

# NEVADA HISTORICAL SOCIETY QUARTERLY



WINTER 1987

# NEVADA HISTORICAL SOCIETY QUARTERLY

Cheryl A. Fox, *Editor*  
William D. Rowley, *Book Review Editor*

## EDITORIAL BOARD

Jerome E. Edwards, *Chairman*  
*University of Nevada, Reno*

Michael J. Brodhead  
*University of Nevada, Reno*

Robert Davenport  
*University of Nevada, Las Vegas*

Doris Dwyer  
*Western Nevada Community College*

James Hulse  
*University of Nevada, Reno*

John H. Irsfeld  
*University of Nevada, Las Vegas*

Candance C. Kant  
*Clark County Community College*

Eugene Moehring  
*University of Nevada, Las Vegas*

Guy Louis Rocha  
*Nevada State Archives*

Wilbur S. Shepperson  
*University of Nevada, Reno*

The *Quarterly* solicits contributions of scholarly or popular interest dealing with the following subjects: the general (e.g., the political, social, economic, constitutional) or the natural history of Nevada and the Great Basin; the literature, languages, anthropology, and archeology of these areas; reprints of historic documents (concerning people, flora, fauna, historical or archaeological sites); reviews and essays concerning the historical literature of Nevada, the Great Basin, and the West.

Prospective authors should send their work to The Editor, *Nevada Historical Society Quarterly*, 1650 N. Virginia St., Reno, Nevada 89503. Papers should be typed double-spaced and sent in duplicate. All manuscripts, whether articles, edited documents, or essays, should conform with the most recent edition of the University of Chicago Press *Manual of Style*. Footnotes should be typed double-spaced on separate pages and numbered consecutively. Correspondence concerning articles and essays is welcomed, and should be addressed to The Editor. © Copyright Nevada Historical Society, 1987.

The *Nevada Historical Society Quarterly* (ISSN 0047-9462) is published quarterly by the Nevada Historical Society, 1650 N. Virginia, Reno, NV 89503. The *Quarterly* is sent to all members of the Society. Membership dues are: Student, \$5; Senior Citizen without *Quarterly*, \$7.50; Regular, \$25; Family, \$30; Sustaining, \$35; Contributing, \$50; Associate Fellow, \$100; Fellow, \$250; Associate Patron, \$500; Corporate Patron, \$1,000; Life, \$2,500. Membership applications and dues should be sent to the Director, Nevada Historical Society, 1650 N. Virginia, Reno, NV 89503. Second-class postage paid at Reno, Nevada. POSTMASTER: Send address changes to Nevada Historical Society Quarterly, 1650 N. Virginia, Reno, Nevada 89503.

# *Formation of the Reno-Sparks Tribal Council, 1934-1939*

ELMER RUSCO

## INTRODUCTION

THIS PAPER DEALS WITH THE FORMATION of the Tribal Council of the Reno-Sparks Colony during the 1930s, as part of an effort to determine the impact of the Indian Reorganization Act on Native Americans in Nevada. Because tribal organization was intimately tied up with other aspects of the Indian New Deal, the nature and legal status of colonies, the origins of the Reno-Sparks Colony, and efforts to improve the economic standing of Colony members are also discussed.

### *The Varying Conditions of Nevada Indians*

At the beginning of the Indian New Deal, Nevada's Native American population perceived itself and was perceived by the Bureau of Indian Affairs in several different ways. Since 1924, when Congress had made all Indians citizens of the United States, the federal government had regarded all Nevada Indians as citizens. How many Native Americans regarded themselves as citizens is not clear.

The classifications which had come to be called tribal—the division into Northern Paiute, Western Shoshone, Southern Paiute and Washoe—no doubt had meaning for many Indians and for government officials. At that time, however, the tribal division never corresponded with a political/governmental one: There was no Northern Paiute Tribe in the sense that all Northern Paiutes participated in the same governmental structure.

The most meaningful distinctions from a political point of view were usually groups smaller than the tribe, and occasionally these were made up of individuals from two or more tribes. Confusingly, many of these groups were

Elmer R. Rusco is professor of Political Science Emeritus at the University of Nevada, Reno. His research has concentrated on governmental policy toward Native Americans for some time. He is currently working a book about the Indian New Deal in Nevada.



Lizzie Lockwood (left) standing in front of her house at the Reno-Sparks Indian Colony around 1920. (Photo courtesy of Clayton Sampson)

also called “tribes.” For example, the Pyramid Lake Paiute Tribe, the Walker River Paiute Tribe, and the Fallon Tribe were much more important entities than the Northern Paiute Tribe. The Fallon Tribe, moreover, contained significant numbers of Western Shoshones among its membership.

In some cases, these groups corresponded with aboriginal groupings. Although the meaning of “band” may still be in dispute, there is no doubt that the people living on the Pyramid Lake and Walker River Reservations during the 1930s were largely descendants of groups who had lived at these locations for at least six centuries before Europeans began to arrive in the Great Basin. In other cases, the local groups were new formations which had been created by federal government policy in the nineteenth or twentieth centuries.<sup>1</sup> An example is the Reno-Sparks Indian Colony, created by federal action in 1917. Often, as in the case of this colony, the membership was tribally complex.

From the standpoint of governmental policy another kind of classification had more significance. This was the division of Indians into groups who: lived on reservations in the classic sense, those who lived on colonies, and those who had no landbase recognized by the federal government.

About a third of Nevada’s Indians lived on reservations—Pyramid Lake, Walker River, Duck Valley, Moapa and Goshute—and at Fort McDermitt, where Indians lived on allotted lands. At these places, the federal government held the land in “trust” for the Native people; however, in some cases the land was federally owned or held in allotment, where the land was given

to Indians.<sup>2</sup> These reservations, and Fort McDermitt, contained resources which could provide an economic base for the group. Fishing remained an important source of food and income at Pyramid Lake and was of lesser importance on other reservations, while hunting and gathering no doubt remained important to most Nevada Indians for some time; however, at all of the reservations ranching was a major economic activity.

About a fifth of the total Indian population of the state lived on colonies—areas which provided only homesites and no agricultural land or other economic resources. There was confusion before the late 1930s about whether these areas were held in trust status. This question was cleared up, however, in a case involving the Reno-Sparks Colony which will be discussed later.

Almost half of Nevada's Indians did not live on trust land, and were usually referred to as "scattered" or "homeless" Indians. No doubt many of these Indians still continued to believe that they were owners of the land in the aboriginal sense, but Euro-Americans usually thought of them as living on the public domain. There is no doubt that many traditional Western Shoshone believed that the Ruby Valley Treaty protected their ownership of lands that had not been explicitly given up in the treaty.<sup>3</sup>

The strategy for helping Nevada Indians followed by the Carson Indian Agency and other units of the Bureau of Indian Affairs during the 1930s was significantly different for each of these groups. For the reservation groups, the policy was largely to provide credit and other forms of assistance to enable the residents of the reservations to make a better living from their lands. For the colonies, the strategy was to secure agricultural lands where possible, so they could make a living from trust lands. For both reservation and colony Indians, a key element of the Indian New Deal was to recognize existing Native American governments or to organize new ones where governmental hostility or other events had eliminated aboriginal governments.

For the "scattered" Indians, the strategy was to provide services and create reservations for as many as possible. The BIA did not think that the organization policy could be applied to these individuals.

