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10 Attorneys for Plaintiffs

11 IN THE UNITED STATES DISTRICT COURT

12 FOR THE DISTRICT OF ARIZONA

13 Tohono O’odham Nation
14 and Gila River Indian Community,

15 Plaintiffs,

16 v.

17 Mark Brnovich in his official capacity as
18 Attorney General of Arizona; Katie Hobbs,
19 in her official capacity as Arizona
20 Secretary of State; Dana Lewis in her
21 official capacity as Pinal County Recorder;
22 Gabriella Cázares-Kelly in her official
23 capacity as Pima County Recorder; Stephen
24 Richer in his official capacity as Maricopa
25 County Recorder,

26 Defendants.

No.

COMPLAINT

27 Plaintiffs Tohono O’odham Nation and Gila River Indian Community (“Tribes”)
28 bring this Complaint against Defendants Arizona Secretary of State Katie Hobbs,
Arizona Attorney General Mark Brnovich, Pinal County Recorder Dana Lewis, Pima
County Recorder Gabriella Cázares-Kelly, and Maricopa County Recorder Stephen
Richer and allege as follows:

INTRODUCTION

1
2 1. Plaintiff Tribes bring this equitable action to challenge the documentary
3 proof of location of residence requirement imposed by Arizona HB 2492. The
4 challenged requirement (hereinafter “DPOR” or “Physical Address Requirement”) will
5 disenfranchise significant numbers of Native Americans by blocking Arizonans who
6 reside in a dwelling that does not have a standard physical address assigned to it—a
7 circumstance that is significantly disproportionately common for Native Americans
8 across many areas of the state—from registering to vote in federal, state, and local
9 elections.

10 2. Plaintiffs are imminently threatened with a concrete and particularized
11 injury in fact that is fairly traceable to the challenged action of the Defendants. As a
12 result of the Physical Address Requirement, people who live in housing that does not
13 have a standard physical address will either be completely unable to register to vote, or
14 will be unable to register to vote without overcoming the severe burden of both
15 obtaining a standard street address for their home and having that address added to their
16 identifying documents—a process that can take years, or even decades, and is largely
17 out of the control of individual voters.

18 3. This DPOR requirement serves no governmental interest, let alone one
19 sufficiently compelling to justify the severe burden that will be imposed on Native
20 voters, and others in Arizona who lack standard addresses, if this provision is allowed
21 to take effect. To the contrary, Arizona has for years implemented a successful voter
22 registration and list maintenance program that allows voters who lack standard physical
23 addresses to submit a description and/or graphic depiction of their location of residence,
24 using either the state or federal voter registration form. The DPOR requirement thus
25 constitutes a violation of the fundamental right to vote guaranteed by the First and
26 Fourteenth Amendments to the United States Constitution for eligible voters who live
27 in housing without a standard physical address.
28

1 *of the Tohono O’odham Nation*, art. V § 1 & art. VII § 1 (March 6, 1986). Among the
2 enumerated powers of the Council and Chairman are the authority to promote, protect
3 and provide for public health, peace, morals, education, and general welfare of the
4 Tohono O’odham Nation and its members and to act as the official representative of
5 the Tohono O’odham Nation. *Id.*, art. VI § (1)(c)(2) & art. VII § (2)(f).

6 9. Approximately, 6,713 voting age individuals live on Tohono O’odham
7 lands. *2020 Census State Redistricting Data (Pub. L. No. 94-171) Summary File*
8 *Prepared by the U.S. Census Bureau, 2021 as published by Caliper Corporation*. Many
9 of those individuals are Tohono O’odham members who will be eligible to register to
10 vote on January 1, 2023. A significant majority of Tohono O’odham members do not
11 have a standard physical address and therefore will be unable to satisfy the DPOR
12 requirement.

13 10. Plaintiff Tohono O’odham Nation brings this action *parens patriae* to
14 protect Tohono O’odham members’ general welfare, which includes the right to vote
15 free from discrimination and undue burden, and to protect its place in the federal system
16 through protection of its members voting rights.

