**Resources on the Doctrine of Discovery**

The following description of the Doctrine of Discovery is posted at doctrineofdiscovery.org:

 **Doctrine of Discovery? What's that?**

Papal Bulls of the 15th century gave Christian explorers the right to claim lands they "discovered" and lay claim to those lands for their Christian Monarchs. Any land that was not inhabited by Christians was available to be "discovered", claimed, and exploited. If the "pagan" inhabitants could be converted, they might be spared. If not, they could be enslaved or killed.

The Discovery Doctrine is a concept of public international law expounded by the United States Supreme Court in a series of decisions, initially in [Johnson v. M'Intosh in](http://www.doctrineofdiscovery.org/johnvmac.htm%22%20%5Ct%20%22mainFrame)[1823](http://www.doctrineofdiscovery.org/johnvmac.htm%22%20%5Ct%20%22_parent). The doctrine was Chief Justice John Marshall's explanation of the way in which colonial powers laid claim to newly discovered lands during the Age of Discovery. Under it, title to newly discovered lands lay with the government whose subjects discovered new territory. The doctrine has been primarily used to support decisions invalidating or ignoring aboriginal possession of land in favor of colonial or post-colonial governments.

John Marshall, who is most credited with describing the Doctrine, did not voice wholehearted support of the Doctrine even while using it to justify judicial decisions. He pointed to the Doctrine as simple fact, looking at the possession-takings, which were supported by the Doctrine, as acts that had occurred and had to be recognized. The supposedly inferior character of Native cultures was a reason for using the Doctrine, but whether or not this use of the Doctrine was justified was not relevant for Marshall.

This Doctrine governs United States Indian Law today and has been cited as recently as 2005 in the decision City Of Sherrill V. Oneida Indian Nation Of N.Y.

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**The UN Permanent Forum on Indigenous Issues and the World Council of Churches both call on faith communities and civic organizations to renounce and repudiate the Doctrine of Discovery. Following are official statements, adopted by various church bodies, that can serve as models.**

**Statement on the Doctrine of Discovery**

 **and its Enduring Impact on Indigenous Peoples**

Issued by the World Council of Churches Executive Committee

Bossey, Switzerland

February 17, 2012

1. Indigenous Peoples have the oldest living cultures in the world. Three hundred to five hundred

million Indigenous Peoples today live in over 72 countries around the world, and they comprise at least 5,000 distinct peoples. The ways of life, identities, well-being and very existence of Indigenous People are threatened by the continuing effects of colonization and national policies, regulations and laws that attempt to force them to assimilate into the cultures of majoritarian societies. A fundamental historical basis and legal precedent for these policies and laws is the “Doctrine of Discovery”, the idea that Christians enjoy a moral and legal right based solely on their religious identity to invade and seize indigenous lands and to dominate Indigenous Peoples.

2. Around the world, Indigenous Peoples are over-represented in all categories of disadvantage. In most indigenous communities people live in poverty without clean water and necessary infrastructure, lacking adequate health care, education, employment and housing. Many indigenous communities still suffer the effects of dispossession, forced removals from homelands and families, inter-generational trauma and racism, the effects of which are manifested in social welfare issues such as alcohol and drug problems, violence and social breakdown. Basic health outcomes dramatize the disparity in well-being between Indigenous Peoples and European descendants.

3. The patterns of domination and oppression that continue to afflict Indigenous Peoples today

throughout the world are found in numerous historical documents such as Papal Bulls, Royal Charters and court rulings. For example, the church documents Dum Diversas (1452) and Romanus Pontifex (1455) called for non-Christian peoples to be invaded, captured, vanquished, subdued, reduced to perpetual slavery and to have their possessions and property seized by Christian monarchs. Collectively, these and other concepts form a paradigm or pattern of domination that is still being used against Indigenous Peoples.

4. Following the above patterns of thought and behaviour, Christopher Columbus was instructed,

for example, to “discover and conquer,” “subdue” and “acquire” distant lands, and in 1493 Pope

Alexander VI called for non-Christian “barbarous nations” to be subjugated and proselytized for the “propagation of the Christian empire.” Three years later, England’s King Henry VII followed the pattern of domination by instructing John Cabot and his sons to locate, subdue and take possession of the “islands, countries, regions, of the heathens and infidels . . . unknown to Christian people.” Thereafter, for example, English, Portuguese and Spanish colonization in Australia, the Americas and New Zealand proceeded under the Doctrine of Discovery as Europeans attempted to conquer and convert Indigenous Peoples. In 1513, Spain drafted a legal document that was required to be read to Indigenous Peoples before “just war” could commence. The Requerimiento informed Indigenous Peoples that their lands had been donated to Spain and that they had to submit to the Crown and Christianity or they would be attacked and enslaved.

