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ESSAY: LATCRIT Y LA DES-COLONIZACION NUESTRA: TAKING COLON OUT

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BIO:

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SUMMARY: ... The so-called "colonial" experience began at the juncture of history and myth - when Cristobal Colon landed on the island of Quisqueya. ... Before Colon we were many. ... Since Colon, one common experience has been trying to "de-colon," decolonize, take Colon out. ... When Colon came he brought double-speak, predating Orwell by several hundred years. Colon the outsider came to our lands and named them "of Spain," making we-who-resisted not-of-Spain, making us the outsiders on our Native soil. ... And can we tell who is Colon and who we are? when he is inside us? ... What is the conceptual grid of Latinoism, of Latino studies, of Chicano Studies, of Puerto Rican Studies? Has this conceptual grid been subservient to the conceptualized grid of imperialism, of colonialism - post and neo? How has the nascent "latinoism" colluded with the mythology of Colon-ization to the exclusion of Native peoples? How has it colluded with the exclusion of ourselves? ... If we are re-claiming the mythology surrounding la Malinche, then we must look at her vision, removed from Colon's interpretation. ... The project begun by Colon instituted the systematic oppression of the peoples indigenous to this hemisphere. ...

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I. Introduction

El panorama de America durante estos ultimos quinientos años, y luego de estos quinientos, nos muestra un curioso mosaico multiétnico, multirracial y en su conjunto plural, donde el eje de unidad y coherencia esta plasmado en aquello que aparece como herencia de Occidente y que nosotros identificamos como latino-america y anglo-america, en referencia al origen europeo de su existencia, dado que opera dentro de los marcos de origen colonial de su patrimonio cultural. Lo que no esta dentro de estos marcos de referencia occidental es llamado indigena. El mundo indigena americano aparece como un archipiélago rodeado de Occidente. n1

¿Cuál es nuestro ser? ... de hecho solo hay implícitamente una respuesta con la cual identificarnos: el mestizaje. n2

I come to this writing as an activist, not as a legal scholar. I wanted to participate in this discussion because it is one critical to our survival - the survival of the many peoples of this hemisphere. I also wanted - and yet did not want - to join this panel because of the "Latino" context, and because of the questions about the

history of the peoples indigenous to the area now known as the United States suggested to the panelists. Therein lies a contradiction: to address the histories of the indigenous peoples of this hemisphere within a "Latino" context (i.e. within a LatCrit conference) without having critically examined the term "Latino" and its relationship to Native [*352] history is impossible. And so I attempt to enter this discussion from the juncture of this history. n3

Say, Skin!

Brown-hued soldadera

of urban slum jungles

& rural plantation esclavitud,

<qmarkx>en que parte

de la historia

has quedado? n4

<qmarkx>En que parte de la historia has quedado? In what part of history have you remained? - asks Indio/Mestizo poet activist Raul Salinas. This is a critical question, perhaps the critical question, for LatCrit studies 101. Where in history are we, we who name ourselves or accept the name "Latina"?

In the October 1997 issue of Latina Magazine, contributing editor Chiori Santiago opens an article on Latina women with a reference to "Nobel Prize-winning Guatemalan activist Rigoberta Menchu" as a Latina who has "made it." n5 I have heard Rigoberta Menchu speak many times since she first toured the US in the early 1980s, denouncing the war of genocide the Guatemalan State has carried out against the Mayan people. I have never heard her refer to herself as "Latina" - and I question whether Ms. Menchu would appreciate that denomination when much of her life's work has been to make visible the histories and present-day lives of the Mayan peoples. What does it mean in the United States today for Ms. Menchu to be named "Latina"?

I am going to assume that these discussions of critical race theory will be of some use, some benefit, to critical race practice. n6 [*353] That it will benefit our communities, tribes and nations as we challenge the structures and devastations that colonialism in all of its manifestations has wrought.

The questions panelists were asked to consider fell into two categories. The first category asked how have the experiences of indigenous peoples in the U.S. been similar or dissimilar? The second category asked if LatCrit has a role to play in examining these histories and if so, what is it? Part of answering these questions requires that we also ask why and how we might use the term "Latino" - a name emerging out of our histories of colonialism - and asking what relationship the term Latino has with the terms "Indigena" or "Native Peoples."