#### HISTORY OF THE COLONIES

The colonies presented special problems. While this paper will deal with organizational efforts in only one of them—the Reno-Sparks Indian Colony—the difficulties the BIA encountered in dealing with this colony are illustrative of problems they faced on a state-wide basis. Moreover, a Supreme Court case arising from conflicts with this colony succeeded in clarifying the legal status of all the colonies.

The term "colony" for a type of Indian trust territory began during the nineteenth century and is apparently unique to Nevada. Pushed out of the areas they had lived on aboriginally and denied access to most sources of

water, the native peoples of Nevada had to develop adaptive strategies to survive.

One important strategy was to attach themselves to the ranches which were developing where many of them had lived. In return for cheap labor—ranch labor for the men and domestic service for the women—many ranchers allowed small groups of Indians to continue to live on or close to the lands they had occupied traditionally. (No full account of the lives of these Nevada Indians over many decades is yet available.)

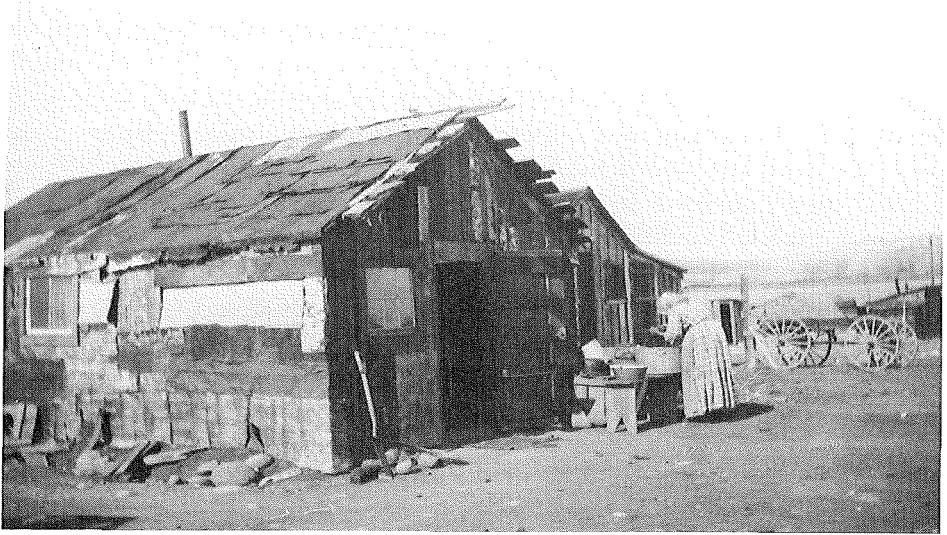
The transition to colonies represented another adaptive strategy. Many Indians moved to the outskirts of towns and cities which were developing in nineteenth-century Nevada; these settlements developed into colonies. Only in the twentieth century did the “camps” of Indians sometimes become trust territory. Apparently in some cases the camps were on what had become regarded as public domain by whites, although no doubt many Indians still regarded the land as belonging to them; in other cases the Indians were allowed to live on lands owned privately. The latter was the case for the Reno-Sparks Colony.

#### HISTORY OF THE RENO-SPARKS COLONY

In the 1930s, the Reno-Sparks Colony consisted almost entirely of approximately equal numbers of Northern Paiute and Washoe Indians. Aboriginally, the Truckee Meadows was the territory of the Washoe Indians. Most of the land along the Truckee River was occupied by Euro-Americans after the early 1860s. Washoes continued to make camps at various places along the river where they were allowed to do so. They were joined by groups of Northern Paiutes at various locations in the same area. A description of Sparks, written in 1924, states that the Indians “returned to camp, fish, and hunt for years after the ‘pale face’ came here to live,” and then identified six Indian camps organized after 1870 along the Truckee River in what would become Sparks. It was reported of a ranch owned by James Gault along the Truckee that:

For many years after 1871 a band of twenty-five or thirty Paiute Indians would come each summer and camp on top of the hill twenty rods west of Mr. Gault’s buildings. Some of the men worked on the ranches and were very good steady workmen.<sup>4</sup>

Just west of the Gault ranch was a ranch owned by John D. O’Sullivan, a native of Ireland who came to San Francisco in 1860 and moved to Nevada where he settled on land adjoining the Truckee River in the late 1860s.<sup>5</sup> According to a biographical sketch of O’Sullivan published in 1904, “The land had not been surveyed, and was still in possession of the government. He found its virgin soil covered with sage brush, and when he located thereon people had no idea that the tract was of any value for farming purposes.” He



Reno-Sparks Indian Colony Paiute housing during the 1920s-1930s. (Photo courtesy of Clayton Sampson)

found water for the site from various sources, built an irrigation ditch, and constructed an attractive ranch which included an orchard and hay lands. In 1904, he had “about forty head of high-grade Durham cattle and fourteen head of horses. . . .” The residence he built for himself and his family was described as “the best farm residence in the entire valley.”<sup>6</sup>

John Beare “Jack” O’Sullivan, one of John D. O’Sullivan’s sons, inherited the ranch after his father’s death on September 27, 1913. In 1904, Jack O’Sullivan was described as a farmer at Pyramid Lake and a man who had secured the franchise for an “electric road” between Harriman (soon to become Sparks) and Reno.<sup>7</sup> As a young man, he had been a miner in Nevada and Colorado and had lived in Hawaii. “In 1907 he accepted a responsible position with the Scheeline Banking and Trust Company,” a position which he held for several years. He was active in Democratic politics, was a good friend of Emmet Boyle, Democratic Governor of Nevada from 1915 to 1922, and was himself the Democratic candidate for State Treasurer in 1910, losing only by a narrow margin. During the Wilson administration, he received a presidential appointment as Surveyor-General of Nevada.<sup>8</sup>

The legal authority for the purchase of the Reno-Sparks Colony from John B. O’Sullivan was, according to the United States Supreme Court in 1938, two separate sections of an Indian appropriations act passed by Congress in 1916. One of these sections appropriated money to buy land for homeless Washoe Indians, while the other authorized the purchase of land for “non-reservation Indians in Nevada.”<sup>9</sup> Nevada’s Democratic Senator Key Pittman asked for both provisions.



