for their violation. See *Sutherland*,

§§ 59.01-59.02 at pages 91-98. Section 500i prohibits any form of sale or transfer of ownership of certain reindeer to non-Natives in Alaska:

Sales or other transfers of said reindeer, if made without the consent in writing herein required, or, although made with said consent, if followed by failure to comply with the condition therein required, shall be null and void, and shall not pass any title to or right to possession of any reindeer or increase thereof. . . . Any willful violation of the provisions of this section by any vendee or other transferee shall be punishable by a fine of not more than \$500: (emphasis added)

In other words, as the means of enforcing the ban on the purchase by non-Natives in Alaska of certain reindeer, § 500i provides for forfeiture of any title acquired in contravention of its provisions and for the imposition of a criminal fine.

If there is fair doubt as to whether the act charged is embraced in a prohibition, that doubt is to be resolved in favor of the person against whom enforcement of the statute is sought. *Sutherland*, § 59.03 at p. 104. Here, there is not even fair doubt as to whether the purchase by Mr. Williams of reindeer in Canada is an act embraced in § 500i's prohibition against the sale or transfer of live reindeer to anyone other than Natives in Alaska.

Under the fundamental principles governing the construction of penal statutes set out above, the IBIA was wrong to expand the coverage of § 500i to the importation by non-Natives of reindeer that are not descendants of the reindeer physically located within the Territory of Alaska at the time the Reindeer Act was passed. Given that the IBIA was in error in its interpretation of the statute, this court should reverse the IBIA and declare that such activities are not prohibited by the Reindeer Act.

3. That § 500i does not prohibit the purchase of reindeer that are not descendants of Alaska reindeer, follows from the principle that where a statute forbids certain things, it is to be construed as excluding from its effect all things not expressly mentioned.

The maxim, *expressio unius est exclusio alterius*, is applicable in the construction and interpretation of statutes when the intention of the lawmaking body is not otherwise clear. *Sutherland*, § 47.23 at 216. Here, § 500i carefully and fully describes two categories of reindeer that non-Natives in Alaska are prohibited from purchasing: (a) government-owned reindeer and their descendants; and (b) Alaska Native owned reindeer and their descendants. Thus, the express mention of the foregoing two categories excludes all other categories not mentioned, including the category of reindeer purchased in Canada, which no one argues could have been descended from reindeer purchased by the Secretary of the Interior or owned by Natives in Alaska. *Sutherland*, § 47.23.

The IBIA apparently believes that the foregoing maxim should not be applied in this case because Congress may not have had the importation of non-Alaska reindeer within its contemplation at the time it adopted § 500i. See, 23 IBIA 67. However, it is absurd to believe that Congress was unaware that other reindeer could be imported to Alaska, given that Congress expressly acknowledged that the source of all of the reindeer in Alaska at that time was through importation of reindeer from outside of Alaska:

To save them [the Eskimos of Northwestern Alaska], 1,280 reindeer were imported from Siberia between the years 1892 and 1902.

H.R. Rep. No. 1188 at 1.

Congress is fully capable of stating a blanket prohibition of impermissible conduct in unqualified terms. See, e.g. the Marine Mammal Protection Act, 16 U.S.C. § 1372, which,

subject to certain specific exceptions, including an exemption for Alaska Natives, makes it unlawful for any person to take any marine mammal on the high seas. If Congress had intended there to be an absolute blanket prohibition on the purchase of reindeer by non-Natives in Alaska, regardless of the source of the reindeer, it would have been simple for Congress to craft such language. In fact, § 500i would be much simpler and considerably shorter if the detailed language qualifying the phrase, "Live reindeer," were omitted.

In interpreting § 500i to have exactly the same meaning as it would have if the qualifying language were omitted, the IBIA ignored the important rule of statutory construction that effect must be given to the whole statute and every part thereof so that no part will become inoperative. *Federal Aviation Administration Administrator v. Robertson*, 422 U.S. 255, 95 S.Ct. 2140, 45 L.Ed.2d 164 (1975); see also *Sutherland*, § 46.06 at pages 119-120. A corollary of this rule of statutory construction is that Congress understood the meaning of the words it used and that it intended to use them. *U.S. v. Goldenberg*, 168 U.S. 95, 18 S.Ct. 3, 42 L.Ed. 394 (1987); see also *Sutherland*, § 45.05 at p. 23. Congress must be presumed to have meant something by the many lines of text in § 500i that qualify the words, "Live reindeer."

