

Dion KILLSBACK, Esq.
KILLSBACK Law PLLC
P.O. Box 294
Busby, MT 59016
(406) 672-4779
dkillsback77@gmail.com
Attorney for Respondents

**IN THE NORTHERN CHEYENNE TRIBAL COURT
OF AND FOR THE NORTHERN CHEYENNE TRIBE
LAME DEER, MONTANA 59043**

IN RE THE MATTER OF:

Case No. C2026-079A

MELISSA FISHER, EVA FOOTE, GWEN
SPOTTED HORSE, STEFAN RAININGBIRD,
MELISSA LONEBEAR, NIZHONI FRIEZ,
DONOVAN LIMBERHAND, HOWARD
ONTIVEROS, EDINA RED STAR, KRISTI
KILLSNIGHT, RYHAL ROWLAND,

**MOTION TO DISMISS FOR LACK OF
SUBJECT MATTER JURISDICTION**

Petitioners,

vs.

LARRY MEDICINE BULL, WESLEY
SPOTTED ELK, ROGER KILLSNIGHT,

Respondents.

COMES NOW, Respondents, Larry Medicine Bull, Wesley Spotted Elk, and Roger
Killsnight, by and through legal counsel, Dion KILLSBACK of KILLSBACK Law PLLC, moves the
court to dismiss the matter, for lack of subject matter jurisdiction, pursuant to the Northern
Cheyenne Constitution.

INTRODUCTION

1 On or around April 15, 2026, Petitioners filed a Verified Complaint, Petition for Declaratory
2 Relief, Injunctive Relief and Writ of Quo Warranto, filed with a Motion for Temporary
3 Restraining Order, Expedited Hearing, and Preliminary Injunctive Relief. On April 30th, the
4 Court issued an Order Lifting a Stay on Temporary Restraining Order, & Vacating and
5 Modifying the April 15, 2026, Temp. Restraining Order ADDENDUM. On April 15, 2026, this
6 Court issued an Order Granting Restraining Order & Scheduling A Hearing on Preliminary
7 Injunction. The Court lacks subject matter jurisdiction over this action because this Court has no
8 authority under the Northern Cheyenne Constitution or the Northern Cheyenne Law and Order
9 Code over Traditional Law matters.
10
11

12 **I. STATEMENT OF FACTS**

- 13 1. Respondents are Traditional Chiefs of the Northern Cheyenne Tribe (“Traditional
14 Chiefs”).
- 15 2. Petitioners are the Former Northern Cheyenne Tribal Council (“Former Northern
16 Cheyenne Tribal Council”), who were removed from office in a series of proceedings
17 beginning September 11, 2025.
- 18 3. The Traditional Chiefs are keepers of the ancient laws of Sweet Medicine.
- 19 4. The authority of the Traditional Chiefs has been recognized since time immemorial.
- 20 5. The authority of the Traditional Chiefs is inherent and continuous, where supremacy
21 resides in the collectively constituted body of Traditional Chiefs.
- 22 6. Northern Cheyenne Traditional Law (“Traditional Law”) does not authorize any
23 supervising or intervening authority over Traditional Chiefs without recognized-standing
24 by the Traditional Chiefs consistent with the historic role of the Council of Forty-Four.
25
26
27
28

