

In The Matter Of:
*U. S. DEPARTMENT OF THE INTERIOR
INDIAN TRUST ASSET REFORM ACT (ITARA) OF 2016*

*TRIBAL CONSULTATION
September 12, 2016*

*National Court Reporters, Inc.
7835 Freeway Circle
Cleveland, Ohio 44130
888.800.9656*

U.S. DEPARTMENT OF THE INTERIOR
INDIAN TRUST ASSET REFORM ACT (ITARA) OF 2016
TRIBAL CONSULTATION
Rancho Mirage, California
Monday, September 12, 2016

REPORTED BY:
KELLIE A. WETHERBEE
CSR NO. 10983

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

U.S. Departement of the Interior Indian Trust
Asset Reform Act (ITARA) of 2016 Tribal Consultation,
taken at 32-250 Bob Hope Drive, Rancho Mirage,
California, commencing at 8:42 a.m., Monday, September
12, 2016, before Kellie A. Wetherbee, CSR No. 10983, a
Certified Shorthand Reporter in and for the County of
Riverside, State of California.

TRIBAL CONSULTATION - September 12, 2016

1 So the legislation is obviously a very
2 important step to strengthening tribal decision making.
3 It gives us an opportunity to evaluate what's working
4 and how we can streamline things and make things work
5 better. And our staff from OSC and Indian Affairs and
6 across the department, as well as all of you, are
7 critical to our evaluation.

8 Our consultation this morning focuses on Title
9 3 of the act, which provides for the Secretary to
10 identify all non-monetary management functions currently
11 being conducted by OSC and looking at how those
12 functions might be transferred to other entities within
13 Interior or whether they should remain the same. And so
14 our goal obviously is, consistent with that act, is
15 providing a report to Congress after we have completed
16 these consultations on how to move forward.

17 So I want to make clear to folks that there
18 are obviously very valuable functions that have been
19 performed for Indian Country, and it's not an intention
20 to eliminate any particular functions but more to figure
21 out how we can streamline those functions, how we can
22 make those functions work better, and organizationally
23 within an organizational structure, whether that can be
24 improved.

25 So the law also provides for, within 18

TRIBAL CONSULTATION - September 12, 2016

1 months, for the Secretary to ensure that appraisals and
2 valuations are performed within a single entity of the
3 department. So we're seeking feedback on that. We're
4 going to have a very short power point this morning to
5 look at some suggestions on how that can be
6 accomplished. And then we will also have a very short
7 presentation on minimum qualifications for individuals
8 for appraisals, and we certainly want your feedback on
9 that as well.

10 And then finally, last but not least, is the
11 law provides for the Secretary to decide whether to
12 establish an Under Secretary for Indian Affairs that
13 would report directly to the Secretary. And so we want
14 to hear your thoughts on that provision and whether the
15 Secretary should create an Under Secretary for Indian
16 Affairs. As I understand, it wouldn't replace the
17 Assistant Secretary for Indian Affairs, but it would be
18 a new position.

19 So I understand that the Special Trustee Vince
20 Logan will be joining us later this morning, but I'm
21 joined with Cheryl Andrew-Maltais from my office, Deb
22 DuMontier, and John White from OST, and Helen Riggs from
23 BIA, and Lauren DiFilippo from Solicitor's office.

24 So thank you all for joining us. We're really
25 excited about hearing your comments and questions, and

TRIBAL CONSULTATION - September 12, 2016

1 we'll have a very short presentation, but then we'll
2 look forward to hearing from you all, so thank you.

3 MS. DuMONTIER: Thank you, Mr. Roberts. And thank
4 you, Helen, for that opening.

5 I am honored to be part of this consultation
6 here today in Palm Springs. My name is Deb DuMontier.
7 I'm the Deputy Special Trustee for the Office of the
8 Special Trustee of American Indians. As Mr. Roberts
9 mentioned, Mr. Logan will be joining us later this
10 morning.

11 My tribal affiliation is the Confederated
12 Salish and Kootenai Tribes of the Flathead Nation,
13 located in Northwest Montana, a large land-based tribe
14 fully exercising self-governance.

15 I was legal counsel for CSKT for 10 years, and
16 I'm a licensed attorney in the state of Montana. For
17 the past 11 years, I've been working with OST
18 implementing and leading trust reform.

19 I next was a litigation Coordinator in D.C.,
20 where it has been very rewarding to be part of the
21 litigation settlement. This administration has settled
22 with more than 100 tribal locations.

23 Now, in my current position, I'm a direct
24 report of Mr. Logan, who is our current confirmed Senate
25 political appointee.

TRIBAL CONSULTATION - September 12, 2016

1 So on behalf of OST and the staff here today,
2 and those working throughout Indian Country, it's a
3 privilege to serve you and to be a partner in that
4 government-to-government relationship.

5 We appreciate the attendance by the tribal
6 leadership and the tribal staff and tribal members here
7 today at this consultation. We also appreciate the
8 participation by our acting Assistant Secretary,
9 Mr. Roberts, as well as Cheryl Andrew-Maltais, and our
10 BIA representative Helen Riggs, as well as Solicitor's
11 Office.

12 There may be members of the media here today.
13 The press is welcome. This is an open meeting.
14 However, we respectfully request that you do not disturb
15 the tribal consultations and that any questions by the
16 media be reserved until after the session is concluded.

17 My presentation is on Title 3, Section 304 of
18 the Indian Trust Asset Reform Act, and you'll hear us
19 refer to it sometimes as ITARA. Improving efficiency
20 and streamlining processes -- first, in addition to John
21 White, who will present after me, I would like to
22 acknowledge the OST leadership: Doug Lords, Deputy
23 Special Trustee for Field Ops; and Mr. Rob Winter, our
24 Director of Trust Services; and Eldred Lesansee, our
25 Director of Appraisal Services. And also our support

TRIBAL CONSULTATION - September 12, 2016

1 staff, Jeremy Rogers has been our project manager, as
2 well as Regina Gilbert from BIA. We appreciate all of
3 their work in getting these consultations set for us.

4 Again, Section 304 requires the Secretary of
5 the Interior to identify the non-monetary functions that
6 OST performs, which is an opportunity for us to reflect
7 upon our current practices and to hear from you your
8 recommendations regarding this section of the act as we
9 chart a path forward together with Indian Country.

10 It's also an opportunity to reflect on the
11 Department's progress in trust reform, and the next few
12 slides will provide you a brief overview and some
13 context of the Office of the Special Trustee.

14 Why OST was created. The American Indian
15 Trust Fund Management Reform Act of 1994 created the
16 Office of the Special Trustee in response to strong
17 demands for accountability and transparency for the
18 Indian trust funds. The primary purpose of the OST was
19 to improve management of Indian trust fund and assets
20 held in trust by overseeing and coordinating trust
21 reforms within the department.

22 However, in 1996 OST's role expanded by
23 Secretarial Order to include operational responsibility
24 for the financial trust fund management, including
25 accounting, investing, and disbursing to individual

TRIBAL CONSULTATION - September 12, 2016

1 Indians and tribal beneficiaries.

2 OST was later delegated the functions of
3 appraisals of Indian Trust lands and historical trust
4 accounting. And if you want to follow along with this
5 presentation, it's in Tab 5 of your binder.

6 The next slide demonstrates the complexity of
7 our work, not only in trust funds managed, but the
8 number of accounts managed. Implementing a modern,
9 centralized fiduciary accounting system, OST currently
10 manages approximately \$5 billion. OST receipts and
11 disburses \$1.7 billion each year. With a 99.99%
12 accuracy rate, OST processes on average more than 40,000
13 financial transactions each day, totaling more than
14 10 million transactions annually.

15 As the pie charts illustrate, the greatest
16 balance, over 80%, is held in 3,300 trust accounts for
17 250 tribes, invested in individual portfolios to meet
18 the cash flow objectives of the respective tribe.
19 Approximately \$845 million or 17% of the trust funds is
20 invested in a pooled account for over 400,000 IIM
21 accounts, 99% of the total accounts managed.

22 Since the settlement of Cobell, OST has
23 received an unmodified opinion on the IIM financial
24 statements conducted by an independent major accounting
25 firm for three consecutive years. In addition, OST has

TRIBAL CONSULTATION - September 12, 2016

1 developed a strong focus on beneficiary services to
2 ensure that our tribes and individual beneficiaries
3 receive the customer service necessary to empower them
4 with the knowledge to make informed decisions about
5 their trust assets.

6 Congress requested identification of all
7 functions, other than collection, management, and
8 investment of Indian trust funds that OST performs,
9 specifically those functions that affect or relate to
10 the management of the non-monetary trust resources,
11 which we've identified as Appraisal Services. For full
12 transparency, we've identified the functions based on
13 the budget justification for OST programs, including the
14 management, collection of the receipting, and the
15 investment of Indian trust funds.

16 In addition, OST has developed a comprehensive
17 fiduciary trust model to enhance beneficiary services
18 and accurately account for Indian trust funds, so some
19 of the functions are interrelated with monetary and
20 non-monetary resources. That asterisk at the bottom
21 denotes functions that impact other Department of the
22 Interior offices, bureaus, or tribes, and you will find
23 a description of each of these functions located in your
24 binder that we have provided today.

25 So Focused Fiduciary Management. In addition

TRIBAL CONSULTATION - September 12, 2016

1 to the improved financial system and maximized service
2 delivery to the beneficiaries displayed on this slide,
3 which included the centralized fiduciary accounting
4 system, the automated receipting with centralized
5 one-day collection, the lockbox management, expedited
6 disbursements through direct deposits, debit cards, and
7 the Trust Beneficiary Call Center, and I also mention
8 the structures of individual tribal portfolios.

9 OST has also established the Office of Trust
10 Records and the American Indian Records Repository.
11 They are located in Lenexa, Kansas, with a dedicated
12 underground storage facility used for the proper
13 safeguarding and storage of fiduciary trust records.
14 This is a major achievement. The AIRR has specially
15 trained staff dedicated to protecting very important
16 documents of Indian Country. And if the tribal
17 leadership is interested in visiting the area, please
18 let us know so we can make those arrangements.

19 Enhanced Beneficiary Services. OST currently
20 has trust officers and staff available to assist
21 beneficiaries either on tribal lands or in close
22 proximity to those lands, to partner with the Bureau of
23 Indian Affairs, the Office of Natural Resource Revenue,
24 the Bureau of Land Management, other federal and state
25 agencies, and tribes in addressing Indian trust matters

TRIBAL CONSULTATION - September 12, 2016

1 on a regional and local level.

2 OST also operates a toll-free Trust
3 Beneficiary Call Center with expanded hours of service
4 in direct support of beneficiary calls and inquiries,
5 providing consistent, timely, and accurate information.
6 The TBCC has responded to more than 1.8 million calls
7 since 2004, with a first-line resolution rate of 94%,
8 and that's an overall resolution rate. That means when
9 a beneficiary calls with an inquiry, their first call
10 they're able to get a satisfactory response, and
11 currently it's been up to 98%. The industry standard is
12 less than 50%, so it's a customer service we're quite
13 proud of.

