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**From:** Andrew Adams III <aadams@hogenadams.com>  
**Sent:** Tuesday, February 14, 2023 9:35 PM  
**To:** ldfclerk@frontier.com; deputyclerkldf@frontier.com  
**Cc:** John Johnson; Allen, Jamie; Gregory Harrold; gjh.sec@hdsdlaw.net  
**Subject:** Re: Tribe's Response to Town's Feb. 2, 2023 Letter  
**Attachments:** 2023.02.13 Letter to Town of LDF.pdf

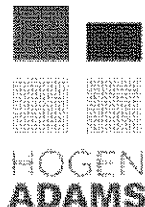
Hello LDF Clerk and Deputy Clerk,

Please see attached President Johnson's letter to Chairman Gaulke.

MVTO

Andrew

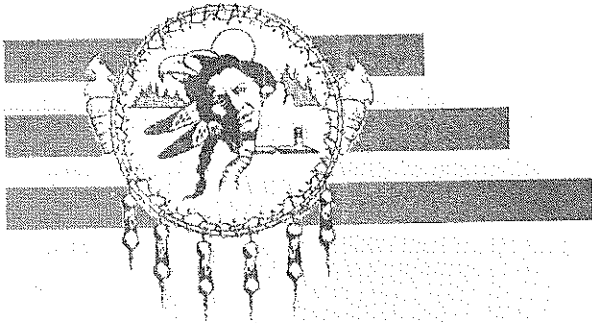
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Legal Excellence in Indian Country

Upcoming out of the office dates: starting February 20 and returning February 28.

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February 13, 2023

Via Email and First Class Mail

Chairman Matt Gaulke  
Town of Lac du Flambeau  
P.O. Box 68  
Lac du Flambeau, WI 54538  
715-588-3358

Re: *Rights of Way over Annie Sunn Lane, Center Sugarbush Lane, East Ross Allen Lake Lane, and Elsie Lake Lane*

Dear Matt,

On behalf of the Lac du Flambeau Band of Lake Superior Chippewa Indians (the "Tribe"), please consider this letter a response to your letter February 6, 2023.

In response to your proposal, the Tribe respectfully declines your offer. If the Town truly respected the Tribe as a sovereign nation, the Town would not have declared to the public, your taxpayers, the County of Vilas, or the State of Wisconsin that the entire length of the above-mentioned roads (with the possible exception of Annie Sunn Lane) are Town Roads. See Town Plat Record for Town of Lac du Flambeau (<https://maps.vilascountywi.gov/webdocs/dot/Lac%20du%20Flambeau.pdf>). The Town has no legal authority to declare the portions of the above-mentioned roads, that traverse Indian lands, to be public roads without the express authorization of the Tribe. Your taxpayers and the public have relied upon Town declarations concerning the above-mentioned roads to their detriment. The Town's declarations concerning land tenure on the Lac du Flambeau Indian Reservation do not trump the Tribe's ownership interest in its land held in trust by the United States nor the Tribe's territorial jurisdiction over its treaty-bounded reservation. The Tribe respectfully urges the Town to fix these inaccuracies with haste. Additionally, the Tribe urges the Town to conduct its own due diligence concerning its continual claims of jurisdiction over Cemetery Road, East Fence Lake Road, Little Trout Lake Road, Old Prairie Road, Pokegama Lake Trail, Wayman Lane given the fact that in 2018 the Tribe demanded return of these roads and the Tribe's assumption of maintenance since that same time.

**Lac du Flambeau Band  
of Lake Superior Chippewa Indians**

P.O. Box 67 • Lac du Flambeau, Wisconsin 54538 • (715) 588-3303 • FAX (715) 588-7930

The Tribe believes the monetary amount offered by the Town is not sufficient to cover the Town's responsibility in contributing to the past trespass on the above-mentioned roads. We urge you to work with the taxpayer residents of these roads and the title companies to make a reasonable and good faith offer to the Tribe. In the last correspondence to the Tribe from Atty. Briget Hubing, on behalf of land owners (and potentially title companies), Gregory Harrold, the Town's attorney, and Nancy Appleby, another title company attorney, were copied. The Tribe is assuming the Town is communicating with the title companies and their attorneys to coordinate negotiation strategies. If this is the case, please consider providing a coordinated offer to the Tribe.

Please feel free to contact me if you have any questions concerning this letter.

Sincerely,



John Johnson Sr.  
President, Lac du Flambeau Band of Lake Superior  
Chippewa Indians

cc: Lac du Flambeau Tribal Council (via email)  
ldfclerk@frontier.com (via email)  
deputyclerkldf@frontier.com (via email)