

April 12, 2021 *Transmitted via Electronic Mail*

Fresno County Board of Supervisors ClerkBOS@fresnocountyca.gov

Chairman Steve Brandau district2@fresnocountyca.gov

Vice Chairman Brian Pacheco District1@fresnocountyca.gov

Supervisor Sal Quintero District3@fresnocountyca.gov

Supervisor Ernest Buddy Mendes District4@fresnocountyca.gov

Supervisor Nathan Magsig District5@fresnocountyca.gov

Re: Resolution to Change the Name of Squaw Valley

Dear Fresno County Board of Supervisors Steve Brandau, Brian Pacheco, Brian Pacheco, Sal Quintero, Ernest Buddy Mendes, and Nathan Magsig,

The American Civil Liberties Foundation of Northern California submits this letter in support of the Resolution to Authorize the Renaming of "Squaw Valley"¹ and to urge the Fresno County Board of Supervisors to heed the call of local residents to adopt the resolution. Although it may be the case that no one in Fresno County today chose this name, and we hope no one today would actively advocate for the use of this horrible word, this does not absolve us of our collective responsibility to address past wrongs and ensure that future generations are not subjected to them.

Culture, heritage, and history are critically important pieces of our identities, how we define ourselves, and our place in society. Since the time of contact, Native American women have been degraded and demeaned by slurs like "sq**w." Native American scholars, activists, and leaders agree that stereotypical mascots and place names—far from "honoring" Native peoples—are deeply damaging and further racist and reductive views of Indigenous peoples. While some will argue that this is just a word, its use represents the ongoing dehumanization of Indigenous women that—for two hundred years—has justified and normalized sexual violence against them. Simply stated, "sq**w" is a racial epithet that encapsulates the epidemic of normalized sexual violence against Indigenous women.

¹ Because the term "squaw" is deeply offensive and harmful, we will opt not to continue writing the full word and instead say "sq**w" for the remainder of this letter.

Throughout the county, governments, schools, and even sports teams are reckoning with this truth and are taking the necessary steps to end the harm inflicted by names like "r****n" and "sq**w."

It is time for Fresno County to end the use of this word.

"Sq**w" and the History of Sexual Violence and Subjugation of Indigenous Women

The term "sq**w" was used for many decades in reference to Native American women in the most degrading and inhumane terms—not as women or human beings, but scornful *objects* for white colonizers to abuse, rape, murder, and discard. In countless primary source documents, prominent historical leaders nonchalantly discuss the brutal treatment of "sq**ws." This name memorializes violence against Indigenous women and normalizes racist beliefs that perpetuate the centuries-long attempted genocide of Native American people.

Sq**w is an offensive slur used to refer to Indigenous women ... it has been used for centuries as a pejorative, reducing Indigenous women to their assumed sexual organs. Sq**w has also been used to describe Indigenous women as ugly, big or heavy, dirty, and stupid.²

Violence against and the dehumanization of Indigenous women were a critical tool of settlercolonialism.³ Subjugation and disenfranchisement of Indigenous women—and their leadership was part and parcel of the European settlers attempts to force assimilation and solve the "Indian Problem." In matrilineal and matriarchical societies, kinship ties were often passed down through women and women led governance and decision-making processes.⁴ Settlers could inflict significant damage to traditional cultures and societies by undermining women's leadership and worth through brutal violence against Native women and labeling them "merciless Indian savages." This would undermine tribal self-governance to the effect of erasing tribes as entities with any legitimacy to self-determination, and by severing kinship ties, would effectively reduce

 $https://scholarship.claremont.edu/cgi/viewcontent.cgi?article=2297\&context=scripps_these.$

⁴ "It is also critical to point out at this time, that most matrilineal societies, societies in which governance and decision making are largely controlled by women, have been obliterated from the face of the earth by colonialism, and subsequently industrialism." Winona LaDuke (Anishinaabe), *The Winona LaDuke Reader: A Collection of Essential Writings* THEYTUS BOOKS (Oct. 15, 2002).

² Abby Abinati, ET AL., *To' Kee Skuy' Soo Ney-Wo-Chek' I Will See You Again in a Good Way Progress Report* SOVEREIGN BODIES INST. and YUROK TRIBAL COURT. (July 2020), available at: https://2a840442-f49a-45b0-b1a1-

⁷⁵³¹a7cd3d30.filesusr.com/ugd/6b33f7_c7031acf738f4f05a0bd46bf96486e58.pdf.

