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ONEIDA TRIBAL
 JUDICIAL SYSTEM

DEC 23 2013

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People of the Standing Stone

Oneida Nation of Wisconsin

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File# 132302

TO: ONEIDA BUSINESS COMMITTEE
 DEPARTMENT: _____

FROM: ONEIDA SEVEN GENERATIONS Date: 12-23-13
 DEPARTMENT: _____

My signature below verifies that I have received the enclosed documents through Inter-Office Mail.
 Signed this 23rd day of December, 2013.

Kathleen M Metzger
 Signature

Kathleen M Metzger
 Printed Name

Executive Tribal Clerk
 Title

Instructions:

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1. Fill out top information – TO/FROM (keep pink copy).
2. Place mail/form in **plastic envelope** and inter-office to addressee.

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For Appeals Commission Use Only:

_____,
 v. Appellant,
 _____,
 Respondent,

Docket No. _____

Oneida Tribal Judicial System

ONEIDA TRIBAL JUDICIAL SYSTEM

ON^YOTE? A•KA TE? SHAKOTIYA? TOLE' HTE DEC 23 2013

ONEIDA SEVEN GENERATIONS CORP.
Petitioner

ORIGINAL COMPLAINT RECEIVED BY: KO

v.
ONEIDA TRIBE OF INDIANS OF
WIS. BUSINESS COMMITTEE
Respondent

Docket # 13-TC-132

Date 12-23-13

Provide the name, address and phone number of:

Petitioner (and Advocate/Attorney)

Respondent (and Advocate/Attorney)

SHARON HOUSE
ONEIDA SEVEN GENERATIONS CORP.
PO BOX 257
ONEIDA, WI 54155

ONEIDA TRIBE OF INDIANS OF
WIS. BUSINESS COMMITTEE
PO BOX 365
ONEIDA, WI 54155

Instructions: Please attach your responses to the questions listed below to this form. List all responses in short, clear and plainly written statements. All statements of the complaint should be set forth in separate paragraphs and should be numbered. Each paragraph should address a single occurrence, event, circumstance or issue. Please use 8.5 X 11 inch paper and type with 1.5 or double spacing, leaving at least a one inch margin on all sides. Include any written exhibits or attachments that you may have with this form and complaint. Also, it is advised that parties refer to the Oneida Tribal Judicial System Rules of Civil Procedure for further information.

- Jurisdiction** Establish who you are, who the respondent is, and the authority of the Oneida Tribal Judicial System trial court to hear the case.
- What happened?** Give the facts surrounding your claim. Describe what happened, who did it, where it took place and when it occurred. List each statement in a separate, numbered paragraph.
- What laws apply?** Explain, in short numbered paragraphs which rule(s), law(s), regulation(s), etc. apply to your facts and exactly how each was violated.
- How were you harmed by the violation(s)?** Explain the causal link between the violation(s) and damages that you suffered.
- What damages did you suffer?** Explain how you were harmed and describe your damages in detail. What do you want?

Petitioner's Signature and Date Bruce A. King 12-23-13

SPECIAL NOTICE: The Petitioner is required to file an original plus five copies of this form and all attachments for use by the Judicial System. In addition, a filing fee of \$25.00 must accompany the complaint. This fee may be waived upon a showing that the petitioner is unable to pay the fee.

ONEIDA TRIBAL JUDICIAL SYSTEM
ONEIDA TRIBE OF WISCONSIN ONEIDA RESERVATION

DEC 23 2013

RECEIVED BY: *MB*

ORIGINAL

ONEIDA SEVEN GENERATIONS
CORPORATION
Petitioner

13-TC-132

MOTION FOR A PRELIMINARY
INJUNCTION TO PREVENT THE
ONEIDA BUSINESS FROM TAKING
ACTION IN REGARD TO THE
ONEIDA SEVEN GENERATIONS
CORPORATION

vs

ONEIDA TRIBE OF INDIANS OF
WISCONSIN BUSINESS COMMITTEE

Respondent

COMES NOW, the above named Petitioner in the above identified proceeding and files this a request and motion for Preliminary Injunction to prohibit action in relation to the Oneida Seven Generation Corporation as a result of the following action by the General Tribal Council on December 15, 2013 and all action is subject to the jurisdiction of the Oneida Tribe of Indians of Wisconsin and as stated ARTICLE V JURISDICTION which stated "The Corporation is created under and is subject to the laws, ordinances and jurisdiction of the Oneida Nation:"

"...To direct the Oneida Business Committee to dissolve the Oneida Seven Generations Corporation based on the Law Office's finding that the OSGC's Corporate Charter identifies the shareholders (i.e. the Tribe) as represented by the Business Committee, can dissolve the Corporation.:"

That the Oneida Seven Generations Corporation, does hereby file this request for a preliminary injunction to prohibit the Oneida Tribe of Indians of Wisconsin Business Committee from taking any action against the Oneida Seven Generation Corporation, (OSGC) for the following reasons and for the potential irreparable harm that could be imposed not only upon the OSGC and its employees as well as the reputation and credibility of the Oneida Tribe and its ability to do business with commercial entities outside the reservation and the Oneida Tribe itself:

1. The OSGC was chartered as a Corporation on September 26, 2006 by Resolution # 9-27-06 H as adopted on behalf of the Oneida Tribe of Indians of WI pursuant to Article IV, Section 1 (h) of the Constitution and By-laws of the ("Oneida Constitution") and pursuant to the exercise of the sovereign rights, ... of the Oneida Nation in Article IV, Section 2 and 3 of the Constitution and By-laws of the Oneida Nation:...
2. That the OSGC By Laws were adopted by the Board of OSGC on December 9, 1996.
3. That the By-Laws of the OSGC specifically require as follows SECTION 12 . REMOVAL. A board member may be removed with cause by a majority vote of the Business Committee or Board of Directors. Prior to removal, the board member will be given the opportunity to

- request a hearing eht the Oneida Appeals Commission in order to object to the proposed removal." This did not occur, the Board Members ver allowed to object to the removal.
4. That the Constitution of the Of the Oneida Tribe of Indians of Wisconsin specifically states t ARTICLE VI – Bill of Rights - "All members of the Tribe shall be accorded equal opportunities...All members of the tribe may enjoy, without hinderence...due process of law as guaranteed by the Constitution of the US. This did not occur the members of the OSGC Board were never allowed the opportunity to be heard, they were denied due process.
 5. That there were not charged provided to the OSGC to allow them to respond to the allegation identified in a packet to the GTC., nor were they allowed to respond to the GTC at the GTC meeting.
 6. Failure to provide due process has and will cause irreperable harm to not only the Board, but the the Tribe as a whole in that a basic right of the Constitution is denied as is required.
 7. If the above actions are not rectified the \$51 million assets of the Corporation are at risk.

Respectfully submitted in compliance with Rule 31, of the Judicial Code Chapter two.
Petitioner

B. A. K.
12-23-13
Date

MOTION FOR INJUNCTION