

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

RED CLIFF BAND OF LAKE SUPERIOR CHIPPEWA INDIANS OF WISCONSIN, a federally recognized Indian tribe, on its own behalf and as *parens patriae* for its members,

BAD RIVER BAND OF THE LAKE SUPERIOR TRIBE OF CHIPPEWA INDIANS OF THE BAD RIVER RESERVATION, a federally recognized Indian tribe, on its own behalf and as *parens patriae* for its members,

LAC COURTE OREILLES BAND OF LAKE SUPERIOR CHIPPEWA INDIANS OF WISCONSIN, a federally recognized Indian tribe, on its own behalf and as *parens patriae* for its members,

LAC DU FLAMBEAU BAND OF LAKE SUPERIOR CHIPPEWA INDIANS OF THE LAC DU FLAMBEAU RESERVATION OF WISCONSIN, a federally recognized Indian tribe, on its own behalf and as *parens patriae* for its members,

ST. CROIX CHIPPEWA INDIANS OF WISCONSIN, a federally recognized Indian tribe, on its own behalf and as *parens patriae* for its members, and

SOKAOGON CHIPPEWA COMMUNITY, a federally recognized Indian tribe, on its own behalf and as *parens patriae* for its members,

Plaintiffs,

-v.-

PRESTON D. COLE, in his official capacity as the Secretary of the Wisconsin Department of Natural Resources,

DR. FREDERICK PREHN, in his official capacity as a person who claims to be, and is acting as, both the Chair and a member of the Wisconsin Natural Resources Board,

GREGORY KAZMIERSKI, in his official capacity as

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the Vice Chair and a member of the Wisconsin Natural Resources Board,

BILL SMITH, in his official capacity as the Secretary and a member of the Wisconsin Natural Resources Board,

SHARON ADAMS, in her official capacity as a member of the Wisconsin Natural Resources Board,

WILLIAM BRUINS, in his official capacity as a member of the Wisconsin Natural Resources Board,

TERRY HILGENBERG, in his official capacity as a member of the Wisconsin Natural Resources Board,

MARCY WEST, in her official capacity as a member of the Wisconsin Natural Resources Board,

Defendants.

DECLARATION OF CONRAD ST. JOHN IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION

I, Conrad St. John, declare as follows:

1. My name is Conrad St. John. I am the representative for the Sand Lake Community on the Tribal Council of the St. Croix Chippewa Indians of Wisconsin. I have served in this position for the past four months.
2. The tribal government mainly operates on grant funds and contracts with federal and other government agencies. Discretionary funding for the tribe is limited, and there are many competing priorities for those discretionary funds.
3. Previously, I was the treaty rights coordinator for St. Croix for five years. In that role, I served as the main contact point for any St. Croix tribal members with questions about treaty gathering rights, wild rice, plants, medicines, any kind of gathering. I opened the spearing lakes in the spring, delegated the quotas for fish, basically handled anything related to

hunting. This position is a resource for tribal citizens to help inform them what they can and cannot do under the Voigt Model Code which governs tribal use of off-reservation treaty rights. In that role, I saw it as my responsibility to maximize tribal citizens' use of and access to the treaty resources.

4. I served on the Voigt Inter-Tribal Task Force for 11 years. The Voigt Inter-Tribal Task Force deals with hunting, fishing, gathering, the resources protected by the treaties. The Task Force is part of the Great Lakes Indian Fish & Wildlife Commission ("GLIFWC") which protects the resources for the tribes in accordance with the Voight decisions that came out of the treaty rights litigation.

5. The St. Croix tribe is 100% opposed to the wolf hunt.

6. It goes way back to our ancestors and their thoughts. Ma'iingan traditionally is known as our brother. To allow the hunt to happen is basically the same as allowing the state to crucify a family member. That's how it feels. The state hunting our share of the wolves is infringing on our religious beliefs. The way we see it, it is a hate crime.

7. Ma'iingan serves an important purpose – it serves to balance the ecosystem. It gets rid of sickness from the animal population in the ecosystem. Ma'iingan is sort of the gardener of the forest.

8. It seems like people in Wisconsin expect to see a deer around every corner but, the deer herds are infected with Chronic Wasting Disease ("CWD"). CWD is everywhere. If we would leave ma'iingan alone, it would take care of the sick deer, and help to keep the herds healthy.

9. The livestock predation issue is brought up a lot to justify wolf hunting. I understand that the livestock is easy prey, standing in a field behind a fence. What wild animal

wouldn't see an easy meal standing behind a fence as easier than chasing down wildlife? But there are other solutions. We don't need to decimate the wolf population.

10. What happened in February was a massacre, not a hunt. That would be like going into a community and shooting all the men, women, children. Females were killed with pups in their stomachs, so we don't know the true impact to the wolf population numbers. And when the male wolves were killed, even if the pups survived, they will grow up without a father. It is horrendous.

11. The way the state went about executing it up was wrong. They didn't talk to or negotiate with the tribes at all, even though they are supposed to discuss it with us under the Voigt decision.

12. Also, the gun season for wolves is a free for all. There are thousands of people in the woods. It is almost like fishing with dynamite. There are so many people in the woods, there is no place for the wolves to hide. It is bad. It overlaps with the state deer hunt. So you can say you are hunting for deer but are able to hunt wolves, too.

13. To me, to the tribe, this does feel like a hate crime. We are being hated for our religious beliefs and they are infringing on our religious beliefs. It is a tough pill to swallow.

14. At St. Croix, we are in the process of updating our natural resources code, and ma'iingan will be protected in our tribal code.

15. We do have wolves that live on our reservation lands. St. Croix is unique in that we don't have one solid block of land. We have four reservations in three different counties. We also have numerous plots of non-trust fee land that we own, so we are scattered all over the map. We consider the trust land and the fee land we own to be Indian country.

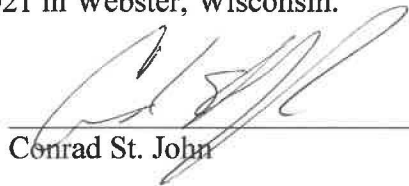
16. It is tough to know exactly how many wolves live on our reservation lands, but

we know they are there because we see their tracks, people report sightings, and we hear them howling at night. Because of the way the reservation land is spread out, and the way that they range, we know that the wolves are on and off-reservation, on and off tribal land.

17. The way Wisconsin is managing the wolf population impedes our ability to manage and protect the on-reservation wolves.

18. I have seen wolves myself, but I don't see them that often. It is a spiritual experience. It is humbling. It makes you realize that those misconceptions about wolves are so far from the truth. It makes you see that they are enormously misunderstood.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on September 30, 2021 in Webster, Wisconsin.



Conrad St. John