14 The OST Field Operations' dedicated and direct
15 service to beneficiaries complements the work of our
16 federal and tribal partners so they may remain focused
17 on their mission and important stewardship of natural
18 resources and land.

19 In addition, our field staff aggressively look
20 for account holders with unknown addresses through
21 outreaches, interagency collaboration, and searches of
22 over 7,000 electronic databases. Thus far we have found
23 more than 330,000 account holders and distributed more
24 than \$386 million. The success stories are awesome, and
25 in some cases have drastically changed lives of our

TRIBAL CONSULTATION - September 12, 2016

1 beneficiaries. We also help the Land Buy Back Program
2 for Tribal Nations in getting purchase offers out to
3 tens of thousands of Indian owners and fractionated
4 land.

5 In addition to their fiduciary expertise, our
6 FTOs and RTAs provide additional empowerment training to
7 promote economic self-sufficiency.

8 OST also provides beneficiaries with a
9 statement of their accounts, including funds activity,
10 and real property assets, to help increase financial
11 awareness and inform individuals and tribes of their
12 interests.

13 OST's ongoing initiatives to streamline
14 automated processes are based on best practices and
15 lessons we have learned from our close work with tribal
16 leaders and communities. Trust resource and asset
17 management in Indian Country must not be stagnant, and
18 trust reform is always a work in progress.

19 OST is developing 21st Century tools to
20 enhance services such as online banking for IIM
21 accounts. We are enhancing Strataweb, which is how
22 tribes currently access tribal account information.

23 OST continues to work on probate reform
24 initiatives and provide support for Indian estate
25 planning services to assist Indian landowners with

TRIBAL CONSULTATION - September 12, 2016

1 understanding the American Indian Probate Reform Act.

2 We are reducing our carbon footprint and
3 promoting cost effective efficiencies with automating
4 trust processes and digitizing trust records.

5 OST will continue to support the Cobell
6 Settlement and the Land Buy Back Program with our
7 expertise in innovation with appraisal evaluations,
8 outreaches, and account services.

9 And of interest for tribes compacting trust
10 programs, OST has developed, with the assistance of nine
11 pilot tribes and consortiums, an online evaluation tool
12 to streamline an evaluation process that is less
13 burdensome on tribes than the current evaluation
14 process. And some of you that were here earlier, we had
15 the video that was showing the project. We call it the
16 tribal Methodology Project. This project may meet some
17 of the Title 2 review requirements.

18 Benefits to the Separation of Duties. We know
19 that OST's value comes not from its position within a
20 particular office at the department, but rather from its
21 singular focus and discrete duties related to the
22 fiduciary trust responsibility. Moreover, these duties
23 must continue, no matter in which office the functions
24 are located, to maintain the level of services Indian
25 Country deserves.

TRIBAL CONSULTATION - September 12, 2016

1 The core trust accounting functions, providing
2 direct beneficiary service and maintaining internal
3 controls, were created and established separately with
4 the intention of operating independently of the general
5 trust operations. This structure was created to avoid
6 conflicts of interest, co-mingling of resources,
7 redirection or re-prioritizing of other interests to
8 ensure accountability and delivery of services.

9 Separation provides a dedicated and direct approach to
10 managing the Indian financial trust assets in accordance
11 with sound fiduciary trust principles and practices.

12 So in conclusion, that's a very quick overview
13 of OST. We've identified our functions. There's also
14 an accomplishment brochure of OST's work over the past
15 20 years. We look forward to working with all of you to
16 implement the 2016 Indian Trust Asset Reform Act, and we
17 welcome this opportunity to dialogue with you to develop
18 a strong plan to serve Indian Country. The handouts
19 that have been provided today are all located on the
20 ITARA website. We've also provided links to various
21 documents and reports, such as our annual audits and
22 other background material on that website for your
23 reference.

24 In the meantime, the OST staff will continue
25 to work hard to serve Indian Country and remain focused

TRIBAL CONSULTATION - September 12, 2016

1 on our mission to honor our trust responsibilities with
2 a beneficiary focus and participation, while providing
3 superior stewardship of trust assets for the proper
4 discharge of the Secretary's trust responsibility.

5 And you'll note on here the slide states, as
6 well as the material, that the written material by
7 September 30th will be considered. As Mr. Roberts
8 mentioned, we are extending that to October 7th, and
9 that is posted on our website.

10 So I thank you, and I bring you John White,
11 who will discuss the Appraisals Section 305(a).

12 MR. WHITE: Good morning. My name is John White.
13 I'm the Deputy Special Trustee for Program Management.
14 I'm a member of the Sisseton-Wahpeton Oyate tribe,
15 located in Northeast South Dakota. And I've been with
16 the federal government now for 26 years. 12 of those
17 years were with the Bureau of Indian Affairs, and the
18 last 14 years were with the Office of the Special
19 Trustee. The last two years, I've had the opportunity
20 to work with the Director of the Office of Appraisal
21 Services in leading the Office of Appraisal Services
22 program.

23 Section 305(a) requires that appraisals and
24 valuations of Indian trust property be administered by a
25 single bureau, agency, or other administrative entity

TRIBAL CONSULTATION - September 12, 2016

1 within the Department.

2 A little background on Appraisal Services. In
3 2002, the Appraisal Program was transferred to the
4 Office of Special Trustee. From 2005 to 2009, the
5 program was administered by what was called the
6 Appraisal Services Director, which is now the Office of
7 Valuation Services. And then in 2010, the Appraisal
8 Services Program came back to OST.

9 I think it's also important that we have an
10 understanding of what the current appraisal process is.
11 If we're going to talk about a single entity and who
12 should administer the single entity, we should have a
13 framework of what the process is. We've developed a
14 five-step process to explain this. And although it's
15 the current appraisal process, the process is not all
16 done by Appraisal Services.

17 Step 1 and Step 2 of the process requires a
18 requestor to request the appraisal report from the
19 Office of Appraisal Services. Generally that's the
20 Bureau of Indian Affairs or a tribal program that
21 they've contracted or compacted with a real estate
22 services program.

23 Once Appraisal Services gets that request,
24 then what they do is they do the appraisal report.
25 They'll complete that. It goes through a technical

TRIBAL CONSULTATION - September 12, 2016

1 evaluation. If it passes that, then it's given back to
2 the requestor for the requestor to complete the trust
3 transaction.

4 Now, keep in mind, Appraisal Services is
5 responsible to conduct all the appraisal activity on the
6 Indian trust land. There are occasions, though, where
7 they have to reach out to the Division of Minerals
8 Evaluation and the BIA Appraisal Program to get
9 additional information to complete the report.

10 It happens occasionally -- and I'll show you
11 this on this page, you can see in Bullet 3 where in
12 FY15, OAS completed 3,099 appraisal requests. 6% of
13 those times, we had to reach out to DME to get
14 additional information. And then 2% of the time, we had
15 to reach out to BIA Forestry.

16 I would also like to note that FY2015,
17 Appraisal Services completed appraisals that totaled
18 over \$2 million.

19 Again, FY2015, OAS completed 3,099 appraisal
20 reports. 2% of the time, we had to reach out to the BIA
21 Forestry. 6% we had to reach out to DME for mineral
22 estate appraisals.

23 Now, when we talk about the single entity,
24 what we envision is taking those functions, transferring
25 them to a single entity, which we call Indian Land

TRIBAL CONSULTATION - September 12, 2016

1 Valuations Office.

2 And who should administer this? We've
3 identified seven options. The first option was the
4 Assistant Secretary of Indian Affairs -- I'm sorry, the
5 Office of the Secretary. The second option was the
6 Office of Special Trustee for American Indians. Third
7 option is the Assistant Secretary of Policy, Management,
8 and Budget. The fourth option is Office of Valuation
9 Services. The fifth option is the Assistant Secretary
10 of Indian Affairs. The sixth option is the Bureau of
11 Indian Affairs. And the seventh option, if you have
12 ideas other than those ideas, you're welcome to present
13 those. We're not limited to the first six. Those
14 aren't in any priority order.

15 I know that was a real quick overview of
16 Section 305(a) and what is required. What I did was
17 give you a brief history of OAS, the current process for
18 the Appraisal Program, or the current appraisal process
19 that we follow, and then I gave the options with the
20 single entity on who could administer the single entity.

21 If there's any questions on the slides that
22 I've presented, I'll answer those after Cheryl's
23 presentation.

24 If we get into any technical appraisal type
25 questions, then I'll call on Mr. Lesensee to answer

TRIBAL CONSULTATION - September 12, 2016

1 those questions. Thank you. Cheryl.

2 MS. ANDREW-MALTAIS: Thank you, and good morning.

3 I'd like to thank the people of the
4 Agua Caliente Tribe for having us here. Thank you all
5 for coming. It's really important, because again, as
6 these laws are developed and as our committment and the
7 administration's committment then to Indian funding, we
8 really are trying to make sure that we get your feedback
9 as we develop these programs.

10 Unlike years ago, as we're coming up with
11 ideas, these are just ideas that we're putting out there
12 so that Indian Country and tribal leadership can help
13 form more programs that are going to best meet the needs
14 of Indian Country itself. So we're here to solicit your
15 comments and your feedback on how to best develop these
16 areas and ideas, and how to best to meet Indian
17 Country's needs.

18 So my area is Section 305(b) Minimum
19 Qualifications for Appraisers. This is essentially
20 trying to develop a framework by which tribes will be
21 able to assume this function on behalf of their own
22 communities.

23 Section 305 has minimum qualifications. Not
24 later than one year after the date of enactment of this
25 Act, the Secretary shall establish and publish in the

TRIBAL CONSULTATION - September 12, 2016

1 Federal Register minimum qualifications for individuals
2 to prepare appraisals and evaluations of Indian trust
3 property. So that means by June 22nd of next year, we
4 have to have this put in the Federal Register.

5 Secretarial Approval means in any case in
6 which an Indian tribe or Indian beneficiary submits to
7 the Secretary an appraisal or valuation that satisfies
8 the minimum qualifications described in subsection (b),
9 and that submission acknowledges the intent of the
10 Indian tribe or beneficiary to have the appraisal or
11 valuation considered under this section, the appraisal
12 or valuation, one, shall not require any additional
13 review or approval by the Secretary; and two, shall be
14 considered to be final for the purposes of effectuating
15 the transaction for which the appraisal or valuation is
16 required.

17 And Proposed Rule 43 CFR 100, this part
18 applies to anyone preparing or relying upon an appraisal
19 of Indian property.