5. In 1823, the U.S. Supreme Court used the same pattern and paradigm of domination to claim in the ruling Johnson & Graham’s Lessee v. M’Intosh that the United States as the successor to various “potentates” had the “ultimate dominion” or “ultimate title” (right of territorial domination) over all lands within the claimed boundaries of the United States. The Court said that as a result of the documents mentioned above, authorizing “Christian people” to “discover” and possess the lands of “heathens,” the Indians were left with a mere “right of occupancy;” an occupancy that, according to the Court was subject to the “ultimate title” or “absolute title” of the United States. The Johnson case has been cited repeatedly by Australian, Canadian, New Zealand and United States courts, and the Doctrine of Discovery has been held by all these countries to have granted European settler societies plenary power (domination) over Indigenous Peoples, legal title to their lands, and has resulted in diminished sovereign, commercial and international rights for Indigenous Peoples and governments. Europeans believed this was proper based on their ethnocentric, racial and religious attitudes that they and their cultures, religions and governments were superior to non-Christian European peoples.

6. Consequently, the current situation of Indigenous Peoples around the world is the result of a

linear programme of “legal” precedent, originating with the Doctrine of Discovery and codified in contemporary national laws and policies. The Doctrine mandated Christian European countries to attack, enslave and kill the Indigenous Peoples they encountered and to acquire all of their assets. The Doctrine remains the law in various ways in almost all settler societies around the world today. The enormity of the application of this law and the theft of the rights and assets of Indigenous Peoples have led indigenous activists to work to educate the world about this situation and to galvanize opposition to the Doctrine. Many Christian churches that have studied the pernicious Doctrine have repudiated it, and are working to ameliorate the legal, economic and social effects of this international framework.

Starting in 2007, for example, with the Episcopal Diocese of Maine, followed by the Episcopal Diocese of Central New York in 2008, and in 2010 by Philadelphia Yearly Meeting of the Religious Society of Friends, individual churches began adopting resolutions and minutes repudiating the Doctrine. In 2009, at its 76th General Convention, the Episcopal Church adopted resolution D035 – “Repudiate the Doctrine of Discovery.” In 2010, the General Synod of the Anglican Church of Canada adopted resolution A086 – “Repudiate the Doctrine of Discovery.” In 2011, various Unitarian Universalist churches and Quaker organizations are adopting and considering adopting resolutions and minutes repudiating the Doctrine. This issue of the Doctrine of Discovery has also been brought to the forefront of world attention by Indigenous Peoples working with international bodies.

7. Considering the fact that the Doctrine of Discovery will be the theme for the 11th session of the United Nations Permanent Forum on Indigenous Issues (UNPFII) in 2012, churches and the

international community need to be sensitized on this issue. The Doctrine of Discovery: its enduring impact on Indigenous Peoples and the right to redress for past conquests (articles 28 and 37 of the United Nations Declaration on the Rights of Indigenous Peoples) will be discussed at the UNPFII from 7 to 18 May 2012; this event will bring together representatives of Indigenous People’s organizations and networks around the world. Churches and ecumenical networks of the WCC will be mobilized to be part of the 11th session of the UNPFII in 2012.

In this context, the executive committee of the World Council of Churches, meeting at Bossey,

Switzerland, 14-17 February 2012,

A. Expresses solidarity with the Indigenous Peoples of the world and supports the rights of

Indigenous Peoples to live in and retain their traditional lands and territories, to maintain and enrich their cultures and to ensure that their traditions are strengthened and passed on for generations to come;

B. Denounces the Doctrine of Discovery as fundamentally opposed to the gospel of Jesus Christ and as a violation of the inherent human rights that all individuals and peoples have received from God;

C. Urges various governments in the world to dismantle the legal structures and policies based on the Doctrine of Discovery and dominance, so as better to empower and enable Indigenous Peoples to identify their own aspirations and issues of concern;

D. Affirms its conviction and commitment that Indigenous Peoples be assisted in their struggle to involve themselves fully in creating and implementing solutions that recognize and respect the

collective rights of Indigenous Peoples to exercise their right to self-determination and self-governance;

E. Requests the governments and states of the world to ensure that their policies, regulations and

laws that affect Indigenous Peoples comply with international conventions and, in particular, conform to the United Nations Declaration on the Rights of Indigenous Peoples and the International Labour Organization’s Convention 169;