- 1 7. Under Traditional Law, Traditional Chiefs are supreme governing authority, which
2 includes, but is not limited to, establishing law, determining peace and treaty decisions,
3 guiding the movement and welfare of the Northern Cheyenne people (the “People”) and
4 maintaining moral and civic order.
5
- 6 8. Northern Cheyenne military societies (“Military Societies”) serve as executive agents of
7 the Northern Cheyenne Traditional Chiefs and operate under their direction to enforce
8 law, maintain camp order, and carry out the decisions of the Traditional Chiefs.
9
- 10 9. On January 26, 1995, the Traditional Military Societies of the Northern Cheyenne Tribe
11 executed their traditional authority and jurisdiction in the retrieval and transfer of the
12 Sacred Buffalo Hat. *See Exhibit 1 - Peaceful Resolution.*
- 13 10. In 1935, the Northern Cheyenne Tribe (“Tribe”) adopted its Northern Cheyenne
14 Constitution (“Constitution”), a boiler-plate constitution imposed upon the Tribe and
15 authorized by the Indian Reorganization Act (IRA) of 1934, with amendments made in
16 1960 and 1996.
17
- 18 11. Constitutions adopted by tribes under the IRA feature a council-style government,
19 requiring federal approval of actions, that were designed to create a recognizable,
20 uniform legal entity and government by European-style standards.
21
- 22 12. On September 11, 2025, the Traditional Chiefs issued a Declaration of the Chief of the
23 Northern Cheyenne Tribe dissolving the Former Tribal Council and removing its
24 members from office: Melissa Fisher, Howard Ontiveros, Stephen Rainingbird, Melissa
25 Lone Bear, Donavin Limberhand, Evan Foots, Nizhoni Freize, Gwen Spottedhorse,
26 Edina, Ontiveros, Kristi Killsnight, and Rhyal Rowland. *See Exhibit 2- Declaration of the*
27 *Chiefs of the Northern Cheyenne Tribe.*
28

- 1 13. On September 12, 2025, Northern Cheyenne President Gene Small (“President Small”)
2 issued an Executive Order No. 1-2025 recognizing the Traditional Chiefs Society of the
3 Northern Cheyenne Nation. *See Exhibit 3 - Executive Order No. 1-2025.*
4
- 5 14. On September 12, 2025, BIA Superintendent Andrew Werk (“Superintendent Werk”)
6 issued a letter stating that the BIA continues to recognize the Tribal Council as the
7 Northern Cheyenne Tribe’s governing body. *See Exhibit 4 - BIA Superintendent Letter,*
8 *dated September 12, 2025.*
9
- 10 15. On September 13, 2025, President Small issued Executive Order No. 2 reaffirming the
11 Traditional Chiefs’ “role as guardians of the people and the land” as well as “keepers of
12 the ancestral authority of the people”. *See Exhibit 5 - Executive Order No. 2.*
13
- 14 16. On September 17, 2025, BIA Superintendent Werk issued a letter withdrawing the former
15 letter issued on September 12, 2025, stating that the “authority and makeup of the Tribal
16 Council are currently the subject of an intra-tribal dispute, and it is the Tribe’s right and
17 responsibility as a sovereign to ‘determine for [itself] the manner and means of resolving
18 such disputes.’” *See Exhibit 6 - BIA Superintendent Letter, dated September 17, 2025.*
19
- 20 17. On September 18, 2025, a temporary appointed council was sworn-in until a special
21 election could be held on October 30, 2025.
22
- 23 18. On October 7, 2026, the Northern Cheyenne Constitutional Court (“Constitutional
24 Court”) issued an Order of Dismissal against the Plaintiffs, Former Tribal Council
25 finding that the Constitutional Court only has jurisdiction to determine whether a Council
26 Enactment is valid or invalid and not to challenge the actions of another party. *See*
27 *Exhibit 7 - Order of Dismissal.*
28

- 1 19. In the Order of Dismissal, the named Defendants were the Traditional Chiefs, who are
2 comprised of the same individuals named as Respondents above in this action. Id.
3
4 20. In The Order of Dismissal, the Plaintiffs, the Former Tribal Council, were challenging the
5 actions of the Traditional Chiefs. Id.
6
7 21. In the Order of Dismissal, the Court states that under Northern Cheyenne Law and Order
8 Code § 2.9.9., “the Constitutional Court only has jurisdiction over claims that the Tribal
9 Council “by resolution, ordinance, or code” in its absolute discretion explicitly empowers
10 the Constitutional Court to adjudicate”.
11
12 22. On October 29, 2025, this Court issued Order No. C2026-015, denying the Former Tribal
13 Council’s request for an emergency injunction to halt the scheduled tribal election on
14 October 30, 2025. *See Exhibit 8 - Order No. C2026-015.*
15
16 23. On October 30, 2025, the Northern Cheyenne Tribe held a special election to elect the
17 Tribal Council (“Tribal Council”). *See Exhibit 9 - Certification of Election Results.*
18
19 24. On November 10, 2025, the Tribal Council issued Resolution No. 84(90) authorizing the
20 Traditional Chiefs and Military Societies in full participation in Northern Cheyenne tribal
21 affairs. *See Exhibit 10 - Resolution No. 84(90).*
22
23 25. On November 20, 2025, the Constitutional Court issued a Final Order No. CC 2026-001
24 affirming President Small’s authority as President of the Northern Cheyenne Tribe who
25 has the right to exercise all presidential authority allowed by the Constitution and Code.
26
27
28

