

**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 22nd day of November 2016, at San Rafael, California.


KENNETH JUE

EXHIBIT 1

Ramah Navajo Settlement

List of Claim Forms Approved by KCC and Moss Adams for Declaration #8

Class #	CLASS MEMBER	Wire Transfer?	Gross Settlement amounts
37	BAD RIVER BAND OF LAKE	Yes	\$593,780.15
39	BARROW, NATIVE VILLAGE OF	Yes	\$1,941,498.28
43	BEAVER VILLAGE COUNCIL	Yes	\$221,951.06
51	BIRCH CREEK TRIBAL COUNCIL	No	\$8,071.72
87	CHEYENN ARAPAHO HOUSING AUTHOR	No	\$8,071.72
117	COLD SPRINGS RANCHERIA	No	\$177,514.48
118	COLORADO RIVER INDIAN TRIBES	No	\$2,496,425.98
172	FALSE PASS TRIBAL COUNCIL	No	\$60,890.06
176	FOREST COUNTY POTAWATOMI COMMU	Yes	\$228,338.49
200	HABEMATOLEL POMO OF UPPER LAKE	No	\$307,196.96
247	KAKE, ORGANIZED VILLAGE OF	Yes	\$1,240,254.16
255	KENAITZE INDIAN TRIBE	No	\$566,213.82
260	KICKAPOO OF OKLAHOMA	Yes	\$939,339.14
261	KICKAPOO TRADITIONAL TRIBE OF TEXAS	Yes	\$585,938.21
275	KOOTENAI TRIBE OF IDAHO	Yes	\$1,134,058.87
327	METLAKATLA INDIAN COMMUNITY	Yes	\$3,927,442.59
365	NATIVE VILLAGE OF GAKONA	Yes	\$143,330.78
366	NATIVE VILLAGE OF KAKTOVIK	No	\$125,727.68
371	NATIVE VILLAGE OF MARSHALL	Yes	\$248,253.63
387	NATIVE VILLAGE OF WALES	No	\$36,248.33
451	PEDRO BAY VILLAGE COUNCIL	Yes	\$241,539.67
477	PUEBLO OF ISLETA	Yes	\$628,406.16
527	SAGINAW CHIPPEWA INDIAN TRIBE	Yes	\$1,228,322.95
542	SANTA YNEZ BAND OF MISSION IND	No	\$292,297.57
545	SANTO DOMINGO TRIBE	Yes	\$528,114.55
582	SLEETMUTE TRADITIONAL COUNCIL	Yes	\$96,539.18
624	TESUQUE PUEBLO	No	\$381,679.06
675	VILLAGE OF SALAMATOFF	No	\$10,198.13