The fact that Congress may not have foreseen all of the consequences of a statutory enactment is not a sufficient reason for refusing to give effect to its plain meaning. *Union Bank v. Wolas*, 502 U.S. 151, 112 S.Ct. 527, 531, 116 L.Ed.2d 514, (1991), citing *Toibb v. Radloff*, 501 U.S. 157, \_\_\_\_, 111 S.Ct. 2197, \_\_\_\_, 115 L.Ed.2d 145 (1991). Thus, even if Congress did not have within its contemplation the importation of non-Alaska reindeer at the time it adopted § 500i, that fact is not a sufficient basis for avoiding the plain meaning of § 500i, which

is that the purchase of non-Alaska reindeer by persons who are not Natives in Alaska is not prohibited.

4. This is not one of the "rare cases" in which the literal application of § 500i will produce a result demonstrably at odds with the intention of the drafters.

Citing *U.S. v. Ron Pair Enterprises, Inc.*, 489 U.S. 235, 109 S.Ct. 1026, 1031, 103 L Ed 2d 290 (1989), the IBIA pays lip service to the Supreme Court's oft-repeated pronouncement that "[t]he plain meaning of legislation should be conclusive, except in the rare cases [in which] the literal application of a statute will produce a result demonstrably at odds with the intention of the drafters." 23 IBIA 68. However, the IBIA then completely ignores the stricture by summarily concluding, without any basis, and contrary to the determination of the Juneau Area Director, that reading § 500i as permitting non-Natives in Alaska to import reindeer having no previous connection with Alaska would produce a result that is "demonstrably at odds with the intention of the drafters."

- a. The language of the Reindeer Act cannot be interpreted as prohibiting the importation by non-Natives of reindeer having no prior connection with Alaska.

The first difficulty with the IBIA's analysis in support of its conclusion that the literal application of the Reindeer Act should not prevail is that the IBIA glosses over the need to identify some specific words, phrases or sentences in the Reindeer Act that the IBIA believes should be read to mean, "No non-Native in Alaska shall purchase and bring into Alaska live reindeer, regardless of the origin of said reindeer." The U.S. Supreme Court, in *U.S. v. Ron Pair* and other cases has recognized that in certain circumstances one can depart from the literal meaning of the words of the statute. However, the Supreme Court has never permitted what

the IBIA has done here, which is to insert an entirely new provision into the legislation, without even attempting to fit that provision within a possible meaning of the language of the legislation.

As noted above, the IBIA acknowledges that "[n]o provision in the Reindeer Act explicitly prohibits the importation of reindeer into Alaska or explicitly precludes a non-Native from entering the reindeer business, using imported reindeer."<sup>2</sup> 23 IBIA 51. The IBIA then asserts that this fact is "an interpretation" of the Reindeer Act, notes that it is not an "unreasonable" interpretation, and concludes that Kawerak's interpretation, which is, apparently, that there is a provision in the Reindeer Act that prohibits the importation of reindeer into Alaska is both reasonable and supported by the statutory language and the legislative history. However, the IBIA never even suggests which provision in the Reindeer Act it believes can be read as making it a crime for a non-Native to import reindeer into Alaska.

- b. Nothing in the Reindeer Act or the legislative history supports the conclusion that it was Congress' intent to ban the importation by non-Natives of live reindeer, where those deer have no connection with the reindeer purchased by the Government or owned by Natives in Alaska.

Having avoided the first task of statutory interpretation, which is to examine the words of the statute itself, the IBIA proceeds to a discussion of the purpose and intention of the drafters of the statute. In this discussion, the IBIA concludes that Congress intended to prohibit non-Natives in Alaska from ever owning any live reindeer, even if the reindeer are purchased outside of Alaska and have no connection with Alaska. As will be shown in the following discussion, here, too, the IBIA's analysis is deeply flawed.