20 Specifically what are the minimum
21 qualifications for qualified appraisers? And this is
22 where we're looking for your input in how to establish
23 this. And be aware and mindful that the minimum
24 qualifications that we're looking for are so that your
25 appraisals and valuations will be good not only for the

TRIBAL CONSULTATION - September 12, 2016

1 individual Indians and for the tribes, but also make
2 sure that the appraisals are accurate to benefit the
3 tribal members and tribal communities.

4 Subsection (a) is that the appraiser must hold
5 a current Certified General Appraiser license in the
6 state in which the property appraised is located; and
7 (b) the appraiser must be in good standing with the
8 regulatory agency of the state in which the property
9 appraised is located; and (c) the appraiser must comply
10 with the Uniform Standards of Professional Appraisal
11 Practices rules and provisions applicable to appraisers,
12 including but not limited to competency and ethics
13 requirements.

14 Now, the reasons are here that we're
15 suggesting; however, we're looking for your input on
16 anything else that you might feel to be relevant.

17 Another question is, "Must I submit an
18 appraisal to the Department?" Yes, in all cases you
19 must submit an appraisal for transactions that require
20 Secretarial approval under other parts of Title 25 and
21 Title 43 of the Code of Federal Regulations. If the
22 Secretary's approval is needed, then absolutely the
23 appraisals and valuations are needed.

24 Another question is, "Will the Department
25 review and approve the appraisals?" And it's yes and

TRIBAL CONSULTATION - September 12, 2016

1 no. No, if, one, the submission acknowledges the intent
2 of the Indian tribe or individual Indian to not require
3 Departmental review; or two, the appraisal was completed
4 by a qualified appraiser meeting the rule's
5 requirements; and three, no owner of any interest in the
6 Indian property objects to the use of the appraisal
7 without Departmental review. And this is the tribes
8 exercising their sovereignty to accept these, because
9 there's no contest to it.

10 However, the appraisal will have to be
11 reviewed by the Department if any of the criteria above
12 are not met or the appraisal was submitted for purchase
13 at probate under 43 CFR 30 or if it was under the Land
14 Buy Back Program for Tribal Nations, or legislation
15 requiring the Department to review and approve an
16 appraisal is present.

17 Another question is, "What happens if the
18 Indian tribe or individual Indian does not agree with
19 the submitted appraisal?" If the Indian tribe or
20 individual Indian does not agree with the submitted
21 appraisal, the Indian tribe or individual Indian may
22 choose to not use the appraisal conclusions or findings,
23 and request that the Department perform an appraisal or
24 valuation.

25 "Is the Department liable if it approves a

TRIBAL CONSULTATION - September 12, 2016

1 transaction for Indian property based on an appraisal
2 submitted by a qualified appraiser?" The Department is
3 not liable for any deficient or inaccurate appraisal or
4 valuation it did not review or approve, meaning that the
5 Federal Government won't be responsible if you choose to
6 go outside of that approval process. Even if the
7 Department approved the transaction for Indian property,
8 including but not limited to lease, grant, sale, or
9 purchase, based on an appraisal prepared by a qualified
10 appraiser. That's why appropriate credentialing of your
11 appraisers is going to be so important to the tribe and
12 your individual needs.

13 Other questions to consider are "Do any tribes
14 grant Certified General Appraiser licenses similar to
15 those granted by states? And if so, is the license
16 limited to appraisals and valuations on property within
17 the tribe's jurisdiction?"

18 Another question, "Are the minimum
19 qualifications appropriate for appraisals and valuations
20 of timber, minerals, or other property separate from
21 appraisals and valuations of real property? If not,
22 what qualifications would be better suited to those
23 appraisals and valuations?"

24 Another question to ask when you're
25 considering the appropriate standards is "Is there a way

TRIBAL CONSULTATION - September 12, 2016

1 to allow for the Department to verify an appraiser's
2 qualifications without requiring the qualifications to
3 be submitted with each appraisal and still ensure that
4 the appraiser is qualified at the time the appraisal is
5 submitted?" meaning whether or not there have been any
6 changes to the appraiser's qualifications, such as loss
7 of license.

8 So those are just some of the things to
9 consider when you're giving us feedback and guidance as
10 to the minimum qualifications for appraisers for the
11 real property for Indian Country.

12 The next section is regard to the Under
13 Secretary. In the law itself, as Larry mentioned, there
14 is a provision to create an Under Secretary's position,
15 and this is where we're really trying to get your
16 feedback and understanding of how you'd like to see this
17 position's roles and responsibilities carried out.

18 Under the ITARA Section 303, this new law
19 provides for the establishment of a position. The
20 Secretary may establish in the Department the position
21 of Under Secretary for Indian Affairs, who shall report
22 directly to the Secretary. The appointment shall be
23 appointed by the President, by and with the advice and
24 consent of the Senate.

25 Duties, in addition to any other duties

TRIBAL CONSULTATION - September 12, 2016

1 directed by the Secretary, the Under Secretary shall
2 coordinate with OST to ensure an orderly transition of
3 the functions of the OST to one or more appropriate
4 agencies, offices, or bureaus within the Department; and
5 to the maximum extent practicable, supervise and
6 coordinate activities and policies of the BIA with
7 activities and policies of the other relevant agencies;
8 and provide for regular consultation with Indians and
9 Indian tribes that own interests in trust resources and
10 trust fund accounts.

11 There are personnel provisions with regard to
12 appointments, and the Under Secretary may appoint and
13 fix the compensation of such officers and employees as
14 the Under Secretary determines to be necessary to carry
15 out any function transferred under this section; and the
16 requirements will be, except as otherwise provided by
17 law, any officer or employee described in paragraph 1
18 shall be appointed in accordance with the civil service
19 laws, and the compensation of such an officer or
20 employee shall be fixed in accordance with Title 5 of
21 the United States Code, and if in appointing or
22 otherwise hiring any employee, the Under Secretary shall
23 give preference to Indians. Basically it's allowing the
24 Under Secretary to develop their own staffing and
25 provide for any responsibilities and duties that they

TRIBAL CONSULTATION - September 12, 2016

1 will be performing.

2 In front of us now is the current
3 organizational chart. And if you notice, the Assistant
4 Secretary of Indian Affairs is highlighted. However,
5 what we're doing is looking to see where Indian Country
6 would be with respect to the roles and responsibilities
7 of the Under Secretary in order to effectuate the
8 changes that are mandated by this new law.

9 And again, these are just ideas and
10 suggestions that we have from our end, and we're looking
11 to Indian Country to provide some in-depth comment and
12 thought as to where this position would be and the
13 functions that would be maintained under the new Under
14 Secretary.

15 Again, thank you very much for your time and
16 your participation in this consultation. We really
17 appreciate it and look forward to a dialogue and your
18 comments. And as Larry mentioned, the comment section
19 will be extended.

20 MR. ROBERTS: I think we're going to open up to any
21 questions or comments that folks have on the bill, and
22 so let's open up.

23 Step up to the microphone.

24 MS. ROSIER: Good morning. My name is Theresa
25 Rosier. I am Deputy General Counsel for Salt River

TRIBAL CONSULTATION - September 12, 2016

1 Pima-Maricopa Indian Community. I'm here with Stacy
2 Gubser. She's in charge of our leasing and most of our
3 realty programs, which have undergone a self-governance
4 compact for a long time now.

5 I have a couple questions. I've read the act
6 a number of times, and I struggle with it. So I guess
7 in your presentation, you're identifying the only
8 non-monetary function as appraisals? Make sure I
9 understand that.

10 Okay, in the bill when it talks about planning
11 a transition plan and a timetable for termination of
12 OST, are you limiting that just to the non-monetary
13 functions?

14 MS. DuMONTIER: We've identified non-monetary
15 functions as appraisals. We're certainly willing to
16 take any comments that folks may have to something
17 non-monetary.

18 As far as the report to Congress and the
19 transition plan, we're seeking comments. The core
20 functions have been identified as extremely important.
21 We would anticipate those functions continuing
22 somewhere, but that's what we're here today is to
23 determine what input tribes may have regarding where
24 those functions should reside or how do we improve
25 services to Indians.

TRIBAL CONSULTATION - September 12, 2016

1 MS. ROSIER: Okay, you kind of answered it.

2 I guess I should have started, Salt River was
3 not -- we didn't write letters of support with this
4 bill. We have struggled with it. We work a lot with a
5 trust officer to Cee Henry, we work with Jim James quite
6 a bit in Albuquerque. Frankly we have a very good
7 relationship with OST, so we were more on the fence,
8 because we found OST to be pretty professional in
9 working with us, solution-oriented.

10 At times when we've struggled with the field
11 office or regional office, OST has been more practical
12 in our response. So we're not here to tear down and
13 burn OST. On the practical end, they're very easy to
14 work with and at times very helpful in helping us get
15 through a problem that maybe doesn't have an easy
16 solution.

17 So we're still monitoring this. We'll
18 definitely submit comments, but I think what we saw
19 today, we were very concerned with possibly getting rid
20 of the OST completely. That's what our main concern
21 was, but seeing today, I think we feel a lot better
22 about possible approaches with it.

23 Our last comment is about appraisals. I think
24 we probably will come out strongly on appraisals. The
25 way the law is written, I'm not sure the plan to

TRIBAL CONSULTATION - September 12, 2016

1 implement it is really what the law intended on that.

2 Again, we have a great relationship with the
3 appraisal officers in Western Region. We want to
4 streamline the process and work with our landowners and
5 help them out. So those are my comments.

6 MS. DuMONTIER: Just real quickly, we've heard from
7 others that maybe the legislation didn't cover what was
8 anticipated for appraisals.

9 Do you have any further comments on that?

10 MS. ROSIER: I can honestly tell you, we've gone
11 from, in all of my 12 years -- when I first started
12 at -- Salt River does things differently. We hire out
13 independent appraisers. We've done that for 15 years
14 probably. Then we just submit for review to OST, but it
15 could take nine months to get a review back.

16 That hasn't been the case in a very long time.
17 And I would say right now, we're under 30 days for the
18 review process. So we're in a really good spot. We've
19 had ebbs and flows throughout the years, but nothing
20 like '04. That was a year of the standstill, and the
21 economy was hot then and we leased a lot of land. So
22 we're in a good place there.

23 I just think if we had the ability to maybe
24 get Secretarial review out of the process generally,
25 that would be more quick, more immediate, better service

TRIBAL CONSULTATION - September 12, 2016

1 for our landowners. But again, the current system we
2 can work with too.

3 MS. DuMONTIER: The proposed rule is in your binder
4 for the minimum qualifications.

5 MS. ROSIER: Okay, thanks.

6 MS. CLONINGER: I'm Julia Cloninger. I'm with the
7 Morongo Band of Mission Indians. We currently compact.
8 And we just recently did take on the function of the
9 appraisal, and I have to agree that we have cut down the
10 wait time dramatically once we've contracted that
11 service.

