sovereignty, Cobb never states which organization had the better strategy. Both the NCAI and the NIYC had some successes, yet they faced even more failures. The rise of the Vietnam War and the end of the War on Poverty created obstacles for the Indian rights movement; however, it continued to hold the government's attention throughout the 20th century.

Cobb leaves the reader with a bitter taste in the mouth as he concludes his book. The reader is left with the impression that the United States is still against tribal sovereignty even as recently as 2007, when it chose to not adopt the United Nations resolution on the Declaration on the Rights of Indigenous Peoples (Cobb 204). Alvin J. Ziontz, on the other hand, sends a much more uplifting message in *A Lawyer in Indian Country*. As stated earlier, both books describe the attempts by various tribes and tribal organizations to strengthen tribal sovereignty. Where Cobb studies the NCAI's attempts to empower tribal governments in general, Ziontz takes a more local approach. Ziontz dedicates each chapter to a different tribe, and in a sense we see him slowly chipping away at the obstacles individual tribes faced. While the NCAI and the NIYC were in Washington D.C. actively lobbying the government for universal tribal sovereignty, Ziontz was in the field with the Indians litigating individual tribe's sovereign rights.

Alvin J. Ziontz was not the typical activist for Native American rights. He stumbled into the world of Native Americans and in it found a place where he could make a change to better the lives of Indians. His journey starts out small, litigating for family members on behalf of a young Indian named Bruce Wilkie. Meeting Bruce Wilkie, a member of the Makah Tribe, leads him to take on what he calls the "touchstone of my Indian world" (Ziontz 59), earning a victory for the Makah Tribe of Neah Bay. The Makah tribe was one of the tribes that reaped the benefits of the Community Action Programs created during the Johnson administration, and Ziontz describes the vast changes that affected the tribe during the War on Poverty. The tribal government, for example, grew from a council of five men to an infrastructure that consisted of committees and both a fire and police department. While the Makah tribe benefitted from Community Action programs, there was still work to be done by Ziontz. Ziontz's first step into Indian litigation was helping the Makah tribe hold on to precious reservation land that was being sought after by the Olympic Park Associates (OPA). He did this by setting up negotiations between the OPA and the Makah tribe. Through the negotiations, OPA decided to settle before matters were taken to court, and the Makah tribe gained their first victory in land rights. However, bigger things were on the horizon for the Makah tribe: the Supreme Court case *U.S. v. Washington* was Ziontz's most profound court battle for tribes in the state of Washington.

U.S. v. Washington was meant to determine who indeed held fishing rights over two rivers. Initially the case only had two plaintiffs, the Puyallup and Nisqually tribes, but the case grew to include fourteen tribes (including the Makah tribe). The presiding Federal District Court Judge, George Boldt, decided in favor of

the tribes, stating that their 19th century treaties included off-reservation fishing rights on the Puyallup and Nisqually rivers. However, non-Indian sports fishing groups refused to abide by the ruling. The State of Washington appealed the case to the U.S. Ninth Circuit Court of Appeals where the decision was upheld in favor of the tribes. At this time, the Supreme Court refused to grant certiorari to the case, but few years later, it agreed to review the case and its affirmation drove "a stake through the heart of resistance to the Boldt decision" (Ziontz 127). This was a huge victory for the fourteen tribes in Washington, but it also provided hope for Indian tribes across the country fighting state governments for rights guaranteed them in treaties. Though Ziontz remains humble by never taking responsibility for the successes that several tribes that he touched had achieved, it is obvious that he made an impact on Indian rights. He does not forget to mention that not every tribe he encountered was victorious in securing its sovereign rights, but he never fails to remain optimistic for the future.

By reading *A Lawyer in Indian Country* and *Native Activism in Cold War America* one is able to gain a perspective on the difficulties Native American tribes have faced in protecting their sovereignty. Both Ziontz and Cobb provide the reader with a narrative that is easy to get entrenched in. What both authors have shown is that there were several roads to securing tribal sovereignty. The NCAI and NIYC differed on their approaches, but appealed largely to legislators and public opinion. Ziontz ,on the other hand, settled matters in the courts with several of his cases reaching the Supreme Court. The Indian activists in *Native Activism in Cold War America* were fighting on the federal level, while Ziontz profiles tribal leaders litigating their rights on a local and state level. Both books bring to light a topic that has been well-hidden among American history. As stated previously, most people reflect on the 1960s and think of either the Civil Rights Movement or the Vietnam War. It may be easy to overlook the fact that Native Americans have been struggling for their rights so long a time. Daniel M. Cobb and Alvin J. Ziontz remind us that Native Americans too made significant political gains during the 1960s.

Works Cited

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Ziontz, Alvin J. *A Lawyer in Indian Country*. Seattle: University of Washington Press, 2009. Print.