II. ARGUMENT

1. **The Order must be dismissed for lack of subject matter jurisdiction because this Court lacks subject matter jurisdiction under Article IV, Section 3 of the Constitution.**

1 Article IV, Section 3 states in full: “Any right and powers heretofore vested in the Northern
2 Cheyenne Tribe but not expressly referred to in this Constitution shall not be abridged by this
3 article [Powers of the Tribal Council] but may be exercised by the people of the Northern
4 Cheyenne Tribe through the adoption of appropriate bylaws and Constitutional amendments.”
5

6 Here, under Article IV, Section 3, the People of the Northern Cheyenne have duly acknowledged
7 the inherent and continuous authority of the Traditional Chiefs and have chosen to vest through it
8 the traditional rights and power found therein. The Constitution does not infringe or abridge
9 upon any rights of the Traditional Chiefs, or upon Traditional Law, and states that the
10 Constitution reserves the rights and powers vested in the Northern Cheyenne Tribe to be
11 exercised by the People of the Northern Cheyenne Tribe, who recognize the supreme authority of
12 the Traditional Chiefs under Traditional Law—and have since time immemorial.
13
14

15 Here, the Traditional Chiefs predate the Constitution of 1935 by time immemorial, upon which
16 Traditional Law recognizes the Traditional Chiefs as supreme governing authority of the
17 Northern Cheyenne People. Further, Traditional Law does not authorize any supervising or
18 intervening authority over Traditional Chiefs without recognized standing by the Traditional
19 Chiefs consistent with the historic role of the Council of Forty-Four. Thus, this Court does not
20 have standing or any jurisdictional authority of the Traditional Chiefs, or any matter under
21 Traditional Law, whose sole authority is vested upon the collective authority of the Traditional
22 Chiefs consistent with the Council of Forty-Four.
23
24

25 Categorically, this Court does not have the power to remove, enjoin or enforce any powers over
26 Respondents in this matter, or any matter, coming before this Court.
27
28

1 a. Constitution Defers to Traditional Law

2
3 The Northern Cheyenne Law and Order Code (“Code”) repeatedly recognizes and defers to the
4 authority of Traditional Law.

5
6 Under Title III, Juvenile Code, § 3-1-1(E), the Juvenile Code is interpreted and construed “to
7 preserve and utilize Northern Cheyenne traditional approaches and remedies whenever
8 appropriate and in the best interest of the child.” In § 3-2-8(B)(4) of the Juvenile Code, states
9 that “any traditional remedy when appropriate” can be used at an informal adjustment hearing in
10 a proceeding regarding the delinquency of a child in need of intervention.

11
12 In Title VII, Offense Code, § 7-6-2, under the criminal offense of reckless burning, “traditional
13 fires (seat lodges, sundances, etc.) [are] excluded from this section at all times”. In § 7-9-7, the
14 offense of drug paraphernalia “will not apply to any person authorized by applicable law to
15 possess or distribute such items, or any item that is traditionally intended for use with tobacco
16 products.
17

18
19 Under the Title VI, Rules of Evidence Code, Rule 2 states in full: “custom and tradition may be
20 used as evidence. Any conflicting procedural rule shall be superseded by the specific
21 presentation of custom and tradition. When procedural rules are superseded in accordance with
22 this section, the custom and tradition and reasons for its use shall be included in the Findings of
23 Fact and Conclusions of Law prepared by the court. Reservation custom and tradition shall be
24 established by testimony or affidavit of an expert or by the judge. An expert is an elder or other
25 person recognized by the community as knowledgeable in custom and tradition.”
26

27
28 Repeatedly, the Code expressly recognizes the supremacy of Traditional Law.