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<sup>2</sup> At a later point in its opinion, the IBIA specifically held that § 500i is inapplicable to Mr. Williams because "by its terms it is applicable only to reindeer owned or sold by the United States, Natives, or Native organizations." 23 IBIA 69.

- (1) That the entire reindeer industry in Alaska be permanently and exclusively Native-owned is not a purpose of the Reindeer Act.

The IBIA begins its analysis of discerning Congress' purpose and intent in passing the Reindeer Act with an examination of § 500, which is entitled "Purpose." Regarding this section, IBIA acknowledges that:

It is arguable . . . that the "reindeer industry" with which § 500 is concerned is not the entire reindeer industry in Alaska, but only the industry which the Act created for Natives. Under this interpretation, a non-Native reindeer industry, parallel to the Native industry, might exist in Alaska without offending § 500.

23 IBIA 51-52. However, by ignoring one phrase of § 500, and inaccurately quoting another out of context, the IBIA misses that the plain meaning of § of 500 is that Congress was concerned with creating and preserving for the Natives only a reindeer industry, which industry may exist along side of a non-Native industry. Section 500 states:

#### Section 500. Purpose

A necessity for providing means of subsistence for the Eskimos and other natives of Alaska is hereby declared to exist. It is also declared to be the policy of Congress, and the purpose of this subchapter, to establish and maintain for the said natives of Alaska a self-sustaining economy by acquiring and organizing for and on behalf of said natives a reindeer industry or business, by encouraging and developing native activity and responsibility in all branches of the said industry or business, and by preserving the native character of the said industry or business thus established. (emphasis added).

On page 51 of its opinion, the IBIA inaccurately quotes the phrase "the said industry or business" as "the industry." 23 IBIA 51. The omitted word, "said," is important. Congress' avowed purpose was not in preserving the Native character of the entire reindeer industry in Alaska but, rather, a reindeer industry.

Strictly on the basis of its misquoting of § 500, the IBIA wrongly declared that § 500 was ambiguous as to whether Congress was concerned with the preservation of a reindeer industry in Alaska or the reindeer industry in Alaska.<sup>3</sup> Having made such a flawed declaration of ambiguity, the IBIA then referred to § 500i, purportedly to resolve the matter.

Section 500i, however, does not resolve the ambiguity. The full phrase referred to by the IBIA from § 500i is, "for the purposes of preserving the native character of the reindeer industry or business in Alaska and effectuating the other purposes of this subchapter." It is impossible to discern from this section whether Congress was referring to the reindeer industry or business that Congress intended to establish and maintain for Natives in Alaska, or whether Congress was referring to the entire reindeer industry or business in Alaska, then and for all time. Moreover, because the phrase concludes with the words, "and effectuating the other purposes of this subchapter," it strongly suggests that in its use of the phrase "preserving the native character of the reindeer industry or business," Congress intended nothing more than a reference back to the statement of purpose in § 500, which was to acquire and organize "for and on behalf of said natives a reindeer industry or business."

Continuing its discussion of § 500i, the IBIA acknowledges that the "principal thrust of the section is to impose restrictions upon the alienation of Native and Government-owned

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<sup>3</sup> In this discussion, the IBIA draws a distinction that makes no practical difference: "It is conceivable that the industry could be Native in character even though not exclusively Native." 23 IBIA 52. However, to ask whether Congress intended to require preservation of the Native character of the entire industry in Alaska, or whether Congress intended the reindeer industry in Alaska to be exclusively Native, is to simply restate the same question. Thus, the IBIA's analysis beginning at page 54 of its opinion is really a continuation of its analysis of whether Congress' purpose in passing the Reindeer Act was to require that the entire reindeer industry in Alaska be permanently and exclusively Native.

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reindeer." 23 IBIA 54. Yet, despite this acknowledgement, the IBIA concludes that Congress must have meant to include all reindeer in the scope of the section, and implicitly reaches such a conclusion by ascribing to Congress factual findings that Congress never made or alluded to.

