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**Review of *Lone Wolf v. Hitchcock: Treaty Rights and Indian Law at the End of the Nineteenth Century* By Blue Clark**

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*Lone Wolf v. Hitchcock: Treaty Rights and Indian Law at the End of the Nineteenth Century.* By Blue Clark. Lincoln: University of Nebraska Press, 1994. Preface, chronology of Lone Wolf court suits, black and white illustrations, epilogue, appendices, notes, bibliography, index. xiii + 182 pp. \$37.50.

The case of *Lone Wolf v. Hitchcock*, decided in 1903 by the Supreme Court, has been cited often in federal Indian law for its proposition that Congress has plenary power over Native

peoples and may abrogate an Indian treaty at will. Clark's study provides a thorough discussion of Lone Wolf's judicial challenge, examining the complex legal issue of treaty abrogation at a time when national policy forced Indians to assimilate by eliminating reservations and, in the process, encouraging frontier expansion.

Characterized by its author as a case study, the work illuminates the evolution of Indian-white relations and the importance of the Lone Wolf judgment from a legal standpoint. It focuses on the historical circumstances surrounding the Lone Wolf decision, including the creation of a reservation for the Kiowa and Comanche under the 1867 Treaty of Medicine Lodge Creek; the 1892 Jerome agreement which provided for the allotment of the reservation; Congress's acceptance of the Jerome agreement; and Lone Wolf's appeal to the Supreme Court. The account of Lone Wolf's legal challenge is arranged chronologically, beginning with the role of the Supreme Court. Subjects that follow include Kiowa life and leadership, Indian opposition to allotment, and Lone Wolf's appeal for justice. The book concludes with an apt discussion of the Lone Wolf decision and its impact on national and international policy. Copies of the Treaty of Medicine Lodge Creek, the Jerome Agreement, and the *Lone Wolf v. Hitchcock* decision accompany the inquiry.

Clark's unique approach in *Lone Wolf v. Hitchcock* allows him to go beyond the initial examination of legal precedent to reveal a story of human dignity and a people's survival. The book presents an authoritative account of Kiowa band chief Lone Wolf's relentless attempts, through various legal channels, to halt the selection and assignment of his own allotment. In the end, he joined the Elk Creek Baptist church and lived on his allotment with his family. What Lone Wolf and his tribe hoped to gain from the lawsuit, how the Court bestowed on Congress unlimited power over Indian affairs, and the impact of this case on other tribes and overseas colonial peoples are all ably discussed in Clark's inquiry.

More than a modest case study, *Lone Wolf v. Hitchcock* is a significant examination of early tribal life on the reservation, Indian opinion regarding national policy, and Indian rights at the turn of the century. Scholars and students should find it an important contribution to the field of Indian studies.

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