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DEPARTMENT OF
WATER RESOURCES

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**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO IN AND FOR THE COUNTY OF TWIN FALLS**

IN RE: PRBA

Case No. 59576

**SUBCASE NO. 87-7125
(Raymond and Tracy Paz)**

**NEZ PERCE TRIBE'S FIRST
RESPONSE TO OBJECTORS'
RAYMOND AND TRACY PAZ
DISCOVERY REQUESTS**

The Nez Perce Tribe ("Tribe") by and through its counsel of record and, pursuant to the Idaho Rules of Civil Procedure ("I.R.C.P."), hereby responds to Raymond Paz's and Tracy Paz's discovery requests. The responses are based upon the best knowledge, information and belief of the Tribe at this time. The Tribe will supplement its responses consistent with the I.R.C.P. and any orders of the Court.

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GENERAL OBJECTIONS

1. The Tribe objects to the discovery requests to the extent they seek information that the Tribe has not yet had the opportunity to develop fully. To the extent research into issues is not yet complete, all responses made herein are to be considered preliminary in nature and subject to revision and supplementation as the Tribe conducts further research and discovery. The Tribe will make a good faith effort to respond to all legally permissible discovery requests based on discoverable information presently available to the Tribe, with the understanding that the Tribe's responses may require revision or supplementation of some responses in accordance with applicable I.R.C.P. or orders of the Court.

2. The Tribe objects to the definitions and instructions to the extent they purport to require discovery responses beyond that required under the I.R.C.P. Although in some cases, the Tribe may provide information that may go beyond that strictly required under the I.R.C.P., its act of doing so is not a waiver of this objection. These responses are provided in accordance with the I.R.C.P. irrespective of any definitions and instructions that may accompany the discovery requests.

3. These responses are made subject to all objections as to competence, relevance, materiality, and admissibility. These responses are subject to all objections that would require the exclusion of any statement, material, or information provided if such requests were asked of, or any statement, material, or information provided were made by witnesses present and testifying in court. All such objections are reserved and may be interposed at any time, including at trial.

4. The Tribe specifically objects to these discovery requests to the extent they seek information protected by the attorney-client privilege; the deliberative process privilege; or any other privileges as recognized in Article V of the Idaho Rules of Evidence; the attorney work-product doctrine; and the rules governing the discovery relating to experts set forth in I.R.C.P. 26(b)(4). This objection is intended to apply to all discovery requests seeking such information and will not be repeated specifically for each request to which it applies. The Tribe, to the extent applicable and possible, has construed each request as requesting only information not subject to any applicable privilege.

5. No incidental or implied admissions are intended. The Tribe's response to any discovery request or portion thereof should not be taken as an admission that the Tribe accepts that the discovery request or the response or objection thereto constitutes admissible evidence. Similarly, the Tribe's response to all or part of a request is not intended to and shall not be construed to be a waiver by the Tribe of all or any part of any objection to other requests. The Tribe's responses to any discovery request herein do not constitute a waiver of the Tribe's right to object to future additional or supplemental discovery requests regarding the same or similar matters.

6. These discovery responses are provided consistent with a stipulated agreement with counsel on March 13, 2026.

7. The Tribe generally objects to the extent that these discovery requests seek expert witness opinions before the entry of a scheduling order on the cases including the captioned subcase. The Tribe will supplement these answers and responses consistent with any scheduling order entered and in accordance with requirements of the I.R.C.P.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. The Tribe objects to the first and second paragraphs in Definitions and Instructions section of the Requests on the basis that the instructions vary from or exceed the specific obligations imposed by I.R.C.P. 33(b). The Tribe's responses are made in a manner consistent with the I.R.C.P.
2. The Tribe objects to the fourth paragraph of the Definitions and Instructions section of the Requests to the extent the instructions vary from the requirements contained in I.R.C.P. 34, regarding documents that at one time existed but no longer exist. The Tribe's responses are made in a manner consistent with the I.R.C.P.
3. The Tribe objects to the second to last paragraph of the Definitions and Instructions section of the Requests on the basis that the instructions vary from the requirements contained in I.R.C.P. 33, 34, and 36. The Tribe's responses are made in a manner consistent with the I.R.C.P.
4. The Tribe objects to the definition of "you" and "your" in the Definitions and Instructions section of the Requests because the definition confuses the distinction between the United States and the Nez Perce Tribe and improperly appears to expand discovery to other parties. The Tribe is a sovereign tribal government. The United States filed water right claims in the PRBA in its capacity as trustee for the Nez Perce Tribe and its allottees and as legal owner of the claimed water rights. The Nez Perce Tribe is the beneficial owner of the water rights claimed by the United States. Regardless of whether the water rights claimed may be the same,

