IN THE MUSCOGEE (CREEK) NATION SUPREME COURT

IN THE MATTER OF THE CONSTITUTIONALITY OF NCA 24-077	)))	Case No: SC-2025-05 (District Court Case No.: CV-2024-122)

Petitioners' Reply Brief

Jana L. Knott, MCN #1320
BASS LAW
252 NW 70th St.
Oklahoma City, OK 73116
(405) 262-4040 – Phone
(405) 262-4058 – Facsimile
jana@basslaw.net

Damario Solomon-Simmons, MCN # 354
SOLOMONSIMMONSLAW, PLLC
601 S. Boulder Ave., Ste. 602
Tulsa, Oklahoma 74119
918-551-8999 – Phone
918-558-8039 – Facsimile
dss@solomonsimmons.com

Attorneys for Petitioners

INTRODUCTION

NCA 24-077 "raise[s] eyebrows" for good reason. Br. of Resp't Muscogee (Creek) Nat'l Council at 8. "Special Justices" are neither Special, nor actual Justices: The Constitution dictates that this Court is composed of seven Justices with six-year terms, and the National Council cannot supersede the Constitution's plain text with a mere statute. *Marbury v. Madison*, 5 U.S. 137, 177 (1803). Instead, NCA 24-077 attempts to craft a scenario in which "Special Justice[s]" can be handpicked to rule in the National Council and Principal Chief's favor on the most critically important legal issues facing the Muscogee (Creek) Nation. NCA 24-077 constitutes an unprecedented attack on the text and structure of the M(C)N Constitution, Petitioners' due process rights, and the due process rights of all those who would appear before this Court. This Court should hold NCA 24-077 unconstitutional and declare the purported appointments of so-called "Special Justices" void.

ARGUMENT

I. The Special Justice Law Is Flagrantly Unconstitutional.

The M(C)N Constitution establishes a government with three co-equal and independent branches: The Executive (Article V), the Legislature (Article VI), and the Judiciary (Article VII). *In re Extended Term of Off. of Dist. Judge Patrick Moore*, SC-10-15, at 12 (Muscogee (Creek) 2011). The M(C)N Constitution provides that "[t]he judicial power of the Muscogee (Creek) Nation shall be vested in one Supreme Court . . . and in such inferior courts as the National Council may from time to time ordain." M(C)N Const. Art. VII, § 1. In turn, "[t]he Supreme Court *shall be composed of seven (7) members* . . . whose terms *shall be for six (6) years* beginning July 1." *Id.*, § 2 (emphasis added). The Supreme Court is tasked with performing judicial review, and the purpose of judicial review is to declare laws that contradict the M(C)N Constitution unconstitutional and void. *Marbury*, 5 U.S. at 177 ("Certainly all those who have framed written

constitutions contemplate them as forming the fundamental and paramount law of the nation, and consequently the theory of every such government must be, that an act of the legislature, repugnant to the constitution, is void.").

As this Court well knows, the National Council is a legislature of limited, enumerated powers. *Id.* Art. VI, § 2 ("All legislative power *herein* shall be vested in the Muscogee (Creek) National Council.") (emphasis added); *id.* § 7 (listing subjects over which the National Council may legislate); *id.* § 8 (reserving power to propose laws and disapprove of "any act of the National Council" in the "citizens of the Muscogee (Creek) Nation."). The National Council is not free to pass any law on any subject at any time. *Id.* § 7 (the National Council's power is "subject to limitations imposed by th[e] Constitution"). The National Council is authorized to "ordain" "inferior courts" as it sees fit, but this Court is decidedly not an "inferior court" that can be created, modified, or destroyed by mere lawmaking. *Id.* Art. VII, § 1. Instead, this Court and its membership are ordained by the M(C)N Constitution itself—not the National Council—and its membership therefore cannot be amended, expanded, or contracted by legislation.[1] This is one of the "limitations imposed by th[e] Constitution"; the Supreme Court's size and membership were set by the M(C)N Constitution and were taken out of the National Council's hands to avoid exactly the situation at bar. *Id.* Art. VI, § 7, Art. VII, § 2.