Bringing this back to critical race practice, I must assume that these questions are asked in order to inform your next steps as practitioners, as activists for change. Native American activist Nilak Butler was direct when I mentioned this panel to her:

What are you going to do with this discussion? [she asked.] Is it for the good of the whole? We need legal practitioners, technicians who understand Native issues, environmental law, land rights. There are not enough legal practitioners with the knowledge we need and the willingness to work pro bono or to accept long-term payments. We need practitioners who are looking to influence policies that will be more reflective of our own peoples. If you are getting together to discuss law and theory the question I have is: Which path makes the most sense for the earth and its peoples? n7

The term "Latino" implies a path that is non-indigenous. Not all the peoples of the areas known as "Latin America" have the same history - nor do we have the same path to our collective future.

II. De-internalizing the mythology/reclaiming our histories

The domination of the mystified past over the present expresses itself in a conception of the future as unalterable. Conversely, the demystification of the past through the reclamation of the history [*354] of individual and collective resistance permits the prefigurative envisioning of a transformed future. n8

To look at the question of our colonial, postcolonial and neocolonial experiences we must open up the entire mythology of the "discovery" of the Americas as it is taught in the United States:

In his search for the Indies Columbus discovered a "New World," whose inhabitants were friendly and welcoming. They thought the Spanish were gods! Fast Forward to Spanish conquistadors on horses - Cortes, Pizarro, Ponce de Leon - claiming lands for Ferdinand and Isabel. A sweet Indian princess/slave befriends/falls in love with great white man, a.k.a., Cortes, helping him conquer her people. Fast Forward to grateful English pilgrims finally landing on Plymouth Rock. Refugees from religious persecution, they have come to face the wilderness of the new world for righteousness and their god. What luck! Again a sweet Indian princess befriends/falls in love with great white man, a.k.a., John Smith. Intervening on behalf of all white men, she implores her father, the savage chief, to spare them. Soon white people and Indians are laughing and smiling together, sharing the first "Thanksgiving" celebration. What nice Indians, they gave the white people corn and turkey! Fast Forward to pioneers and cowboys, moving west in covered wagons. Bad Indian warriors are terrorizing white women and children! Burning houses! Plundering, scalping, whooping war calls as they ride naked across the plains! Thank god for the Calvary, who arrive in time to save the white women and children from the savages! Fast Forward to the Lone Ranger and his friend Tonto, the one good Indian. He white man friend.

In order to understand the colonial, postcolonial or neocolonial experiences of Native peoples on this continent, we - all the peoples of the Americas - must step outside of this mythology in all of its variations. How simple to put those words on paper, to even say them out loud. How very difficult the process of stepping outside of all that we have internalized during the past five hundred and five years of colonialism - of de-internalizing, if you will, the mythology of our origins; of casting off the domination of the mystified past in the subjective practice of liberating our own stories.

The so-called "colonial" experience began at the juncture of history and myth - when Cristobal Colon landed on the island of Quisqueya. This European soldier/explorer claimed Quisqueya for Spain, "naming" this "discovered" land *Esparola* - belonging to Spain - and kidnapped/abducted several Tainos in the first of millions of acts of war. In Colon's own words: "As soon as I arrived in the Indies, on the first Island which I found, I took some of the [*355] Natives by force in order that they might learn and might give me information of whatever there is in these parts." n9

So we have the point of contact, and we have the first act of war. Five hundred and five years ago our world was split apart (not brought together, as myth would have it) and since then our mythologies and our histories have evolved in Pllel realities.

This juncture has critical implications for Latinos, for what some call "outsider discourse" and "critical race theory," as well as for legal scholarship - beginning with a name which may or may not be the name we would have chosen for ourselves, depending on which Pllel reality you occupy. Before Colon we were many. We were not Americans. We were not hyphenated. "Hispanic" came with Colon. "Latino" came with Colon. Since Colon, one common experience has been trying to "de-colon," decolonize, take Colon out.

When Colon came he brought double-speak, predating Orwell by several hundred years. Colon the outsider came to our lands and named them "of Spain," making we-who-resisted not-of-Spain, making us the outsiders on our Native soil. One of the defining factors in the colonial, postcolonial and neocolonial experiences of Native peoples in this hemisphere, then, is how much we have remained outside of Colon/the colony and how much we have internalized Colon. And can we tell who is Colon and who we are? when he is inside us?