Photograph of (from left) Nick Downington, Annie Downington, Juanita Downington Sampson and Harry Sampson taken in 1936. (Two girls seated unidentified.) (Photo courtesy of Clayton Sampson)

In December 1914, John B. O'Sullivan asked Senator Pittman for his help in purchasing the portion of land on which Indians had been living for some time. Pittman began efforts to secure such funds.<sup>10</sup> Without specific authority to do so, the Bureau of Indian Affairs in 1915 paid O'Sullivan two months' rent on the land. Subsequently, the BIA entered into a lease to pay rent at the rate of \$40 a month for a year. In 1916, Senator Pittman sought rent at the rate of \$30 a month for the ten years from 1905 to 1915. The Senate Committee on Indian Affairs refused to approve this request, and Pittman was equally unsuccessful the next year in getting a bill out of committee asserting a claim on behalf of O'Sullivan.<sup>11</sup> However, twenty acres which became the core of the Reno-Sparks Colony was purchased by the BIA for \$6,000, presumably from Mr. O'Sullivan, in 1917. In 1926 a contiguous parcel was purchased for \$4,300, bringing the total size of the Colony to 28.38 acres.<sup>12</sup>

The purchase of the Reno-Sparks Colony in 1917 was part of a wider effort to purchase camps where Indians had lived. Prior to 1917, only two colonies which had grown up in Nevada had become trust lands; in 1907 and 1910 the Lovelock Colony was purchased, and in 1911 the Las Vegas Colony was purchased for the Las Vegas Band of Southern Paiutes. But in 1917-18, after passage of the two provisions noted above, in addition to the Reno-Sparks Colony, colonies in Carson City, Yerington and Fallon were purchased. In



addition, the Battle Mountain and Elko Colonies were created by executive order.<sup>13</sup>

The camps that became colonies received some governmental services and, despite some confusion over their status, were often considered by the Bureau of Indian Affairs to be under their jurisdiction. This was also the case for many of the "scattered" Indians. For example, when Assistant Commissioner of Indian Affairs E.B. Meritt was asked in a Senate hearing in 1915 whether the government had had "supervision and control" over the Washoe Indians, for whom it was desired to purchase land, he replied that they were "supposed to be under the jurisdiction" of the federal government.<sup>14</sup>

There is no doubt that the BIA provided various services for the Reno-Sparks Colony. For example, the addition of land in 1926 was part of a project to improve the water supply for the Colony. (This effort apparently was only partially successful; however, the Colony was still described in the 1930s by two field agents who assisted with the organizational effort as "rocky and rather unproductive." They went on to say that "Very little water is available for the residents.")<sup>15</sup> During the 1920s and 1930s the Bureau of Indian Affairs stationed a nurse at the Colony, and for a number of years before the Indian New Deal a policeman, paid from government funds, had been stationed there.

#### THE LEGAL STATUS OF COLONIES

The confusion over the legal status of the colonies created inconsistency in the criminal justice area. For example, in December 1934, Superintendent Bowler wrote the Commissioner of Indian Affairs that the Bureau "enforcement officer for this area," a Mr. Edmunds, had told her that the United States Attorney for Nevada had refused to prosecute assault and liquor possession cases on the Dresslerville Colony, but did prosecute the same types of cases on the Reno-Sparks Colony. Bowler asked the Office whether the colonies were "bona fide reservations."<sup>16</sup>

In 1938, the matter was settled. In a criminal case originating in the Reno-Sparks Colony, it was decided that colonies were reservations in the full legal sense; in other words, there was legally no difference between a reservation and a colony. The decision arose out of the confiscation of two Chevrolet automobiles which had been used to transport alcoholic beverages into the Colony in violation of federal statutes. The lawyers for the owners of the two seized autos argued that the action was invalid because the Colony was not "Indian country"; that is, the Colony was not a reservation and therefore was not under federal jurisdiction. While the federal district court in Nevada and the 9th Circuit Court of Appeals agreed with this contention, the United States Supreme Court overruled them and held that it was "not reasonably possible to draw any distinction between this Indian 'colony' and 'Indian



Harry Sampson, the first chairman of the Reno-Sparks Tribal Council, in his front yard at the Reno-Sparks Indian Colony in the 1930s. *(Photo courtesy of Clayton Sampson)*

country.’ ” The Court did not discuss the significance of the term “colony” which had been considered a matter of importance by the lower courts, but noted that:

The Reno Colony has been validly set apart for the use of the Indians. It is under the superintendence of the Government. The Government retains title to the lands which it permits the Indians to occupy. The Government has authority to enact regulations and protective laws respecting this territory.

Apparently this last consideration was decisive in determining the issue. Noting that "The fundamental consideration of both Congress and the Department of the Interior in establishing this colony has been the protection of a dependent people," the Court noted that the prohibitions on importation of alcohol into reservations were intended to protect the Indians.<sup>17</sup>

#### THE COLONIES AND THE INDIAN REORGANIZATION ACT

Even the Bureau of Indian Affairs was confused about the status of the colonies at the beginning of the Indian New Deal. The confusion was apparent at the first stage of the organization process set in motion by the passage of the Indian Reorganization Act. Congress had included in the IRA a provision requiring that each reservation or tribe vote on whether to reject the IRA within a year after its passage (later extended for another year). If a reservation or tribe rejected the IRA, most of its provisions could not apply to that entity (although some important provisions, such as the section ending the process of allotment, were held to be independent of such a vote). This provision forced the BIA to conduct elections among each group which might ultimately benefit from the IRA within the time limits set by Congress. Confusion over the status of the colonies first surfaced in Nevada when the Carson Indian Agency had to decide whether or not to conduct elections on the colonies.

Superintendent Alida C. Bowler favored letting the colonies vote, but since she was not sure they were reservations, she consulted the Washington office. Because of a long delay in getting a reply from the office, the residents of the Reno-Sparks Colony almost lost a chance to vote on the IRA. In a letter to the Commissioner of Indian Affairs in April 1935, Bowler expressed her irritation at the delay saying that "We have been waiting for many months and have more than once asked for a decision in the matter." She said that her recommendation was the same as her advice regarding the Washoe Indians living at Dresslerville.

That is that these Indians who possess no land, [sic] who have no tribal organization and no tribal assets have absolutely nothing to lose through application of the Indian Reorganization Act. Therefore, if they do not hold a referendum election and the Act automatically applies to them the benefits will become available to them and they will not be deprived of any rights without an opportunity to reject the application.<sup>18</sup>

Superintendent Bowler interpreted the IRA as applying to any group which did not vote on it, an incorrect interpretation. In any case, she wrote that

because the "time for conferences and educational work is now so short," it was her opinion that IRA referenda should not be held on the Reno-Sparks Colony or other "great groups of scattered Indians of whom this Reno Colony is but one small example."<sup>19</sup> (Note that she used the terminology usually used to refer to Indians with no land at all.)

Precise information is lacking to determine whether the residents of the Reno-Sparks Colony were entirely Washoes or if they included Northern Paiutes at the time it was purchased, but by the 1930s the Colony consisted of roughly equal numbers of Washoes and Northern Paiutes, with a few Western Shoshones. In 1935, according to the BIA, there were sixty-five Washoes, eighty-nine Northern Paiutes, and two Western Shoshones living on the Colony.<sup>20</sup> The perception by the Bureau that this "tribal" division was important led to a counting of the vote on whether or not to accept the IRA by tribe. In reporting the overall vote to accept the IRA, Superintendent Bowler reported that, of the fifty-three eligible Northern Paiute voters, twenty-two voted for the IRA and three voted against it; of the forty-two eligible Washoe voters, thirty voted for the act and two against it. The overall total vote was fifty-two to five for acceptance of the IRA.<sup>21</sup>

#### *Organizing Tribal Councils at the Reno-Sparks Colony*

Little is known about political organization on the Reno-Sparks Colony prior to 1934. A Nevada Indian Welfare Association based on the Colony was organized by Indians in the early 1930s. In 1933 this association developed a program titled "Suggestions for the Relief of Nevada Indians," which was sent to various government officials. Harry Sampson, a Northern Paiute of the Reno-Sparks Colony, played an important role in this association; a letter sending the program to Senator Key Pittman was signed by Sampson.<sup>22</sup>

There were sixteen points in the program, several dealing with the status of Indians living on colonies. Several points dealt with relief programs which the authors expected would deal with reforestation: "We call your attention to so called 'non wards' of the government who live in Indian Colonies or nereby [sic] towns. They are especially needy at this time and should be considered in your Reforestration [sic] Work plan." Another proposal was: "We ask no discrimination be made between so called 'government wards' and non-government wards, and we also believe, and ask that no discrimination be made between Indians where there is a drop of Indian blood."