the Tribe and the United States are separate entities. The Tribe responds to the Requests on its own behalf; if the Claimants seek discovery from the United States, such discovery should be sought from the United States.

5. The Tribe objects to the definition of “spring” in the Definitions and Instructions section of the Requests because the definition conflicts with the contextual usage of the term “spring” in the Requests. The Tribe notes this inconsistency where it appears in the Requests.

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1. Please describe all information you have relating to the specific Spring that is referenced in the Caption of these discovery requests, including all measurement or knowledge of flow from the specific spring referenced and include how the measurement or knowledge was obtained.

ANSWER: The information that the Tribe has relating to the specific Spring referenced in the above caption is provided in the expert reports previously produced in Subcase No. 87-12105:

- *Palouse River Basin Adjudication Springs Expert Report*, and supporting documents [US0000823 to -2730];
- *A History of Nez Perce Treaty Rights and Traditional Uses of the Palouse River Basin in Idaho*, and supporting documents [US0002731 to -6605];
- *Rebuttal to State of Idaho Experts* [US0011639 to -11661 and US0007104 to -7876];

- *United States Supplemental Disclosure re Springs' Reports* [US_PRBA_00008962 to -14814];
- *The Nez Perce Tribe's Traditional Cultural Connections to and Uses of the Palouse Lands and Waters within the Palouse River Basin*, and supporting documents [NPTPRBA04767 to -6285];
- *Additional Ethnographic and Ethnohistoric Context of Nez Perce Fishing for Resident Fish in the Palouse River Basin: A Rebuttal Report to the State of Idaho's Expert Witness Disclosure* [NPTPRBA06457 to -6524].

Information regarding the spring referenced in the above caption can also be found in the *United States' Standard Form 1 Objection* (filed Jan. 10, 2022), the *Nez Perce Tribe's Joinder in United States Objection to Claim* (filed Jan. 10, 2022), and in the *United States' Notice of Claim* form in Subcase No. 87-12105 (filed Dec. 30, 2019).

As discovery is ongoing in this matter, the Tribe will supplement its answer as additional information becomes known or in accordance with any litigation schedule entered.

INTERROGATORY NO. 2. Describe fully and in detail the historic use, if any, that the Nez Perce Tribe has made of the specific Spring that is referenced in the Caption of these discovery requests and specifically answer each of the following questions:

- a. Date when the spring was used, accessed or observed;
- b. Names of person(s) who used, accessed or observed the spring;
- c. Describe the purpose(s) for which the spring was used, accessed or observed.

ANSWER: The Tribe objects to this Interrogatory because it seeks information beyond the scope of I.R.C.P. 26(b)(1)(A), as the Interrogatory, including each subpart, is not relevant to any party's claim or defense. The Tribe's basis for joinder in the objection to the specific Spring referenced in the Caption of these discovery requests does not require a showing of use of the specific Spring that is referenced in the Caption of these discovery requests, but is based upon rights reserved in the Treaty with the Nez Perces, June 11, 1855, 12 Stat. 957 ("1855 Treaty") and Treaty with the Nez Perces, June 9, 1863, 14 Stat. 647 ("1863 Treaty"). Article 8 of the 1863 Treaty provides:

The United States also agree to reserve all springs or fountains not adjacent to, or directly connected with, the streams or rivers within the lands hereby relinquished, and to keep back from settlement or entry so much of the surrounding lands as may be necessary to prevent the said springs or fountains being enclosed; and, further, to preserve a perpetual right of way to and from the same, as watering places, for the use in common of both whites and Indians.

Treaty rights and federal reserved water rights are not subject to forfeiture or abandonment for nonuse.

INTERROGATORY NO. 3. Describe fully and in detail all the facts that support the Nez Perce Tribe's claim to the Spring that is referenced in the Caption of these discovery requests, including but not limited to how the Spring was identified to be claimed.