Historians make political choices when they choose which facts - whose actions, what relationships, which events - to report and which to leave out. They make deeper choices still when they align those "facts" in a conceptual grid, such as liberalism, Marxism, or Christianity. When a historian's grid accords closely with the understanding of the world that best serves the interests of those in power, it becomes invisible and what is left looks like a simple, factual chronology. n10

The conceptual grid that defines our understanding of/our telling of history is itself defined by our internalization of the colonial mythology from the European perspective. What is the conceptual grid of Latinoism, of Latino studies, of Chicano Studies, of Puerto Rican Studies? Has this conceptual grid been subservient to the conceptualized grid of imperialism, of colonialism - post and neo? How has the nascent "latinoism" colluded with the mythology of [*356] Colon-ization to the exclusion of Native peoples? How has it colluded with the exclusion of ourselves?

Is Latino a meaningful category? In what situations? n11 Eric K. Yamamoto refers to "decentering whiteness" as the singular "referent for determining racial group identities and relations." n12 It expands racial formation and racial justice into the realm of interracial relations. Yet for some Latinos, whose Mestizo culture is Native and Spanish (and for some of us, African), de-centering whiteness splits us in two: are you white, Native or other? What does it mean to be "other" and referentially opposed to "Native" when it is often your Native blood that makes you not-white?

III. At the outsider table - can we talk?

Whatever the differences in our various histories - whether actual or mythologized - we are currently experiencing a shared reality in relation to the evolution of postcolonial power relations in the world. Let us imagine that we are sitting collectively at the global outsider table, we children of colonialism. We bring to this table our various histories: we are the survivors of genocidal intent, we are the children of slaves, we are full-bloods and half-breeds, we are Mestizos and Mayas, Kickapoo and Caribs. We speak K'anjobal, Spanglish, Quechua, Mohawk, Creole, English. Our hair is straight and kinky, we are trigue<tild n>as, blond, color de cafe. We have been pitted against each other over and over again. When we look at each other it is difficult for us to see past the mythologies, the lies, the propaganda. We look at each other and see the projections of a mythologized past/present: we might think we are seeing la Malinche, Colon, Uncle Tom, Geronimo, Tupac Amaru, Freddie Prinze, the virgin, el macho, the slut, fulana de tal. In fact we are the product of all of these and of none of these. We need to pack up those images and put them in the folder icon on our desktop, labeled "old archetypes for future study" so we can begin to really look around the table at our naked faces. Presente todos, let's get on with the agenda.

[*357] And what is that agenda? A central "challenge facing any movement dismantling... a system in which one culture dominates another... is to provide for a new order that does not reproduce the social structure of the old system." n13 The first item on our agenda, then, must be an agreement that we aim to work in solidarity with each other as we discover how we have internalized and have perpetuated the old system - the colonialisms; as we work to dismantle and to de-colonize those structures inside us individually and collectively; and to look to our common and different experiences pre- and post-Colon for the basis of the new order.

I believe that we must consider the proposals of our indigenous sisters, mothers, grandmothers, compañeras en lucha as one of the first items for our common agenda. If we claim that we are the children of indigenous women, then we must seriously listen to our mothers. If we are re-claiming the mythology surrounding la Malinche, then we must look at her vision, removed from Colon's interpretation. If we embrace Tenontzin as our spiritual guide then we must follow her and not patriarchal Christianity's interpretation of her.

I must ask those of you developing this discourse called LatCrit theory, if la Raza Cosmica comes of the union of the Indian mother and the European father, where is your mother's voice? In what form has the mythology born of colonialism entered into our theories? Colon set forth the language, the world-view that would define the discourse of colonialism in this hemisphere for the next five hundred plus years. With few exceptions, the recognized history of colonialism has taken place in the oppressors' tongue, whether we are Taino or Chiricahua, Potawatomi or Mapuche, K'anjolab or Dine. Denied our tongues, we are denied our stories, and without our stories we have no decolonized legacy to leave for our children. n14

[*358] The late scholar/activists Ricky Sherover-Marcuse and Harrison Simms, and their colleague Hugh Vasquez, have proposed this working definition of the term "oppression": the systematic, pervasive, routine, institutionalized mistreatment of individuals based on their membership in various groups which are disadvantaged by imbalances of power in society. n15

The project begun by Colon instituted the systematic oppression of the peoples indigenous to this hemisphere. How the various colonial societies evolved in relation to the different indigenous Peoples, and how the oppression of indigenous peoples was imbedded into the political, cultural, economic and social institutions of each colonial state is a topic far too vast for the scope of this discussion. The racial stratification born of the systematic oppression of indigenous and African peoples, of forced as well as chosen unions between races, and the mixing of blood and culture is as diverse and varied by region and state as any other aspect of the hemispheric history since Colon.