³ "Settler colonialists used rape and violence as a tool to colonize the New World, and this physical violence continued far after the early days of settlement and well into the establishment of the United States. The consistent violence Native peoples endured from frontiersmen, the U.S. military, traders and more has been well documented ... What is less recognized and explored in today's scholarship is how Anglo-American systems institutionalized sexual violence against Native women after 1776, and how this violence against Native women was built to endure throughout time." Martha Bono, *Historicizing Sexual Violence Against Native American Women: Colonization, Intracommunal Shifs, and Creative Forms of Disclosure* SCHOLARSHIP @ CLAREMONT (2019), available at:

the population of Indigenous people with any "claim" to the land.⁵ Rape and sexual violence were tools of the conqueror.

Federal government agents referred to the poor parenting, poor hygiene, bad housekeeping, and general uselessness of Native American women—emblematic of the "sq**w" image—as not only justification for but demanding the forced removal of Indian children to boarding schools and into indentured servitude. This narrative about Native American women and mothers – and the public policies it legitimates – reinforces the damaging stereotypes that lead to Native American children being vastly overrepresented in the foster system, torn from family and community and far too often placed in non-Native homes where their cultures and traditions are not welcome.⁶

Effectively, the term "sq**w" —and how it defined Indigenous women in the white, colonialsettler imagination—was a powerful tool in dismantling tribes and severing the cultural and traditional identity of future Indigenous generations.

"Sq**w" and the Crisis of Missing and Murdered Indigenous Women, Girls and Two-Spirit People

Words define our reality and give meaning to everything around us. The term "sq**w" is a racist and derogatory term that paints Indigenous women as nothing more than dirty, worthless creatures to be exploited, sexualized, and subjugated. Scholars increasingly underscore the connections between the colonial state violence against Indigenous women and continued violence against them today—expressed in Missing and Murdered Indigenous Women, Girls and Two-Spirit People (MMIWG2).⁷ In an environment in which Indigenous people are made invisible—the

⁵ The first way in which the federal government institutionalized violence was through their push to "civilize" Indians by subjugating Native women within their own communities and creating a patriarchy (a mission carried out by Native men). The second way was through developments in federal Indian policies that eroded tribal sovereignty, which in turn prevented tribal governments from effectively responding to cases of sexual assault. The combination of restructuring Indigenous communities into a patriarchy and diminishing sovereignty worked to build a foundation on which the current climate of violence against Native women could succeed and persist. Bono, *supra* n.3.

⁶ "The squaw stereotype was given to Indigenous women to legitimize land acquisition. The term squaw literally means dirty, immoral, and unworthy ... Portraying Indigenous women as squaw has legitimized many forms of violence against Indigenous women. For example, the squaw stereotype presents Indigenous women as unfit mothers. Therefore, if Indigenous mothers are portrayed as unfit to raise their children ... [the] government can legitimize the forcible removal of Indigenous children ... The narrative of Indigenous women as 'easy squaw' is also used to describe Indigenous women's sexuality as 'lewd and licentious.' This manifestation of the squaw stereotype was, and still is, used to excuse the violence Indigenous women and girls experience by white-settler men." Elisha Corbett, *No News Isn't Always Good News: Media Representation of Missing and Murdered Indigenous Women in Canada* QUEEN'S UNIV. (2019), available at: https://www.cpsa-acsp.ca/documents/conference/2019/399.Corbett.pdf.

⁷ See Sarah Deer, *Relocation Revisited: Sex Trafficking of Native Women in the United States* 36(2) WILLIAM MITCHELL L. REV. 621 (2010). Paulina García-Del Moral, *Representation as a Technology of Violence: On the Representation of the Murders and Disappearances of Aboriginal*

majority of people in the US know little to nothing about Native Americans—many non-Native people are informed only by prevalent stereotypes and myths.⁸ Among these include the rich casino Indian, the "stoic Indian," or the alcoholic. For Indigenous *women*, the two stereotypes are the Indian Princess and the "sq**w." In the absence of almost any other information, these stereotypes take hold—to devastating consequences:

- The Center for Disease Control and Prevention has reported that murder is the thirdleading cause of death among American Indian and Alaska Native women. Rates of violence on reservations can be up to ten times higher than the national average.⁹
- Nearly half of all Native American women report having experienced sexual violence¹⁰
- Thirty-four percent of American Indian and Alaska Native women will be raped in their lifetimes¹¹