With these background principles in mind, this Court must now answer a resounding no to the proposition that the Special Justice Law is somehow constitutional. The Special Justice Law

[1] Nor can the National Council amend the M(C)N Constitution alone: Article IX, Section 1(a) of the M(C)N Constitution requires a two-thirds vote of the National Council followed by a two-thirds vote of all eligible voters.

is impossible to square with the M(C)N Constitution's plain text, regardless of what standard of review applies.[2]

A. The Special Justice Law Defies the Plain Language of Article VII, Section 2's Requirements of a "Justice."

Chief Hill and the National Council cannot create a new temporary "Justice" while maintaining fidelity with the unambiguous text of the M(C)N Constitution. The judicial power of the M(C)N is vested in a Supreme Court consisting of seven Justices "whose terms shall be for six (6) years." M(C)N Const. Art. VII, §§ 1, 2. There are thus three fatal flaws in the Special Justice Law: (1) a "Special Justice" holds no office because there are already seven Justices; (2) if a "Special Justice" does somehow hold an office, the Special Justice Law unlawfully expands the number of Justices beyond seven; and (3) a "Special Justice" has an unconstitutional term in any event. There is simply no way to read the Special Justice Law that is consistent with the M(C)N Constitution. The result is that "Special Justices" are illegitimate and unlawful.

"The Constitution must be strictly interpreted and where the Constitution speaks in plain language with reference to a particular matter, the Court must not place a different meaning on the words." *Cox v. Childers*, SC-1991-04 at 3 (Muscogee (Creek) Nation 1991) (quoted in Br. of Resp't Muscogee (Creek) Nat'l Council at 11). The M(C)N Constitution's plain language dictates the number of seats on this Court and the appointment process to fill those seats; no alternative method for appointing a Justice is provided and no mechanism exists for expanding the Court by

---

[2] Because the fundamental constitutional right to due process of law before a court is at issue in this case, Petitioners submit that strict scrutiny is the appropriate standard of review. *See Dept. of State v. Munoz*, 144 S. Ct. 1812, 1821 (2024) ("When a fundamental right is at stake, the Government can act only by narrowly tailored means that serve a compelling state interest."). But even if this Court concludes that fundamental liberty interests are not at stake and so rational basis review applies, Respondents cannot establish that the Special Justice Law is "rationally related to [a] legitimate government interest[]." *Washington v. Glucksberg*, 521 U.S. 702, 728 (1997).

legislation. Likewise, the M(C)N Constitution dictates that there shall be *seven* Justices—not eight or nine. A recusal is not a resignation. *See al-Iraqi v. United States*, 455 F. Supp. 3d 1273, 1335 (U.S.C.M.C.R. 2020) (distinguishing between permanent resignations and temporary recusals). This means there is no vacant seat for a "Special Justice" to occupy. Nor can the National Council add more seats to this Court. Finally, the M(C)N Constitution establishes that each Justice's term shall last six years—not for however long a single case may be pending. A "Special Justice" consequently holds no office, has an unconstitutional term if he or she does, and thus has no judicial power under the M(C)N Constitution because he or she is definitionally not a "Justice."

For their part, Respondents merely take for granted that a "Special Justice" is a Justice of this Court. However, Respondents provide no explanation as to how or why that is so except to conveniently observe that "the process to appoint Special Justices" is "consistent with Article VII, § 2." Br. of Resp't Muscogee (Creek) Nat'l Council at 14. But that "consistency" is of no consequence if there is no seat to fill. And here, there is none: there is no vacancy on the current Court, because there are currently seven justices on the Court. Just like if the National Council and Principal Chief purported to fill an already-occupied seat on this Court, the "Special Justices" accordingly hold no office and have no power. Faced with this basic analysis, the conclusion that the Special Justice Law violates the Muscogee (Creek) Nation's foundational charter is inescapable. "Special Justices" are not and cannot be Justices.

Respondents wave these concerns away, promising that the Special Justice Law "ensure[s] the existence of a full appellate panel," and "ensure[s] the legitimacy" of this Court's decisions, and therefore "will survive intense Federal scrutiny." Br. of Resp't Muscogee (Creek) Nat'l Council at 3, 13. Respondents studiously ignore precedent such as *Nguyen v. United States*, where the United States Supreme Court summarily vacated a unanimous decision of an appellate panel

of the United States Court of Appeals for the Ninth Circuit solely because the panel was "improperly constituted." 539 U.S. 69, 82 (2003) ("[T]his Court has never doubted its power to vacate the judgment entered by an improperly constituted court of appeals, even when there was a quorum of judges competent to consider the appeal.").