17 11. Plaintiff Gila River Indian Community is a federally recognized Tribe
18 with approximately 21,300 enrolled members. 87 Fed. Reg. 4636, 4638 (January 28,
19 2022). The Community is governed by the Gila River Community Council, which has
20 among its enumerated powers the authority to promote and protect the health, peace,
21 morals, education, and general welfare of the Community and its members and to act
22 for and on behalf of those members. *Constitution and Bylaws of the Gila River Indian*
23 *Community of Arizona*, art. XV, § 1(a)(9) (codified by Gila River Indian Community
24 Council on July 7, 2021).

25 12. Approximately, 9,268 voting age individuals live on the Gila River
26 Reservation. *2020 Census State Redistricting Data (Pub. L. No. 94-171) Summary File*
27 *Prepared by the U.S. Census Bureau, 2021 as published by Caliper Corporation*. Many
28 of those individuals are Gila River members who will be eligible to register to vote on

1 January 1, 2023. A significant number of Gila River members do not have a standard
2 physical address and therefore will be unable to satisfy the DPOR requirement.

3 13. Plaintiff Gila River Indian Community brings this action *parens patriae*
4 to protect Gila River members' general welfare, which includes the right to vote free
5 from discrimination and undue burden, and to protect its place in the federal system
6 through protection of its members' voting rights.

7 Defendants

8 14. Defendant Katie Hobbs, as Arizona's Secretary of State, serves as the
9 chief state election officer for Arizona. A.R.S. § 16-142. The Secretary of State is a
10 statewide elected public officer and is responsible for supervising voter registration
11 throughout the state, including implementation of HB 2492 when it goes into effect.
12 The Secretary of State is responsible for providing binding regulations and guidelines
13 for voter registration. Ariz. Const. art. 5, § 1(A); A.R.S. § 16-142. The Secretary of
14 State also issues the Arizona Election Procedures Manual
15 (https://azsos.gov/sites/default/files/2021_EPM_October_1_Submission.pdf), which
16 establishes voter registration procedures for all of Arizona's counties. A.R.S. § 16-452.
17 The Manual is approved by the Governor and the Arizona Attorney General and carries
18 the force of law. A.R.S. § 16-452(B). Katie Hobbs is sued in her official capacity.

19 15. Defendant Mark Brnovich, as Arizona's Attorney General, is the State's
20 chief legal officer, A.R.S. § 41-192, and is authorized to approve voter registration
21 procedures issued by the Secretary of State, A.R.S. § 16-452, and enforce Arizona's
22 election laws in "any election for state office . . . through civil and criminal actions,"
23 A.R.S. § 16-1021. The Attorney General is responsible for enforcing HB 2492 when it
24 goes into effect. Mark Brnovich is sued in his official capacity.

25 16. Defendants Dana Lewis, Gabriella Cázares-Kelly, and Stephen Richer
26 are sued in their official capacities as Arizona County Recorders in the counties where
27 the Tohono O'odham Nation and the Gila River Indian Community are located. They
28 are independent chief election officers at the local level in the State of Arizona. In that

1 capacity, they are responsible for the implementation and enforcement of HB 2492
2 relating to the processing of the Physical Address Requirement, processing voter
3 registration forms, rejecting a voter's registration form, and canceling a voter's
4 registration.

5 **FACTUAL BACKGROUND**

6 17. The State of Arizona is home to twenty-two federally recognized Native
7 American tribes and encompasses all or part of twenty Native American reservations.
8 Altogether, those reservations cover more than nineteen million acres, which is more
9 than one-quarter of all land in Arizona. Those reservations are home to approximately
10 162,000 individuals, including over 121,000 voting age citizens. *2020 Census State*
11 *Redistricting Data (Pub. L. No. 94-171) Summary File Prepared by the U.S. Census*
12 *Bureau, 2021 as published by Caliper Corporation.*

13 18. Homes on Native American reservations in Arizona are significantly
14 more likely to lack a standard physical address, as compared to homes in non-Native
15 areas. For example, one study found that approximately 86 percent of Arizona's non-
16 Hispanic white voters outside of Pima and Maricopa counties have standard, mailable
17 addresses, compared to only 18 percent of Native voters—a disparity of over 350
18 percent. Rodden, Ph.D., Jonathan, *Second expert Report in Ariz. Democratic Party, et*
19 *al. v. Michelle Reagan, et al.*, Case No. 16-10650-PHX-DLR (amended Sept. 12, 2017).