1
2 b. 1995 Peaceful Resolution

3 The Tribal Council has recognized the traditional authority and jurisdiction of the Traditional
4 Military Societies of the Northern Cheyenne Tribe. On January 26, 1995, in the retrieval and
5 transfer of the Sacred Buffalo Hat, the Tribal Council recognized the inherent power and
6 authority of the Military Societies. *See Peaceful Resolution.*
7

8
9 c. Executive Order No. 1-2025

10 On September 12, 2025, President Small (“President Small”) issued an Executive Order No. 1-
11 2025 recognizing the Traditional Chiefs Society of the Northern Cheyenne Nation. *See Executive*
12 *Order No. 1-2025.*
13

14
15 d. Executive Order No. 2

16 On September 13, 2025, President Small issued Executive Order No. 2 reaffirming the
17 Traditional Chiefs’ “role as guardians of the people and the land” as well as “keepers of the
18 ancestral authority of the people”. *See Executive Order No. 2.*
19

20
21 e. Resolution 84(90)

22 On November 10, 2025, the Tribal Council issued Resolution No. 84(90) authorizing the
23 Traditional Chiefs and Military Societies in full participation in Northern Cheyenne tribal affairs.
24 *See Resolution No. 84(90).*
25

26
27 f. The Constitutional Court has already declared it does not have jurisdiction over any
28 actions made against Traditional Chiefs, as stated in its October 7, 2025 Order.

1 On October 7, 2026, the Constitutional Court issued an Order of Dismissal against the Formal
2 Tribal Council in challenging the actions against the Traditional Chiefs. *See Order of Dismissal.*
3 In the Order of Dismissal, the Constitutional Court found it did not have jurisdiction over the
4 claim and stated that under the Code, “the Constitutional Court only has jurisdiction over claims
5 that the Tribal Council by resolution, ordinance, or code in its absolute discretion explicitly
6 empowers the Constitutional Court to adjudicate”. Id.

8
9 The Tribal Council has not, by resolution, ordinance or code, empowered the Constitutional
10 Court to adjudicate over matters involving Traditional Chiefs. In fact, under the Code, the 1995
11 Peaceful Resolution, Executive Order No.1-2025, Executive Order No. 2, and Resolution 84(90),
12 the Tribal Council has empowered, and upheld Traditional Law, as supreme law of the Northern
13 Cheyenne Nation—whose authority supersedes the Constitution and Code.

15 g. Traditional Law is not subject to judicial review

16
17 Should this Court take action against the Respondents and not grant this Motion to Dismiss, the
18 Court would not have the authority under the Constitution, the Code, or Traditional Law to
19 enforce it. Under the Constitution, the Code, and Traditional Law, this court, or any court, does
20 not grant the review, or any review, of Traditional Law. This authority rests only with the
21 Traditional Chiefs, in accordance with the collective authority of the Council of Forty-Four. The
22 Constitutional Court’s October 7, 2025 Order affirms this.

24
25 Categorically, this Court does not have the power to remove, enjoin or enforce any power or
26 authority over Respondents in this matter, or any matter, coming before this Court. This Motion
27 to Dismiss must be granted.
28

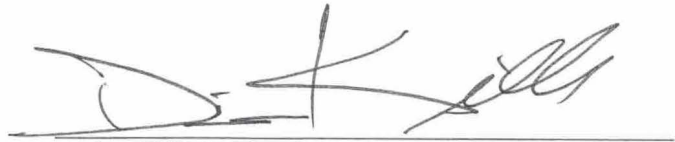
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

III. CONCLUSION

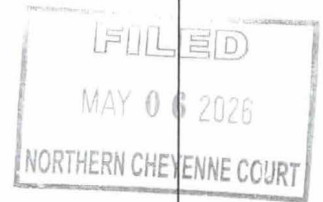
For the reasons stated above, Respondents respectfully requests this Court to dismiss this Motion to Dismiss for lack of subject matter jurisdiction.

Respectfully submitted

this 6th day of May 2026.