12 We do our own scope of work, send it out, and
13 set our timelines. And then we upload to Oasis the
14 complete appraisal, and we do submit for the review, and
15 it has been within two, three weeks and even faster when
16 needed. So the process has worked for us as it stands.

17 We do -- I feel like having somebody look at
18 that appraisal besides us to give an additional eye to
19 the value, I feel that it serves the purpose, and we
20 like the way it is.

21 MS. RISLING: Hello, my name is Lois Risling. I'm
22 with the Land Management Department of the Hoopa Indian
23 Reservation.

24 One of the things that we're considering is
25 that it's a -- it was a little bit confusing getting the

TRIBAL CONSULTATION - September 12, 2016

1 information about this hearing for us because we were
2 under the impression that the legislation was designed
3 to sunset the Office of Special Trustee, but all the
4 language coming out in these announcements was a review
5 of "maybe," "might be," "is there a possibility that."
6 And so we're just kind of curious on whether or not that
7 means that the intent and the language in the
8 legislation is being changed by these hearings or
9 being -- how that is being implemented?

10 In terms of the specific areas, we read the
11 draft proposed rule, and it says that it's for
12 appraisals and valuations of Indian trust property to be
13 administered by a single administrative entity within
14 the Interior Department, and specifically says
15 regulations is -- "The purpose of the regulations is
16 written broadly, "to include appraisals and valuations
17 of real property, appraisals and valuations of timber,
18 minerals, and other property to the extent of the whole
19 property, and appraisals and valuations of timber,
20 minerals, and other property separate from appraisals
21 and valuations of real property."

22 And then there's a question about once all
23 these appraisals get put into one entity, can you use
24 the same criteria to hire the appraiser, and the
25 criteria that was proposed has three parts. One of

TRIBAL CONSULTATION - September 12, 2016

1 them, you have to have the general Appraiser license and
2 the other things.

3 And appraisers -- it's been our experience
4 there are different kinds of appraisers. So there's
5 like residential appraisers, there's appraisers for
6 economic properties, and they have different criteria
7 that's used to establish their right to do those
8 appraisals. So they're not necessarily foresters who
9 can do forestry appraisals or mineral people who can do
10 mineral appraisals.

11 So if we're requiring -- if that implies that
12 we're requiring that the forestry appraisals, they have
13 to have that general appraisal -- land appraisals,
14 that's an additional burden.

15 And on our reservation we have a hard time
16 getting appraisers, even residential appraisers, and not
17 all residential appraisers have that general certificate
18 that you're requiring. And in my eyes, they are even
19 harder to get. They would have those, but they're
20 harder to get.

21 So we're having a hard time understanding how
22 the forestry appraisal and the mineral appraisal would
23 have to have the surface land appraisal, and we would
24 ask you to look at the possibility of saying it depends
25 upon the land that you're appraising. That's what

TRIBAL CONSULTATION - September 12, 2016

1 should drive the qualifications for the appraiser. I'm
2 hoping that what's not happening here is the check-box
3 approach to what appraisals are.

4 And this will really apply to us, because
5 we're also a self-governance tribe. When we deal with
6 allotments, that's where it's really going to apply to
7 us. It's not going to apply to us on tribal lands, but
8 it will on that.

9 And our -- and also when we do probate, buy
10 back at probate, we're not able to do buy back at
11 probate. OST would not pay for those appraisals for us,
12 and there's a little line drawn around the bottom of
13 your thing.

14 But those criteria I think need to be
15 developed with actual experiences from the tribe and
16 need to consider the type of land as the basis, and not
17 just a uniform definition and implementation, because I
18 think it will lead to some real problems for tribes,
19 especially tribes that are in areas that are difficult
20 to get appraisers, because it is very difficult on
21 reservations to get appraisers to come.

22 We started finding appraisers who would come
23 to the reservation, but they are seven- and eight-hour
24 trips just to get out to where we are, and then it
25 becomes a very expensive process.

TRIBAL CONSULTATION - September 12, 2016

1 I'll come back for the rest of my comments.

2 MR. ROBERTS: Thank you.

3 On your first comment with regard to OST and
4 the potential termination of it, if you'll focus on
5 Section 304, which basically provides for a report of
6 the transition plan, and the transition plan would be
7 two years or longer than that. That's what we're
8 seeking consultation on. Is it working well? So that's
9 as to your first question in terms of scope. I think
10 that's what we're seeking comments on.

11 MS. RISLING: Well, our confusion came from the
12 written material that was sent out. In the material you
13 sent out, it says -- this is on Title 3, improving
14 efficiency and streamlining processes. So the
15 legislation says, Section 303, Establishment of
16 Position. That's the Under Secretary. And then Section
17 303, Under Secretary for Indian Affairs, Part C,
18 "coordinate with the Special Trustee for American
19 Indians to ensure an orderly transition of the functions
20 of the Special Trustee to one or more appropriate
21 agencies, offices, or bureaus within the Department, as
22 determined by the Secretary."

23 Your July 13, 2016, letter states, "The
24 functions of the Office of the Special Trustee for
25 American Indians, and whether the functions, they should

TRIBAL CONSULTATION - September 12, 2016

1 be transferred to other entities within the Department
2 of Interior," so the language switches in intent and
3 direction from it's going to happen to whether it's
4 going to happen.

5 Our testimony is going to differ between
6 whether it's going to happen, and it will happen and how
7 we look at it. So that was just one example, and so
8 that was our concern.

9 MR. LESANSEE: Thank you for the comments. We have
10 to same problem as far as getting qualified appraisers
11 to bid on their work, because most of your appraisers
12 come from the cities, and their specialization is doing
13 valuations within the cities.

14 But when we get into the remote locations to
15 bid on the work, we do find appraisers have unusually
16 higher than your typical fees, because it takes them
17 longer -- it's a longer distance to travel. Gathering
18 the information is difficult as well. Land sell
19 information or market information is not readily
20 available. So that increases the cost.

21 As far as the qualifications based on
22 different land types, we have worked with the Cherokee
23 Nation in Oklahoma and the Chippewa Tribes in the
24 Midwest on the possibility of using residential
25 certified appraisers to do valuations that are maybe

TRIBAL CONSULTATION - September 12, 2016

1 non-complex and just routine type of valuations that
2 they may be qualified to do.

3 We do recognize that residential appraisers do
4 valuations of land, just vacant land, at a cheaper
5 price. And sometimes if you spread -- if you have a
6 larger base of vendors, you have better bids on the
7 process of valuation.

8 So if you focus on just say certified general
9 appraisers or MAIs or ARA, they specialize in rural
10 valuations and agricultural properties. If you focus or
11 limit your pool of vendors, then your prices go up.

12 We do reviews. We do real property
13 consultation, technical assistance. Any time a tribe
14 needs assistance, even highly strategized -- how to get
15 more vendors to bid on your work, that's some of the
16 stuff we can help you with. A few of our appraisers are
17 affiliated with the American Society of Farm Managers
18 and Rural Appraisal Institute. We have networked with
19 the local private appraisers.

20 Yes, we do agricultural properties, commercial
21 properties, right-of-ways, telecommunication sites, just
22 name it, air rights, water rights. There's a number of
23 different things.

24 One of the things about your Indian trust
25 lands, you don't know what's going to come your way as

TRIBAL CONSULTATION - September 12, 2016

1 far as an appraisal problem. There's a number of things
2 that OAS doesn't get into or they don't routinely do
3 valuations on. And Salt River, yes, there's some
4 challenging stuff. And here in Palm Springs too,
5 there's some stuff. We've been here in Palm Springs,
6 and we've got highly specialized developed properties
7 here that are based on really complicated businesses.

8 I think as we're hiring people with
9 specialized experience, we're customizing or bringing in
10 people with specific background to fit the work. And
11 we've hired recently Greg Powell at Western Region.
12 He's a good appraiser of ARA. And we've also hired an
13 additional person. So as we get more people, that's
14 really helping us out.

15 And with a lot of lands, we have highly
16 fractured situations. So you may have a thousand people
17 on one allotment. And with a thousand people doing
18 different things or having different objectives, you get
19 a high volume of real estate transactions, which leads
20 to more appraisals.

21 We hardly do valuations for tribal loans
22 anymore, because there's authorities out there for rent
23 and market value estimates. So majority of our work is
24 allotment lands.

25 MR. MASILON: Hi, I'm Matt Masilon with the Morongo

TRIBAL CONSULTATION - September 12, 2016

1 Band of Mission Indians. I just wanted to clarify
2 something real quick.

3 Under the Qualifications of Appraisers
4 portion, it says I submit an appraisal to the
5 Department. I'm assuming all appraisals will be
6 submitted as recordkeeping no matter what. Is that kind
7 of the process of that?

8 So when it says no, and it says, "The
9 submission acknowledges the intent of the Indian Tribe
10 or individual Indian to not require Department review or
11 approval," if an individual Indian let's say wanted to
12 do a land sale, would they have a waiver if they wanted
13 to waive the right of an appraisal for a land sale? We
14 wouldn't suggest it to them, but if they were so crazy
15 and they wanted to do it that way.

16 MS. ANDREW-MALTAIS: If it met those three criteria
17 and it doesn't involve probate and didn't involve --

18 MR. MASILON: So they have the right to waive it?

19 MS. ANDREW-MALTAIS: That's the intent.

20 MR. MASILON: Will they need to sign something
21 stating that or would it just be in the submission of
22 the appraisal?

23 MR. LESANSEE: I think what we talked about is the
24 tribe or individual Indian I think has to show their
25 intent to exercise their rights under ITARA.

TRIBAL CONSULTATION - September 12, 2016

1 And I don't think it was specific as to
2 whether it was written or whether it was a verbal
3 announcement or notice that "We are exercising our
4 rights under ITARA."

5 MR. MASILON: That's what I would assume is there
6 would need to be something in writing. I would think
7 it's a rarity.

8 But for instance, if somebody wanted to do
9 farming and grading and they wanted to waive the right
10 to that, there would have to be a document there for
11 that; correct?

12 MR. LESANSEE: Correct.

13 One thing, though, is you have one owner that
14 says, "I want to exercise my rights under ITARA," but a
15 co-owner says, "I would like the benefit of an
16 appraisal" --

17 MR. MASILON: Then no matter what, it goes to the
18 review. Okay, that's what I assumed, especially with
19 individuals that are the sole owners. If they waive
20 that right, they can pretty much do -- as long as they
21 sign a waiver.

22 Okay, thank you.

23 MR. ROBERTS: Anyone else have comments or
24 questions this morning?

25 MS. RISLING: Lois Risling, and I'm with the Hoopa

TRIBAL CONSULTATION - September 12, 2016

1 Tribe.

2 We had a couple more questions on the
3 appraisers and the proposed rule. In the section where
4 you talk about the time frame for submitting appraisals,
5 it doesn't address how long the appraisal is good for.
6 Like is it six months? One year? Whatever it is. And
7 so that would be helpful to have that in the
8 legislation, because right now there's nothing in the
9 language right now.