20 Current mechanism for specifying residence location

21 19. Arizona law already requires voter registration applicants to provide their
22 residence address or location. The purpose of that requirement is to allow election
23 administrators to identify the precinct where voters live so they can be provided with
24 the correct ballot.

25 20. To collect residence location information from registrants, the voter
26 registration form created by the state of Arizona (the State Form) directs applicants to
27 provide their residential address or, if the registrant does not have a street address, to
28 "describe [the] location [of their residence] using mileage, cross streets, parcel #,

1 subdivision name/lot, or landmarks” and to “[d]raw a map and/or provide
2 latitude/longitude or geocode in Box 23 if located in a rural area without a traditional
3 street address.” Ariz. Voter Reg. Form available online at:
4 https://azsos.gov/sites/default/files/voter_registration_form.pdf.

5 21. Similarly, the voter registration form created by the federal Election
6 Assistance Commission (EAC) (the Federal Form), directs registrants to provide their
7 home address or, if the registrant does not have a street address, to “show where [they]
8 live” using the map in Box C. Federal Voter Registration Form available online at:
9 https://www.eac.gov/sites/default/files/eac_assets/1/6/Federal_Voter_Registration_E
10 [NG.pdf](https://www.eac.gov/sites/default/files/eac_assets/1/6/Federal_Voter_Registration_E).

11 22. Due to the lack of addresses on reservation homes or to the unfamiliarity
12 with Tribal addressing systems, many Arizona voters from Native American areas,
13 including from Gila River and Tohono O’odham, register by drawing a map of the
14 location of their residence and have done so without issue for years.

15 *Documentary proof of location of residence requirement in HB 2492*

16 23. Against the backdrop of the lack of addresses on Arizona reservations
17 and a working system for identifying voters’ location of residence, Arizona passed HB
18 2492, which makes documentation that proves the physical location of the applicant’s
19 residence a requirement of voter registration in Arizona.

20 24. Under the new law, the documents proscribed in A.R.S. § 16-579(A)(1)
21 constitute satisfactory proof of location of residence. To meet the standards of A.R.S.
22 § 16-579(A)(1), the individual must provide a government-issued photo ID that
23 contains or is paired with another document that contains the ID holder’s current
24 physical address or, if photo ID isn’t provided, the individual must provide two items
25 or documents that contain their current physical address. In any case, all of the options
26 proscribed in that section of statute require at least one document that contains the
27 applicant’s current physical address. A P.O. Box number will not qualify.
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1 Native-majority areas of the County. Pima County Development Services, *Pima County*
2 *Geospatial Data Portal*, accessed in October 2022, available at;
3 [https://gisopendata.pima.gov/datasets/pima-county-official-address-](https://gisopendata.pima.gov/datasets/pima-county-official-address-points/explore?location=31.977155%2C-111.875000%2C9.57)
4 [points/explore?location=31.977155%2C-111.875000%2C9.57](https://gisopendata.pima.gov/datasets/pima-county-official-address-points/explore?location=31.977155%2C-111.875000%2C9.57).

5 29. As a result, a significant majority of people living in Native areas of Pima
6 County will be unable to participate in the election of their county, state legislative, and
7 congressional representatives due to the DPOR requirement in HB 2492, while people
8 living in white-majority areas will be largely unaffected.

9 30. Without physical addresses or postal routes in their community, most
10 members of the Tohono O’odham Nation who reside on the Tohono O’odham Indian
11 Reservation receive their mail delivery at post office boxes. Thus, the address
12 reservation residents commonly use for identification purposes is the family P.O. Box
13 number, which is not sufficient to satisfy the Physical Address Requirement in HB
14 2492.