Other proposals in the program dealt with a variety of aspects of federal Indian policy. It was charged that the Carson Indian School had "failed in its purpose" to educate Indian children, and should be turned into either a "State Normal School" or a veterans' hospital or home. Apparently the chief objection to the school was that it was a BIA school, in that the program stated that, "Our definite purpose is to remove Indian children from Indian day



Indians worked as part of the WPA or CCC during the 1930s in Reno. *(Photo courtesy of Clayton Sampson)*

schools and Indian boarding schools and place them in the public schools of the United States.” Other points urged the “development of Indian craftsmanship,” proposed a system for distributing “Indian supplies” directly to Indians on reservations or colonies, advocated “free electric light and water to Indians, whether on reservations, in colonies, or individual homes,” and asked that, “Adequate homes should be provided for Indians. . . .” In addition, the program requested that Indians “be trained to fill all positions now held by white employees,” and urged limited self-government for Indians, with this statement:

Where Indians are housed on reservations or in colonies, we urge well selected supervision be made and that to this end an intelegent [sic] advisory board of Indians be selected to co-operate with the administration, all of which shall come under the direct control of the Commissioner of Indian Affairs.

The program did not object to the allotment system, but proposed “equal division of all lands and trust funds now held by the GOVERNMENT FOR INDIANS.”<sup>23</sup>

Within a year, Harry Sampson attended a congress held by the BIA at Riverside, California, March 17-18, 1934 to secure Indian opinions about the Wheeler-Howard Bill which later became the Indian Reorganization Act. (There were also Nevada Indians from Pyramid Lake, Fort McDermitt, and Dresslerville.) Sampson asked if the possible purchase of land for the Reno-Sparks Colony from the existing colony would “segregate us from the whites

in Reno." Later, he indicated that he attended the Congress to obtain information and "go back and tell those people what I have learned." He stated that "We have no land, therefore, if the bill is rejected or if it goes thru it does not matter . . . We are in favor of this bill. Why? Because we believe everything is in our favor and we cannot lose anything. We have everything to gain."<sup>24</sup>

The first formal council of the Colony was organized in early 1934 as an unintended consequence of the attempt to enact the IRA. The bill, which eventually became the IRA, had been introduced in Congress in early January, 1934. Prior to this there had been no consultation between the bill drafters and Indian governments or field personnel of the Bureau. However, on January 20, 1934 the Bureau sent to agencies and Indians a long circular letter asking for reactions to the main policy thrusts of the proposed legislation, without stating that the bill had already been drafted. The result was a substantial amount of correspondence to the Bureau. In Nevada the immediate result was the organization of several tribal councils. In February, 1934 acting Superintendent John H. Holst visited four Indian groups, one of which was the Reno-Sparks Colony. Holst wrote the BIA that:

In accordance with the instructions [sic] of the Indian Office Circular on Indian self-government . . . four conferences were held in this jurisdiction. At each place the principles of self-government and the necessary organization were explained and discussed. Fort McDermitt only, had any council or form of organization, but following the conferences at each place, the Indian groups continued in session or in adjourned session until they had selected a council, and in every instance they seem to have made a good start.<sup>25</sup>

The Reno-Sparks Tribal Council was organized at a "mass meeting" held at the Colony on February 9, 1934. Apparently there was no decision to draw up a written constitution. The meeting elected a council consisting of three Paiutes—Cleveland Cypher, Thomas Ochiho, and George Hooten—and three Washoes—Willie Tondy, Jack Mahone, and George McGinnis. In addition, Harry Sampson was selected Chairman by the Council. In his report to the Commissioner of Indian Affairs on this meeting, Holst said that the principal source of difficulty was the tribal division.

The meeting was well attended but not very harmonious. They did not at first think they could work together but it was suggested that they might select a council equally divided between Paiutes and Washoes, the council to select an additional member as chairman. This they later did and there appears to be a growing sentiment for more cooperation between the tribal groups.<sup>26</sup>

The new council endorsed the Wheeler-Howard Bill in a letter to Senator Key Pittman April 14, 1934. Chairman Harry Sampson wrote:

Believing that the Wheeler-Howard Bill S. 2755 will be of lasting benefit to the progress of all Indians in the United States: Therefore, we the organized Indians of the Reno Indian Colony do hereby ask that you will give S. 2755 your untiring support until its passage.<sup>27</sup>

Almost immediately, however, conflict began between the Carson Indian Agency and the Tribal Council headed by Sampson. Initially, Superintendent Bowler interpreted the situation as a conflict between Washoes and Paiutes. When Chairman Sampson forwarded a petition to Washington asking for the removal of the Indian policeman at the Colony, the petition was routinely forwarded to the Carson Indian Agency for investigation. Superintendent Bowler had two of her employees hold a hearing at the community house on the Colony. According to her report of this hearing, all of the signers of the petition were Northern Paiutes. Moreover, she reported that "a good many" of the signatures on the petition were not the actual signatures of the persons involved; some said "that they had given Harry Sampson permission to sign their names for them." After the hearing, another petition was received by the Agency asking for the retention of the policeman; this one was signed only by Washoes. The Superintendent's conclusion was that the first petition:

. . . was not founded on evidence of any importance in relation to the performance of his police duties, but that it was apparently the result of considerable personal disagreements between the active factions at that colony. We expressed the opinion that it would be utterly impossible to find a police officer who would satisfy all of these factions.<sup>28</sup>

This incident was the beginning of personal hostility between Bowler and Sampson. The same day that the report was sent to Washington, Superintendent Bowler mailed Chairman Sampson a letter telling him that he was authorized only to "carry out the instructions of a majority vote of [the] council"; she told him that "election as chairman of a council gives no individual Indian any power." At the time of her letter, the process which led to the first Constitution of the Colony was under way. Referring to this, Bowler told Sampson that "your group has not yet organized for self-government under the Indian Reorganization Act. . . . Your group has only begun its work looking toward self-government and is not yet organized for that purpose."<sup>29</sup>

She was apparently trying to tell him that he and his council had no authority, although the council had been organized by the Agency. In a letter to the "Reno Indian Council" written February 20, 1934 Holst stated:

I hereby recognize this as a lawfully constituted council and will confer with it or its representatives on any or all matters relating to the government and welfare of the Reno Indian Community. Your council should gradually become the governing body of your community. You should prepare to obtain a government charter, which



This photo of Harry Sampson (top left) and his brother, Dewey (top right) was taken at the Reno-Sparks Indian Colony around 1919. Bottom l to r: Juanita Sampson, Sam Withorn and Daisy. (*Photo courtesy of Clayton Sampson*)

charter will acknowledge specific obligations on your part and will guarantee to you specific privileges in return.<sup>30</sup>

It is true that Holst misunderstood the circular from the Washington office, and it was also true that he had been replaced by another superintendent a few months after this. Nevertheless, Bowler's denigration of the council elected by the Colony must have caused concern among the members of that body.