The IBIA correctly notes that the purpose of the post-transfer restrictions in § 500i was "to preclude the re-emergence of a non-Native reindeer industry descended from reindeer purchased from Natives." 23 IBIA 54. However, the IBIA then asserts that "there would seem to be little point to these detailed restrictions if they could so easily be circumvented with imported reindeer" and "the extent to which the Native reindeer industry would be adversely affected by non-Native commercial reindeer operations does not depend upon the source of the reindeer with which the non-Native operations are launched." In these assertions, the IBIA ignores its own statement of the purpose of § 500i as being "to preclude the re-emergence of a non-Native reindeer industry descended from reindeer purchased from Natives." Importing reindeer that are not descended from reindeer purchased from Natives does not circumvent the detailed restrictions, and launching non-Native commercial reindeer operations with imported reindeer has nothing to do with precluding the re-emergence of a reindeer industry with reindeer purchased from Natives.

Even if this serious flaw in logic is overlooked, the IBIA's statements suffer from the fatal defect that the propositions that it proffers are completely unsupported by findings on the part of Congress, the Department of the Interior, or its own proceedings. The IBIA points to nothing in the Reindeer Act, the legislative history, or the administrative record before it that explicitly or implicitly constitutes a finding that transfer restrictions in § 500i could be "easily circumvented

with imported reindeer" or that the Native reindeer industry would be "adversely affected by non-Native commercial reindeer operations" launched with imported reindeer.

Finally, that the IBIA was wrong in concluding that Congress intended the Reindeer Act to require the preservation in perpetuity of the reindeer industry in Alaska as an exclusively Native industry is belied by other provisions of the Reindeer Act itself. For example, § 500a directs the Secretary of the Interior to acquire, *inter alia*, reindeer he deems necessary to effectuate the Act's purpose, but does not expressly mandate purchase of all non-Native owned animals. The possibility that some reindeer might remain in private non-Native ownership is also suggested by the language of § 500b, which requires non-Natives to file with the duly authorized agent of the Secretary, declarations of ownership of reindeer, not only at the time of the initial implementation of the Act, but "at any time after September 1, 1937."

Similarly, § 500f states that the Secretary of Interior is "authorized and directed to organize and manage the reindeer industry or business provided for by this subchapter." Thus, the Secretary is directed to organize only the reindeer industry "provided for in this subchapter," which is the one to be purchased from the non-Natives. The section does not direct the Secretary to organize and manage the entire reindeer industry in Alaska for all time.<sup>4</sup>

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Significantly, as originally introduced by Delegate Dimond, this section of the bill read as follows:

Sec. 6. The Secretary of the Interior is authorized and directed to organize and manage the reindeer industry or business provided for by this Act . . . in such manner as to establish and maintain for said natives of Alaska exclusively a complete and self-sustaining economy.

H.R. 5126, 75th Cong., 1st Sess. However, in the version of the Act that was adopted into

The foregoing provisions, which stop considerably short of a Congressional mandate to maintain the reindeer industry in Alaska as an exclusively Native industry, are consonant with Congress' reluctance to write a "blank check" in regard to the cost of implementing the law, a reluctance which is reflected in the ceiling on authorized appropriations, and the establishment in § 500e of an "off-budget" revolving fund for administration of the Act. While some of the statements made prior to enactment of the Act suggest that certain proponents wanted a permanent and exclusive reindeer industry for Natives in Alaska, the depression-era Congress was not willing to dictate achievement of such a goal at any cost. Rather, the statute directed the Secretary to exercise his discretion in acquiring reindeer so as to establish and maintain a Native reindeer industry.

- (2) Even if a purpose of the Act were that the entire reindeer industry in Alaska be permanently and exclusively Native-owned, it was not Congress' intent to include in the Act a total ban on the ownership by non-Natives of non-Alaska reindeer as one of the means for accomplishing the Act's purpose.

Even if the Reindeer Act and the legislative history of it could be read to conclude that what Congress sought in enacting the Reindeer Act was the permanent exclusion "of all others than natives from the reindeer business or industry" in Alaska, that conclusion does not decide the question concerning the means that Congress intended to employ to accomplish its purpose. For example, because a person may have the intention and purpose of getting rich does not mean that the person intends to use any means to accomplish that intention and purpose. Put

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law, the word, "exclusively," was deleted.

1 Statement by delegate Dimond on the House floor. 81 Cong. Rec. 9471.