15 31. Most members of the Tohono O’odham Nation who reside on the Tohono
16 O’odham Indian Reservation do not have any documents that include both their name
17 and an address corresponding with the physical location of their home. For these Tribal
18 members, documents that typically might include such an address if they did have
19 one—for example a lease, utility bill, bank statement, or vehicle registration—instead
20 contain the family’s P.O. Box number, list the name of another household member, or
21 both. These documents thus do not satisfy the Physical Address requirement under HB
22 2492.

23 32. There is no process available for members of the Tohono O’odham
24 Nation who reside on the Tohono O’odham Indian Reservation to obtain a physical
25 address for their home on their own, preventing them from complying with the
26 requirements under HB 2492.

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Gila River Indian Community

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2 33. The Gila River Indian Community is located on the Gila River Indian
3 Reservation, which lies entirely within the state of Arizona, south of the city of Phoenix.
4 Approximately 14,000 people, including a voting age population of 9,268 individuals,
5 reside on the reservation in 3,516 occupied housing units. *2020 Census State*
6 *Redistricting Data (Pub. L. No. 94-171) Summary File Prepared by the U.S. Census*
7 *Bureau, 2021 as published by Caliper Corporation.*

8 34. A majority of Gila River Community members who live on the Gila River
9 Indian Reservation do not have any identifying documents that include the physical
10 address assigned to their home by the Community. Even for the minority of Community
11 members who do have such documentation, it is unknown whether Community-
12 assigned addresses will be accepted for the purpose of satisfying the Physical Address
13 Requirement.

14 35. The U.S. Postal Service has informed the Community that, aside from a
15 portion of the Community's District 4 that is directly adjacent to the off-reservation city
16 of Chandler, home mail delivery will not be provided to the reservation. As a result of
17 the lack of home mail delivery, most Gila River Community members who live on the
18 Gila River Indian Reservation have a post office box which they use to send and receive
19 mail. Commonly, the address Gila River residents use for identification purposes is
20 their family P.O. Box number. These P.O. Boxes addresses do not satisfy the Physical
21 Address requirement under HB 2492.

22 36. These Community members, which include individuals who will become
23 eligible to register to vote after January 1, 2023, typically do not have any documents
24 that include both their name and an indicator of the physical location of their home
25 sufficient to satisfy the Physical Address requirement under HB 2492. For these Tribal
26 members, documents that typically might include such an address if they did have
27 one—for example a lease, utility bill, bank statement, or vehicle registration—instead
28 typically contain the family's P.O. Box number, are in the name of another household

1 member, or both. These documents thus do not satisfy the Physical Address
2 requirement under HB 2492.

3 37. The Community’s Land Use, Planning, and Zoning Department (LUPZ)
4 can provide a homeowner or lessee a document that identifies the address the
5 Community has assigned to their housing. But LUPZ cannot provide similar
6 documentation to other family members in the household who are not also listed as an
7 owner or lessee.

8 38. In many cases, it would require Community members to navigate a
9 lengthy and burdensome process involving multiple government offices for household
10 members who are not listed as owners or lessees to obtain documentation of the address
11 assigned to their home by the Community. First, the owner or lessee would have to get
12 documentation of their home’s Community-assigned address from LUPZ. Next, the
13 other household members would have to apply for an Arizona ID using their family
14 members’ LUPZ document or visit another tribal department to obtain documentation
15 that they reside with their family member who was able obtain documentation of their
16 address from LUPZ.

17 39. Thus, even if it were clear that Community-assigned addresses are
18 sufficient to satisfy the DPOR requirement—which it is not—many Community
19 members would be unable to complete the burdensome process required to obtain
20 identification documents containing that address sufficient to satisfy the DPOR
21 requirement.