Dion KILLSBACK, Esq
KILLSBACK Law PLLC
P.O. Box 294
(406) 672-4779
dkillsback77@gmail.com
Attorney for Respondents



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a full, true and correct copy of the foregoing document: **MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION**

was served by [U.S. Mail, postage prepaid, email] on this 6th day of May 2026, addressed to:

Elmore Limberhand, Lay Advocate for Petitioners
elmoreiilimberhand@gmail.com
P.O. Box 988
Lame Deer, MT 590143

Steve Kelly, Counsel for Petitioners
steve.kelly@trustlandllc.com
Trusland Consultants LLC
1101 47th Ave SW
Minot ND 58701

Deidre Anstead, Counsel for Respondents
daanstad@ctnativelaw.com
2057 Harvney St.
Omaha, NE 68102

Dana Eaglefeathers, Lay Advocate for Respondents
eaglefeathersdana@yahoo.com
P.O. Box 97
Busby, MT 59016

Dion Killsback

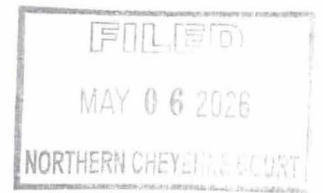


Exhibit 1

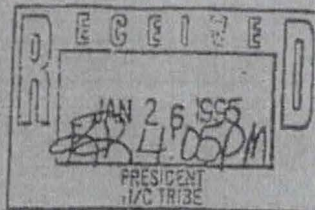
RECEIVED
BUREAU OF ADMINISTRATION

JAN 26 1995

NORTHERN CHEYENNE AGENCY
WYOMING, MONTANA 59043

MILITARY SOCIETIES

NORTHERN CHEYENNE TRIBE



RETURN OF ESEVONE - A PEACEFUL RESOLUTION

Concomitant with the "Peace Resolution" No.167 (95) of the Northern Cheyenne Tribal Council appertaining to the theft and peaceful repatriation of the Sacred Buffalo Hat (Esevone), in accordance with the traditional sovereign governing authority of the Military Societies of the Northern Cheyenne Tribe hereby execute their traditional authority and jurisdiction in the retrieval and transfer of the Sacred Buffalo Hat from James Red Cloud residence to Steve Brady (Keeper) residence (from where it was illegally seized - stolen) and submit herewith a retrieval plan and pertinent information.

1. Immediately after the "Peace Resolution" is executed on by Llevando Fisher, President of the Northern Cheyenne Tribe the following will proceed to retrieve the Sacred Buffalo Hat and in order to ensure that there is not violence the BIA Law Enforcement will escort the designated Military Society Men, and will include:

1. James Francis Kills Night, Sun Dance Priest & Crazy Dog
2. Bernard Red Cherries, Sun Dance Priest & Crazy Dog
3. Alfred Strange Owl, Bow String
4. Vincent White Crane, Bow String
5. Gilbert White Dirt, Elk Horn
6. Clifford Long Sioux, Elk Horn
7. Eugene Big Back, Kit Fox
8. Luke Brady, Crazy Dog
9. Sterling Watan, Observer/Witness
10. Bureau of Indian Affairs Law Enforcement

2. Prior to arrival of the retrieval delegation at the Red Cloud Residence the BIA Law Enforcement will secure the area and maintain a controlled environment at all times while the Sacred Buffalo Hat is being removed to ensure the safety of everyone.

3. Once the Sacred Buffalo Hat and the associated sacred objects are located by the BIA Law Enforcement (including Steve Brady's personal ceremonial items - see list pg.2&3), the Ceremonial and Society men will proceed to retrieve.

4. In accordance with the traditional religious ceremonial procedures the Sacred Buffalo Hat Covenant will be removed from Red Cloud residence and transported on the vehicle of Sterling Watan under the escort of the Military Societies and the BIA Law Enforcement to the Residence of Steve Brady.

Esevone

1/26/95

Pg. 2

5. Upon arrival at Steve Brady residence, with appropriate ceremonial procedures the Sacred Buffalo Hat Covenant will be taken into the lodge (tipi) where inventory will immediately proceed.

5a. In order to ensure that there is no damage and/or missing items in the Sacred Buffalo Hat Bundle, Sterling Watan will be witness of record from the point of transfer from Red Cloud residence to Steve Brady residence and throughout the entire inventory proceeding until the last item is secured back into the Sacred Buffalo Hat Bundle. In addition to this it is requested of the BIA Superintendent to provide one the BIA Law Enforcement Officers as a witness of record (preferably Cheyenne). Since this is a unique and an unusual circumstance, it is imperative that there be witnesses of record to ensure that nothing is removed and that everything is put back into the Sacred Buffalo Hat Bundle (see attached list of items in the Sacred Hat Bundle).