10 And then we needed a little more clarification
11 on multiple-owned allotments. If one owner, no matter
12 what percentage they own, says, "We don't want an
13 appraisal," does that stop the appraisal process for
14 that whole piece of property? That's unclear, because
15 we have that happen sometimes. We have a case where 99%
16 of the owners, and a less than 1% has stopped all
17 actions on that property, because the Bureau is
18 requiring 100% agreement. So is the appraisal going to
19 be that same standard for those multiple-owned
20 allotments?

21 In terms of the verification, if there could
22 be an addition. Right now, the verification of the
23 qualifications of the criteria for the appraiser is
24 submitted at the same time as the appraisal for review.
25 But it would be -- if we could get them -- I'm not

TRIBAL CONSULTATION - September 12, 2016

1 saying take that out, but to add an additional
2 requirement that allows the appraisers to be preapproved
3 before they start so that we know the person is -- I
4 know what they're trying to do is say that at the time
5 they did the appraisal, the person was certified. But
6 it would be helpful to know that the person could meet
7 that certification and it would go through, because what
8 I would hate to see is we pay for a whole appraisal,
9 then it goes through certification, and it says, "This
10 guy didn't do this class" or whatever it was. I don't
11 know what the criteria is.

12 So if that's possible, that would be helpful.

13 MR. ROBERTS: May I ask a question. For either
14 your comments or written comments on the regulation
15 itself, I hear you loud and clear on the
16 pre-certification process.

17 I guess the other thing is whether you set up
18 some sort of process where the appraiser that's been
19 approved is sort of approved for a period of time, and
20 you put it on the appraiser to notify the department
21 whenever their status changes or something like that.

22 We're also looking at, for the appraiser, do
23 you have a period of time where unless they report to
24 us, otherwise they are approved for purposes going
25 forward?

TRIBAL CONSULTATION - September 12, 2016

1 MS. RISLING: It would seem to me you would want to
2 do whatever helps tribes in their appraisal process.

3 Appraisals in isolated areas are very
4 difficult to get, when you're in a county that doesn't
5 have a lot of appraisers anyway, and then when you're in
6 an area that those appraisers don't know.

7 We have a couple of problems with appraisers.
8 They may be certified and they may be very good, but
9 they can't find anybody to compare the property with.
10 So you have to go to another county or you have to go to
11 a town over 80 miles away. And if you're -- if the
12 people are trying for some kind of bank loan, the banks
13 will say, "No, we're not going to use that because
14 you're not within four city blocks."

15 So there are those issues. And so what would
16 be helpful is if there were dual processes in the
17 regulation that allows tribes to exercise options.

18 I think way back when -- I don't know who was
19 doing appraisals, but way back, you could have a list,
20 and they could say, "This meets the standard," and "This
21 person is good. Their license is good until this time."
22 And you could ask them to send in a copy of the license
23 with the report.

24 It's when the federal office, whichever one it
25 ends up being, has to take the time to check it, and

TRIBAL CONSULTATION - September 12, 2016

1 we're under some kind of time frame or time limit, and
2 so that's what we're worried about. If we send it in
3 the with process, two things: It's declared invalid;
4 and secondly, it's going to take time. If you already
5 pre-approve this guy or gal, and you see that that
6 license is still attached, it's still good, then it
7 should be able to be approved right away. So we need
8 more than just one option. And you guys are all really
9 smart, so I'm thinking you can come up with more
10 options.

11 So one of the other things besides that
12 appraisal information that we're concerned with is, is
13 that consultation -- we're encouraging you to do
14 consultation on the other titles in this law and with a
15 schedule, because there are things in this law that we
16 want to have some input on.

17 So for example, Title 2, the Indian Trust
18 Asset Management Demonstration Project, that's the
19 title. Under the definition, Project, "The term
20 'Project' means the Indian trust asset management
21 demonstration project." But as you read through the
22 language, it talks about Indian tribes. So is this
23 Indian tribes meeting for one project or is this one
24 project with several Indian tribes in it? What is the
25 criteria? Does it mean only one project? How many

TRIBAL CONSULTATION - September 12, 2016

1 projects?

2 Section 2 of 3, "Establishment of
3 Demonstration Project; Selection of Participating Indian
4 Tribes." So what does that mean? Does that mean one
5 project, and you get several tribes in the one project?
6 Is it more than one project?

7 Section 203, Part A, "In General - The
8 Secretary shall establish and carry out an Indian trust
9 asset management demonstration project."

10 Trust responsibility in general, "United
11 States shall not be liable for losses sustained by an
12 Indian tribe as a result of the execution of any forced
13 land management activity pursuant to tribal regulation
14 under Subsection B." What does that mean and how is it
15 going to be monitored and where is it going to be
16 monitored from?

17 We need to have consultation on this. It is
18 as important as whether or not we're going to have an
19 Under Secretary sitting in D.C. So we need consultation
20 on 1 -- Title 1 and Title 2.

21 And that information needs to be sent out
22 ahead of time. It was very helpful to have on your site
23 what the presentations are going to be, because we were
24 able to inform staff and the council and get input at
25 the time.

TRIBAL CONSULTATION - September 12, 2016

1 So we want to go on record saying we need that
2 consultation and we need it right away.

3 MR. ROBERTS: And we'll go on record to say we are
4 in consult on Title 2. We wanted to keep these
5 consultations focused on Title 3, but we will definitely
6 focus on Title 2.

7 MS. RISLING: Lois Risling.

8 The questions, "Are the minimum qualifications
9 appropriate for valuations of timber, minerals, or other
10 property separate from appraisals and valuations of
11 mineral property?" We think it's a different kind of
12 appraiser than the land values appraiser. The land
13 appraisers consults with the forestry appraisers and the
14 mineral appraisers, and even the presenter recognized
15 that this morning.

16 So they need to have different criteria. To
17 require a forestry evaluator and minerals evaluator to
18 have the general appraisal is not going to be
19 beneficial, and we will have zero people available if we
20 require that. So I think you need to reconsider that.

21 MR. LESANSEE: You're right in that the timber
22 appraisers and the mineral appraisers are currently not
23 required. The Department -- Division of Mineral
24 Valuations do not have certified general appraisers on
25 board. It's not a requirement.

TRIBAL CONSULTATION - September 12, 2016

1 However, they are required to adhere to the
2 preamble and the ethics provisions and the first part of
3 the act, so they do have to comply with certain
4 requirements of use. They're not required to follow a
5 standard loan, but they do have to be competent to do
6 the valuations that they're doing, such as timber or
7 minerals.

8 The BLM under Part 200 requires an appraisal,
9 and if anybody performs an appraisal, they have to meet
10 certain criteria. Mainly it's the ethics provision and
11 the competency provision. So the overall real estate
12 valuation process begins with identification of the
13 property, highest best use, and gathering sales at the
14 highest best use, and reconciling valuations either
15 based on the income cost or the market sales comparison.
16 So they follow the same process we do, but they use
17 different market information.

18 MS. RISLING: We have a couple of questions on the
19 ongoing initiatives of OST.

20 So one of them is the online evaluation tool
21 for tribes that compact trust programs. There was -- I
22 wouldn't call it a hearing or a consultation, but there
23 was a meeting with someone from OST a month or so ago
24 regarding the implementation of that evaluation tool.

25 One of the primary concerns we had is that our

TRIBAL CONSULTATION - September 12, 2016

1 tribe doesn't have the computer access capabilities. We
2 have major issues with that. We don't have access to
3 towns, because we don't have the capabilities to do that
4 on the reservation. I can't even download your little
5 videos and play them on the computer in the office,
6 because we don't have capability to do that. It took me
7 three days to be able to get to the power points and
8 print them, because we don't have the capabilities.

9 There are -- within the formatting or the
10 process that's being used for this evaluation tool,
11 there are some issues with design, and we brought those
12 up to the woman that was there. So that evaluation tool
13 isn't going to be productive for tribes that don't have
14 the capability to interact with it online, because we
15 don't.

16 And our suggestion at that meeting is the same
17 one that I'm making here today is that if OST could come
18 up with the funds to make sure that we could connect to
19 that evaluation system, then tribes would be more
20 willing to participate and have something to do with it.

21 And that's the same thing with the paperless
22 environment. To go to a fully automatic process with
23 digitized records, we can't get to that. We can't get
24 to those records. There's no way we can interact with
25 them.

TRIBAL CONSULTATION - September 12, 2016

1 Those are my questions.

2 MR. ROBERTS: With regards to the tribal
3 methodology, that application, we did understand there's
4 going to be exceptions. We hope it not to be the norm,
5 but we understand there's going to be exceptions.

6 There's really two options I would consider:
7 One of them is we can utilize CDs and mail those; or
8 worst case scenario is we have to send auditors out to
9 do those reviews on site. That's what we're
10 conceptualizing right now. But we have to find the most
11 cost effective approach to address issues like this. I
12 guess the worst case scenario is we send auditors out on
13 site to do those evaluations.

14 MS. DuMONTIER: We'll certainly entertain any
15 recommendations or suggestions that you have.

16 As far as the probate reform, one of the
17 things we've been looking is, one, we've been
18 collaborating with law schools. That's one area.

19 Also our fiduciary trust officers make every
20 effort to work with the landowners so they have a better
21 understanding.

22 We've also been looking at how do we process,
23 how do we get legislation so that we're not faced with
24 all these people that have a will in probate. For
25 example, in everyday estate planning, generally when you

TRIBAL CONSULTATION - September 12, 2016

1 meet with your attorney, they try to plan your estate so
2 you can avoid probate. Currently with trust
3 administration, we don't have that opportunity.

4 So these are some of the things that we're
5 looking at, something that would avoid probate. Those
6 are all things that we've been working on and certainly
7 will keep making those efforts.

8 MS. ROSIER: I have one last comment.

9 When you were talking about probates, we've
10 really shied away from law schools. From our
11 experience, we've even had -- we've had Bar certified
12 attorneys who don't know Indian law and who
13 unfortunately have done estate planning which we all
14 know did not lead to the intent of the landowner.

15 So even with the law schools, we've actually
16 turned them away because we can't give law students --
17 they really need to be supervised. They need to have
18 real training, need to have malpractice insurance,
19 because what we've done, and it's really disheartening,
20 is taken the time, hired an attorney, met with somebody,
21 and to see the results go intestate or to see the will
22 disqualified, it's been really sad to those play out
23 because their wishes were never honored. So I would
24 just be a little careful with the law schools on those
25 matters.

TRIBAL CONSULTATION - September 12, 2016

1 What Salt River had to do is we actually have
2 somebody who is designated to work on wills and they're
3 supervised by attorneys. It's not perfect, but it's
4 somewhat quality controlled.