⁸ "What most people in this country know—or think they know—about Native Americans is rooted in myths, stereotypes and half-truths. Information they have received since birth from movies, television, the media and school lessons has created a false narrative (or commonly accepted story) about historic and contemporary Native Americans and tribes. From a young age, most people in the United States have been immersed in the current dominant narrative about Native peoples. It is a largely false and deficit-based narrative, meaning it focuses on challenges and weaknesses real, assumed or exaggerated—rather than being based on strengths and opportunities. These narratives are almost always created by non-Native people, often with the intention to oppress Native nations, peoples and cultures." FIRST NATIONS DEV. INST. and ECHO HAWK CONSULTING, *Reclaiming Native Truths: Changing The Narrative About Native Americans A Guide For Allies* 4 (2018), available at: https://illuminatives.org/wp-content/uploads/2018/04/MessageGuide-Allies-screen-spreads.pdf

⁹ Ronet Bachman, ET AL., Violence Against American Indian and Alaska Native Women and the Criminal Justice Response: What is Known U.S. DEP'T OF JUST. (Aug. 2008), available at: https://www.ncjrs.gov/pdffiles1/nij/grants/223691.pdf.

¹⁰ CTR. FOR DISEASE CONTROL AND PREVENTION, *CDC Works to Address Violence Against American Indian and Alaska Native People* (2020), available at: https://www.niwrc.org/sites/default/files/images/resource/violence-against-native-peoples-fact-sheet.pdf.

¹¹ NCAI POL'Y RESEARCH CENTER, Policy Insights Brief: Statistics on Violence Against Native Women (Feb. 2-2013), available at: https://www.ncai.org/attachments/PolicyPaper_tWAjznFslemhAffZgNGzHUqIWMRPkCDjpFtx eKEUVKjubxfpGYK_Policy%20Insights%20Brief_VAWA_020613.pdf.

Women in Canada and Women in Ciudad Juarez 36(72) CANADIAN J. OF LATIN AMERICAN AND CARIBBEAN STUD. 33-63 (2011). Katherine Morton, *Hitchhiking and Missing and Murdered Indigenous Women: A Critical Discourse Analysis of Billboards on the Highway of Tears* 4(3) CANADIAN J. OF SOCIO. 299-326 (2016). Sherene Razack, *Timely Deaths: Medicalizing the Deaths of Aboriginal People in Police Custody* 9(2) L, CULTURE AND THE HUMAN. 352-374 (2011). Sherene Razack "It Happened More Than Once": Freezing Deaths in Saskatchewan 26(1) CANADIAN J. OF WOMEN AND THE L. 51-80 (2014). Sherene Razack, Dying from Improvement: Inquests and Inquiries into Indigenous Deaths in Custody (UNIV. OF TORONTO PRESS, 2015)

- Among Native women victims of rape or sexual assault, an average of sixty-seven percent describe the offender as non-Native.¹²
- More than four in five Indigenous women report having experienced violence
- Over forty percent of women victims of sex trafficking in the US are Native American¹³
- According to the Sovereign Bodies Institute, California has the fifth-highest number of cases of Missing and Murdered Indigenous Women, Girls and Two Spirit People of all states.
- As of July 2020, the Sovereign Bodies Institute has documented 165 MMIWG2 cases in California.

Although advocacy and public awareness are increasing, the crisis of violence against Indigenous women still goes largely unreported. Family and community members face serious challenges in accessing justice for their missing and murdered relatives. Because of serious deficiencies in tracking and reporting these cases, it is nearly impossible to understand the vast extent of the impact of MMIWG2 on Indigenous communities.

Native American Mascots and Names Have Demonstrated Negative Consequences

Much research has been conducted on the detrimental impacts of team mascots and names, providing important insight into the impacts of stereotypical or racially insensitive names. These are not *just* mascots. One comprehensive review of the research on the impacts of "Native American mascots" offers clear and damning findings: "[these mascots] are psychologically detrimental to Native American students. Second, for non-Native persons, they are associated with *negative stereotypes of Native Americans*. Third, these mascots undermine intergroup relations by increasing negative stereotyping of Native Americans. Lastly, supporters of these mascots are more apt to believe prejudicial ideas."¹⁴ Native American mascots—and the stereotypes and attitudes these mascots justify and license—are associated with a host of negative indicators for Indigenous youth, including lower self-esteem, increased depression, increased rates of self-harm and substance abuse, and increased discrimination against Native American students in schools.¹⁵

¹² *Id*.

