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UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

CONFEDERATED TRIBES OF THE CHEHALIS
RESERVATION
420 Howanut Road
P.O. Box 536
Oakville, WA 98568

TULALIP TRIBES
6406 Marine Drive
Tulalip, WA 98271

HOULTON BAND OF MALISEET INDIANS
88 Bell Road
Littleton, ME 04730

AKIAK NATIVE COMMUNITY
P.O. Box 52127
Akiak, AK 99552

ASA'CARSA MIUT TRIBE
P.O. Box 32249
Mountain Village, AK 99632

ALEUT COMMUNITY OF ST. PAUL ISLAND
2050 Venia Minor Road
P.O. Box 86
St. Paul Island, AK 99660

Plaintiffs,

Case No.: __1:20-cv-01002_____

DECLARATION OF AMOS PHILEMONOFF,
SR.

1 v.

2 STEVEN MNUCHIN, SECRETARY, UNITED
3 STATES DEPARTMENT OF THE TREASURY
4 1500 Pennsylvania Ave., N.W.
Washington, D.C. 20220

5 Defendant.

6
7 I, Amos Philemonoff, Sr., declare the following on the basis of personal knowledge to which I
8 am competent to testify:

- 9 1. I am the President of the Aleut Community of St. Paul Island (“ACSPI”), a federally
10 recognized Indian tribal government located on St. Paul Island in the Bering Sea in
11 Alaska.
- 12 2. ACSPI is an isolated fishing community in the middle of the Bering Sea. ACSPI has a
13 total of 1,554 tribal members, with 95% of St. Paul’s population being ACSPI tribal
14 members.
- 15 3. The ACSPI, its representative sovereign governing body the Tribal Government of St.
16 Paul, its tribal businesses, and its tribal fishermen represent approximately two-thirds of
17 St. Paul’s local economy and jobs. The ACSPI has an annual budget of \$12 million and
18 employs between 80-100 staff year-round. ACSPI tribal fishermen employ another 75
19 residents, catching local halibut and other fish species in the summer.
- 20 4. Over the past four (4) weeks, due to COVID-19, our community has lost its only
21 passenger airline to bankruptcy, leaving us isolated. We are without any means of
22 reaching the distant mainland of Alaska 800 miles away for necessary health care or
23 critical infrastructure needs.

- 1 5. We have witnessed our fishing markets collapse, and we have attributed almost every
2 resource of the Tribal Government to responding to the pandemic threat. The impacts on
3 our tribe, tribal members, and tribal community will be in the tens of millions as we
4 charter planes, establish quarantine facilities, and deal with the sudden and severe
5 economic dislocations created from this pandemic.
- 6 6. On April 2, 2020, the President of the Tribal Government of St. Paul declared a COVID-
7 19 Public Health Disaster, including request for assistance on behalf of the ACSPI.
- 8 7. ACSPI has submitted the certification form through the Department of Treasury web
9 portal necessary to participate in the disbursement of CARES Act Title V funding, so that
10 it is eligible to receive a portion of the \$8 billion set aside for Tribal governments.

11
12 I declare under penalty of perjury that the foregoing is true and correct. Executed on April 17,
13 2020.

14 
15 Amos Philemonoff, Sr.