Europeans set up a colonial project here to extract wealth from the peoples and land. The "wars of independence" were the colonists cutting off the economic and political control of Europe - while maintaining the colonial structures of the systematic oppression of indigenous peoples. The privileges and power previously held by the Spanish was now claimed by the children of the Spanish, Portuguese, English, and French. Over the course of these 500 years the "Anglo-American" states formed a union, and ultimately achieved political, military and economic dominion over a good part of the hemisphere - specifically over many "Latin-American" states. This dominion has come to be called neocolonialism - the re-colonizing of the region by a new power - the U.S. This new colonial relationship did not change the essential structures of power - it added a new top layer to the stratification of power, whether military, political or economic.

The peoples of Anglo America have colonized the peoples of Latin America, and this neocolonialism defines the relationship of all Latin Americans to the U.S. When Latin Americans migrate to the [*359] U.S. they are transformed into Latinos - colonized peoples forced by history to enter the colonizers' nation.

The mythology of the Latin American nation states is that their peoples are "Latin" descendents of Spain, or, that they are Mestizo nations who claim indigenous ancestry but whose voice and vision (education, philosophy, literature, social sciences) are European or Euro-American. History begins at "conquest" and is interpreted and embodied by the colonizer. This mythology effectively makes invisible the Native peoples of Latin America, or at best reduces them to colorful remnants of the past to be packaged for tourism.

IV. De-colonizing "Latino"

It will be good if the Ladino can understand what the ancianos know, that if there is no suffering there is no change. Maybe the next step will be to say, "I am the product of a mix of our country's races - so I am Maya too." n16

Can the histories and experiences of the peoples indigenous to this hemisphere enhance LatCrit analyses of social and legal power, privilege and subordination? I believe the answer to your question is a qualified yes. I think that we must ask ourselves some very hard questions, as people who have been defined - by whose conceptual grid? - as Latinos. For example, what is the basis of our (Mestizos in US) social and legal power today? What are the so-called privileges we enjoy? What is our relationship to the (subordinated) indigenous nations/communities in the U.S./Americas? Our understanding of our history is incomplete without these questions. Until they are answered we are hindered in our process of de-colonizing our individual and collective selves.

You ask, can or should LatCrit theory help to deconstruct and interweave these histories to facilitate empowerment and interconnection among and between these and other subordinated groups? I think that depends on how LatCrit theorists determine their relationships to "these subordinated groups." Can LatCrit theory take this on? I guess my question is, can it afford not to?

How should this be done?, you ask. By continuing the process of our own de-colonization. By beginning a critical examination of our relationship to "conquest", "subjugation", and to the indigenous peoples of the world through a de-colonized lens. I believe this is done through entering into and supporting a dialogue with Native activists and academics about our common struggle/s. Do you know the works of Paula Gunn Allen, Ned Blackhawk, Beth Brant, Ward Churchill, Elizabeth Cook-Lynn, Vine Deloria, M. Annette Jaimes, [*360] Winona Laduke, D'arcy McNickle, Anna Lee Walters, Angela Cavender Wilson? n17 Why not? This work should be done by supporting the leadership of Native thinkers, theorists, activists, by asking them for their perspectives before assuming they want to hear yours. Remember to ask, who is at the table?

This work must be done by critically examining colonial, postcolonial, and neocolonial "legal" relationships between Native and Euro/American nations and governments through a de-colonized or at least de-colonizing lens. It must be done by taking a pro-active stand against those relationships that perpetuate subordination, domination and genocide - no matter the privileges we might have to give up.

This work must be done by making "critical thinking" as it comes out of the LatCrit community accessible to other Mestizo/indigenous people in our communities, through de-colonizing [*361] language, and through insistence on translation to all of our languages.

Finally, you ask, why?

