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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Apache Stronghold,
a 501(c)(3) nonprofit organization,

Plaintiff,

v.

United States of America,

Sonny Perdue, Secretary, U.S. Department
of Agriculture (USDA),

Vicki Christensen, Chief, Forest Service,
USDA,

Neil Bosworth, Supervisor, Tonto National
National Forest, USDA,

And

Tom Torres, Acting Supervisor, Tonto
National Forest, USDA,

Defendants.

No. CV-21-_____

**DECLARATION OF
CRANSTON HOFFMAN JR.**

Under the penalties of perjury in accordance with the laws of the United States of America, I hereby declare:

1. I, Cranston Hoffman Jr, am an enrolled member of the San Carlos Apache Tribe.
2. I was born on May 31, 1952 in San Carlos, Arizona.
3. I am of the Tanasgizin Clan (“Washed People”) on my mother’s side and born for the Tiis tu ayeh Clan (“Cottonwood Sticking in the Water”) on my father’s side.
4. I am a Veteran. I served in Desert Storm in the Persian Gulf.
5. I am an Apache Traditional Practitioner and Medicine Man who conducts the Apache Holy Grounds Ceremony.
6. I was raised by parents who taught me and my siblings about the Apache way of life.
7. When I was a child, I remember early memories of Chi'Chil Biłdagoteel (“Oak Flat”) when my family stopped to pick acorn at Oak Flat. I also remember picking medicine in the area too. My family and I drove around in the nearby Pinto Creek where there were plenty of cottonwood and acorn trees along the creek. This whole region we visited at different seasons of the year.
8. Chi'Chil Biłdagoteel (“Oak Flat”) is a holy place. It is part of Western Apache lands. Today there are living descendants of our ancestors whose clans come from this territory. Many of the living descendants are enrolled tribal members from the San Carlos Apache Tribe. In early history, the United States Government prevented us from freely roaming through these lands because the lands were rich in natural resources. During this time and for many years, the Government also restricted Apaches from freely practicing their traditional ceremony, both on and off the reservation. Instead of stopping our religious practices we had our ceremonies in secluded areas. The Government laws were strict and our ceremonies were hidden but we kept conducting them, even at Chi'Chil Biłdagoteel.
9. I was taught and learned the ways of the Holy Ground ceremony from the Hoffman side of my family. The stories, songs, and prayers from the Holy Ground ceremony have been passed down for

many generations within my family line. In return, I am teaching the next generation so they will be able to teach the future generations about the Holy Grounds ceremony.

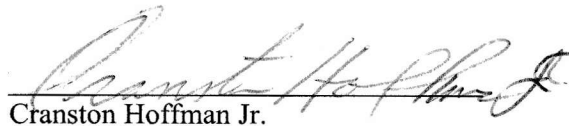
10. The Holy Grounds Ceremony is a blessing and a healing ceremony. At Chi'Chil Biłdagoteel (“Oak Flat”) the Holy Ground ceremony is conducted for people who are sick, have ailments or seek guidance. The Holy Grounds ceremony is also a ceremony to pray for elements that are part of the eco-system, like rain, so water can rain down upon the People (the Apache), the animals, medicines, minerals, and trees. Oak Flat is a holy place for healing.

11. I have conducted the Holy Grounds ceremony at Chi'Chil Biłdagoteel (“Oak Flat”) for many years. The Holy Ground ceremony at Oak Flat supports life, and the emotional, physical and spiritual well-being of our People (the Apache). It is a ceremony that should not be recorded or shared in social media or newspapers as it is very personal.

12. To have a land exchange occur at Oak Flat and to have destruction of this spiritual place by mining—these actions will have a direct, negative effect on me and members of the Holy Ground group who assist me in conducting these ceremonies. The prayers we have offered will be disrupted, the negative things extracted will resurface and we believe that these negative elements will come back to hurt us, our loved ones, and/or our tribal community. Our religious beliefs in the good that we do by conducting prayers at a special, holy place will be broken. We do not want this for our People, for our Future and for Ourselves. Just as I served to defend this Country as a soldier in the Army, I serve my People to defend our traditional Apache Way of Life as an Apache Medicine Man who conducts the Apache Holy Grounds Ceremony at Oak Flat. I request that our declarations be heard and considered fairly and in good faith.

Respectfully submitted,

Dated: January 10, 2021


Cranston Hoffman Jr.