5 MS. DuMONTIER: Yeah, it's extremely important to
6 monitor that.

7 I know that in Montana, we have specific
8 collaboration with the area on aging as well as probate
9 matters.

10 But it's true that it's legislation that's
11 difficult to understand, and a trust in general can be
12 difficult for attorneys in general to understand,
13 because like I said, they try to avoid probate, at least
14 the process of going through probate. We appreciate
15 your comments on that.

16 We do have a grant pending with the Indian
17 Land Tenure Foundation, and they have been providing
18 funding to attorneys, to some legal associations as part
19 of our effort to expand that service.

20 MR. MASILON: Matt Masilon, Morongo Reservation.

21 I was just going to say, I also work very
22 closely with Indian Land Tenure Foundation. Oklahoma
23 City University Law School, they have American Indian
24 Law School there. Casey Ross-Petherick actually trains
25 students in Indian will writing, and she does workshops

TRIBAL CONSULTATION - September 12, 2016

1 all over the state. She is somebody you should
2 definitely reach out to. I've used her multiple,
3 multiple times. Thank you.

4 MS. RISLING: Lois Risling, Hoopa Tribe.

5 On the probate issue, our tribe has the need
6 for -- to look at Indian people as -- the ultimate
7 natural resource we have is our tribal members. And
8 they base probate not only for federal lands, federal
9 probate, but they also have personal property that
10 somehow the federal government in its infinite wisdom
11 says, "Your million dollar home, it's your personal
12 property, and we're not going to have anything to do
13 with it." This has caused real consternation and
14 problems on our reservation.

15 So we now have an Indian person who, like this
16 young woman said, went out and they have tried to do
17 these different kinds of wills, and the attorneys don't
18 know the difference between federal probate and state
19 probate and what the tribe is.

20 You'll have an individual who has a federal
21 land allotment. You'll have an individual who has a
22 home on that, personal property. You'll have an
23 individual who has -- is under some state authority for
24 their probate. And then you have tribal like regalia,
25 and for our tribe, this is a really big thing that we

TRIBAL CONSULTATION - September 12, 2016

1 have, and that doesn't come under the state and it
2 doesn't come under the Feds. So the person is waiting
3 for the federal probate, waiting for the state probate,
4 and waiting for the tribe to do something.

5 And we have to look at this. Our trustee
6 needs to look this. Right now, we have OST trustee, we
7 have BIA trustee, and we have IHS trustee, and nobody
8 has tried to put this together. We need to help tribes.

9 What it is is that the trust law is an
10 opportunity to turn the issues toward tribal priorities.
11 Instead, we shouldn't try to mold those tribal interests
12 around generic federal regulations and make it work for
13 the federal government, because probate is a real issue
14 and it causes irreparable damage among tribal member
15 families, which we cannot afford to happen, because our
16 tribes need to be working together with each other but
17 internally as well.

18 So looking at probate, I notice that one of
19 the things you funded was to establish a records
20 management curriculum. I think it's a really good idea.
21 The more we can support our Indian universities and
22 colleges, the better it is. But we need to make sure
23 that that has a tribes portion of it, not just to train
24 for OST or the federal government.

25 We used to do that in a lot of programs when I

TRIBAL CONSULTATION - September 12, 2016

1 first started teaching or getting jobs for people in the
2 Bureau. We need to look at tribes, because sometimes
3 the interests are not the same as the federal
4 government.

5 MR. ROBERTS: Any other questions or comments?

6 Okay, well, thank you all for attending this
7 morning. I really appreciate it.

8 We have a few more in-person consultations,
9 and then we also have a telephonic consultation coming
10 up. And we've extended the deadline for written
11 submissions to the week of October 7th.

12 So thank you all for attending this morning,
13 and we really appreciate your time and input and look
14 forward to receiving comments as well from you all, so
15 thank you.

16

17

18 (Whereupon, at 10:16 a.m., the Indian Trust
19 Reform Act Tribal Consultation was concluded.)

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

I, KELLIE WETHERBEE, CSR NO. 10983, in and for the State of California, do hereby certify:

That said meeting was taken down by me in a shorthand form at the time and place therein named, and thereafter reduced to typewriting under my direction, and the same is a true, correct and complete transcript of said proceedings.

I further certify that I am not interested in the event of the action.

WITNESS my hand this 20th day of September 2016.



KELLIE WETHERBEE, CSR 10983
Certified Shorthand
Reporter for the
State of California

	20:25;28:5;47:3; 54:19	16:25;22:8	38:22	appraiser's (2) 25:1,6
\$	acting (1) 7:8	aggressively (1) 12:19	applicable (1) 22:11	appraising (1) 33:25
\$1.7 (1) 9:11	actions (1) 41:17	aging (1) 51:8	application (1) 49:3	appreciate (7) 7:5,7;8:2;27:17; 51:14;54:7,13
\$2 (1) 18:18	activities (2) 26:6,7	ago (2) 20:10;47:23	applies (1) 21:18	approach (3) 15:9;34:3;49:11
\$386 (1) 12:24	activity (3) 13:9;18:5;45:13	agree (3) 23:18,20;31:9	apply (3) 34:4,6,7	approaches (1) 29:22
\$5 (1) 9:10	actual (1) 34:15	agreement (1) 41:18	appoint (1) 26:12	appropriate (6) 24:10,19,25;26:3; 35:20;46:9
\$845 (1) 9:19	actually (3) 50:15;51:1,24	agricultural (2) 37:10,20	appointed (2) 25:23;26:18	Approval (6) 21:5,13;22:20,22; 24:6;39:11
A	add (1) 42:1	Agua (2) 3:16;20:4	appointee (1) 6:25	approve (3) 22:25;23:15;24:4
ability (1) 30:23	addition (8) 7:20;9:25;10:16, 25;12:19;13:5;25:25; 41:22	ahead (1) 45:22	appointing (1) 26:21	approved (5) 24:7;42:19,19,24; 44:7
able (6) 12:10;20:21;34:10; 44:7;45:24;48:7	additional (8) 13:6;18:9,14; 21:12;31:18;33:14; 38:13;42:1	air (1) 37:22	appointment (1) 25:22	approves (1) 23:25
above (1) 23:11	address (2) 41:5;49:11	AIRR (1) 11:14	appointments (1) 26:12	approximately (2) 9:10,19
absolutely (1) 22:22	addresses (1) 12:20	Albuquerque (1) 29:6	Appraisal (73) 7:25;10:11;14:7; 16:20,21;17:2,3,6,7, 10,15,16,18,19,23,24; 18:4,5,8,12,17,19; 19:18,18,24;21:7,10, 11,15,18;22:10,18, 19;23:3,6,10,12,16, 19,21,22,23;24:1,3,9; 25:3,4;30:3;31:9,14, 18;33:13,22,22,23; 37:18;38:1;39:4,13, 22;40:16;41:5,13,13, 18,24;42:5,8;43:2; 44:12;46:18;47:8,9	ARA (2) 37:9;38:12
accept (1) 23:8	addressing (1) 11:25	allow (1) 25:1	appraisals (40) 5:1,8;9:3;16:11,23; 18:17,22;21:2,25; 22:2,23,25;24:16,19, 21,23;28:8,15;29:23, 24;30:8;32:12,16,17, 19,20,23;33:8,9,10, 12,13;34:3,11;38:20; 39:5;41:4;43:3,19; 46:10	area (5) 11:17;20:18;43:6; 49:18;51:8
access (3) 13:22;48:1,2	adhere (1) 47:1	allowing (1) 26:23	appraised (2) 22:6,9	areas (4) 20:16;32:10;34:19; 43:3
accomplished (1) 5:6	administer (3) 17:12;19:2,20	allows (2) 42:2;43:17	appraiser (19) 22:4,5,7,9;23:4; 24:2,10,14;25:4; 32:24;33:1;34:1; 38:12;41:23;42:18, 20,22;46:12,12	around (2) 34:12;53:12
accomplishment (1) 15:14	administered (3) 16:24;17:5;32:13	along (1) 9:4	appraisers (36) 20:19;21:21;22:11; 24:11;25:10;30:13; 33:3,4,5,5,16,16,17; 34:20,21,22;36:10, 11,15,25;37:3,9,16, 19;39:3;41:3;42:2; 43:5,6,7;46:13,13,14, 22,22,24	arrangements (1) 11:18
accordance (3) 15:10;26:18,20	administration (2) 6:21;50:3	although (1) 17:14		Asset (6) 7:18;13:16;15:16; 44:18,20;45:9
account (6) 9:20;10:18;12:20, 23;13:22;14:8	administration's (1) 20:7	always (1) 13:18		assets (5) 8:19;10:5;13:10; 15:10;16:3
accountability (2) 8:17;15:8	administrative (2) 16:25;32:13	American (9) 6:8;8:14;11:10; 14:1;19:6;35:18,25; 37:17;51:23		assist (2) 11:20;13:25
accounting (6) 8:25;9:4,9,24;11:3; 15:1	advice (1) 25:23	among (1) 53:14		assistance (3) 14:10;37:13,14
accounts (7) 9:8,16,21,21;13:9, 21;26:10	Affairs (14) 3:11;4:5;5:12,16, 17;11:23;16:17; 17:20;19:4,10,11; 25:21;27:4;35:17	Andrew-Maltais (5) 5:21;7:9;20:2; 39:16,19		Assistant (6) 5:17;7:8;19:4,7,9; 27:3
accuracy (1) 9:12	affect (1) 10:9	announcement (1) 40:3		associations (1) 51:18
accurate (2) 12:5;22:2	affiliated (1) 37:17	announcements (1) 32:4		assume (2) 20:21;40:5
accurately (1) 10:18	affiliation (1) 6:11	annual (1) 15:21		assumed (1) 40:18
achievement (1) 11:14	afford (1) 53:15	annually (1) 9:14		assuming (1) 39:5
acknowledge (1) 7:22	Again (7) 8:4;18:19;20:5; 27:9,15;30:2;31:1	answered (1) 29:1		asterisk (1) 10:20
acknowledges (3) 21:9;23:1;39:9	agencies (4) 11:25;26:4,7;35:21	anticipate (1) 28:21		attached (1) 44:6
across (2) 3:19;4:6	agency (2)	anticipated (1) 30:8		
Act (13) 3:3,17;4:9,14;7:18; 8:8,15;14:1;15:16;		anymore (1)		

