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U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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NANCY M.
MAYER-WHITTINGTON
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ELOUISE PEPION COBELL, et al.,)
)
Plaintiffs,)
)
v.)
)
GALE A. NORTON, Secretary of the)
Interior, et al.,)
)
Defendants.)
_____)

Case No. 1:96CV01285
(Judge Lamberth)

**INTERIOR DEFENDANTS' OFFICE OF THE INSPECTOR GENERAL'S
SUBMISSIONS IN COMPLIANCE WITH PRELIMINARY INJUNCTION**

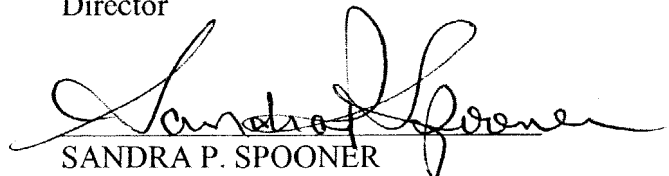
By order dated July 28, 2003, the Court ordered the Department of Interior immediately to disconnect from the Internet all of its information technology systems, except for (1) systems whose continued connection to the Internet are certified to be necessary to protect against fires and other threats to life or property, and (2) systems that the Special Master has previously authorized to be reconnected to the Internet, if the Department of Interior further certifies that those systems are either secure or do not house or access "individual Indian trust data," as defined by the preliminary injunction.

In compliance with the Court's order, the Department of Interior submits the attached certification of the Department of Interior's Office of Inspector General. This compliance should not be understood to reflect agreement with the Court's reasoning. As we explained in opposing entry of the preliminary injunction, the record contains no evidence that could warrant entry of any injunction, much less an order requiring the Department of the Interior to disconnect from the Internet. The Court does not have a general power to supervise the security of the Interior Department's information technology systems. To the extent that the Court has any authority in

this area, its review is limited to determining whether the Department's security measures are "so defective that they would necessarily delay rather than accelerate the ultimate provision of an adequate accounting." Cobell v. Norton, 240 F.3d 1081, 1110 (D.C. Cir. 2001). The government thus reserves the right to challenge the Court's preliminary injunction ruling on appeal.

Respectfully submitted,

ROBERT D. McCALLUM, JR.
Associate Attorney General
PETER D. KEISLER
Assistant Attorney General
STUART E. SCHIFFER
Deputy Assistant Attorney General
J. CHRISTOPHER KOHN
Director



SANDRA P. SPOONER
D.C. Bar No. 261495
Deputy Director
JOHN T. STEMPLEWICZ
Senior Trial Counsel
GLENN D. GILLETT
JOHN WARSHAWSKY
Trial Attorneys
Commercial Litigation Branch
Civil Division
P.O. Box 875
Ben Franklin Station
Washington, D.C. 20044-0875
Telephone: (202) 514-7194
Facsimile: (202) 514-9163

Dated: August 11, 2003

CERTIFICATE OF SERVICE

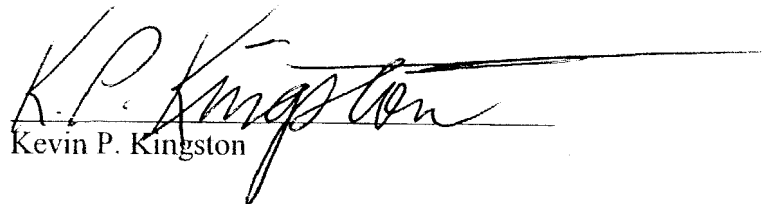
I declare under penalty of perjury that, on August 11, 2003 I served the foregoing *Interior Defendants' Office of the Inspector Generals' Submissions in Compliance with the Preliminary Injunction* by Prepaid First Class Mail upon:

Keith Harper, Esq.
Native American Rights Fund
1712 N Street, N.W.
Washington, D.C. 20036-2976

Dennis M Gingold, Esq.
Mark Kester Brown, Esq.
607 - 14th Street, NW
Box 6
Washington, D.C. 20005

Elliott Levitas, Esq
1100 Peachtree Street, Suite 2800
Atlanta, GA 30309-4530

Earl Old Person (*Pro se*) (Per the Court's Order of April 17, 2003)
Blackfeet Tribe
P.O. Box 850
Browning, MT 59417


Kevin P. Kingston