F. Calls on each WCC member church to reflect upon its own national and church history and to

encourage all member parishes and congregations to seek a greater understanding of the issues facing Indigenous Peoples, to support Indigenous Peoples in their ongoing efforts to exercise their inherent sovereignty and fundamental human rights, to continue to raise awareness about the issues facing Indigenous Peoples and to develop advocacy campaigns to support the rights, aspirations and needs of Indigenous Peoples;

G. Encourages WCC member churches to support the continued development of theological

reflections by Indigenous Peoples which promote indigenous visions of full, good and abundant life and which strengthen their own spiritual and theological reflections.

**Examples of Church Statements Repudiating the Doctrine of Discovery and**

**Endorsing the UN Declaration on the Rights of Indigenous Peoples**

**A Minute to Repudiate the Doctrine of Discovery and to Affirm**

**the U.N. Declaration on the Rights of Indigenous Peoples**

**Approved by Boulder Friends Meeting on March 10, 2013**

In solidarity with initiatives led by Indigenous leaders and a growing number of religious organizations, the Boulder Friends Meeting repudiates the “Doctrine of Discovery.” For centuries, this doctrine of domination has been used to oppress Indigenous Peoples throughout the world and deny them their rights. The Doctrine originated in 15th and 16th century papal bulls that privileged European Christians over all other peoples. The popes authorized European monarchs to “invade, capture, vanquish, and subdue all…pagans and other enemies of Christ…to reduce their persons to perpetual slavery…and…to take away all their possessions and property,” (Pope Nicholas V). The Doctrine of Discovery violates Christian teachings, from their foundation in the Ten Commandments to their expression in the life of Jesus. It also violates our Quaker testimonies of equality, peace, integrity, community, and stewardship.

As citizens of Colorado, we occupy lands that were recognized by treaty as the territories of Indigenous Nations including the Arapaho, Cheyenne, and Ute peoples -- and then taken from them. Consciously or unconsciously, we benefit from historical and ongoing injustices committed against the Native peoples of this land.

Because the Doctrine of Discovery was embedded in the legal foundations of the United States and other countries, it continues to be cited as a precedent. Even today it is used to deny Indigenous Peoples their rights. For this reason, we urge our government and all governments to dismantle the legal structures and revoke the laws and policies that are based on the Doctrine of Discovery. We accept our own responsibility to work to dismantle the economic, social, cultural, and educational structures of privilege that are rooted in the Doctrine.

In order to build relationships with Indigenous Peoples founded in equity and justice, we affirm and support the United Nations Declaration on the Rights of Indigenous Peoples. The Declaration seeks to ensure that Indigenous Peoples collectively and individually enjoy all the human rights and fundamental freedoms recognized in the Charter of the United Nations, the Universal Declaration of Human Rights, and international human rights law. The Declaration recognizes Indigenous Peoples’ right to self-determination and establishes a framework for political and social relationships based on equity and mutual respect. Just as Quakers played a role in promoting the passage of the Declaration by the UN General Assembly in 2007, we acknowledge that we must also labor to implement it.

**Episcopal Church, Resolution D035**

**Repudiate the Doctrine of Discovery**

Resolved, the House of Bishops concurring, That the 76th General Convention repudiates and renounces the Doctrine of Discovery as fundamentally opposed to the Gospel of Jesus Christ and our understanding of the inherent rights that individuals and peoples have received from God, and that this declaration be proclaimed among our churches and shared with the United Nations and all the nations and peoples located within The Episcopal Church's boundaries. This doctrine, which originated with Henry VII in 1496, held that Christian sovereigns and their representative explorers could assert dominion and title over non-Christian lands with the full blessing and sanction of the Church. It continues to be invoked, in only slightly modified form, in court cases and in the many destructive policies of governments and other institutions of the modern nation-state that lead to the colonizing dispossession of the lands of indigenous peoples and the disruption of their way of life; and be it further

Resolved, that The Episcopal Church review its policies and programs with a view to exposing the historical reality and impact of the Doctrine of Discovery and eliminating its presence in its contemporary policies, program, and structures and, further, that this body directs the appropriate representatives of the House of Bishops and House of Deputies, to inform all relevant governmental bodies in The United States of its action and suggest similar and equivalent review of historical and contemporary policies that contribute to the continuing colonization of Indigenous Peoples and, further, to write to Queen Elizabeth II, the Supreme Governor of the Church of England, requesting that her Majesty disavow, and repudiate publicly, the claimed validity of the Christian Doctrine of Discovery; and be it further