The incident over the petition to remove the policeman seems to have been the beginning of a conflict which ultimately led to a decision by Superintendent Bowler that she would refuse to work with the Reno-Sparks Tribal Council.

After the acceptance of the IRA in the referendum vote at the Reno-Sparks Colony, the Agency took steps to develop a written constitution to replace the council elected in 1934. Whether this was because of dissatisfaction with this council or the assumption that any government of the Colony should be based on a written constitution is unclear. The documents which have survived in the National Archives are inadequate to describe the process of constitution-writing in detail, but several features of the process can be reported.

On behalf of the Indians, a committee of five men—Harry Sampson, Cleveland Cypher, George Hunter, Jack Mahoney, and Willie Tandy—worked on the constitution; they were paid two dollars a day for the time they



actually spent working on the document. (All but Hunter were members of the council elected in early 1934.)<sup>31</sup> On behalf of the Bureau, most of the work was done by Organization Division employees Kenneth A. Marmon, a member of Laguna Pueblo, and John H. Holst, who as Acting Superintendent had organized the first council. (Actual organization work was conducted largely by employees of the Organization Division in Washington, although they were supposed to acknowledge the authority of the local Superintendent.) Marmon and Holst reported to the Commissioner of Indian Affairs in mid-August, 1935 that they spent an average of fourteen or more hours each day for eight straight days (including Sundays) helping write constitutions for the Reno-Sparks Colony, the Pyramid Lake Reservation, the Washoe Tribe, and the Fort McDermitt Reservation.<sup>32</sup>

Unfortunately there are no reports about the nature of this work on the Reno-Sparks Colony. Also missing are the comments from the Washington office on the draft sent from the field. This was a crucial stage of the process, during which much uniform language was inserted in constitutions and the viewpoints of the office often prevailed over those of the Indians and the field staff.

In December, 1935 another field agent of the Organization Division, George LaVatta, a Northern Shoshone from the Fort Hall Reservation, spent two weeks in Nevada campaigning for several constitutions, including the one drawn up for the Reno-Sparks Colony. On December 5 he spent an evening at the Colony reading and explaining the constitution to residents. Because there was insufficient time to handle all of the questions, he returned on December 11 for another meeting. LaVatta reported of this second meeting that "Considerable enthusiasm was aroused at this meeting, and before the meeting was over, the Indians expressed themselves to the effect that they were ready to vote on their constitution and by-laws."<sup>33</sup>

The election for the adoption of the Constitution was held on December 16, 1935, and was approved by a vote of fifty-one to one. The votes were not counted by tribe.<sup>34</sup> The two most significant portions of the document were those dealing with membership and the election of a governing body. Reflecting the mixed character of the Colony from a tribal standpoint, the membership provision did not mention tribal membership, merely stating that "all persons of Indian blood who have completed one year's continuous residence in the Reno-Sparks Colony" were members. This provision did state that membership could be lost by "one year's continuous absence" from Colony residence, and it also authorized the Reno-Sparks Tribal Council to enact ordinances providing for enrollment of new members; however, it offered no guidance to the council in enacting such ordinances. No mention of tribal membership and no requirement for a "blood quantum" for membership are unusual in Great Basin constitutions.

While the provisions establishing the Tribal Council did not mention tribal

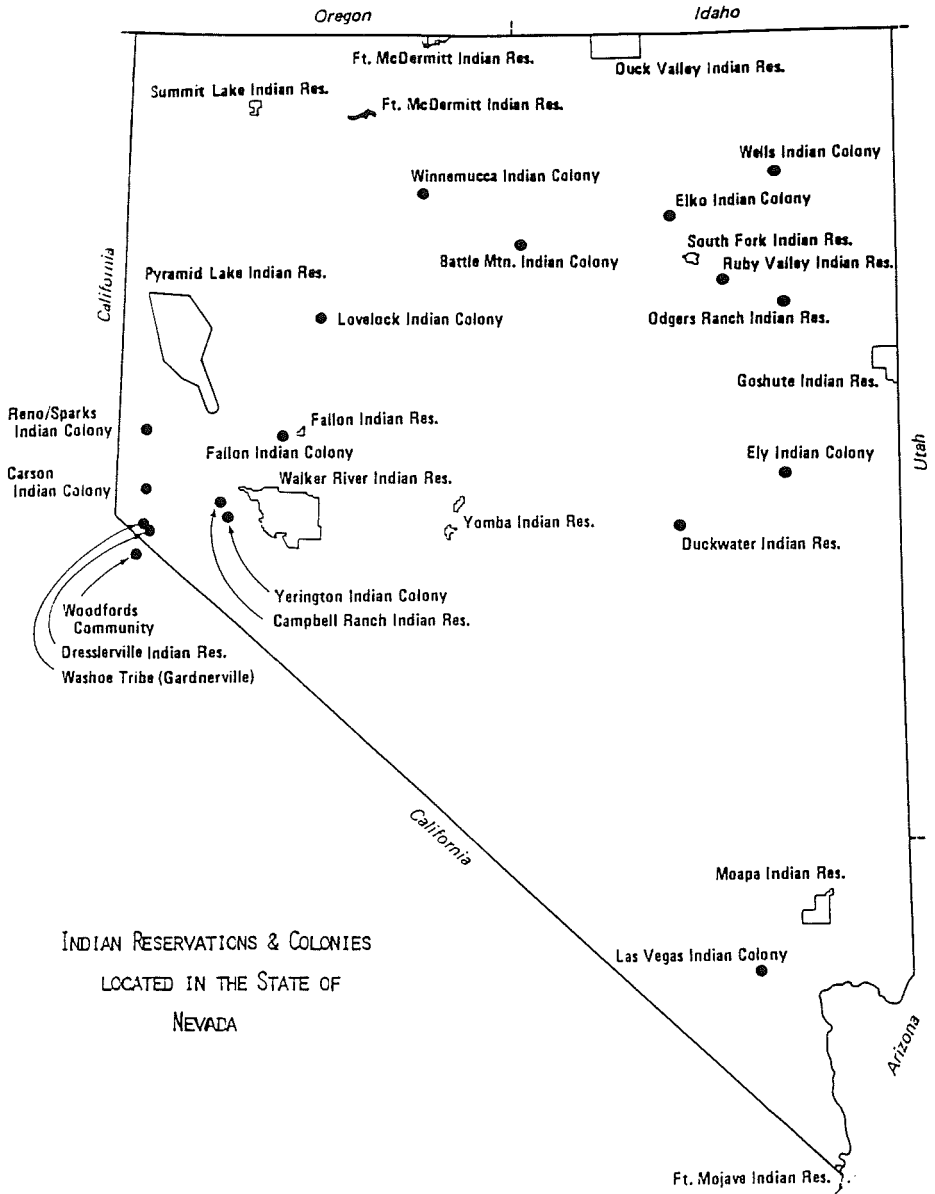
affiliation, they did provide for election from districts which corresponded with tribal membership. The governing body of the Colony was an Indian Council consisting of six members elected for two-year terms. The officers of the Council—Chairman, Vice-Chairman, Secretary and Treasurer, at a minimum—were elected by the Council. The crucial feature of the elections procedure was the division of the Colony into two districts, by a line running east-west “through the center of the Community house.” At that time, Washoes lived in the southern half of the Colony while Paiutes lived in the northern half. Each of these districts was to elect three members to the council. Moreover, a provision of the by-laws stated that it was the duty of each council member “to make reports to the district from which he was elected, concerning the proceedings of the council.” Thus, the major division within the Colony was explicitly recognized by the document, although not identified as a tribal division.

