

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

**RAMAH NAVAJO CHAPTER,
OGLALA SIOUX TRIBE, and PUEBLO
OF ZUNI**, for themselves, and on behalf of
a Class of others similarly situated,

Plaintiffs,

v.

SALLY JEWELL, Secretary of the
Interior, *et al.*,

Defendants.

No. 90-cv-957-JAP/KBM

DECLARATION

Comes now KENNETH JUE, and being first duly sworn, states as follows:

1. I am Senior Projects Manager at Kurtzman Carson Consultants (“KCC”).
2. KCC is the Settlement Administrator selected by Class Counsel and approved by the Court to carry out the functions required by § VIII.D.4. of the Final Settlement Agreement (“FSA”) (Doc. 1331). I am responsible for supervising the settlement administration services provided by KCC.
3. My previous declaration (Doc. 1361-5) verified that the Claim Form amounts set out on Exhibit B (Doc. 1361-2) and the payment amounts set out on Exhibit C (filed under seal) to the Class’s “Unopposed Motion for Approval of the Reserve Account Amount, the Holdback Amount, the Payment of Costs and Fees to Class Counsel, and the Final Claim Form and Payment Amounts for Class Members” (Doc.

1361), had been properly calculated pursuant to the methodologies required by the FSA and the prior Orders of the Court.

4. Paragraph 31 of that Motion (Doc. 1361) provided:

By this Motion, Class Counsel also seek the Court's approval for Class Counsel to direct payment to each Class Member of the sum, except for the small negative amounts for three Class Members as discussed above, shown on Exhibit C, upon that Class member's return of a properly-executed Claim Form as verified by declarations of the Settlement Administrator and the Class Monitor (to be filed of record), without requiring any further Order of this Court.

5. The Court's Order approving that Motion (Doc. 1362) provided at paragraph J. thereof as follows:

The Court authorizes the payment of the payment amounts to Class Members as set out in Exhibit C without further order of the Court once all preconditions for payment have been satisfied.

6. I hereby certify that Claim Forms for the Class Members identified on Exhibit 1 to this Declaration (a) were duly completed as required by the above Motion and Order; (b) that the amounts and Class members named therein have been duly verified by KCC and separately by the Class Monitor, Moss Adams, LLP ("Moss Adams"); (c) that KCC mailed those claim forms to the listed Class Members; (d) that KCC later received duly executed Claim Forms from those Class members; (e) that KCC verified the proper completion of those Claim Forms and then submitted those executed Claim Forms to the Class Monitor for separate confirmation and received that confirmation; and (f) that all pre-conditions for payment of the amounts listed on Exhibit C to Doc. 1361 to the Class Members listed on Exhibit 1 hereto have now been satisfied.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed this 4th day of October, 2016, at San Rafael, California.


KENNETH JUE

EXHIBIT 1

Ramah Navajo Settlement

List of Claim Forms Approved by KCC and Moss Adams on 10/2 & 10/3/16

Class #	CLASS MEMBER	Wire Transfer?
3	AGDAAGUX TRIBAL COUNCIL	No
22	AMERICAN INDIAN SERVICES INC	Yes
29	AROOSTOOK BAND OF MICMACS	Yes
47	BIG PINE PAIUTE TRIBE OF THE 0	No
57	BRIDGEPORT INDIAN COLONY	Yes
64	CABAZON BAND OF MISSION INDIANS	Yes
65	CACHE INDIAN PARENT COMMITTEE	No
66	CACHE PUBLIC SCHOOLS	No
70	CALIFORNIA INDIAN MANPOWER	No
77	CEDARVILLE RANCHERIA	Yes
93	CHIEF DULL KNIFE COLLEGE	Yes
101	CHIPPEWA-CREE INDIANS OF THE ROCKY BOY'S RESERVATION	Yes
123	CONF TRBS OF COOS LOWER UMPQUA	Yes
126	CONF TRIBES OF THE GRANDE ROND	Yes
133	CORTINA RANCHERIA	Yes
151	DUCK VALLEY, SHOSHONE-PAIUTE OF	Yes
162	ELKO BAND COUNCIL	Yes
163	ELY SHOSHONE TRIBE	Yes
173	FED. INDIANS OF GRATON RANCHER	No
177	FORT BELKNAP COMMUNITY COUNCIL	Yes
179	FORT MCDERMITT PAIUTE SHOSHONE	No
182	FORT PECK TRIBAL EXECUTIVE BD	Yes
184	FT BERTHOLD COMMUNITY COLLEGE	Yes
186	FT. INDEPENDENCE RESERVATION	Yes
195	GREAT LAKES INTER-TRIBAL COUNC	No
206	HOH INDIAN TRIBE	Yes
215	HUALAPAI TRIBE	Yes
222	IIPAY NATION OF SANTA YSABEL	Yes
230	INTER TRIBAL COUNCIL OF MI INC	Yes
263	KING SALMON TRIBE	Yes
284	LA POSTA BAND OF MISSION INDNS	Yes
296	LITTLE RIVER BAND-OTTAWA INDNS	Yes
310	MANCHESTER/PT. ARENA RANCHERIA	No
326	MESCALERO APACHE TRIBE GRANTS	Yes
330	MIDDLETOWN RANCHERIA	Yes
335	MINNESOTA CHIPPEWA TRIBE - GRAND PORTAGE BAND	Yes
341	MODOC TRIBE OF OKLA	No
401	NINILCHIK TRADITIONAL COUNCIL	Yes
422	OGLALA SIOUX TRIBE	Yes

Ramah Navajo Settlement

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Class #	CLASS MEMBER	Wire Transfer?
453	PEORIA TRIBE OF OKLAHOMA	No
510	REDWOOD VALLEY LITTLE RIVER	Yes
516	ROBINSON RANCHERIA	Yes
531	SAN CARLOS APACHE TRIBE	Yes
554	SENECA CAYUGA TRIBE OF OKLAHOM	No
573	SISSETON-WAHPETON COMM.COLLEGE	No
587	SOKAOGON CHIPPEWA COMMUNITY	Yes
590	SOUTHERN CA INDIAN CENTER INC	Yes
591	SOUTHERN CALIF TRIBAL CHAIRMEN	No
595	SPOKANE TRIBE OF THE SPOKANE RESERVATION	Yes
596	SQUAXIN ISLAND TRIBAL COUNCIL	Yes
603	STANDING ROCK SIOUX TRIBE	No
614	SYCUAN BAND OF MISSION INDIANS	No
639	TORRES MARTINEZ BD OF MISSION	Yes
650	TUOLUMNE RANCHERIA	No
651	TURTLE MOUNTAIN BAND	Yes
653	TWENTY-NINE PALMS BAND OF	No
660	UNITED KEETOOWAH BAND OF CHEROKEE INDIANS IN OKLAHOMA	Yes
662	UNITED SOUTH AND EASTERN	Yes
668	UPPER SKAGIT INDIAN TRIBE	Yes
687	WINNEBAGO TRIBE OF NEBRASKA	Yes
690	WYANDOTTE TRIBE OF OKLAHOMA	Yes