6. Immediately upon completion of inventory, the Military Societies will in accordance with their jurisdiction proceed into a formal session as to the determination and placement of the Sacred Buffalo Hat, including the selection of a Keeper (temporary or otherwise).

The following is a list of sacred items last known to be in or attached to the Sacred Hat Bundle (as of October 1994):

1. Esevone (Sacred Buffalo Hat Covenant)
2. Scalps (5)
3. Sacred Turner (Nimhoyoh)
4. Straight Pipe
5. Weasel (small dark brown animal skin with head)
6. Sweetgrass
7. Buffalo hide pouch (approx. 24" circumference x 24")

The following is a list of Steve Brady's personal ceremonial items that were stolen along with the Sacred Buffalo Hat:

1. Small "L" shaped pipe w/ stem (stem is varnished and has orange and green colors);
2. A "T" shaped pipe w/ dark brown stem;

Esevone

1/26/95

Pg. 3

3. A dark brown leather beaded pipe bag;
4. A small white leather pouch w/ red & blue beads approx. 3"x 4";
5. A white leather (tobacco) pouch w/ red & beads approx. 8"x 10";
6. A cloth (cedar) bag, multi-colored (zig-zag lines) approx. 10"x 10";

Pursuant to the jurisdiction of the Military Societies and in accordance with traditional laws and rules of the traditional religious ceremonial cultural way of life of the Cheyenne, the following have been excommunicated for misconduct (among other things) and cannot participate in any traditional religious ceremonial proceedings for period of 5 years (expires summer of the year 2000):

1. Joe Little Coyote, Sr.
2. Abraham Spotted Elk, Sr.
3. Leonard Elk Shoulder, Sr.
4. Silas Big Left Hand
5. Matthew Two Moons, Sr.

The following cannot participate in any social or religious ceremonial proceedings due to the sacred significance and the stipulations of their vows:

- SUN DANCE PLEDGER:
1. John Russell (did not complete)
 2. Mark Elk Shoulder (did not complete)
 3. Larry Beartusk

- ARROW PLEDGER:
1. Logan Curley
 2. Kenneth Kaline

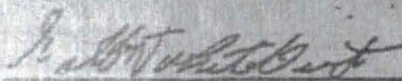
It has been made apparent that the following have recently been involved in the theft and/or illegal concealment of the Sacred Buffalo Hat Covenant and cannot be involved in any way with traditional religious ceremonial proceedings due to the serious nature of their crimes (murder):

1. James Red Cloud
2. Marvin Woodenlegs
3. Joe Morrison, Jr.

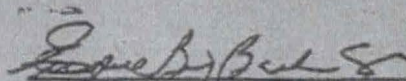
Esevone
1/26/94
Pg. 4

At one time prior to Reservation times when a high crime such as murder was committed the entire family of the offender was excommunicated (exiled). However, in more contemporary times (1960's ca.) the law was amended to where only the individual that committed the crime is held accountable, thus, this law will only be enforced to this extent.

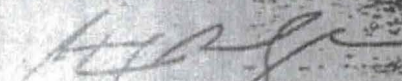
THEREFORE BE IT RESOLVED THIS 26TH DAY OF JANUARY, 1995 BY THE MAJORITY OF THE TRADITIONAL MILITARY SOCIETIES OF THE NORTHERN CHEYENNE TRIBE AND AS EXECUTED BY AND THROUGH THEIR DESIGNATED AND AUTHORIZED REPRESENTATIVES.