Resolved, that each diocese within the Episcopal Church be encouraged to reflect upon its own history, in light of these actions and encourage all Episcopalians to seek a greater understanding of the Indigenous Peoples within the geo-political boundaries claimed by the United States and other nation states located within the Episcopal Church's boundaries, and to support those peoples in their ongoing efforts for their inherent sovereignty and fundamental human rights as peoples to be respected; and be it further

Resolved, that the 76th General Convention direct the Office of Government Relations to advocate for the U.S. government's endorsement of the "United Nations Declaration on the Rights of Indigenous Peoples," which the United States has refused to endorse (only the U.S., Canada, New Zealand, and Australia have failed to sign on).

**A Unitarian Universalist Resolution**

**To Repudiate the Doctrine of Discovery,**

**and Implement the UN Declaration on the Rights of Indigenous Peoples**

**Adopted on January 29, 2011, by Universalist Unitarian Church of Peoria**

BECAUSE as Unitarian Universalists we believe that all persons have inherent worth and dignity; that

human relations should be based on justice, equity and compassion; that this world should be a

community of peace, liberty and justice for all; and that we seek to live in peace with our fellow human beings, both as individuals and as peoples; and

WHEREAS, the Doctrine of Discovery was a principle of “law” developed in a series of 15th century papal bulls and 16th century charters by European monarchs by which the Americas were first explored, and was the “legal authority” used by those who colonized Native Peoples, appropriated Indian lands and resources, and attempted to dominate Native nations and undermine inherent Native sovereignty; and

WHEREAS, after the United States Revolutionary War, the tenets of Discovery were continued by the new states and courts, controlling all purchase of Indian lands and any foreign, personal, or commercial interactions with tribes; and

WHEREAS, in the U.S. Supreme Court ruling in Johnson v. M’Intosh (1823), Chief Justice John Marshall

stated that discovery rights annulled pre-existing rights of “ancient possessors,” and that “power, war,

conquest, give rights, which after possession, are conceded by the world.…”; thus having the Johnson

decision influence all subsequent thinking in federal Indian law to this day; and

WHEREAS, for more than five centuries, the interpretive framework of the Doctrine of Discovery has been institutionalized and used as a right of dominance over the existence of Indigenous Peoples, assuming the right to take, grant, and dispose of their lands, territories, and resources without their permission or consent; and

WHEREAS, we as Unitarian Universalists, along with the U.S. government, and society at large, must all

acknowledge that federal Indian law and modern day treatment of tribes and Indians is based on the

centuries old Doctrine of Discovery; and also

WHEREAS, the United Nations Declaration on the Rights of Indigenous Peoples was overwhelmingly

adopted by the General Assembly in September 2007, without conditions and/or qualifications, after

more than 20 years of discussions and deliberations by thousands of Indigenous nations, governments, organizations, and peoples from around the world; and

WHEREAS, the Declaration is a positive move towards creating true reform to respect and recognize the right of Indigenous Peoples to sovereignty and self-determination; and

WHEREAS, the Declaration is the most comprehensive, international human rights instrument explicitly addressing the economic, social, cultural, political, spiritual and environmental rights of Indigenous Peoples and is essential to the dignity, survival and well-being of over 340 million Indigenous Peoples world-wide; and

WHEREAS, the Declaration is described in the preamble “as a standard of achievement to be pursued in a spirit of partnership and mutual respect;” and

WHEREAS, the rights addressed in the Declaration are consistent with other international human rights instruments that the United States already has ratified and is implementing in myriad federal laws, policies, treaties, agreements, and executive orders; and

WHEREAS, all four UN-member nations (Australia, Canada, New Zealand, the United States) who initially voted against the Declaration have reversed their positions, and

WHEREAS, Indigenous Peoples from around the world are asking all religious faiths and their respective national and international organizations to rescind the Doctrine of Discovery and related documents, and to call for the United States to implement the U.N. Declaration on the Rights of Indigenous Peoples;

THEREFORE, BE IT RESOLVED that we, as an Unitarian Universalist congregation, repudiate the

Doctrine of Discovery as a relic of colonialism, feudalism, and of religious, cultural, and racial biases

having no place in the modern day treatment of the American Indians; and

BE IT FURTHER RESOLVED that we call on the leadership of the Unitarian Universalist Association to

make a clear and concise statement repudiating the Doctrine of Discovery and its current use in U. S, federal Indian laws and regulations, and