The panel in *Nguyen* was made up of two Article III judges and the Chief Judge of the District Court for the Northern Mariana Islands (an Article IV judge). *Id.* at 72. Even though the two Article III judges constituted a quorum, and even though the panel was unanimous, the Supreme Court determined that the Ninth Circuit had "so far departed from the accepted and usual course of judicial proceedings as to call for an exercise of th[e United States Supreme] Court's supervisory powers" and vacated the Ninth Circuit's decision purely on the basis that the panel had no authority to act because it was not properly constituted. *Id.* at 73-74, 82-83. That is, because Article IV district judges were not "district judges" within the meaning of the statute authorizing Article III district judges to sit by designation on a Ninth Circuit panel, the United States Supreme Court determined that there was a "plain defect in the composition of the panel" that rendered its actions null and void *ab initio*. *Id.* at 81-82 (concluding there would be reversible error "no matter how distinguished and well qualified the judge might be"). The United States Supreme Court's ruling was unambiguous: The presence of just *one* improper panel member (an Article IV judge on an Article III court) robbed the Article III court of any authority to act. Other United States Supreme Court cases reach the same result. *See United States v. Am.-Foreign S. S. Corp.*, 363 U.S. 685, 691 (1960) (vacating judgment issued by en banc Court of Appeals solely because "a retired circuit judge is without power to participate" in a ruling of the court), *superseded by statute as stated in Yovino v. Rizo*, 586 U.S. 181, 185-86 (2019) (vacating judgment issued by

en banc Court of Appeals because a deceased judge was unlawfully allowed to "exercise the judicial power of the United States after his death").

Moreover, unlike the Article IV judge in *Nguyen*, the "Special Justice[s]" here are not even judicial officers because they have no authority and hold no office under the M(C)N Constitution. Any proceeding before this Court where a Special Justice purports to preside over the case is even more legally suspect than that held unconstitutional by *Nguyen*. Far from guaranteeing due process, ensuring a full appellate panel, or protecting the legitimacy of this Court's decisions, the Special Justice Law *undermines* due process, this Court's legitimacy, and the lawfulness of *every decision* this Court reaches if a Justice recuses. Because the Special Justices are not and cannot be Justices of this Court, the Special Justice Law is incapable of addressing Respondents' purported "concern" with "final orders and mandates issued by less than a simple majority of" this Court. Br. of Resp't Muscogee (Creek) Nat'l Council at 8. Rather, the Special Justice Law should be seen for what it is: Respondents' blatant and hasty effort to stack the deck against Petitioners and other similarly situated litigants challenging their authority.

Respondents also argue that Petitioners "have no substantive due process right to challenge the number of [J]ustices, or which [J]ustices, preside." Br. of Resp't Muscogee (Creek) Nat'l Council at 14. Again, Respondents take for granted that Special Justices are "Justices." And again, *Nguyen* is instructive. In *Nguyen*, even though the petitioners there never "objected to the composition of the panel before the cases were submitted for decision" and never "sought rehearing," the United States Supreme Court found the error so fundamental that it granted *certiorari* and summarily vacated the panel's decision, concluding that it would have reached the same decision "[e]ven if the parties had *expressly* stipulated to" the Article IV judge. *Nguyen*, 539 U.S. at 73, 79-80. Like the petitioners in *Nguyen*, Petitioners here are threatened with having their

appeal decided by an unlawfully constituted judicial body. Petitioners have the right to challenge its composition and ensure that their case is heard by a valid court. Due process demands nothing less.

In conclusion, the Special Justice Law is unlawful on its face. It attempts to expand the size of this Court, and it purports to create Justices of this Court who do not have six-year terms. This directly and unambiguously contradicts the M(C)N Constitution, rendering the Special Justice Law unconstitutional.

B. The Special Justice Law Denies Parties Due Process of Law.

In an ironic twist, the Respondents claim the Special Justice Law is a "legislative upgrade" that is necessary to protect due process rights. Br. of Resp't Muscogee (Creek) Nat'l Council at 3. Far from a legislative upgrade, however, the Special Justice Law operates to allow the Principal Chief and National Council to temporarily pack this Court in critical cases. *See supra* § I(A). The unavoidable consequence of the Special Justice Law is a functional denial of due process rights to litigants and the weaponizing of this Court's ethical obligations by Chief Hill and the National Council. All this in service of a thinly veiled attempt to silence Petitioners and similarly situated litigants.