attendance (1) 7:5	10:12;13:14;24:1, 9:36;21:38;7;47:15	16:10	carry (2) 26:14;45:8	19:22
attending (2) 54:6,12	Basically (2) 26:23;35:5	bringing (1) 38:9	case (5) 21:5;30:16;41:15; 49:8,12	Chippewa (1) 36:23
attorney (3) 6:16;50:1,20	basis (1) 34:16	broadly (1) 32:16	cases (2) 12:25;22:18	choose (2) 23:22;24:5
attorneys (5) 50:12;51:3,12,18; 52:17	becomes (1) 34:25	brochure (1) 15:14	Casey (1) 51:24	cities (2) 36:12,13
auditors (2) 49:8,12	begins (1) 47:12	brought (1) 48:11	cash (1) 9:18	city (2) 43:14;51:23
audits (1) 15:21	behalf (2) 7:1;20:21	budget (2) 10:13;19:8	caused (1) 52:13	civil (1) 26:18
authorities (1) 38:22	beneficial (1) 46:19	Bullet (1) 18:11	causes (1) 53:14	clarification (1) 41:10
authority (1) 52:23	beneficiaries (7) 9:1;10:2;11:2,21; 12:15;13:1,8	burden (1) 33:14	CDs (1) 49:7	clarify (1) 39:1
automated (2) 11:4;13:14	beneficiary (11) 10:1,17;11:7,19; 12:3,4,9;15:2;16:2; 21:6,10	burdensome (1) 14:13	Cee (1) 29:5	class (1) 42:10
automatic (1) 48:22	benefit (2) 22:2;40:15	Bureau (8) 11:22,24;16:17,25; 17:20;19:10;41:17; 54:2	Center (2) 11:7;12:3	clear (2) 4:17;42:15
automating (1) 14:3	Benefits (1) 14:18	bureau (3) 10:22;26:4;35:21	centralized (3) 9:9;11:3,4	Cloninger (2) 31:6,6
available (3) 11:20;36:20;46:19	besides (2) 31:18;44:11	burn (1) 29:13	Century (1) 13:19	close (2) 11:21;13:15
average (1) 9:12	best (6) 13:14;20:13,15,16; 47:13,14	businesses (1) 38:7	certain (2) 47:3,10	closely (1) 51:22
avoid (4) 15:5;50:2,5;51:13	better (8) 4:5,22;24:22; 29:21;30:25;37:6; 49:20;53:22	Buy (5) 13:1;14:6;23:14; 34:9,10	certainly (4) 5:8;28:15;49:14; 50:6	Cobell (2) 9:22;14:5
aware (1) 21:23	BIA (8) 5:23;7:10;8:2;18:8, 15,20;26:6;53:7	Buy (5) 13:1;14:6;23:14; 34:9,10	certificate (1) 33:17	Code (2) 22:21;26:21
awareness (1) 13:11	bid (3) 36:11,15;37:15	C	certification (1) 33:17	collaborating (1) 49:18
away (5) 43:11;44:7;46:2; 50:10,16	bids (1) 37:6	Caliente (2) 3:16;20:4	certification (2) 42:7,9	collaboration (2) 12:21;51:8
awesome (1) 12:24	big (1) 52:25	Call (7) 11:7;12:3,9;14:15; 18:25;19:25;47:22	Certified (8) 22:5;24:14;36:25; 37:8;42:5;43:8; 46:24;50:11	collection (3) 10:7,14;11:5
B	bill (4) 3:19;27:21;28:10; 29:4	called (1) 17:5	CFR (2) 21:17;23:13	colleges (1) 53:22
Back (11) 13:1;14:6;17:8; 18:1;23:14;30:15; 34:10,10;35:1;43:18, 19	billion (2) 9:10,11	calls (3) 12:4,6,9	challenging (1) 38:4	coming (4) 20:5,10;32:4;54:9
background (3) 15:22;17:2;38:10	binder (3) 9:5;10:24;31:3	came (2) 17:8;35:11	changed (2) 12:25;32:8	co-mingling (1) 15:6
balance (1) 9:16	bit (2) 29:6;31:25	can (21) 4:4,21,21,23;5:5; 11:18;18:11;20:12; 30:10;31:2,32:23; 33:9,9;37:16;40:20; 44:9;48:24;49:7; 50:2;51:11;53:21	changes (3) 25:6;27:8;42:21	comment (6) 3:21;27:11,18; 29:23;35:3;50:8
Band (2) 31:7;39:1	BLM (1) 47:8	capabilities (3) 48:1,3,8	charge (1) 28:2	comments (18) 5:25;20:15;27:18, 21:28;16,19;29:18; 30:5,9;35:1,10;36:9; 40:23;42:14,14; 51:15;54:5,14
bank (1) 43:12	blocks (1) 43:14	capability (2) 48:6,14	chart (2) 8:9;27:3	commercial (1) 37:20
banking (1) 13:20	board (1) 46:25	carbon (1) 14:2	charts (1) 9:15	commitment (2) 20:6,7
banks (1) 43:12	bottom (2) 10:20;34:12	cards (1) 11:6	cheaper (1) 37:4	communities (3) 13:16;20:22;22:3
Bar (1) 50:11	brief (2) 8:12;19:17	careful (1) 50:24	check (1) 43:25	Community (1) 28:1
base (2) 37:6;52:8	bring (1)	carried (1) 25:17	check-box (1) 34:2	compact (3) 28:4;31:7;47:21
based (7)			Cherokee (1) 36:22	compacted (1) 17:21
			Cheryl (3) 5:21;7:9;20:1	compacting (1)
			Cheryl's (1)	

14:9 compare (1) 43:9 comparison (1) 47:15 compensation (2) 26:13,19 competency (2) 22:12;47:11 competent (1) 47:5 complements (1) 12:15 complete (4) 17:25;18:2,9;31:14 completed (5) 4:15;18:12,17,19; 23:3 completely (1) 29:20 complexity (1) 9:6 complicated (1) 38:7 comply (2) 22:9;47:3 comprehensive (1) 10:16 computer (2) 48:1,5 conceptualizing (1) 49:10 concern (2) 29:20;36:8 concerned (2) 29:19;44:12 concerns (1) 47:25 concluded (2) 7:16;54:19 conclusion (1) 15:12 conclusions (1) 23:22 conduct (1) 18:5 conducted (2) 4:11;9:24 Confederated (1) 6:11 confirmed (1) 6:24 conflicts (1) 15:6 confusing (1) 31:25 confusion (1) 35:11 Congress (4) 3:17;4:15;10:6; 28:18 connect (1) 48:18	consecutive (1) 9:25 consent (1) 25:24 consider (4) 24:13;25:9;34:16; 49:6 considered (3) 16:7;21:11,14 considering (2) 24:25;31:24 consistent (2) 4:14;12:5 consortiums (1) 14:11 consternation (1) 52:13 consult (1) 46:4 Consultation (20) 3:3,14,16,20,25; 4:8;6:5;7:7;26:8; 27:16;35:8;37:13; 44:13,14;45:17,19; 46:2;47:22;54:9,19 consultations (6) 3:18;4:16;7:15; 8:3;46:5;54:8 consults (1) 46:13 contest (1) 23:9 context (1) 8:13 continue (3) 14:5,23;15:24 continues (1) 13:23 continuing (1) 28:21 contracted (2) 17:21;31:10 controlled (1) 51:4 controls (1) 15:3 coordinate (3) 26:2,6;35:18 coordinating (1) 8:20 Coordinator (1) 6:19 co-owner (1) 40:15 copy (1) 43:22 core (2) 15:1;28:19 cost (4) 14:3;36:20;47:15; 49:11 council (1) 45:24	counsel (2) 6:15;27:25 country (14) 3:19;4:19;7:2;8:9; 11:16;13:17;14:25; 15:18,25;20:12,14; 25:11;27:5,11 Country's (1) 20:17 county (2) 43:4,10 couple (4) 28:5;41:2;43:7; 47:18 cover (1) 30:7 crazy (1) 39:14 create (2) 5:15;25:14 created (4) 8:14,15;15:3,5 credentialing (1) 24:10 criteria (11) 23:11;32:24,25; 33:6;34:14;39:16; 41:23;42:11;44:25; 46:16;47:10 critical (1) 4:7 CSKT (1) 6:15 curious (1) 32:6 current (11) 6:23,24;8:7;14:13; 17:10,15;19:17,18; 22:5;27:2;31:1 currently (8) 4:10;9:9;11:19; 12:11;13:22;31:7; 46:22;50:2 curriculum (1) 53:20 customer (2) 10:3;12:12 customizing (1) 38:9 cut (1) 31:9	9:13 days (2) 30:17;48:7 DC (2) 6:19;45:19 deadline (1) 54:10 deal (1) 34:5 Deb (2) 5:21;6:6 debit (1) 11:6 decide (1) 5:11 decision (1) 4:2 decisions (1) 10:4 declared (1) 44:3 dedicated (4) 11:11,15;12:14; 15:9 deficient (1) 24:3 definitely (3) 29:18;46:5;52:2 definition (2) 34:17;44:19 delegated (1) 9:2 delivery (2) 11:2;15:8 demands (1) 8:17 demonstrates (1) 9:6 Demonstration (4) 44:18,21;45:3,9 denotes (1) 10:21 Department (26) 3:12;4:6;5:3;8:21; 10:21;14:20;17:1; 22:18,24;23:11,15, 23,25;24:2,7;25:1,20; 26:4;31:22;32:14; 35:21;36:1;39:5,10; 42:20;46:23 Departmental (2) 23:3,7 Department's (1) 8:11 depends (1) 33:24 deposits (1) 11:6 Deputy (4) 6:7;7:22;16:13; 27:25 described (2) 21:8;26:17	description (1) 10:23 deserves (1) 14:25 design (1) 48:11 designated (1) 51:2 designed (1) 32:2 determine (1) 28:23 determined (1) 35:22 determines (1) 26:14 develop (5) 15:17;20:9,15,20; 26:24 developed (7) 10:1,16;14:10; 17:13;20:6;34:15; 38:6 developing (1) 13:19 dialogue (2) 15:17;27:17 differ (1) 36:5 difference (1) 52:18 different (10) 33:4,6;36:22; 37:23;38:18,18; 46:11,16;47:17; 52:17 differently (1) 30:12 difficult (6) 34:19,20;36:18; 43:4;51:11,12 DiFilippo (1) 5:23 digitized (1) 48:23 digitizing (1) 14:4 direct (6) 6:23;11:6;12:4,14; 15:2,9 directed (1) 26:1 direction (1) 36:3 directly (2) 5:13;25:22 Director (4) 7:24,25;16:20;17:6 disbursements (1) 11:6 disburses (1) 9:11 disbursing (1)
		D		
		Dakota (2) 3:25;16:15 damage (1) 53:14 databases (1) 12:22 date (1) 20:24 day (1)		