22 *Enactment of HB 2492’s Physical Address Requirement*

23 40. During hearings on the legislation, witnesses testified that the law would
24 prevent Native Americans who live in housing without a physical address from
25 registering to vote. Retired Army Lieutenant Colonel Dana Almond testified that “proof
26 of address deters those with nonstandard addresses such as [people from] Native
27 American reservations.” *Voter Registration; verification; citizenship: Hearing on H.B.*
28 *2492 Before the S. Jud. Comm., 55th Leg. 2nd Reg. Sess. (Ariz. 2022).* The ACLU of

1 Arizona testified that “Native American voters without traditional addresses recognized
2 by the postal service ... would be forced to provide documentary proof of residence
3 that they may not have or that may not even exist.” *Id.* The Arizona Asian American
4 Native Hawaiian and Pacific Islander for Equity (“AZ AANHPI for Equity”) Nonprofit
5 asked, “what does this bill mean for Native American tribes that do not have standard
6 addresses?” *Id.* The bill sponsors and other legislators that voted yes on the bill ignored
7 the warnings and passed the bill anyway.

8 41. None of the supporting legislators offered any rationale whatsoever for
9 why the Physical Address Requirement is needed to meet their stated goals of
10 preventing non-citizens from voting.

11 42. The Federal Form does not require documentary proof of where the
12 registrant’s home is located.

13 43. If the Physical Address Requirement is implemented, registrants who are
14 not able to meet it have no other opportunity under the State’s entire system to register
15 to vote.

16 **CLAIMS FOR RELIEF**

17 **COUNT I**

18 **National Voter Registration Act Section 6, 52 U.S.C. § 20505**

19 **Failure to Accept and Use Federal Form**

20 **(On Behalf of All Plaintiffs and as to All Defendants)**

21 44. The National Voter Registration Act (NVRA) requires that states “accept
22 and use the mail voter registration application form prescribed by the Election
23 Assistance Commission pursuant to section 20508(a)(2) . . .for the registration of voters
24 in elections for Federal office.” 52 U.S.C. § 20505(a)(1).

25 45. In *Arizona v. Inter Tribal Council of Ariz., Inc.* 570 U.S. 1 (2013)
26 (“*ITCA*”), the Supreme Court held that the NVRA preempted the application of a
27 documentary proof of citizenship requirement passed by Arizona voters in 2004 as
28 applied to registrations for federal elections submitted using the Federal Form.

1 46. After the *ITCA* ruling, the United State District Court for the District of
2 Arizona ordered and declared that the NVRA “precludes Arizona from requiring a
3 Federal Form applicant to submit information beyond that required by the [Federal]
4 form itself.” *Gonzalez v. Arizona*, 2013 WL 7767705, at *1 (D. Ariz. Sept. 11, 2013).

5 47. Currently, to specify the location of their residence, the Federal Form
6 directs people that live in rural areas and that do not have a street address to show where
7 they live by filling in a map at the bottom of the form. The Federal Form does not
8 require further documentary proof of location of residence.

9 48. Despite that, under HB 2492, the DPOR requirement is explicitly applied
10 to all Arizona registrations, including registrations for federal elections using the
11 Federal Form.

12 49. The NVRA precludes Defendants from requiring Federal Form
13 applicants to submit documentary proof of location of residence, as this is plainly not
14 required by the Form itself.

15 50. The NVRA provides that “[a] person who is aggrieved by a violation of
16 [the NVRA] may provide written notice of the violation to the chief election official of
17 the State involved.” 52 U.S.C. § 20510(b)(1). If the violation is not corrected within 90
18 days, or within 20 days if the violation occurred within 120 days before the date of a
19 federal election, “the aggrieved person may bring a civil action . . . for declaratory or
20 injunctive relief . . .” *Id.* § 20510(b)(2).

21 51. Because the violations alleged herein occurred within 30 days before the
22 date of an election for Federal office, pursuant to 52 U.S.C. § 20510(b)(3), Plaintiffs as
23 the aggrieved parties do not need to provide notice to the chief election official of the
24 State before bringing this civil action. *See, e.g., Nat’l Council of La Raza v. Cegavske*,
25 800 F.3d 1032, 1044–45 (9th Cir. 2015) (“Neither the notice nor the complaint needs
26 to specify that the violation has been actually observed, and that there is thus a
27 ‘discrete violation,’ during the 120–day or 30–day period. It is enough that the notice
28

1 letter and the complaint plausibly allege the existence of an ongoing violation within
2 the appropriate time period, whether or not it was “discrete” during the period.”).

3 52. HB 2492 violates Section 6 of the NVRA.