1. The Special Justice Law Interferes with Litigants' Right to a Fair Tribunal.

Ultimately, the Special Justice Law cannot be reconciled with the due process rights of litigants before this Court. The M(C)N Constitution and Indian Civil Rights Act of 1968 prohibit the M(C)N from depriving individuals of sufficient liberty interests without due process of law. *See Muscogee (Creek) Nation Nat'l Council v. Muscogee (Creek) Election Bd.*, SC-09-10 at 21 (Muscogee (Creek) 2010); 25 U.S.C. § 1302(a)(8). This Court identifies procedural due process violations based on a balancing of three elements: "(1) the strength and nature of the private interest

involved; (2) the risk of an erroneous outcome if additional procedure isn't afforded; and (3) the Nation's interest in proceeding with no more process than already afforded." *Ellis v. Checotah Muscogee Creek Indian Cmty.*, SC-10-01 at 5 (Muscogee (Creek) 2013). Any analysis of these elements must draw from the Mvskoke's longstanding tradition of recognizing the importance of fair and just conflict resolution. *See Beaver v. Okmulgee Indian Cmty.*, SC-99-03 at 4 (Muscogee (Creek) 1999) ("The purpose of the Muscogee (Creek) Nation Courts is to decide conflicts on the basis of fairness to all litigants."). Thus, a litigant must be afforded an opportunity to present their case "as freely as possible, consistent with fairness and civility" for their due process rights to be satisfied under M(C)N law. *Id.* at 4.

It is well established that the right of the individual to have their case heard by a fair tribunal falls within this due process guarantee. *See Muscogee (Creek) Nation Nat'l Council*, SC-09-10 at 3 (Corrected Response to the December 3rd Filing by Justice Jonodev Chaudhury, Justice Amos McNac, and Justice Houston Shirley) (rejecting a justice's filing to "silence the litigants" as a violation of the litigants' due process rights). This is because "'[p]ublic confidence' in the judicial branch depends on the 'fairness and reasonableness of their courts.'" *Bruner v. Muscogee (Creek) Nation*, SC-18-04 at 7 (Muscogee (Creek) 2019) (quoting In Re: The Practice of Law Before the Courts of the Muscogee (Creek) Nation, SC-04-02 at 3, 4 (Muscogee (Creek) 2005). Without an opportunity to be heard by a fair tribunal, a litigant's case suffers a high risk of reaching an erroneous outcome to the detriment of whatever liberty or property interest is at stake.

At the expense of due process, the Special Justice Law allows the Principal Chief and National Council to selectively and unconstitutionally alter the makeup of this Court. Working as intended, the Special Justice Law raises an intolerably high risk of producing an erroneous outcome with deleterious effect on the liberty or property interests of litigants like the Petitioners.

By taking affirmative steps to enact this law through emergency procedures, the Respondents harmed these due process rights rather than protected them.

In the wake of the Special Justice Law, any case of interest to the Principal Chief and National Council with a recusal can be subject to interference by one-off appointees who are chosen specifically for their views on that particular case. That is, the Principal Chief and the National Council will be able to hand-pick their representatives to sit and decide cases on a case-by-case basis. Undoubtedly, these representatives' views will conform with those of the Principal Chief and National Council. Such ad-hoc court-packing would produce an appearance of impropriety—the very thing recusal is intended to avoid—and heighten the risk of erroneous outcomes being reached by one-time representatives masquerading as Justices of this Court. For cases such as this, where the underlying issues involve fundamental rights like citizenship, the danger of a due process violation from an unfair tribunal could not be more tangible.

2. The Special Justice Law Weaponizes Recusals Against Particular Litigants and Issues.

The Special Justice Law poses another danger to due process: As here, it provides an opportunity for gamesmanship whereby the Principal Chief and National Council turn a Justice's ethical duty of recusal against the litigants. This Court has consistently championed recusals as "an essential function in maintaining public confidence in the integrity and independence of the judicial branch . . . ." *Ellis*, SC-10-01 at 6; *see Bruner*, SC-18-04 at 10. When deciding whether to recuse, Justices must often weigh competing factors using their best judgment to ensure litigants before them receive a fair opportunity to be heard impartially. *See Bruner*, SC-18-04 at 7. However, close calls may arise that make this decision difficult. *See id.* at 6 (describing the importance of Justices recusing out of an abundance of caution for how their decision would be perceived in Muscogee (Creek) courts).