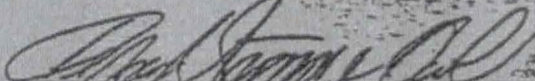
Gilbert White Dirt
Chief Headsman
Elk Horn Society



Eugene Big Back, Sr.
Chief Headsman
Kit Fox Society



Steve Brady, Sr.
Chief Headsman
Crazy Dog Society and
Keeper of Esevone



Alfred Strange Owl
Chief Headsman
Bow String Society

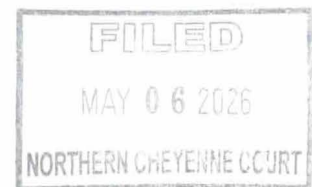


Exhibit 2

DECLARATION OF THE
CHIEFS OF THE NORTHERN CHEYENNE TRIBE

SEP 11 2025
NORTHERN CHEYENNE AGENCY
LAME DEER, MT 59043

We, the undersigned Chiefs of the Northern Cheyenne Tribe we met on Wednesday September 10, 2025 at 6:00 pm with the undersigned Headsmen of the Northern Cheyenne Tribe military societies. We declare the Chiefs have the inherent authority under Northern Cheyenne Traditional Law as follows:

1. We have inherent authority for leading the Northern Cheyenne people, providing guidance and making important decisions for the Cheyenne People.
2. We have inherent authority to interpret and to enforce traditional laws and customs within the Northern Cheyenne Reservation.
3. We have inherent authority to manage the resources of the Northern Cheyenne people for the benefit of the people

We, the Chiefs of the Northern Cheyenne Tribe have decided under our inherent authority to take back control of the Northern Cheyenne Tribal Government. We declare we are dissolving the current Tribal Council due to extensive theft, misuse of monetary sources and misconduct. The Chiefs hereby dissolves the Northern Cheyenne Tribal Council. The Chiefs hereby remove the following Tribal Council Members and other staff as follows:

1. Melissa Fisher, Council member and Sargent of Arms
2. Howard Ontiveros, Council member
3. Stephen Raining Bird, Council member
4. Melissa Lone Bear, Council member
5. Donavin Limberhand, Council member
6. Eva Foote, Council member
7. Nizhoni Freize, Council member
8. Gwen Spotehorse, Council member
9. Edina Ontiveros, Tribal Council secretary
10. Kisti Killnight, Treasurer
11. Ryhal Rowland, Employee

We declare the above persons are hereby banned for life from ever standing for any election with the Northern Cheyenne Tribe or holding any leadership position. The above Tribal Council members and staff are directed to immediately leave the Tribal Building.

We also declare all of the members of the following illegal security team hired by Mellisa Fisher and the above Tribal Council members to be a threat to the people and to have illegally seized the Northern Cheyenne Tribal Building preventing the people from accessing it.

1. Arlio Blackhorse
2. Daulton Gondreau
3. Doreen Sanchez
4. Ryan Foote
5. [illegible]
6. [illegible]
7. [illegible]
8. [illegible]

8. Lynn American Horse
9. Collins Russell
10. Selena Little Old Man
11. James Morrison
12. Dean Braine
13. Billy Graham
14. Baby Son Littlesun

In addition, to any recently hired security members by Melissa Fisher and other council members. The above members of this illegal security team are directed to immediately leave the Tribal Building. The Northern Cheyenne Tribal building is the Peoples Building and shall not be used by the Council members and illegal security team to block the peoples access to the building.

LARRY D. Becraft Sr.

Larry D. Becraft Sr.
Chief

Lyon Seminole

Lyon Seminole
Chief

Residual Killgists

Residual Killgists
Chief

Wesley Spotted Elk
Chief

Larry Medicine Bull

Larry Medicine Bull
Chief

Elvin Standing Elk
Chief

Collins Russell Sr.

Chief Collins Russell Sr.

Chief

Rugie Killgists Sr.

Rugie Killgists Sr.
Chief

Chief

Larry Braden Sr.

Larry Braden Sr.
Headsman, Dog Soldiers

Alvin M. F.
Headsman, Crazy Dogs

Mark Round Horn

Headsman, Bowstrings

Joseph Weasel Bear Hornx 20's

Headsman, Elkhorn Scrapers

Headsman, Swift Foxes

Headsman, Kit Foxes

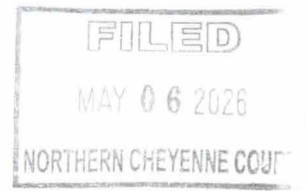


Exhibit 3



NORTHERN CHEYENNE TRIBE

ADMINISTRATION

P.O. Box 128
LAME DEER, MONTANA 59043
(406) 477-6284
FAX (406) 477-6210



RECEIVED
BRANCH OF ADMINISTRATION

September 12, 2025

SEP 12 2025

Executive Order No. 1-2025

NORTHERN CHEYENNE AGENCY
LAME DEER, MT 59043

Declaration of Authority and Continuity

WHEREAS, the Traditional Chiefs Society of the Northern Cheyenne Nation, keepers of the ancient laws of Sweet Medicine, have gathered in solemn council; and