#### ADOPTING A CHARTER

The Colony then proceeded to take steps in adopting a charter. In June, 1936 a petition to hold a charter election was forwarded to Washington by Superintendent Bowler. She indicated there had been a delay because an earlier petition had contained “signatures obviously not in the handwriting of the persons themselves, since we had names on it that were written by the same person.” Apparently this was the result of confusion over how to deal with persons who could not sign their names; when the petition was returned with instructions to have persons who could not write make a cross or a thumbprint, either witnessed by two persons, it came back in good order.<sup>35</sup>

Perhaps the Agency did not assign high priority to securing a charter for the Colony because of its view that most of the activities made possible by a charter were appropriate only to reservations with agricultural resources. In her letter transmitting the properly prepared petition for a charter to Washington, Bowler wrote that she had not been able to meet with Indian councils as often as she would have liked because of the pressures of rehabilitation work in the Agency, and therefore did not know why the charter was being requested. She wrote: “I am sorry to say that we do not know just what this Reno-Sparks group has in mind in getting a business charter. They have no agricultural lands on which credit funds could be expended in development.” She indicated she would find out later what the Colony had in mind and report back to Washington.<sup>36</sup>

After this, even longer delays took place because Agency staff were too busy to spend much time on charter questions. Charters were essentially boiler-plate documents prepared by Washington attorneys. They are so legalistic in form that even a well-informed non-attorney has difficulty understanding them, so there is little doubt that the Indian input from the Colony



INDIAN RESERVATIONS & COLONIES  
LOCATED IN THE STATE OF  
NEVADA

Reprinted from *Nevada Indian Commission Directory*, by permission of Nevada State Indian Commission, copyright © 1986.

on the drafting of the charter was small. George LaVatta played an important role in drafting the charter. Bowler explained the delay in part was due to doubt on her part that the Colony could make use of a charter. She wrote the Washington office in April, 1937 that:

One reason for Mr. LaVatta's delay may be because we do not quite see any very feasible use of credit funds up there. However, I think we should permit that group to go ahead and obtain its charter. Then we can deal with them on the basis of approval of any plans they may make for use of credit funds for which they wish to apply.<sup>37</sup>

This letter indicated the delay was due partly to the workload of the Agency; she afforded that the rapid approval of charters was creating problems for her staff, which was not expanding rapidly enough to keep up with the increased work. Further, Bowler expected there would soon be five charters among Carson Indian Agency groups, and she was "a little frightened at the speed with which these things are moving ahead."

That is all to the good as far as opening up credit resources for our Indian people is concerned. On the other hand it means a very considerable additional responsibility of an important kind without additional personnel to help develop the program. You know what that means.<sup>38</sup>

The charter was approved at an election held January 7, 1938 in which thirty-five persons voted for it and one against it. While the process of writing this document has not been studied, the likelihood that the charter was essentially written in Washington is supported by the fact that it refers in one paragraph to "the Colony grazing lands."<sup>39</sup>

The Constitution adopted during the 1930s lasted until 1970, when an entirely new document was adopted: this constitution governs the Colony today. The new Constitution changed the membership rules significantly. While allowing members who qualified under the former rules to retain their membership, the new Constitution requires at least "one-fourth (1/4) degree Indian blood of the Washoe, Paiute or Shoshone tribe" and Colony residence for at least one year to qualify a person as a member. Spouses of persons who do not meet these qualifications cannot be members, although they may continue to reside on the Colony if they were living there when the new Constitution was adopted; children of members are members only if they are at least one-fourth Washoe, Paiute or Shoshone. There is also an unusual provision which allows a member of the Reno-Sparks Colony to be a member of another tribe or reservation "unless such person has received land or money by virtue of his membership in or affiliation with another tribe or group of Indians." This permits Washoes living on the Colony, for example, to be members of the Washoe Tribe, whose constitution does not require residence on a reservation. John H. Dressler, Chairman of the Washoe Tribe for several years, lived on the Reno-Sparks Colony during those years. In addition, the new Constitution abolished the system of electing council members by district. Instead, a seven-person council is elected by all of the voters of the Colony.<sup>40</sup>

*Proposals for Economic Development*

In spite of her conflicts with the Sampsons, Superintendent Bowler cooperated with efforts made by the Reno-Sparks Tribal Council to bring about economic development on the Colony, at least initially. Although Bowler had not known what economic development plans the Colony might have had earlier, these became clear by December 1936. On December 18 she wrote J.E. White, the Bureau's Credit Agent in Salt Lake City, enclosing a letter from the Tribal Council. She wrote:

Last week the Chairman and Secretary of the Reno-Sparks Tribal Council came in to talk briefly about their wishes to obtain some of the credit money to finance certain industrial enterprises at that Colony. I suggested that they put in writing something of their ideas on the subject and that I would then send it on to you.<sup>41</sup>

In their letter written December 13, the council said that at a special meeting on December 11, 1936 the council had "recommended for establishment of a cooperating laundry, [a co-operative] store and meat-market combine, and a gas-filling station," and for "Poultry raising and a harness repair shop for individual Indian members who wanted to do business for themselves."<sup>42</sup> A credit report subsequently reiterated these requests and noted that the chairman of the council had appointed committees "to investigate the feasibility of these proposed projects and report their findings and make definite recommendations to the council by June 1, 1937."<sup>43</sup> (It is not clear what happened to this proposal.)

An important part of the Indian Reorganization Act was the section authorizing the purchase of lands to create or enlarge reservations. In January 1937 a formal proposal was made to purchase agricultural land for the Colony in the Truckee Canyon to the east of Reno. As noted, the purchase of more land for the Colony had been raised by Harry Sampson at the Riverside Congress in March 1934. In February 1934 Commissioner Collier noted in a letter to Superintendent Holst that the bill which had been introduced in Congress would permit very flexible programs tailored to the needs of each reservation as the members of that reservation saw these needs. Holst wrote that "In such a case as the Reno Colony, the bill would make it possible to acquire land suitable for cultivation."<sup>44</sup>

E.M. Johnstone, Land Field Agent stationed in Sacramento, wrote the report recommending the land purchase. On January 14, 1937 he sent the report to Credit Agent White, Superintendent Bowler, and Field Agent George LaVatta.<sup>45</sup> In this report he stated that the Indians on the Colony were "To all intents and purposes . . . landless" because, while eight of the 28 acres was used for gardens "to a limited extent," even this portion of the Colony was not very useful for agricultural purposes because its source of

water was the Truckee River, "which runs dry in July." Johnstone continued that "Wages from seasonal farm labor, returns from glove work and labor of the women as domestics as afforded at irregular intervals, constitute their income and average approximately \$300.00 per annum, per family."

