

Exhibit 6



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 Direction

September 17, 2025

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

Dear Tribal Council Members of the Northern Cheyenne Tribe:

On September 12, 2025, the Bureau of Indian Affairs (BIA) issued the enclosed letter (dated September 12, 2025), stating that, the BIA continues to recognize the Tribal Council as the Northern Cheyenne Tribe's governing body.

In its September 12th letter, the BIA also listed by name the individuals whom the BIA considers to be the members of the Tribal Council. The BIA included President Gene Small on the list, even though other members of the Tribal Council had voted to remove President Small from office one day earlier, on September 11, 2025. The BIA included President Small on the list because, as stated in the enclosed letter (dated September 9, 2025), the BIA had concluded that the Tribal Council lacked the authority to hold a hearing to remove President Small.

Upon further review and discussion of the enclosed letters, the BIA is withdrawing the letters based on the BIA's policy of noninterference in intra-tribal governance. The authority and makeup of the Tribal Council are currently the subject of an intra-tribal dispute, and it is the Tribe's right and responsibility as a sovereign "to determine for [itself] the manner and means of resolving such disputes."¹ Absent a pending matter requiring Federal recognition for government-to-government purposes² or a specific "Federal need for action," "the appropriate course is to exercise restraint and defer to tribal mechanisms for the resolution of intra-tribal disputes."³ The enclosed letters are therefore withdrawn. However, should the need arise, the

¹ *Pueblo de San Ildefonso Council of Principally v. Acting Sw. Reg'l Dir.*, 54 IBIA 253, 259 (Feb. 13, 2012) (citation omitted).

² See *Wadena v. Acting Minneapolis Area Dir.*, 30 IBIA 130, 145 (Dec. 11, 1996) ("BIA stepped in and issued a decision only when the situation deteriorated to the point that recognition of some government was essential for Federal purposes, such as maintaining the government-to-government relationship with the tribe or operating P.L. 93-638 grants or contracts.").

³ *Pueblo de San Ildefonso Council*, 54 IBIA at 258-59.

BIA may recognize and deal with a Tribal governing body on an interim basis until resolution of the dispute.⁴

The BIA will continue delivering programs and services on the Northern Cheyenne Reservation while the Tribe works to resolve this dispute. The BIA encourages the Tribe to come together to resolve this matter peacefully.

Sincerely,

ANDREW
WERK

Superintendent

Digitally signed by
ANDREW WERK
Date: 2025.09.17
09:28:53 -06'00'

Enclosures: September 12, 2025 Letter
September 9, 2025 Letter

⁴ See *Goodface v. Grassrope*, 708 F.2d 335, 339 (8th Cir. 1983).