ANSWER: The Tribe objects to this Interrogatory on the basis that the Tribe is not the claimant in the subcase that is referenced in the Caption of these discovery requests, but joined in an objection to the claim made by the United States. The Tribe also joined a claim made by the United States to this spring in a separate subcase,

Subcase No. 87-12105. The Tribe filed a joinder in the United States' claim on October 16, 2023, and the Court entered an *Order Granting the Motion to Join* on December 12, 2023. The Tribe further objects to this Interrogatory as premature. Contentions interrogatories are premature where there has not been a substantial amount of discovery, and such interrogatories will do more to advance litigation when the parties are in possession of facts obtained from a meaningful amount of discovery.

Subject to and without waiving the objections, at this time, the Tribe states that the facts supporting the claim which was made by the United States as Trustee for the Nez Perce Tribe, are contained in the previously produced expert reports, *The Nez Perce Tribe's Traditional Cultural Connections to and Uses of the Palouse Lands and Waters within the Palouse River Basin* [NPTPRBA04767 to -6285], *A History of Nez Perce Treaty Rights and Traditional Uses of the Palouse River Basin in Idaho* [US0002731 to -6605], *Palouse River Basin Adjudication Springs Expert Report* [US0000823 to -2730], *Additional Ethnographic and Ethnohistoric Context of Nez Perce Fishing for Resident Fish in the Palouse River Basin: A Rebuttal Report to the State of Idaho's Expert Witness Disclosure* [NPTPRBA06457 to -6524], and the supporting documents produced with the reports.

The claim is supported by the Treaty with the Nez Percés, June 11, 1855, 12 Stat. 957 ("1855 Treaty") and the Treaty with the Nez Percés, June 9, 1863, 14 Stat. 647 ("1863 Treaty"). Article 8 of the 1863 Treaty provides:

The United States also agree to reserve all springs and fountains not adjacent to, or directly connected with, the streams or rivers within the lands hereby relinquished, and to keep back from settlement or entry so much of the

surrounding lands as may be necessary to prevent the said springs or fountains being enclosed; and, further, to preserve a perpetual right of way to and from the same, as watering places, for the use in common of both whites and Indians.

The Tribe also incorporates the United States' answer to Interrogatory No. 3.

INTERROGATORY NO. 4. Describe fully and in details what “watering places” means as contained in Article 8 of the 1863 Nez Perce Treaty.

ANSWER: The Tribe objects to this Interrogatory to the extent that it seeks a legal conclusion regarding the interpretation of the phrase “watering places” in the 1863 Treaty. The 1863 Treaty and the contemporaneous historical documentation of the 1863 Treaty proceedings are the best evidence of the meaning of the phrase “watering places” as used in Article 8 of that treaty.

Subject to and without waiving the objection, the Tribe’s various traditional uses of the springs as watering places are discussed throughout the previously produced report, *The Nez Perce Tribe’s Traditional Cultural Connections to and Uses of the Palouse Lands and Waters within the Palouse River Basin* [NPTPRBA04767 to -6285].

As the report indicates,

In all, the many springs of the PRB – connected directly and indirectly to other Nez Perce places like villages, camp sites, gathering grounds, pasturing areas, and the trails to and from these places – are all an important part of Nez Perce traditional practices and lifeways, a part of the larger and interconnected traditional cultural landscape of the PRB. Within this landscape, the many spring-fed water sources are not only used for drinking, but for ceremony, for sweat, for cold water conditioning, for the pasturing of horses, among other uses. These other multivalent uses are detailed further in the following subsections, although as noted previously, Nez Perce worldviews and epistemology defy easy categorization.

[NPTPRBA04813].

The report previously produced by the United States, *A History of Nez Perce Treaty Rights and Traditional Uses of the Palouse River Basin in Idaho* [US0002731 to -6605] also discusses the use of springs as watering places:

In addition to relying on springs for drinking water, food preparation, and livestock watering, Nez Perce Tribal members also used both hot and cold springs for medicinal and ceremonial purposes.

* * *

Nez Perce elder and historian Allen Pinkham likewise commented on the importance of springs to the Nimiipuu, writing that they represented “the ultimate medicine, the ultimate visible tangible power available.”