Johnstone proposed buying land for twenty Indian families (including about ninety individuals) in the Truckee Canyon, just west of the southern tip of the Pyramid Lake Indian Reservation, between Highway 40 and the Southern Pacific Railroad tracks. It was proposed to purchase 309 acres of irrigated bottom land, 200 acres of bottom pasture land, and 571 acres of upland grazing land, for a total of 1,080 acres. It was proposed that each farming household would have approximately fifteen acres of "good farm land" and fifty acres of grazing land. While no detailed appraisals had been made, it was estimated that the lands could be purchased for \$19,163; with \$10,000 for improvements, the total cost to provide for the twenty families was estimated to be about \$30,000. The lands involved were mostly fenced and had "ordinary houses and farm buildings upon them," although additional houses would have to be built. Although there was no specific mention of purchasing water rights, it was noted that there were various rights dating back to 1879. Clearly, the assumption was that the water rights would go with the land.<sup>46</sup>

On January 22, 1937 Credit Agent White wrote Johnstone approving "the proposed purchase of the Reno-Sparks Project, although he suggested that a more precise estimate of the carrying capacity of the lands for livestock be made. On January 25, Superintendent Bowler wrote the Commissioner of Indian Affairs asking "favorable consideration" of the proposal, but asking that only Paiutes be eligible for lands purchased for the project. "I should prefer," she wrote, "that this project not [be] limited to the Indian residents on the Reno-Sparks Colony." She continued that "The mixture of Paiutes and Washoes on that Colony has always been a serious error. They never have and we do not believe they ever will live and work together in harmony. . . . It is our intention to consider the Washoes as eligible for the land being purchased in Carson Valley for landless Washoe Indians." She indicated that the Washoe families living on the Colony were already being "canvassed" along with "all other Washoes" to determine who would receive assignments in this Washoe project. Bowler believed that the proposal had originated with the Agency on February 8, 1935 as a proposal to acquire about 1,600 acres "for the use of scattered Paiute Indians including those resident on homesite colonies without usable land." The proposal was also approved by LaVatta, although he wondered if the project would really "take care of the twenty families as shown in your justification."<sup>47</sup> Again, what happened to this proposal is not known, but to this day the Reno-Sparks Colony has no agricultural land.

*Conflict Develops*

By 1939 relations between Bowler and Harry Sampson and his brother Dewey had deteriorated to the point that the Superintendent made the statement that she did not desire to cooperate further with the Colony. The immediate cause of the rupture was a decision to reassign a house which Bowler originally thought had been assigned to the father of the Sampsons. (Houses were not owned by individual Indians, but the right to use them could be "assigned" by the Superintendent.) However, it developed in the course of the dispute that the house had actually been assigned to Nick Downington. His widow, Annie Downington (who was the stepmother of Harry and Dewey Sampson) was temporarily living with members of her family, but according to the Sampsons, wished to retain the house.<sup>48</sup>

During the course of correspondence between the Sampsons and Bowler, bitter words were exchanged. In a letter to Bowler written July 24, 1939, Dewey Sampson accused Superintendent Bowler of having visited the Colony only twice since she had come to the Agency. He insisted that he had written the Commissioner of Indian Affairs on "subjects vital to Indian progress" but that "invariably when responding to these request [sic] that we believe to be advantageous to Indians, the employees of the Indian Service have replied in numerous cases that our objections are unfounded, and often without proper investigation." This letter asserted that the issue was one of self-government. He wrote, "We contend that the Indian Council have certain authority to govern the Reno-Sparks Colony in all that does not break the laws of the U.S. Government."<sup>49</sup>

On July 25, Bowler wrote Dewey Sampson expressing "surprise" and "regret" that he had written this letter. Bowler asserted that she had attended "more than two Council meetings at the Indian Colony" and had "made other visits there." She said that the Agency's information was that the house in question had been rented illegally to persons not eligible to live there and that it was needed for an aged, indigent Indian. Bowler wrote that "I had hoped that in your public office you would forget selfish interests and be genuinely interested in the welfare of all Indian people." Bowler charged that the Colony had not made proper use of a BIA-installed irrigation system, and virtually declared that she would not cooperate further with the Colony:

I will in all fairness state that I have visited the Reno-Sparks Colony less frequently during the last two years because the attitude of the Indian members of that community has been so poor. They have not shown a disposition to help themselves. I have therefore felt that I could render better service by working diligently with communities that do endeavor to help themselves and that are not so entirely willing to take everything that they can get from the Federal Government without putting forth any effort of their own. . . . Of course, when a different attitude develops in that community and they present evidence of being able to work together harmoniously

and to have a desire to improve their condition, we will be more than glad to renew activities on their behalf.<sup>50</sup>

Harry Sampson replied on August 4, 1939 that the problem with the irrigation system was that a road built through the Colony had "destroyed the natural irrigation ditches that supplied water to certain portions of the colony. This impracticalbe [sic] management of the Indian Affairs in our colony naturally lost our interest, and our belief, in your ability to supervise."<sup>51</sup>

#### SUMMARY AND CONCLUSIONS

The confusion about the legal status of Nevada colonies at the beginning of the Indian New Deal was cleared up in a Supreme Court case which originated in the Reno-Sparks Colony, determining that colonies were not legally different from reservations. Efforts to organize a Nevada Indian Association and develop an Indian program began before passage of the Indian Reorganization Act, with leadership from Harry Sampson. A local agency official organized a temporary tribal council at the Colony headed by Sampson, and when a constitution drawn up under authority of the Indian Reorganization Act went into effect, Sampson also led this body. Sampson, and his brother Dewey, found it increasingly difficult to deal with the Nevada Indian Agency. By 1939 Superintendent Bowler was unwilling to work with the Colony's elected leadership as a result of several bitter disputes with the Sampsons.

The BIA held that the most serious source of conflict on the Reno-Sparks Colony was differences between Washoes and Northern Paiutes due to the voting procedures acceptance or rejection of the IRA being counted separately by tribe. Likewise, the first constitution under the IRA conducted elections for the Tribal Council by tribe. This provision was dropped in a new constitution approved in 1970. In neither document was there any requirement of tribal membership in order to be a member of the Colony.

The Reno-Sparks Tribal Council pushed for adoption of a charter after the constitution was adopted, and made requests for loans to enable the Colony to establish several businesses. The Agency supported these requests, and also made an application for purchase of agricultural land for Northern Paiutes, including colony residents, in the Truckee River east of the Colony. Neither of these efforts came to fruition, however. Only in the last couple of decades has the Reno-Sparks Colony experienced economic development. Perhaps not coincidentally, in recent decades the level of conflict among Colony residents has also declined.

#### NOTES

<sup>1</sup> There is a brief discussion of this controversy in David H. Thomas, et al., "Western Shoshone" in *Handbook of North American Indians, Great Basin*, vol. 11, ed. Warren L. d'Azevedo (Washington: Smithsonian Institution, 1986), 274-279; Catherine S. Fowler and Sven Liljeblad, "Northern Paiute," in



*Handbook of North American Indians, Great Basin*, vol. 11, ed. Warren L. d'Azevedo (Washington: Smithsonian Institution, 1986), 436-437; 446-449.

<sup>2</sup> For a discussion of the complexities of trust status, see Felix A. Cohen, *Handbook of Federal Indian Law* (Charlottesville, Virginia: Michie Bobbs-Merrill, 1982), 471-522.

<sup>3</sup> Steven J. Crum, "The Western Shoshone People and Their Attachment to the Land: A Twentieth Century Perspective," (nd).