¹³ NCAI POL'Y RESEARCH CENTER, Tribal Insights Brief: Human & Sex Trafficking—Trends and Responses across Indian Country (2016), available at: https://www.ncai.org/policy-researchcenter/research-data/prc-publications/TraffickingBrief.pdf.*See also, The Devastating Impact of Human Trafficking of Native Women on Indian Reservations* Testimony of Lisa Brunner, Program Specialist, at National Indigenous Women's Resource Center Hearing on "Combating Human Trafficking: Federal, State, and Local Perspectives" before the Committee on Homeland Security and Governmental Affairs (Sept. 23, 2013), available at: https://www.hsgac.senate.gov/imo/media/doc/Testimony-Brunner-2013-09-23.pdf.

¹⁴ Laurel R. Davis-Delano, Joseph P. Gone, & Stephanie A. Fryberg, *The psychosocial effects of Native American mascots: a comprehensive review of empirical research findings* 23(5) RACE ETHNICITY AND EDUC. 613-633 (June 8, 2020) https://www.tandfonline.com/doi/full/10.1080/13613324.2020.1772221?journalCode=cree20 ¹⁵ Id.

If terms like "Chief" or "Indian" further these negative stereotypes and inflict real and possibly fatal damage on Native American communities, it is clear that a term used to justify and legitimate extreme violence against Native American women has these same psychological and traumatic impacts on Indigenous women, while normalizing continued violence against them.¹⁶

Native American People in California's History

The state of California was founded on the forced removal, enslavement, and genocide of Indigenous peoples. Our state's first Governor, Peter Burnett, put it bluntly in his 1851 address to the Legislature: "[t]hat a war of extermination will continue to be waged between the two races until the Indian race becomes extinct must be expected."

California's treatment of its original inhabitants was shockingly violent. After the brutal Mission system enslaved and took the lives of thousands of Indigenous peoples, the state sanctioned and funded massacres against Indigenous peoples—authorizing \$1.29 million in 1850's dollars to pay for the militia campaigns that amounted to genocide.¹⁷ In addition to this brutal violence, laws and policies subjugated California Indians; for example, the 1850 "Act for the Governance and Protection of Indians" made the enslavement of California Indians legal, and fueled the kidnapping and trafficking of Native American children into indentured servitude. The State of California and the U.S. federal government destroyed sacred places and prohibited traditional and cultural practices by law.

Native peoples—who stood in the way of the rich bounty that California's diverse natural beauty signified for newcomers – were forcefully removed from and dispossessed of their ancestral lands.

The Travesty of Fresno County's Non-Recognized Tribes

Through treaties and other agreements, the United States and Indian Tribes entered into government-to-government relationships, the federal government acknowledging Tribes' existence as sovereign nations predating the US. In exchange for vast swaths of ancestral territory

¹⁶ This word underscores the acceptance of violence against Native American women and girls while actively doing harm to those who encounter the slur in their lived experiences: "the psychological impact of this racial and sexual slur has a significant negative impact on quality of life, perceptions, and opportunities for Native American women (ethnostress) due to the consistent use and reification of the squaw stereotype through more than 400 years of U.S. history." Further, "these representations not only reinforce dehumanizing and limiting views of the capabilities of Native women ... but also result in 'structural exclusions and cultural imagining [that] leave[s] minority members vulnerable to a system of violence'." Debra Merskin, *The S-Word: Discourse, Stereotypes, and the American Indian Woman* 21 THE HOWARD J. OF COMMC'NS 345-366 (2010), available at: https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/11739/s-word.pdf;sequence=1.

¹⁷ See, for example, Brendan C. Lindsay, Murder State: California's Native American Genocide, 1846–1873 346 (University of Nebraska Press 2015); and, Benjamin Madley, An American Genocide: The United States and the California Indian Catastrophe (YALE UNIV. PRESS 2016). For a non-comprehensive list of genocide incidents in the San Joaquin Valley, see STATE OF CAL. NATIVE AM. HERITAGE COMM'N, Timeline of Genocide Incidents in the San Joaquin Valley Region, available at: http://nahc.ca.gov/cp/timelines/san-joaquin/ (last accessed Apr. 9, 2021).

– nearly the entire country – and often upon forced removal to distant, barren lands, the federal government assumed a trust relationship with the Tribes, legally binding itself to provide for the education, health, and well-being of Native American peoples; to hold tribal land in trust and respect self-determination; and provide federal protections for sacred and burial sites and rights to hunt, fish and gather.

Many tribes were never recognized by the United States or had their federal relationship terminated. Without federal recognition, tribes still exist, but without the rights and protections afforded under federal law. Many tribes are today fighting to gain or regain federal recognition.

