

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PUEBLO OF SANDIA,)	
)	
Plaintiff,)	Civil No. 1:94CV02624
v.)	
)	Hon. Harold H. Greene
BRUCE H. BABBITT and)	
MIKE ESPY,)	
)	
Defendants.)	

AFFIDAVIT OF ELIZABETH A. BRANDT, PH.D.

COUNTY OF BERNALILLO)
) ss.
STATE OF NEW MEXICO)

Elizabeth A. Brandt, Ph. D., being duly sworn, deposes and states:

1. I am a Professor of Anthropology and Linguistics in the Department of Anthropology at Arizona State University in Tempe, Arizona and also a private consultant. I specialize in the culture, ethnohistory, and language of the Tiwa Pueblos of New Mexico, especially Sandia Pueblo. My research concerning the Pueblo of Sandia began in 1968 and has continued to the present day. I have had extensive training in sociocultural anthropology including ethnohistory, linguistics, and some in archeology and physical anthropology. I am the author of the standard reference articles on Sandia Pueblo. I am fluent in Spanish and have broad knowledge of Southern Tiwa, the language of the Pueblo of Sandia. My résumé is attached as Exhibit A.

2. Archeological evidence indicates that the Pueblo of Sandia has occupied essentially the same area since approximately 1300 A. D. The historical landscape in and around the claim area is prominent in their oral history and cultural traditions. It has served continuously as a site of cultural and religious practice for centuries.

3. Despite several centuries of contact with European civilization, the people of Sandia still guard their traditional religious and cultural practices which are focused on numerous sites within the claim area. That religion involves several elements: ritual significance of specific plants, animals, and sites; collection of specific plants and minerals at certain times; specific places of worship and sites where offerings and prayers are made, and prescribed pilgrimages to those places which are intimately connected to the origin and continued ethnic identity of the community.

4. The manner and timing of this worship is specified by tradition. Various elders have duties which must be performed at specific shrines on a periodic basis. Other religious leaders or individuals may seek to worship for special petitions or to gather curing herbs. Ceremonies marking rites of passage are also accomplished through such pilgrimages. Hunters make offerings at shrines. In all of these observances secrecy and privacy is absolutely essential.

5. Over the years both before and after the erroneous survey, the people of Sandia continued to worship at the shrines and sacred areas within the claim area. As the intrusions by the Forest Service and the public became more numerous over the past years and sites were destroyed or offerings removed, it became more and more difficult to find the necessary privacy to continue the

religious and cultural practices essential to the well-being and continued survival of the Pueblo.



Elizabeth A. Brandt, Ph.D.

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS ____ DAY OF JUNE 1996



Notary Public

My commission Expires:

6-10-98