4 53. As a result, many members of Tohono O’odham and Gila River will be
5 unable to register to vote using the Federal Form as required by the NVRA.

6 **COUNT 2**

7 **First and Fourteenth Amendments to the U.S. Constitution; 42 U.S.C.**

8 **§ 1983**

9 **Severe and Unjustifiable Burden on the Right to Vote**

10 **(On behalf of Plaintiff Tohono O’odham Nation and as to all Defendants)**

11 54. A court considering a federal constitutional challenge to a state election
12 law must carefully balance the character and magnitude of the injury to the First and
13 Fourth Amendment rights that the Plaintiffs seek to vindicate, against the justifications
14 put forward by the state for the burdens imposed by the rule. *Burdick v. Takushi*, 504
15 U.S. 428, 434 (1992); *Anderson v. Celebrezze*, 460 U.S. 780, 789 (1983).

16 55. “However slight th[e] burden may appear, ... it must be justified by
17 relevant and legitimate state interests sufficiently weighty to justify the limitation.”
18 *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 191 (2008) (Stevens, J.,
19 controlling op.) (quotation marks omitted).

20 56. “Regulations imposing severe burdens on plaintiffs’ rights must be
21 narrowly tailored and advance a compelling state interest.” *Angle v. Miller*, 673 F.3d
22 1122, 1132 (9th Cir. 2012) (quotation marks omitted). Even a minimal burden on the
23 right to vote “require[s] an assessment of whether alternative methods would advance
24 the proffered governmental interests,” *Dudum v. Arntz*, 640 F.3d 1098, 1114 n.27 (9th
25 Cir. 2011). *See also Soltysik v. Padilla*, 910 F.3d 438 (9th Cir. 2018) (quoting same).

26 57. The documentary proof of residence requirement in HB 2492 imposes a
27 severe, disparate, and/or unjustifiable burden on the fundamental right to vote of people
28 of the thousands of voting age citizens in Arizona who live in housing without a

1 standard physical address. There is no state interest sufficient to justify this burden, as
2 evidenced by the fact that Arizona has for years successfully implemented a voter
3 registration program whereby voters with nonstandard addresses may describe and/or
4 depict their location of residence in a way that fully facilitates all aspects of local
5 election administration, including polling place precinct assignments

6 **PRAYER FOR RELIEF**

7 Plaintiff Tohono O’odham Nation respectfully request that this Court enter
8 judgement and an order granting the relief outline in paragraphs A through F below.

9 Plaintiff Gila River Indian Community respectfully request that this Court enter
10 judgment and an order granting the relief outline in paragraphs A, B, D, E, and F below:

11 A. Declare that the documentary proof of residence requirement in HB 2492
12 violates and is preempted by the NVRA for registration for federal elections submitted
13 using the Federal Form;

14 B. Enjoin Defendants, along with their respective agents, officers,
15 employees, and successors from enforcing the documentary proof of residence
16 requirement as to applications for voter registration for federal elections submitted
17 using the Federal Form;

18 C. Declare that the documentary proof of residence requirement in HB 2492
19 violates Plaintiffs’ fundamental right to vote as guaranteed by the First and Fourteenth
20 Amendments to the U.S. Constitution;

21 D. Enjoin Defendants, along with their respective agents, officers,
22 employees, and successors from implementing or enforcing the documentary proof of
23 residence requirement as to all applications for voter registration submitted using either
24 the state or Federal Form;

25 E. Direct Defendants, under a court-approved plan, to take all appropriate
26 measures necessary to remedy the harm caused by their noncompliance with the NVRA
27 and for their violation of Plaintiffs’ First and Fourteenth Amendment rights, including,
28

1 without limitation, ensuring that individuals affected by their noncompliance are
2 provided remedial opportunities for voter registration;

3 F. Award Plaintiffs their costs, expenses, and reasonable attorney's fees,
4 pursuant to 42 U.S.C. § 1988, 52 U.S.C. § 20510(c), and any other applicable law;

5 G. Grant such other and further relief as the Court deems just and proper.

6 DATED this 7th day of November, 2022.

7 OSBORN MALEDON, P.A.

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