The decision to recuse will become even more difficult if the Special Justice Law is allowed to stand, as the Justice's perceived bias may be outweighed by the perceived bias of his or her hand-picked replacement—especially in cases such as this involving the executive or legislative branches of government. The Principal Chief and National Council will also have an incentive to intentionally shape lawsuits to force recusals by Justices who oppose their positions. Consequently, the ripple effects of the Special Justice Law would produce further distrust in this Court's rulings whenever a Justice decides not to recuse in important cases. The Principal Chief and National Council cannot be permitted to erode this court's ability to ensure that all litigants receive an opportunity to be heard by a fair and lawful tribunal.

C. The Separation of Powers Forbids the Principal Chief and National Council from Usurping Judicial Power.

Separation of powers principles embedded in the M(C)N Constitution and Mvskoke tradition do not tolerate the Special Justice Law's interference with this Court's power of judicial review. The National Council's legislative power is "subject to limitations imposed by th[e] Constitution" and must therefore comport with applicable checks and balances of governmental power. M(C)N Const. art. VI, § 7. For example, the National Council cannot enact laws "that manipulate the functions of the Judiciary any way they desire." *Judge Patrick Moore*, SC-10-05 at 12.

Attempts by members of the executive or legislative branches to circumvent particular Justices in ongoing litigation violate the separation of powers. *See id.* at 6 n.9. This Court previously addressed a proposal by the attorney general to have a selected Justice hear and rule on a particular kind of court matter. *Id.* The purpose of this proposal was to allow the attorney general to "circumvent" a district judge, which was "clearly violative of the Doctrine of Separation of

Powers." *Id.* If the proposal were allowed to go forward, it would have established a mechanism without any basis in law to interfere with the Judiciary's constitutionally afforded powers. *Id.*

When the drafters of the M(C)N Constitution carefully granted the Principal Chief the power to appoint justices with the National Council's approval, this did not include the power to make one-off appointments. *See* M(C)N Const. art. VII, § 2. Rather, the drafters envisioned that this Court would have the express authority to "establish procedures to insure that the appellant receives due process of law and prompt and speedy relief" with the approval of the National Council. M(C)N Const. art. VII, § 3. Any claim that the Principal Chief and National Council have the authority to provide temporary stop-gap measures to alter the makeup of this Court would thus lack support from the text of this Constitution.

Just like the attorney general's failed proposal in 2010, Chief Hill and the National Council's Special Justice Law makes a fatally flawed attempt to circumvent this Court's ability to reach a result they find unpleasant: Citizenship for Mvskoke of African descent. To avoid taking this medicine, they enacted a law without any constitutional basis to effectively circumvent Justices on this Court who are willing to explore Petitioners' arguments. Given this Court's central role under the M(C)N Constitution to ensure that the Judiciary functions smoothly with fair process and outcomes for litigants, the Special Justice Law cannot be allowed to stand: The risk to litigants and the perception of this Court is too great.

II. Petitioner's Claims Do Not Raise a Political Question.

The political question doctrine does not apply when there are clear means by which to reject facially unconstitutional legislation like the Special Justice Law. This Court's traditional role to "say what the law is" warns against finding a question to be political if it can be resolved by a straight-forward interpretation of the M(C)N Constitution. *Marbury*, 5 U.S. at 177. Further, the political question doctrine only applies when such a question is "inextricable from the case."

Baker v. Carr, 369 U.S. 186, 217 (1962) (providing that a court must look beyond "semantic cataloguing" to decide whether a question is purely political).

Respondents identify three kinds of political questions based on *Baker v. Carr* in an attempted hail mary to save the Special Justice Law, but none apply here. *See id.* The first, a textual commitment of an issue to another branch of government, does not give rise to a political question unless the M(C)N Constitution makes that issue "judicially unreviewable." *See Powell v. McCormack*, 395 U.S. 486, 520 (1969). No constitutional basis supports the notion that this Court must sit idly by and allow the Principal Chief and National Council to invent a new position on this Court. Articles VI and VII expressly limit the power to legislate with respect to the M(C)N Judiciary, and judicial review would provide the only means to check such an overstep in power.