[US0002761].

The Tribe has traditionally used such springs for a variety of purposes, including drinking, livestock watering, cooking, hunting game, gathering food and medicines, bathing, making horn bows and certain religious and ceremonial uses. These uses are within the meaning of the term “watering places” as the Nez Perce people would have understood it.

The Tribe also incorporates the United States’ answer to Interrogatory No. 4.

INTERROGATORY NO. 5. Please identify any spring claim in this adjudication for which you did not file an objection.

ANSWER: The Tribe objects to this Interrogatory as beyond the scope of I.R.C.P. 26(b)(1)(A). The Interrogatory is not relevant to any party’s claim or defense, because neither entitlement nor quantification of the springs claim referenced in the caption depends on what springs claims the Tribe did not object to. The Tribe also objects to the extent the term “spring” in this Interrogatory is used in a manner that is not consistent with the definition of “spring” in the Definitions and Instructions section of the

discovery. Further, the Tribe objects to this Interrogatory because it is overly broad and unduly burdensome.

Subject to and without waiving its objections, the Tribe states that it joined in objections in the PRBA made by the United States in its role as Trustee on behalf of the Tribe, that the United States may have the information sought by this Interrogatory, and that the information sought is equally available to all parties to the PRBA.

The Tribe also incorporates the United States' answer to Interrogatory No. 5.

INTERROGATORY NO. 6. Please identify any spring you have knowledge of that is not adjacent to or directly connected with the streams or rivers within the lands relinquished under the 1863 Treaty.

ANSWER: The Tribe objects to this Interrogatory as beyond the scope of I.R.C.P. 26(b)(1)(A). The Interrogatory is not relevant to any party's claim or defense for the subcase referenced in the Caption. The Tribe also objects to the extent the term "spring" in this Interrogatory is used in a manner that is not consistent with the definition of "spring" in the Definitions and Instructions section of the discovery. Further, the Tribe objects to this Interrogatory as overly broad and unduly burdensome, as it includes lands ceded in the 1863 Treaty that are not located in Basin 87.

Subject to and without waiving the objections, the Tribe states that the following claims in the PRBA meet the criteria of this Interrogatory: 87-12007 to 87-12033, 87-12036 to 87-12052, 87-12054 to 87-12057, 87-12059 to 87-12060, 87-12062 to 87-12064, 87-12066 to 87-12069, 87-12171 to 87-12086, 87-12088 to 87-12093, 87-12095 to 87-12148, 87-12150 to 87-12156, 87-12159, 87-12161 to 87-12163,

87-12165 to 87-12174, 87-12176, 87-12337 to 87-12340, 87-12342 to 87-12344, 87-12346, 87-12364 to 87-12366.

INTERROGATORY NO. 7. Please describe all of the steps you took to determine whether or not the Spring that is referenced in the Caption of these discovery requests is adjacent to or directly connected with a stream or river.

ANSWER: The Tribe objects to this Interrogatory because it does not define “adjacent to or directly connected with,” making this request ambiguous.

Subject to and without waiving the objection, the Tribe states that the methodology used to determine whether or not springs for which claims were made in the PRBA were adjacent to or directly connected with a stream or river, as those terms are used in the 1863 Treaty, is explained in the previously produced report, *Palouse River Basin Adjudication Springs Expert Report* [US0000823 to -870], §§ 3.2, 4.4 and 7.0.

The Tribe also incorporates the United States’ answer to Interrogatory No. 7.

INTERROGATORY NO. 8. Please describe what you believe to be the definition of ‘adjacent to or directly connected with’ as it relates that term used in the 1863 Treaty upon which you rely.

ANSWER: The Tribe objects to this Interrogatory because it seeks a legal conclusion as to the interpretation of the phrase “adjacent to, or directly connected with” found in Article 8 of the 1863 Treaty. The 1863 Treaty and contemporaneous historical documentation of the 1863 Treaty proceedings speak for themselves and are the best evidence of the meaning of the phrase “adjacent to, or directly connected with” as used in Article 8.