BE IT FURTHER RESOLVED that we ask other UU congregations to join us in passing similar

resolutions, and assisting us in presenting an Action for Immediate Witness on this issue during an

upcoming UUA General Assembly, and

BE IT FURTHER RESOLVED that we encourage other communities of faith to reject the use of the

Doctrine of Discovery to dominate Indigenous Peoples, and

BE IT FURTHER RESOLVED that we call on Pope Benedict XVI of the Catholic Church, Queen Elizabeth

II of England, to repudiate the Doctrine of Discovery; and

BE IT FINALLY RESOLVED that we recommend a congressional commission be established to be

comprised of Native leaders and representatives of the U.S. Interior, Justice and State departments, and charged to determine how U.S. policy and laws should be amended to eliminate the practices of colonialism contained in the Doctrine of Discovery, and to meet the standards of the U.N. Declaration on the Rights of Indigenous Peoples.

**Statement by the UN Permanent Forum on Indigenous Issues**

**The Doctrine of Discovery and Implementation of the**

**UN Declaration on the Rights of Indigenous Peoples**

New York, 20 - 31 May 2013

**This is a Joint Statement of First Nations Summit; Grand Council of the Crees (Eeyou Istchee);** **Canadian Friends Service Committee (Quakers); Amnesty International; Assembly of First Nations; Federation of Saskatchewan Indian Nations;** **Chiefs of Ontario**; **Union of British Columbia Indian Chiefs;** **Assembly of First Nations of Québec and Labrador/Assemblée des Premières Nations du Québec et du Labrador; Native Women’s Association of Canada;** **Quebec Native Women/Femmes Autochtones du Québec**; **National Association of Friendship Centres; Hul’qumi’num Treaty Group; International Indian Treaty Council; Indigenous World Association; First Peoples Human Rights Coalition.**

*The UN Declaration on the Rights of Indigenous Peoples* in its entirety is rooted in the principle of racial non-discrimination, a peremptory norm from which no derogation is permitted. Full and effective implementation of the *UN Declaration* is dependent on ensuring that racial discrimination against Indigenous peoples is eradicated.

Last year, the special theme of the Permanent Forum focused on the Doctrine of Discovery, its enduring impacts and the need for redress.  In this regard, our organizations look forward to an expert study to be tabled at next year’s session.  In its 2012 final report, the Forum called on all States to repudiate colonial doctrines such as the doctrine of discovery, and associated legal fictions as the doctrine of*terra nullius*, “as the basis for denying indigenous peoples’ human rights.”[[1]](https://mail.google.com/mail/ca/%22%20%5Cl%20%2213ed10463ba12d9e__ftn1%22%20%5Co%20%22)

The *Declaration* unequivocally affirms:

“… all doctrines, policies and practices based on advocating superiority of peoples or individuals on the basis of national origin or racial, religious, ethnic or cultural differences are racist, scientifically false, legally invalid, morally condemnable and socially unjust”

Rejection of doctrines of superiority is also found in the *International Convention on the Elimination of All Forms of Racial Discrimination*. Further, in September 2011, the UN Human Rights Council by consensus "condemned" doctrines of superiority "as incompatible with democracy and transparent and accountable governance".

There is no doubt that the doctrine of discovery is based on assertion of racial superiority.  Yet developed States, such as Canada, United States and Australia, among many others, continue to shamefully rely upon and perpetuate this debilitating doctrine for their narrow self-interest.  Under the doctrine, the ability of the colonializing powers to claim to unilaterally extinguish the pre-existing sovereignty of Indigenous peoples and establish their own dominion over Indigenous peoples’ lands, territories, and resources is – as the Special Rapporteur on the rights of indigenous peoples has noted – inextricably linked to “*colonial era attitudes toward indigenous peoples that can only be described as racist*.”[[2]](https://mail.google.com/mail/ca/%22%20%5Cl%20%2213ed10463ba12d9e__ftn2%22%20%5Co%20%22)

The doctrine of discovery must not be used as justification for the arbitrary and unilateral denial of the human rights of Indigenous peoples.  In this context, we bring to your attention the judgment of the British Columbia Court of Appeal in *Tsilhqot'in Nation*v. *British Columbia,*rendered on 27 June 2012. This ruling, if not reversed by Canada's highest court, could set a dangerous precedent.