The history – and current plight of – non-federally recognized and terminated tribes in California is little-known to those who are not directly impacted, and kept in relative obscurity. Among the many dozens of tribes, and tens of thousands of individual Indians, impacted by unratified treaties of the 1850s¹⁸ and termination policies of the 1950s and 60s,¹⁹ are the Choinumni Tribe, the Dunlap Band of Mono Indians, and the Wukchumni, all of whose ancestral lands are in proximity to or overlap with "Sq**w Valley" in Fresno County.

The Dunlap Band of Mono Indians' ancestors signed two separate treaties with the federal government in 1851; however, "under pressure from the California Congressional delegation, the United States Senate not only refused to sign the 18 treaties that had been negotiated, but they also took extraordinary steps to place the treaties under seal."²⁰ Ancient villages, burial sites, and

¹⁸ According to the Bureau of Indian Affairs, "Between the un-ratified treaties and the Land Claims Act of 1851, most California Indians became homeless." Bureau of Indian Aff., *Who We Are* U.S. DEP'T OF THE INTERIOR, available at: https://www.bia.gov/regional-offices/pacific/who-we-are (last accessed Apr. 9, 2021). *See also*, Larisa K. Miller, *The Secret Treaties With California's Indians*, NAT'L ARCHIVES (2013), available at: https://www.archives.gov/files/publications/prologue/2013/fall-winter/treaties.pdf.

¹⁹ Most significantly, through the California Rancheria Act of 1958 and subsequent amendments. See, Am. Indian Studies Center, XIV. Status and Needs of Unrecognized and Terminated California Indian Tribes UCLA, available at: https://www.aisc.ucla.edu/ca/Tribes14.htm. See also, Debra Utacia Krol (Xolon Salinan), An Indigenous way of life for those California tribes HIGH COUNTRY NEWS (Sept. 17, 2019). available breaks state laws at: https://www.hcn.org/issues/51.17/tribal-affairs-an-indigenous-way-of-life-for-these-californiatribes-breaks-state-laws.

²⁰ The Dunlap Band of Mono Indians' petition for federal recognition is supported by the National Congress of American Indians, the largest inter-tribal organization in the United States representing American Indian and Alaska Native nations. NAT'L CONG. OF AM. INDIANS, Res. DEN-07-083, Request for Congress to Approve H.R. 3069 to Reaffirm the Federally Recognized Status of the Dunlap Band of Mono Indians, Leading to the Inclusion of the Tribe on the Part 83 List of Indian Entities Recognized and Eligible to Receive Services from the U.S. Bureau of Indian Affairs (Dec. 5, 2007), available at: https://www.ncai.org/attachments/Resolution ZkqoOpRxEODErtMIbusgHMPStVePqzeNIhTk mtqnVfzVmZpvtkn DEN-07-083 final.pdf. H.R. 3069, submitted in 2007 by Congressmen Nunes, would have reaffirmed the federal recognition of the Tribe. H.R. 3069, 110th Cong. (2007), available at: https://www.congress.gov/bill/110th-congress/house-bill/3069/text.

pictographs at Kings Canyon National Park – on the ancestral lands of Dunlap Band of Mono Indians – date back over 3,000 years.

Despite signing a treaty with the United States government on April 29, 1851, the Choinumni Tribe does not have federal recognition, and has actively worked to gain it since 1959.²¹

Like many non-federally recognized Tribes, the Wukchumni face extinction. Although the Tribe has had a petition for recognition since at least as far back as 1988, they remain unrecognized. Today, there is only one remaining native fluent speaker of the Wukchumni language.²²

Native American People in California Today

There are approximately 110 federally recognized tribes in California and well over fifty tribes recognized by the state or petitioning for federal recognition. There are nearly 100 separate reservations or rancherias, including three in Fresno County, Big Sandy Rancheria, Cold Springs Rancheria, and Table Mountain Rancheria. As of the 2010 census, California had the largest population of American Indian/Alaska Native people, representing roughly fourteen percent of the entire Native American population of the United States. Urban centers throughout the state—including Sacramento, Santa Rosa, and the Bay Area—have among the largest Urban Indian populations in the country. The Indigenous population in California today represents incredible and rich diversity and are leading in many efforts that impact all our communities, from climate change and wildfire prevention to restorative justice and reconciliation.