Because it is the path to our own emancipation as human beings. If we are lucky, we will get to glimpse our own de-colonized potential. We do this work so that our children, and their children, can be free to have visions of their potential that is beyond our still-colonized imaginings.

FOOTNOTE-1:

n1. Luis Guillermo Lumbreras, La cultura indigena 500 años despues, in Quinientos años de historia, sentido y proyeccion 101, 102 (Leopoldo Zea ed., 1991).

n2. Juan A. Ortega y Medina, Identidad, amplitud y plenitud del Mestizaje en Hispanoamerica, in Quinientos años de historia, sentido y proyeccion 129, 134 (Leopoldo Zea ed., 1991).

n3. To refer to the indigenous peoples of the area now known as the Americas - the continents and islands that comprise this hemisphere with one all-encompassing term is itself problematic. For the purpose of this paper, when it is not possible to speak of a particular nation (Dine or Oneida, for example) I will use the terms "Native," "Native American," "American Indian," and "Indian" interchangeably to refer to the indigenous peoples of the area now known as the Americas. Less frequently, I will use "American Indian" and "Indian" to refer to the Native peoples of Canada and the US, and "Indigena" to refer to Native peoples of the Central and South America. When referring to the works or words of others I will use the language of the author.

n4. Raul R. Salinas, *Homenaje a la Pachuca*, in *East of the Freeway* 12 (1995).

n5. Chiori Santiago, *Mujeres who made it and the men who helped*, *Latina*, Oct. 1997, at 69.

n6. See Robert A. Williams, Jr., *Vampires Anonymous and CriticalRace Practice*, [95 Mich. L. Rev. 741 \(1997\)](#). Mr. Williams, a member of the Lumbee tribe in North Carolina, tells how he was called upon by the Native communities surrounding the law school where he taught and wrote about critical race theory to be accountable to them:

"What these Arizona Indians really wanted me to do was to get off my critical race theory ass and do some serious Critical Race Practice. They didn't give a damn about the relationship between hegemony and false consciousness. They wanted help for their problems, and I was a resource. That's why they were so tough on me." [Id. at 759](#).

This challenge to develop a critical race practice resulted in the formation of a Tribal Law Clinic, where all of the clinic's projects:

are approached as efforts aimed at decolonizing United States law and international law relating to indigenous peoples' rights. Students are encouraged to try to understand how the legacy of European colonialism and racism are perpetrated in contemporary legal doctrine, to expose that legacy at work in the project they are working on, and to develop strategies which delegitimize it, literally clearing the ground for the testing and development of new legal theories.

[Id. at 763](#).

n7. Telephone Interview with Nilak Butler, Native American Activist (Apr. 1997).

n8. Erica Sherover-Marcuse, *Emancipation and Consciousness* 140 (1986).

n9. Christopher Columbus, quoted in Howard Zinn, *A People's History of the United States, 1492-Present* 1 (1995).

n10. Rebecca Gordon, *Movement Media* 13 *Women's Rev. Books* 6 (Mar. 1996) (reviewing Rodger Streitmatter, *Unspeakable: The Rise of the Gay and Lesbian Press in America* (1995)).

n11. Eric K. Yamamoto asks these questions as well:

under what circumstances do individuals faced with justice issues shift between pan-racial and ethnic identities? How do differences concerning history, culture, economics, gender, class, mixed ancestry, immigration status and locale contribute to malleable victim and perpetrator racial identities? How do unstable racial identities detract from or provide opportunities for deeper understandings of interracial harms and group responsibility for healing?

Eric K. Yamamoto, Rethinking Alliances: Agency, Responsibility and Interracial Justice, [3 UCLA Asian Pac. Am. L. J. 33, 43-44 \(1995\)](#).

n12. [Id. at 36](#).

n13. Lisa Lowe, Heterogeneity, Hybridity, Multiplicity: Marking Asian American Differences, in *Diaspora* 24, 31 (1991) quoted in Eric K. Yamamoto, Rethinking Alliances: Agency, Responsibility and Interracial Justice, [3 UCLA Asian Pac. Am. L. J. 33, 57 \(1995\)](#).

n14. Elizabeth Cook-Lynn has written eloquently of the decolonization of storytelling:

The role of Indians, themselves, in the storytelling of Indian America is as much a matter of 'jurisdiction' as is anything else in Indian Country: economics, the law, control of resources, property rights. It goes without saying that it reflects our struggle with the colonial experience of our concomitant histories. If that sounds benign, it is anything but that. On the contrary, how the Indian narrative is told, how it is nourished, who tells it, who nourishes it, and the consequences of its telling are among the most fascinating - and, at the same time, chilling - stories of our time.

