*Butler v. Leech Lake Band of Ojibwe*, ___ F. Supp. 3d ___, 2021 WL 2651981 (D. Minn. June 28, 2021)

- **Holding:** Employment termination claims under the Age Discrimination in Employment Act, the Equal Pay Act, and Title VII of the 1964 Civil Rights Act were dismissed on sovereign immunity, inapplicability to internal tribal matters, and absence of individual officer liability grounds, while the district court declined to exercise supplemental jurisdiction over state law-based claims.
- **Summary**: Plaintiff was employed as the Leech Lake Band's director for almost two years beginning in 2018. After being demoted to an administrative assistant position following reprimanding a Band officer's relative, her employment was terminated. Plaintiff filed a pro se action against the Band and several tribal officers alleging violation of the ADEA, EPA, Title VII and Minnesota law. The district court granted Defendants' motion to dismiss.

  The court first held the federal statutory claims against the Band barred by its immunity from suit in the absence of congressional abrogation. It next concluded that, without regard to sovereign immunity, subject-matter jurisdiction was precluded because "[n]one of those statutes applies to Indian tribes when the matters at issue are purely internal, as here." As to the claims against the tribal officers, "Title VII and the ADEA do not provide for liability of individually named defendants in any capacity." The EPA-based claim was treated similarly because, while that statute did not preclude individual liability, "the court is persuaded that Butler is precluded from bringing such a claim against individual officers as representatives of the Band, just as she is precluded from bringing an EPA claim against the Band." Lastly, the court declined to exercise supplemental jurisdiction over the state law claims given dismissal of the federal statutory claims.
- **Relevant (2020) Deskbook Section:** 7:13 n.10