Subject to and without waiving its objection, the Tribe responds that the terms “not adjacent to” and “directly connected with” in Article 8 of the 1863 Treaty must be defined in accordance with their ordinary plain meaning at the time the Treaty was entered into and in a way that gives their practical meaning the effect as the terms would have been understood by the Tribe and United States treaty negotiators. These terms in Article 8 were meant to convey the common or lay understandings of the time period and not technical, legal or scientific understanding. The meaning of “adjacent” which gives effect to the 1863 Treaty is “next to, contiguous, bordering upon.” Given the limited state of hydrologic knowledge at the time of the 1863 Treaty, the meaning of “directly connected with” must be read to apply only to a surface connection between the subject spring’s natural, perennial flow through a continuous channel that reaches and is deposited into a perennial stream or river. In other words, Article 8 of the 1863 Treaty reserves “all springs” within the ceded area, except for those which are shown to be either next to a perennially flowing stream or river or otherwise directly connected over the surface in a perennially flowing way to such stream or river. Given the Tribe’s intimate familiarity with the area based on its exclusive use and occupancy of the area over a long period of time, and the importance of springs to the Tribe given the relative scarcity of water in the area, the Tribe and United States treaty negotiators would likely have viewed the springs reservation broadly, and exceptions narrowly, and would likely have understood the qualification to exclude only springs which are in the beds of a stream or river or contiguous thereto. The 1863 Treaty “must therefore be construed, not according to the technical meaning of its words to learned lawyers, but in the sense in which they

would naturally be understood by the Indians.” *Washington v. Wash. State Com. Passenger Fishing Vessel Ass’n*, 443 U.S. 658, 676 (1979) (citation omitted). To the extent the meaning of these terms is not answered in the historical record or is ambiguous, the canons of Indian treaty construction must be applied.

The Tribe also incorporates the United States’ answer to Interrogatory No. 8.

INTERROGATORY NO. 9. Describe fully and detail the basis for the quantity claimed for the claim listed above including why that quantity is the amount needed for the purposes claimed.

ANSWER: The Tribe objects to this Interrogatory as vague and impermissibly compound. First, the phrase “claim listed above” is vague and undefined. The Tribe is not the claimant to the subcase that is referenced in the Caption of these discovery requests, but joined in an objection to the claim made by the United States. The Tribe joined a claim to this spring in a separate subcase, Subcase No. 87-12105. The Tribe filed a joinder in the United States’ claim on October 16, 2023, and the Court entered an *Order Granting the Motion to Join* on December 12, 2023. Further, the phrase “fully and detail” is vague and the Interrogatory does not state the “basis” to which it refers (i.e., legal or factual). The claim made by the United States as Trustee for the Nez Perce Tribe in Subcase No. 87-12105 is for one-half of the natural flow of the spring.

Subject to and without waiving the objections, the Tribe states that the basis of the United States’ claim is outlined in the “Basis of Claim” section of the Notice of Claim for No. 87-12105:

The legal basis for this water right includes the following: the reservation of aboriginal rights recognized in *United States v. Winans*, 198 U.S. 371 (1907) [sic], and its progeny; the Treaty of 1855 between the United States of America and the Nez Perce Indians, U.S.-Nez Perce Indians, June 11, 1855, 12 Stat. 957 (“1855 Treaty”); the Treaty of 1863 between the United States of America and the Nez Perce Indians, U.S.-Nez Perce Indians, June 9, 1863, 14 Stat. 647 (“1863 Treaty”); the circumstances surrounding the establishment of the Nez Perce Reservation; the doctrine of federal reserved water rights articulated in *Winters v. United States*, 207 U.S. 564 (1908), and its progeny; and the interpretation of treaties in *Washington v. Wash. State Commercial Passenger Fishing Vessel Ass’n*, 443 U.S. 658 (1979), and its progeny.

The Tribe also incorporates the United States’ answer to Interrogatory No. 9.

INTERROGATORY NO. 10. Describe fully and in detail your answers to Request for Admissions 1 through 5 below.

ANSWER: The Tribe states that it responded to the Request for Admissions in accordance with I.R.C.P. 36.

The Tribe also incorporates the United States’ answer to Interrogatory No. 10.

RESPONSES TO REQUEST FOR ADMISSION

REQUEST FOR ADMISSION 1. Admit that there is no documentary evidence to support that the Nez Perce Tribe or any of its members actually visited or used the spring represented by the above listed claim.