Elizabeth Cook-Lynn, American Indian Intellectualism and the New Indian Story, 20 *Am. Indian Q.* 57 (1996).

Ms. Cook-Lynn continues:

The diversity of American scholarship is being developed in substantially different ways from that of the historical educational pattern of colonial coercion for captive Indians. There are new movements afoot. This means that the Indian story is included in every genre and most disciplines during this era of the rise of cultural studies, diversity, and multiculturalism. In this period, the so-called "mixed-blood" story, often called "the post-colonial" story, has taken center stage. The bicultural nature of Indian lives has always been a puzzle to the monoculturalists of America; thus, mixed-bloodedness becomes the Pdigm of preference.

[Id. at 59](#).

n15. This definition is utilized today in classes, workshops, and trainings presented by the activists and facilitators of the TODOS Sherover Simms Alliance Building Institute and the Oakland Men's Project, both of Oakland, California.

n16. Miguel Matias, Guatemala's Peacetime Challenge: Maya Indians Reassert Identity While Ladinos Wonder About Theirs, 13 *Native Americans* 64 (1996).

n17. This is certainly not an exhaustive list of American Indian scholars and writers, but are some of the authors who have informed my thinking about this paper. Paula Gunn Allen (Laguna/Sioux) is a poet and writer, author of *The Sacred Hoop: Recovering The Feminine In American Indian Traditions* (1992). Ned Blackhawk has written, among other articles, *I Can Carry On From Here: The Relocation of American Indians to Los Angeles*, 11 *Wicazo Sa Rev.* 16 (Fall 1995); Beth Bryant (Mohawk) is a writer, whose works include: *A Gathering of Spirit: A Collection By North American Indian Women* (Beth Bryant ed., 1988); *Writing as Witness: Essay and Talk* (1994). Ward Churchill (Creek/Cherokee Metis) is a scholar, activist, and prolific writer, his books include: *From A Native Son: Selected Essays In Indigenism, 1985-1995* (1994); *Indians Are Us?: Culture and Genocide In Native North America* (1994); and *Since Predator*

Came: Notes From the Struggle For American Indian Liberation (1995). Elizabeth Cook-Lynn (Crow/Creek/Sioux) is the founder and editor of the native studies journal *Wicazo Sa Review*, and the author of various articles including the collection of essays *Why Can't I Read Wallace Stegner: A Tribal Voice* (1996). Vine Deloria, Jr. (Standing Rock Sioux), Professor of American Indian Studies, Law, and Political Science at the University of Colorado at Boulder, is a prolific writer. His books include: *American Indians, American Justice* (1983); *American Indian Policy in the Twentieth Century* (1985); *Behind the Trail of Broken Treaties* (1974); *Custer Died For Your Sins* (1969); *Red Earth, White Lies: Native Americans and the Myth of Scientific Fact* (1995); and *We Talk, You Listen* (1970). M. Annette Jaimes (Juaneño/Yaqui) has worked and written in a variety of fora, and is the editor of *The State of Native America: Genocide, Colonization, and Resistance* (1992); Winona LaDuke (Chippewa) is an American Indian rights and environmental activist, whose recent writings include: *Last Standing Woman* (1997); and *Ogitchida Ikwewag: The Women's Warrior Society in Reinventing the Enemy's Language: Contemporary Native Women's Writing of North America* (Joy Harjo & Gloria Bird et al. eds., 1993). The late D'Arcy McNickle (Confederated Salish and Kutenai Tribes of Montana) was an historian, activist, and writer. His works include: *Native American Tribalism: Indian Survivals and Renewals* (1973); and *Runner in the Sun: A Story of Indian Maize* (1954). Anna Lee Walters (pawnee) lives and works on the Navajo Nation, her works include: *Ghost Singer: A Novel* (1988); and with Peggy V. Beck & Nia Francisco, *The Sacred: Ways of knowledge, sources of life* (1995). Angela Cavender Wilson (Dakota) has written various critical articles including *American Indian history Or Non-Indian perceptions of American Indian History?* *20 Am. Indian Q.* 3 (1996).