Fresno County Residents and Leaders are Calling for this Long-Overdue Change

Local Indigenous leaders and residents are calling on the Fresno County Board of Supervisors to live up to its own stated values of "working together for a quality of life for all" and "respecting and embracing ethnic and cultural diversity" by changing the name. Words matter. We name our schools, parks, and landmarks after leaders and heroes to honor and celebrate them. By keeping the name "Sq**w Valley," the Fresno County Board of Supervisors is implicitly telling the community that we should celebrate the long legacy of violence against Indigenous women.

Fresno County is Behind the Times

Across the country, localities, schools, and even national football teams have realized the deeply damaging impact of racist mascots and place names on Indigenous communities and on all people. This is the time for action.

²¹ This includes a still-pending application for recognition dating back to 1987 and more recently, a 2001 Joint Resolution from the California Legislature, requesting that the federal government recognize the Tribe. AJR 8 (Cal. 2001), available at: http://www.leginfo.ca.gov/pub/01-02/bill/asm/ab_0001-0050/ajr_8_bill_20010328_introduced.pdf.

²² Emmanuel Vaughan-Lee, 'Who Speaks Wukchumni?' N.Y. TIMES (Aug. 18, 2014), available at: https://www.nytimes.com/2014/08/19/opinion/who-speaks-wukchumni.html

Page 9

- After an extensive process of research and consultation, the "Sq**w Valley" Ski Resort—home to the 1960 Winter Olympics—announced its decision to change the name of the resort in August 2020.²³ They have yet to announce a new name.
 - The resort published its extensive findings, and the arguments it found in favor of keeping the name were "some disagreement locally," "strong brand recognition," and that the "change will be costly." In the "pro" column: "our name will no longer be a racist slur."²⁴
- In recognition of the harm done to Native American students by Native mascots, the Fresno High School Board voted to change the "warriors" mascot image in December 2020.
- After years of advocacy and mobilizing by Native Americans and allies, the Washington football team announced the change of its racist name "r****n" in July 2020
- Oregon, Montana, Minnesota, Maine, Oklahoma, and Idaho have taken steps to systematically remove the "sq**w" name
- The USDA Forest Service is removing the name "sq**w" from all markers, signs, and maps and will no longer be used, finding that the term is "derogatory"

In 2019, Governor Newsom issued an apology to California Native American Peoples "for the many instances of violence, mistreatment and neglect California inflicted." As a part of that apology, the Governor announced the creation of a Truth and Healing Council so that California's Indigenous peoples can share their stories and work with the state to recommend steps towards healing.²⁵ While much work remains to be done, this is a powerful example of government reckoning with and accepting responsibility for the past, building mutual and meaningful relationships with Native American communities and leaders, and taking the lead of Indigenous peoples rather than telling them their perspectives are wrong, uninformed, or too sensitive.

We all have a great deal of work to do to reckon with and rectify the unimaginable horrors and injustices of our shared history. The Fresno County Board of Supervisors can take action towards truth and healing – and building mutual, respectful relationships with Indigenous residents—by embracing the community's call to redress this injustice.

Conclusion

Instead of contributing to a false narrative of harmful stereotypes of Indigenous peoples, Fresno County has a real opportunity to contribute to the creation of a new narrative – one that speaks to

²³ SQUAW VALLEY ALPINE MEADOWS, *Squaw Valley Name Change*, available at: https://www.squawalpine.com/squaw-valley-name-change (last accessed April 9, 2021).

²⁴ SQUAW VALLEY ALPINE MEADOWS, *Findings on the Issue of "Squaw"* (July 27, 2020), available at: https://www.squawalpine.com/-/media/squaw-alpine/pdfs/findings-on-the-name-squaw-updated.ashx.

²⁵ EXEC. DEP'T STATE OF CAL., Exec. Order N-15-19 (June 18, 2019), available at: https://www.gov.ca.gov/wp-content/uploads/2019/06/6.18.19-Executive-Order.pdf

the strength, resiliency, diversity, and leadership of Native American communities in the region. This is what Indigenous Fresno County residents and their allies are asking for. Over 4,351 people have joined in this call. Following this letter, we include the signatures of the 1,756 people who have signed the ACLU NorCal petition in support of this resolution at the time of submission.

There is no legitimate reason to hold tightly to a name that represents the subjugation, dehumanization, and brutal violence against Indigenous women. We hope that the Fresno County Board of Supervisors will heed the call of your constituents, the call of history, and the call to live up to your own values and adopt the resolution to change the name of "Sq**w Valley."

Sincerely,

Theodora Simo

Tedde Simon (Navajo), Indigenous Justice Project Manager

Diandon J. Dreve

Brandon Greene, Racial & Economic Program Director