

EXHIBIT A

**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

**SETTLEMENT ADMINISTRATOR'S
FIRST PERIODIC REPORT TO THE COURT
Declaration of Kenneth Jue**

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”) (ECF 1331). I am responsible for supervising the settlement administration services provided by KCC.

3. 2. Section VIII.D.4 of the FSA provides *inter alia*:


The Settlement Administrator shall provide to the Court and Parties periodic reports and a final accounting of the distribution of the Net Settlement Amount, the Reserve Account, and costs incurred by Class Counsel and the Settlement Administrator.

4. This declaration and the documentation attached as Exhibits 1 and 2 hereto constitute the Settlement Administrator's First Periodic Report to the Court on the distribution process. Exhibit 1 will be filed under seal as it contains information barred from disclosure regarding the application of the Treasury Offset Program to certain Class Members. The information set out in those exhibits was prepared using data compiled as of the several data compilation dates shown on those exhibits.

5. The only costs so far paid from the Reserve Account are the \$47,989.28 in reimbursed costs to Class Counsel as approved by the Court (ECF 1412). Further costs have been incurred by the Settlement Administrator, the Class Monitor and Class Counsel. The Court approved payment of those costs in the amount of \$364,491.90 for reimbursement to Class Counsel by Order of March 7, 2017 (Doc. 1426). Those costs have not yet been paid from the Reserve Account.

6. KCC stands ready to address any questions the Court may have regarding the distribution process and the information provided in this report.

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 8th day of March, 2017, at San Rafael, California.



KENNETH JUE