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March 8, 2019

The International Comanche Society, Inc.  
Kate Burrows, President  
c/o Village Press, Inc.  
2779 Aero Park Dr  
Traverse City, MI 49686-9101

***Re: ICS e-Newsletter dated February 18, 2019  
Request to Cease and Desist***

Dear Ms. Burrows,

Be advised that this firm represents the Northeast Comanche Tribe, Inc. (the "Northeast Tribe"), a corporation organized and existing in the State of Kansas per Articles of Incorporation filed in 1992. This representation is in connection with the ICS e-Newsletter you published on February 18, 2019 (the "Newsletter") concerning the Northeast Tribe. As you are well aware, the **ICS has no ownership in the Northeast Tribe nor has it ever been delegated any authority of any kind to act on behalf of the Northeast Tribe.**

Your Newsletter is based on the **mistaken premise that the Northeast Tribe is governed by bylaws.** A Kansas non-stock corporation is not required to adopt bylaws, and a review of the historical minutes of the meetings of the Northeast Tribe demonstrates that it has never done so.

Furthermore, the 'bylaws' that you baselessly claim to govern the **Northeast Tribe do not recite the tribe's correct name. Rather, they recite the name of an entity, "The North East Tribe of the ICS, Inc." that has never filed Articles of Incorporation in the State of Kansas.**

From the content of the Newsletter, it appears that the ICS, by and through your office, intends to intermeddle with the Northeast Tribe's affairs, and is basing such intermeddling on the false contention that a set of bylaws exists governing such internal affairs. The Northeast Tribe hereby demands that you **IMMEDIATELY CEASE AND DESIST from your interference with the Northeast Tribe's internal affairs** and governance, and immediately publish a notice of retraction of the Newsletter, in the same manner and to the same distribution list as the Newsletter was published.

Accordingly, your efforts to prompt the tribe to engage in certain actions under these irrelevant “bylaws” is baseless and your *ipse dixit* regarding the Tribe’s current management is false and actionable.

In particular, the Newsletter makes the following meritless assertions:

- a. that the Northeast Tribe has bylaws governing its operations,
- b. that those purported ‘bylaws’ provide extensive ICS control over the Northeast Tribe 's operations and actions,
- c. that the ‘bylaws’ allow the ICS to unilaterally declare all the current Northeast Tribe officers to lack “validity” at its whim and caprice,
- d. that the ‘bylaws’ allow the ICS to initiate elections for replacement the Northeast Tribe officers, and
- e. that the ‘bylaws’ allow the ICS to conduct those elections via electronic voting on the ICS website.

Out of an abundance of caution, the Northeast Tribe has carefully evaluated your claim concerning the existence of bylaws. In addition to the above-referenced historical record search, such diligence includes interviews with prior tribe chiefs in a position to know. This due diligence exercise demonstrates beyond any reasonable doubt that no tribe bylaws were ever adopted.

It was learned that a Northeast Tribe secretary had once posted a set of bylaws on the tribe website, but that said posting was not an endorsement thereof and was in no way an assertion or representation that such ‘bylaws’ were the official bylaws of the tribe.

Accordingly, your assertion that current Northeast Tribe officers lack “validity” is false and defamatory and your attempt to initiate tribal elections and be the proctor thereof constitutes tortious interference with the tribe’s advantageous relations with its officers.

In addition, your effort to host the purported elections is in violation of security provisions of Kansas Statute 17-6505(e).

Absent your prompt written agreement to cease and desist and as requested herein, and your immediate retraction of the Newsletter, suit will be filed in a court of proper jurisdiction seeking an injunction against your further wrongful conduct in connection with the Northeast Tribe as well as seeking damages and attorneys’ fees in connection therewith.

ICS  
Page 3 of 3  
March 8, 2019

We look forward to your prompt response.

Very Truly Yours,

**MOORE PENNA & ASSOCIATES PLLC**

*Timothy J. Harrington*

Timothy J. Harrington  
Attorney at Law

cc: Ken Mori, ICS Secretary  
CJ Stumpf, Northeast Tribe Chief  
Ron Ward, Northeast Assistant Tribe Chief  
Pete Morse, Northeast Tribe Scribe  
Malcolm Dickinson, Northeast Treasurer