RESPONSE: The Tribe objects to this Request as irrelevant and beyond the scope of I.R.C.P. 26(b)(1)(A), because Article 8 of the 1863 Treaty contains no requirement that the Nez Perce Tribe or any of its members “actually visited or used” the spring at issue in this claim. The Tribe further objects to this Request because it seeks a legal interpretation or calls for a legal conclusion regarding Article 8 of the 1863 Treaty,

which speaks for itself. Subject to and without waiving the objections, the Tribe denies this Request.

REQUEST FOR ADMISSION 2. Admit that there is no non-documentary evidence to support that the Nez Perce Tribe or any of its members actually visited or used the spring represented by the above listed claim.

RESPONSE: The Tribe objects to this Request as vague and ambiguous because “non-documentary” is not defined. The Tribe further objects to this Request as irrelevant and beyond the scope of I.R.C.P. 26(b)(1)(A), because Article 8 of the 1863 Treaty contains no requirement that the Nez Perce Tribe or any of its members “actually visited or used” the spring at issue in this claim. The Tribe further objects to this Request because it seeks a legal interpretation or calls for a legal conclusion regarding Article 8 of the 1863 Treaty, which speaks for itself. Subject to and without waiving the objections, the Tribe denies this Request.

REQUEST FOR ADMISSION 3. Admit that you did not conduct a site visit of the specific Spring referenced in the Caption of these discovery requests.

RESPONSE: Admit.

REQUEST FOR ADMISSION 4. Admit that the Spring referenced in the Caption of these discovery requests is adjacent to or directly connected with Gnat Creek, which is a stream or river.

RESPONSE: The Tribe objects to this Request as vague and ambiguous because it does not define “adjacent to or directly connected with.” The Tribe responds that claim information on file with the Idaho Department of Water Resources (“IDWR”) lists the

spring referenced in caption as “tributary” to Gnat Creek. However, IDWR’s instructions for filing a claim, Form No. 42-1409-1 (found at [Instructions for Filing Notice of Claim | Form 42-1409-1 PRBA \(NIA Phase 2\)](#)), which gathers this information, directs the applicant to “[e]nter the first named stream or lake downstream to which the source is a tributary to on line (b)” without defining what a “tributary” is or how the determination is made. The Tribe denies that this means the spring is “adjacent to, or directly connected with” a stream or river, as that phrase is used in Article 8 of the 1863 Treaty, and therefore denies the Request.

The Tribe also incorporates the United States’ response to Request for Admission No. 4.

REQUEST FOR ADMISSION 5. Admit that if the Spring referenced in the Caption of these discovery requests is adjacent to or directly connected with Gnat Creek, then you have no rights to the Spring under the 1863 Treaty.

RESPONSE: The Tribe objects to this Request as vague and ambiguous because it does not define “adjacent to or directly connected with.” The Tribe therefore denies this Request. Moreover, while the Idaho Department of Water Resources does list the spring referenced in the above caption as a tributary to Gnat Creek, the Tribe denies that this means the spring is “adjacent to, or directly connected with” a stream or river, as that phrase is used in Article 8 of the 1863 Treaty, such that the Tribe has no right to the spring under the Treaty.

The Tribe also incorporates the United States’ response to Request for Admission No. 5.

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1. Produce clear and legible copies of each and every document that supports the answers to ROG 1-10 above and ROA 1-5 above.

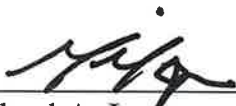
RESPONSE: The documents which support the answers to Interrogatories 1 through 10 and Request for Admissions 1 through 5 are referenced in each of the specific answers and responses. This response will be supplemented pursuant to I.R.C.P. 26(e)(1).

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2. Provide all documents, measurements, reports, studies, and information that relate to the Spring represented by the above listed claim.

RESPONSE: The documents relating to the spring in this matter are the expert reports and other documents identified in the answer to Interrogatory No. 1. These reports and documents have been previously produced to the attorney for Claimants.

The Tribe also incorporates the United States' response to this Request for Production. This response will be supplemented pursuant to I.R.C.P. 26(e)(1).

DATED this 15th day of April, 2026.



Michael A. Lopez
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Nez Perce Tribe



Thomas L. Murphy
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Native American Rights Fund