WHEREAS, the Chiefs have recognized the authority of the Office of the President as the rightful guardian of the Cheyenne people; and

WHEREAS, the Chiefs, with the full weight of their sacred duty, have suspended all constitutional procedures of the Tribal Council, having lost confidence in its members to act in the best interests of the Nation; and

WHEREAS, the Chiefs have declared their full faith and trust in the President of the Northern Cheyenne Nation to carry forward the responsibilities of governance in this time of trial;

NOW, THEREFORE, I, Gene Small, President of the Northern Cheyenne Nation, by the recognition and directive of the Sacred Traditional Chiefs Society, do hereby order the following:

1. Suspension of Tribal Council Authority

Effective immediately, all actions, resolutions, and directives of the current Tribal Council are suspended and without force.

2. Full Authority of the Office of the President

The Office of the President shall exercise complete executive and administrative authority over all tribal programs, agencies, and operations of government.

3. Deployment of Protection

The President shall call upon the Bureau of Indian Affairs and all available forces of law and order to protect the people, secure the lands, and safeguard the programs of the Nation.

4. Continuity of Government

All program directors, employees, and officers are directed to report directly to the Office of the President for instructions and authority until further notice.

This declaration is made with the full recognition and sacred endorsement of the Traditional Chiefs Society, whose voice is eternal among the Cheyenne people.

IN WITNESS WHEREOF, I, Gene Small, President of the Northern Cheyenne Nation, do set my hand and affix the Seal of the Nation on this day, September 12, 2025.

THE WOLF AND MORNING STAR - Out of defeat and exile they led us back
to Montana and our Cheyenne homeland that we will keep forever.



Exhibit 4



United States Department of the Interior
BUREAU OF INDIAN AFFAIRS
NORTHERN CHEYENNE AGENCY
P.O. BOX 40
LAME DEER, MONTANA 59043

IN REPLY REFER TO
Executive Directive

September 12, 2025

Gene Small, President
Northern Cheyenne Tribe
P.O. Box 128
Lame Deer, Mt. 59043

Tribal Council Members
Northern Cheyenne Tribe
P.O. Box 128
Lame Deer, Mt. 59043

Dear President Small and Tribal Council Members:

The Bureau of Indian Affairs, in accordance with the Tribe's Amended Constitution and Bylaws, recognizes as the governing body of the Northern Cheyenne Tribe the duly elected Tribal officials listed below:

Gene Small, Tribal President
Ernest Littlemouth, Sr, Tribal Vice President
Howard Ontiveros, Tribal Council Member (Muddy District)
Gwen Spotted Horse, Tribal Council Member (Birney District)
Donavin Limberhand, Tribal Council Member (Lame Deer District)
Theresa Small, Tribal Council Member (Lame Deer District)
Melissa Lonebear, Tribal Council Member (Lame Deer District)
Nizhoni Friesz, Tribal Council Member (Lame Deer District)
Stefan Raining Bird, Tribal Council Member (Busby District)
Torrey Davie, Tribal Council Member (Busby District)
Eva Foote, Tribal Council Member (Ashland District)
Melissa Fisher, Tribal Council Member (Ashland District)

Additionally, per enacted Tribal legislation the Bureau of Indian Affairs also recognizes the Tribal Treasurer Kristi Killnight and Tribal Secretary Edina Ontiveros.

We appreciate and respect the traditional and cultural ways of the Tribe, but at this time the Bureau of Indian Affairs recognizes the Tribal officials listed above as the governing body.

Sincerely,

ANDREW
WERK

Superintendent

Digitally signed by
ANDREW WERK
Date: 2025.09.12
15:11:35 -0600

Northern Cheyenne Confederacy



Exhibit 5