The judgment includes: “European explorers considered that by virtue of the "principle of discovery" they were at liberty to claim territory in North America on behalf of their sovereigns ... While it is difficult to rationalize that view from a modern perspective, the history is clear.”[[3]](https://mail.google.com/mail/ca/%22%20%5Cl%20%2213ed10463ba12d9e__ftn3%22%20%5Co%20%22)

In the contemporary context of justice, reconciliation and international human rights, the doctrine of discovery must have no place whatsoever in determining Indigenous peoples' title and rights, in international and domestic law. States and courts must not rely on this fictitious doctrine so as to *purportedly*diminish or extinguish Indigenous peoples' sovereignty and title.

True implementation of the *UN Declaration*requires the repudiation of this racist and colonial doctrine.

 **Recommendations**

 1.     THAT the Permanent Forum reiterate its recommendation that States repudiate the Doctrine of Discovery and fully utilize the *UN Declaration on the Rights of Indigenous Peoples* as a framework for justice and reconciliation.

 2.     THAT the Permanent Forum reiterate the recommendation of Special Rapporteur James Anaya in his August 2012 report: "courts should discard such colonial era doctrine in favour of an alternative jurisprudence infused with ... contemporary human rights values ... including those values reflected in the United Nations Declaration on the Rights of Indigenous Peoples."

3.     THAT States take immediate measures, in conjunction with Indigenous peoples, to ensure that the Doctrine is not invoked in contemporary court cases or negotiations that should be aimed at the affirmation, protection and restitution of Indigenous peoples’ lands, territories and resources, consistent with international human rights standards.

 4.     THAT the Permanent Forum reaffirm that international human rights law is a legitimate and important influence on the development of the common law. Any common law doctrine founded on discrimination in the enjoyment of Indigenous peoples' rights demands urgent reconsideration.

 5. THAT for full and effective implementation of the *UN Declaration,*all States must abandon policies that serve to deny the existence of Aboriginal title and unjustly place the burden of proof on Indigenous peoples that have territorial rights based on original occupation.

6. THAT affirmation of Indigenous peoples' title to lands, territories and resources is critical for their survival, dignity, security and well-being.  States and domestic courts must reject any use of or reliance on the doctrine of discovery and "extinguishment" of Indigenous peoples' rights. Extinguishment is also a relic of colonialism and such destruction of rights is incompatible with international human rights law.

[[1]](https://mail.google.com/mail/ca/%22%20%5Cl%20%2213ed10463ba12d9e__ftnref1%22%20%5Co%20%22) *Report on the eleventh session (7 – 18 May 2012)*, Economic and Social Council, Official Records, Supplement No. 23, United Nations, New York, E/2012/43-E/C.19/2012/13, para. 4.

[[2]](https://mail.google.com/mail/ca/%22%20%5Cl%20%2213ed10463ba12d9e__ftnref2%22%20%5Co%20%22) Human Rights Council, *Report of the Special Rapporteur on the rights of indigenous peoples, James Anaya, Addendum: The situation of indigenous peoples in the United States of America*, UN Doc. A/HRC/21/47/Add.1 (30 August 2012). Para 16.

 [[3]](https://mail.google.com/mail/ca/%22%20%5Cl%20%2213ed10463ba12d9e__ftnref3%22%20%5Co%20%22) *Tsilhqot'in Nation v. British Columbia, 2012 BCCA 285, para. 166*

**Readings on the Doctrine of Discovery**

*In the Courts of the Conqueror, The Ten Worst Indian Law Cases Ever Decided*, Walter Echo-Hawk (Pawnee), 2010.

*Pagans in the Promised Land, Decoding the Doctrine of Christian Discovery*, Steven T. Newcomb (Shawnee/Lenape), 2008.

*Native America, Discovered and Conquered: Thomas Jefferson, Lewis and Clark and Manifest Destiny*, Robert J. Miller, Esq. (Eastern Shawnee), 2006.

**Readings for Context**

*Exiled in the Land of the Free*, edited by Oren Lyons et al., 1992.

*Savage Anxieties: The Invention of Western Civilization,* Robert A. Williams (Lumbee), 2012.

**Web Links**

Dismantling the Doctrine of Discovery, with videos of lectures, power point presentations, reports, articles and more links, dismantlingdoctrineofdiscovery.org

500 Years of Injustice, [ili.nativeweb.org/sdrm\_art.html](http://ili.nativeweb.org/sdrm_art.html)

Doctrine of Discovery (study group), doctrineofdiscovery.org

Unitarian Universalists, “*Discussion Guide for Considering the Report and Responsive Resolution from the UUA Board on the Doctrine of Discovery*,”

<http://www.uua.org/documents/lfd/dod_discuss_guide.pdf>