<sup>4</sup> F.B. Kingsbury, "Pioneer Days in Sparks and Vicinity: Early Settlers and Points of Interest," in *Nevada State Historical Society Papers, 1925-1926* (Reno: Nevada Historical Society, 1926), 285-374.

<sup>5</sup> Thomas Wren, *A History of the State of Nevada, Its Resources and People* (New York: Lewis Publishing Co., 1904), 472-74; Sam Davis, *The History of Nevada* (Reno: Elms Publishing Co., 1913), 1123-24.

<sup>6</sup> Wren, *Nevada*, 473.

<sup>7</sup> *Ibid.*, 182, 473.

<sup>8</sup> Boyd Moore, "Persons in the Foreground," in *Nevada, Newsletter and Advertiser* (January 1915): 7, 10.

<sup>9</sup> *United States v. McGowan*, 302 US 535 (1938). The circumstances of the purchase of several Nevada colonies in 1917-19 are treated in greater detail in an unpublished manuscript by the author, "Purchasing Nevada Colonies."

<sup>10</sup> O'Sullivan to Pittman, 9 December 1914, Pittman Papers, Box 65, Library of Congress.

<sup>11</sup> Senate Committee on Indian Affairs, *Hearing on Indian Appropriation Bill* (Washington: GPO, 1916), 188.

<sup>12</sup> 39 Stat. 125, Section 13, 44 Stat. 328.

<sup>13</sup> Richard O. Clemmer and Omer C. Stewart, "Treaties, Reservations, and Claims in *Handbook of North American Indians, Great Basin*, Vol. 11, ed. Warren L. d'Azevedo (Washington: Smithsonian Institution, 1986), 532-533.

<sup>14</sup> House of Representatives Subcommittee on Indian Affairs, *Hearings on Indian Appropriation Bill* (Washington: GPO, 1915), 260.

<sup>15</sup> Kenneth A. Marmon and John H. Holst, memorandum on "Reno-Sparks Indian Colony," 30 August 1935, National Archives Building, Record Group 75, Records of the Bureau of Indian Affairs (hereafter cited as BIA Records), Organization Division, file 9708A-1936-Carson-068-Reno-Sparks.

<sup>16</sup> Alida C. Bowler to Commissioner of Indian Affairs, 18 December 1934, BIA Records, Central Classified Files, 1907-1936, file 64044-1934-Carson-170.

<sup>17</sup> *United States v. McGowan*, 302 US 535 (1938).

<sup>18</sup> Alida C. Bowler to Commissioner of Indian Affairs, 18 April 1935, BIA Records, Organization Division, file 9708-1936-Carson-066.

<sup>19</sup> *Ibid.*

<sup>20</sup> Marmon and Holst memo, 30 August 1935.

<sup>21</sup> Bowler to Commissioner of Indian Affairs, 10 June 1935, BIA Records, Organization Division, file 9708-1936-Carson-066.

<sup>22</sup> Harry Sampson to Key Pittman, 11 May 1933, "Suggestions for the Relief of Nevada Indians," Pittman Papers, Box 73, "Executive Departments," file "Indian Affairs."

<sup>23</sup> *Ibid.*

<sup>24</sup> BIA Records, Organization Division, Wheeler-Howard Files, "Proceedings of the Conference for the Indians of Southern California": 34, 32-3, 52.

<sup>25</sup> Holst to Commissioner of Indian Affairs, 14 February 1934, BIA Records, Central Classified Files, 1907-1936, file 9532-066-Carson.

<sup>26</sup> Holst to Reno Indian Council, 20 February 1934; Holst to Commissioner of Indian Affairs, 10 February 1934; Reno Indian Council to John Collier, 9 February 1934; Holst to Commissioner, 14 February 1934, BIA Records, Wheeler-Howard Files, file 4894-34-066-Part 1A.

<sup>27</sup> Sampson to Pittman, Pittman Papers, Box 73, "Executive Departments," file "Indian Affairs."

<sup>28</sup> Bowler to Reno Mayor John Cooper, 17 June 1935, BIA Records, Wheeler-Howard files, file 4894-34-066-Part 1A.

<sup>29</sup> Bowler to Harry Sampson, 17 June 1935, BIA Records, Wheeler-Howard files, 4894-34-066-Part 1A.

<sup>30</sup> Holst to Reno Indian Council, 20 February 1934, BIA Records, Wheeler-Howard File, file 4894-34-066.

<sup>31</sup> Marmon to Bowler, 20 November 1935, BIA Records, Organization Division, file 9532C-1936-Carson-057.

<sup>32</sup> Marmon and Holst to Commissioner of Indian Affairs, 14 August 1935, BIA Records, Organization Division, file 9532C-1936-Carson-057.

<sup>33</sup> George LaVatta to Commissioner of Indian Affairs, 24 December 1935, BIA Records, Organization Division, file 9532C-1936-Carson-057.

<sup>34</sup> Bowler to Commissioner of Indian Affairs, 17 December 1935, BIA Records, Central Classified Files, 1907-1936, file 9708A-1936-Carson-068-Reno-Sparks.

<sup>35</sup> Bowler to Commissioner of Indian Affairs, 4 June 1936, BIA Records, Central Classified Files, 1907-1936, file 9708B-1936-Carson-067.

<sup>36</sup> *Ibid.*

<sup>37</sup> Bowler to Allan G. Harper, 16 April 1937, BIA Records, Central Classified Files, 1907-1936, file 9708B-1936-Carson-067.

<sup>38</sup> *Ibid.*

<sup>39</sup> Corporate Charter of the Reno-Sparks Indian Colony, ratified January 7, 1938.

<sup>40</sup> Constitution and Bylaws of the Reno-Sparks Indian Colony, approved December 5, 1970.

<sup>41</sup> Bowler to J.E. White, 18 December 1936, Laguna Niguel Regional Archive, Record Group 75, Records of the Bureau of Indian Affairs, Division of Extension and Industry/General Correspondence, 1937-1952/Carson/Box 302 (hereafter Extension and Industry records), file "Reno-Sparks Colony/Carson Agency/Social and Economic Information/1937."

<sup>42</sup> *Ibid.*

<sup>43</sup> "Social and Economic Information for the Reno-Sparks Colony": 17, in Laguna Niguel Regional Archive, Extension and Industry records, file "Reno-Sparks Colony/Carson Agency/Social and Economic Information/1937."

<sup>44</sup> John Collier to Holst, 27 February 1934, BIA Records, Wheeler-Howard File, file 4894-34-Carson-066-Part IA.

<sup>45</sup> E.M. Johnston to Bowler, 14 January 1937, Laguna Niguel Regional Archive, Extension and Industry records, file "Reno-Sparks Colony/Carson Agency/Social and Economic Information/1937."

<sup>46</sup> *Ibid.*

<sup>47</sup> White to Johnston, 22 January 1937; Bowler to Johnston, 25 January 1937; LaVatta to Johnston, 27 January 1937, Laguna Niguel Regional Archive.

<sup>48</sup> Library of Congress, Pittman Papers, Box 73, "Executive Departments," file "Reno-Sparks Colony."

<sup>49</sup> Sampson to Bowler, 24 July 1939, Pittman Papers, Box 73.

<sup>50</sup> Bowler to Sampson, 25 July 1939, Pittman Papers, Box 73.

<sup>51</sup> Sampson to Bowler, 4 August 1939, Pittman Papers, Box 73.