

## APPENDIX A

PETITION BY OLD CROW INDIANS RESPECTING  
CERTAIN LANDS

To The Honourable The Commons of Canada

In Parliament Assembled:

The Petition of the undersigned members of the aboriginal people of the Old Crow Indians, in that area known to your honourable House as the Yukon Territory, who now avail ourselves of our ancient and undoubted right thus to present a grievance common to your Petitioners in the certain assurance that your honourable House will therefor provide a remedy.

## SHEWETH:

That for so long that the mind of man runneth not to the contrary and for so long as the waters of the Old Crow and Porcupine Rivers have flowed, and flowing mingled, for so long have the people of the Old Crow occupied those lands that lie south of the British Mountains, west of the Richardson Mountains and north of the Ogilvy Mountains;

That these lands are not included in the documents of title under which Canada defines its boundaries either through the purchase of the territorial rights of the Hudson's Bay Company in Rupert's Land, as defined in the Rupert's Land Act, 1868, of the statutes of the United Kingdom, or through treaty purchase from the people of the Old Crow, or in any other wise or at all;

That Canada has trespassed and continues to trespass without lawful title or colour of right upon these lands of the people of the Old Crow, where the rivers flow westward to the Pacific Ocean, and, by such trespasses, asserts a legal title to these lands;

That your Petitioners, adopting for their own and incorporating by reference herein so much of the arguments of their brothers, the Nishga Indians of British Columbia, submitted in a cause now pending in the Supreme Court of Canada, as are applicable and pertinent to the subject

matter of this Petition, stipulate the distinction that the trespasses complained of in that cause are committed by a province of Canada while the trespasses complained of in this Petition are committed by Canada and are therefore proper to be presented to and considered by your honourable House;

That your Petitioners, by their Petition, do not submit themselves nor any other of the people of the Old Crow to the jurisdiction of the Parliament of Canada, or of any institution by that Parliament created, nor do your Petitioners, by their Petition, admit the authority of the Parliament of Canada, or of any institution by that Parliament created, to determine that any rights of the people of the Old Crow are either less or more;

That this Petition is presented to your honourable House to the end that your honourable House, upon consideration thereof, will resolve to respect the territorial integrity of the people of the Old Crow as by reference to our Prayer hereafter will more fully appear: so that thereby will your Petitioners be upheld in their belief that your honourable House, guided neither by the trivial considerations of commercial profit or commercial loss, will govern itself by the law of good faith which, as between peoples, must be the philosophy of their politics and the religion of their governments;

Wherefore your Petitioners PRAY that your honourable House will prevail upon Her Most Gracious Majesty's Canadian Government to cease and desist from the trespasses hereinbefore recited and to acknowledge and respect the aboriginal rights of the people of the Old Crow to their ancient tribal territories, and that your honourable House will provide such further and other relief in the premises as to your honourable House seems just and meet;

And your Petitioners now prayeth and will ever pray,

And your Petitioners have, and each of them hath, signed this 21 day of February, in the year of Our Lord One Thousand Nine Hundred and Seventy-Two.

Charlie Abel,  
Chief

Abraham Peter,  
Band Councillor

Edith Josie,  
Band Councillor

John Kendi,  
Band Councillor

Lazarus Charlie,  
Band Councillor