The second basis Respondents point to is similarly distinguishable because there are clear legal standards for this Court to apply to resolve the case. *See Japan Whaling Ass'n v. Am. Cetacean Soc.*, 478 U.S. 221, 230 (1986) (explaining that a political question does not arise when a court can resolve a case with legal standards rather than policy choices or value judgments). The requirements for a Justice, the promise of due process, and the guarantee of separation of powers are all drawn from the plain text of the M(C)N Constitution and well-established legal principles; no policy or value determinations are necessary to resolve this case.

The Respondents' final basis to establish a political question also fails because an adverse ruling against the Special Justice Law would not express a "lack of . . . respect" for "coordinate branches of government." *Baker*, 369 U.S. at 217. Chief Hill and the National Council's lack of adherence to procedure compounds existing due process concerns and further reveals their intention to roll out an unconstitutional law to interfere with ongoing litigation.

No nonjusticiable political question arises in this case and the Special Justice Law is therefore reviewable by this Court. Clear-cut application of the M(C)N Constitution and Mvskoke tradition are sufficient to resolve this case in favor of Petitioners without the need to resort to policy or value judgments.

CONCLUSION

Finally, it is true that the M(C)N Constitution leaves the appointment and confirmation process of judges and Justices to the Executive and Legislative branches. *Judge Patrick Moore*, SC-10-05 at 8. But it does not leave the Principal Chief and National Council free to redefine who a Justice is. They assume that a "Special Justice" is a Justice of this Court without explaining why. That is because they cannot: The Constitution established that the Supreme Court is comprised of seven Justices, each of whom serves a six-year term. A Justice does not cease to be a Justice when he or she recuses from a case. Recusal creates no empty office and leaves no vacancy to be filled. Thus, the Special Justice Law fails to pass constitutional muster on three fronts: (i) it purports to appoint judicial officers to already-filled seats; (ii) it attempts to expand the size of the Supreme Court from seven Justices to nine; and (iii) it professes to create Justices who serve only for one case rather than six years. This is fundamentally inconsistent with the M(C)N Constitution.

Even if it could somehow be rendered consistent with the process in the M(C)N Constitution, the Special Justice Law ensures litigants will be denied due process of law whenever recusals arise in cases of national importance. A tribunal with a temporary representative from other branches of government is incapable of providing litigants with a fair opportunity to be heard. The danger to litigants' due process rights and public confidence (or lack thereof) in this Court's rulings that will ensue from the Special Justice Law far outweighs any perceived benefit of ensuring all cases before this Court have a full panel.

This case is about a cornerstone of democracy: the division of power between the branches of government. Here, two of those branches are acting in concert to tip the scales of justice in their favor by manipulating the third. Justice Scalia anticipated that cases just like this one would arise: "Frequently an issue of this sort will come before the Court clad, so to speak, in sheep's clothing: the potential of the asserted principal to effect important change in the equilibrium of power is not immediately evident, and must be discerned by a careful and perceptive analysis. *But this wolf comes as a wolf.*" *Morrison v. Olson*, 487 U.S. 654, 699 (1988) (Scalia, J., dissenting) (emphasis added). Petitioners respectfully request that this Court declare the Special Justice Law and the appointments of "Special Justices" thereunder unconstitutional and void.

Respectfully submitted,

Jana L. Knott, MCN #1320
BASS LAW, P.C.
252 NW 70th St.
Oklahoma City, OK 73116
(405) 262-4040 – Phone
(405) 262-4058 – Facsimile
jana@basslaw.net

Damario Solomon-Simmons, MCN # 354
SOLOMONSIMMONSLAW, PLLC
601 S. Boulder, 600
Tulsa, Oklahoma 74119
918-551-8999 – Phone
918-558-8039 – Facsimile
dss@solomonsimmons.com

Attorneys for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of October 2024, a true and correct copy of the foregoing document was mailed to the following, postage prepaid:

Kyle B. Haskins
Muscogee (Creek) National Council
Mound Building
P.O. Box 580
Okmulgee, OK 74447

General Counsel for Muscogee (Creek) National Council

Geri Wisener
Attorney General
P.O. Box 580
Okmulgee, OK 74447

Attorney General for the Muscogee (Creek) Nation

O. Joseph Williams
P.O. Box 1131
Okmulgee, OK 74447

Attorney for Principal Chief David Hill