

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 BRIAN A. DEVEAU, and being first duly sworn, states as follows:

1. I am a C.P.A. and a Partner in Moss Adams, LLP (“Moss Adams”).
2. Moss Adams is the Class Monitor selected by Class Counsel and approved by the Court to carry out the functions required by § VIII.F. of the Final Settlement Agreement (“FSA”) (Doc. 1358).
3. My previous declaration (Doc. 1361-6) verified that the Claim Form amounts set out on Exhibit B (Doc. 1361-2) and the payment amounts as calculated by the Settlement Administrator 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.

4. I hereby certify that (a) Moss Adams has verified that the amounts and Class Members named in Claim Forms identified on Exhibit 1 to this Declaration are the amounts for those Class Members set forth in Exhibits A and B to the Plaintiff 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 dated August 17, 2016 (Doc. 1361), and the Court's Order of August 17, 2016, granting that Motion and approving the Exhibit B Claim Form amounts and the Exhibit C payment amounts for Class Members (Doc.1362); (b) the Settlement Administrator has submitted executed Claim Forms from the Class Members listed on Exhibit 1 hereto to Moss Adams for verification; and (c) Moss Adams has confirmed that those completed Claim Forms were properly executed in accordance with the FSA and the Court's August 17, 2016, Order.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this declaration was executed this 21st day of December, 2016, at Bellingham, Washington.



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BRIAN DEVEAU

# **EXHIBIT 1**

## Ramah Navajo Settlement

List of Claim Forms Approved by KCC and Moss Adams 12/21/16

Class #	CLASS MEMBER	Wire Transfer?	Gross Settlement amounts
562	SHIPROCK ASSOCIATED SCHOOLS INC	No	8,902.65
122	COMANCHE NATION	Yes	587,166.05
234	INTER-TRIBAL COUCIL OF CA INC	No	8,071.72
80	CHEESH-NA TRIBE (PREVIOUSLY LISTED AS THE NATIVE VILLAGE OF CHISTOCHINA)	Yes	354,941.32
286	LAC DU FLAMBEAU CHIPPEWA	Yes	1,432,222.76
373	NATIVE VILLAGE OF NAPAKIAK	No	16,143.45
420	O S T PARK AND RECREATION AUTH	No	658,991.77
458	PINON COMMUNITY SCHOOL	No	13,324.52
520	ROUNDHOUSE COUNCIL, INC.	No	137,219.32
631	TOHATCHI SPECIAL EDUC & TRG CT	Yes	176,610.55
	TOTAL		3,393,594.11