8:25 discharge (1) 16:4 discrete (1) 14:21 discuss (1) 16:11 disheartening (1) 50:19 displayed (1) 11:2 disqualified (1) 50:22 distance (1) 36:17 distributed (1) 12:23 disturb (1) 7:14 Division (2) 18:7;46:23 DME (2) 18:13,21 document (1) 40:10 documents (2) 11:16;15:21 dollar (1) 52:11 done (4) 17:16;30:13;50:13, 19 Doug (1) 7:22 down (2) 29:12;31:9 download (1) 48:4 draft (1) 32:11 dramatically (1) 31:10 drastically (1) 12:25 drawn (1) 34:12 drive (1) 34:1 dual (1) 43:16 DuMONTIER (9) 3:2;5:22;6:3,6; 28:14;30:6;31:3; 49:14;51:5 Duties (6) 14:18,21,22;25:25, 25;26:25	3:13 easy (2) 29:13,15 ebbs (1) 30:19 economic (2) 13:7;33:6 economy (1) 30:21 effective (2) 14:3;49:11 effectuate (1) 27:7 effectuating (1) 21:14 efficiencies (1) 14:3 efficiency (2) 7:19;35:14 effort (2) 49:20;51:19 efforts (1) 50:7 eight-hour (1) 34:23 either (3) 11:21;42:13;47:14 Eldred (1) 7:24 electronic (1) 12:22 eliminate (1) 4:20 else (2) 22:16;40:23 employee (3) 26:17,20,22 employees (1) 26:13 empower (1) 10:3 empowerment (1) 13:6 enactment (1) 20:24 encouraging (1) 44:13 end (2) 27:10;29:13 ends (1) 43:25 enhance (2) 10:17;13:20 Enhanced (1) 11:19 enhancing (1) 13:21 ensure (6) 5:1;10:2;15:8; 25:3;26:2;35:19 entertain (1) 49:14 entities (2)	4:12;36:1 entity (10) 5:2;16:25;17:11, 12;18:23,25;19:20, 20;32:13,23 environment (1) 48:22 envision (1) 18:24 especially (2) 34:19;40:18 essentially (1) 20:19 establish (7) 5:12;20:25;21:22; 25:20;33:7;45:8; 53:19 established (2) 11:9;15:3 establishment (3) 25:19;35:15;45:2 estate (8) 13:24;17:21;18:22; 38:19;47:11;49:25; 50:1,13 estimates (1) 38:23 ethics (3) 22:12;47:2,10 evaluate (1) 4:3 evaluation (11) 4:7;14:11,12,13; 18:1,8;47:20,24; 48:10,12,19 evaluations (3) 14:7;21:2;49:13 evaluator (2) 46:17,17 Even (9) 24:6;31:15;33:16, 18;37:14;46:14;48:4; 50:11,15 everybody (1) 3:6 everyday (1) 49:25 everyone (4) 3:2,10,12,21 example (3) 36:7;44:17;49:25 except (1) 26:16 exceptions (2) 49:4,5 excited (1) 5:25 execution (1) 45:12 exercise (3) 39:25;40:14;43:17 exercising (3) 6:14;23:8;40:3	expand (1) 51:19 expanded (2) 8:22;12:3 expedited (1) 11:5 expensive (1) 34:25 experience (3) 33:3;38:9;50:11 experiences (1) 34:15 expertise (2) 13:5;14:7 explain (1) 17:14 extended (3) 3:23;27:19;54:10 extending (1) 16:8 extent (2) 26:5;32:18 extremely (2) 28:20;51:5 eye (1) 31:18 eyes (1) 33:18	29:7 few (3) 8:11;37:16;54:8 fiduciary (9) 9:9;10:17,25;11:3, 13;13:5;14:22;15:11; 49:19 Field (4) 7:23;12:14,19; 29:10 fifth (1) 19:9 figure (1) 4:20 final (1) 21:14 finally (1) 5:10 financial (6) 8:24;9:13,23;11:1; 13:10;15:10 find (4) 10:22;36:15;43:9; 49:10 finding (1) 34:22 findings (1) 23:22 firm (1) 9:25 first (9) 7:20;12:9;19:3,13; 30:11;35:3,9;47:2; 54:1 first-line (1) 12:7 fit (1) 38:10 five-step (1) 17:14 fix (1) 26:13 fixed (1) 26:20 flag (1) 3:21 Flathead (1) 6:12 flow (1) 9:18 flows (1) 30:19 focus (7) 10:1;14:21;16:2; 35:4;37:8,10;46:6 Focused (4) 10:25;12:16;15:25; 46:5 focuses (1) 4:8 folks (3) 4:17;27:21;28:16 follow (4)
E			F	
earlier (1) 14:14 early (1)			faced (1) 49:23 facility (1) 11:12 families (1) 53:15 far (6) 12:22;28:18;36:10, 21;38:1;49:16 Farm (1) 37:17 farming (1) 40:9 faster (1) 31:15 federal (18) 11:24;12:16;16:16; 21:1,4;22:21;24:5; 43:24;52:8,8,10,18, 20;53:3,12,13,24; 54:3 Feds (1) 53:2 feedback (6) 5:3,8;20:8,15;25:9, 16 feel (4) 22:16;29:21;31:17, 19 fees (1) 36:16 fence (1)	

9:4;19:19;47:4,16 footprint (1) 14:2 forced (1) 45:12 foresters (1) 33:8 Forestry (7) 18:15,21;33:9,12, 22;46:13,17 form (1) 20:13 formatting (1) 48:9 forward (7) 4:16;6:2;8:9; 15:15;27:17;42:25; 54:14 found (2) 12:22;29:8 Foundation (2) 51:17,22 four (1) 43:14 fourth (1) 19:8 fractionated (1) 13:3 fractured (1) 38:16 frame (2) 41:4;44:1 framework (2) 17:13;20:20 Frankly (1) 29:6 front (1) 27:2 FTOs (1) 13:6 full (1) 10:11 fully (2) 6:14;48:22 function (4) 20:21;26:15;28:8; 31:8 functions (28) 4:10,12,18,20,21, 22;8:5;9:2;10:7,9,12, 19,21,23;14:23;15:1, 13;18:24;26:3;27:13; 28:13,15,20,21,24; 35:19,24,25 Fund (4) 8:15,19,24;26:10 funded (1) 53:19 funding (2) 20:7;51:18 funds (8) 8:18;9:7,19;10:8, 15,18;13:9;48:18	further (1) 30:9 FY15 (1) 18:12 FY2015 (2) 18:16,19 G gal (1) 44:5 Gathering (2) 36:17;47:13 gave (1) 19:19 general (14) 15:4;22:5;24:14; 27:25;33:1,13,17; 37:8;45:7,10;46:18, 24;51:11,12 Generally (3) 17:19;30:24;49:25 generic (1) 53:12 gets (1) 17:23 Gilbert (1) 8:2 given (2) 3:9;18:1 gives (1) 4:3 giving (1) 25:9 glad (1) 3:5 goal (1) 4:14 goes (3) 17:25;40:17;42:9 Good (19) 3:2,5,8,10;16:12; 20:2;21:25;22:7; 27:24;29:6;30:18,22; 38:12;41:5;43:8,21, 21;44:6;53:20 government (6) 16:16;24:5;52:10; 53:13,24;54:4 government-to-government (1) 7:4 grading (1) 40:9 grant (3) 24:8,14;51:16 granted (1) 24:15 great (1) 30:2 greatest (1) 9:15 Greg (1) 38:11	Gubser (1) 28:2 guess (4) 28:6;29:2;42:17; 49:12 guidance (1) 25:9 guy (2) 42:10;44:5 guys (1) 44:8 H handouts (1) 15:18 happen (6) 36:3,4,6,6;41:15; 53:15 happening (1) 34:2 happens (2) 18:10;23:17 hard (3) 15:25;33:15,21 harder (2) 33:19,20 hardly (1) 38:21 hate (1) 42:8 heading (1) 3:11 hear (4) 5:14;7:18;8:7; 42:15 heard (1) 30:6 hearing (4) 5:25;6:2;32:1; 47:22 hearings (1) 32:8 held (2) 8:20;9:16 Helen (5) 3:4,4;5:22;6:4;7:10 Hello (1) 31:21 help (6) 13:1,10;20:12; 30:5;37:16;53:8 helpful (6) 29:14;41:7;42:6, 12;43:16;45:22 helping (2) 29:14;38:14 helps (1) 43:2 Henry (1) 29:5 Hi (1) 38:25	high (1) 38:19 higher (1) 36:16 highest (2) 47:13,14 highlighted (1) 27:4 highly (3) 37:14;38:6,15 hire (2) 30:12;32:24 hired (3) 38:11,12;50:20 hiring (2) 26:22;38:8 historical (1) 9:3 history (1) 19:17 hold (1) 22:4 holders (2) 12:20,23 holding (1) 3:18 home (2) 52:11,22 honestly (1) 30:10 honor (1) 16:1 honored (2) 6:5;50:23 Hoopa (3) 31:22;40:25;52:4 hope (1) 49:4 hoping (1) 34:2 hosting (1) 3:16 hot (1) 30:21 hours (1) 12:3 I idea (1) 53:20 ideas (6) 19:12,12;20:11,11, 16;27:9 identification (2) 10:6;47:12 identified (6) 10:11,12;15:13; 19:3;28:14,20 identify (2) 4:10;8:5 identifying (1) 28:7	IHS (1) 53:7 IIM (3) 9:20,23;13:20 illustrate (1) 9:15 immediate (1) 30:25 impact (1) 10:21 implement (2) 15:16;30:1 implementation (2) 34:17;47:24 implemented (1) 32:9 implementing (2) 6:18;9:8 implies (1) 33:11 important (9) 4:2;11:15;12:17; 17:9;20:5;24:11; 28:20;45:18;51:5 impression (1) 32:2 improve (2) 8:19;28:24 improved (2) 4:24;11:1 honor (2) 7:19;35:13 inaccurate (1) 24:3 include (2) 8:23;32:16 included (1) 11:3 including (5) 8:24;10:13;13:9; 22:12;24:8 income (1) 47:15 increase (1) 13:10 increases (1) 36:20 independent (2) 9:24;30:13 independently (1) 15:4 in-depth (1) 27:11 Indian (92) 3:3,11,17;4:5,19; 5:12,15,17;7:2,18; 8:9,14,18,19;9:3; 10:8,15,18;11:10,16, 23,25;13:3,17,24,25; 14:1,24;15:10,16,18, 25;16:17,24;17:20; 18:6,25;19:4,10,11; 20:7,12,14,16;21:2,6,
--	--	--	--	---

6,10,19;23:2,2,6,18, 18,19,20,21,21;24:1, 7;25:11,21;26:9; 27:4,5,11;28:1; 31:22;32:12;35:17; 37:24;39:9,10,11,24; 44:17,20,22,23,24; 45:3,8,12;50:12; 51:16,22,23,25;52:6, 15;53:21;54:18	interact (2) 48:14,24 interagency (1) 12:21 interest (3) 14:9;15:6;23:5 interested (1) 11:17 interests (5) 13:12;15:7;26:9; 53:11;54:3	5:20,24;6:9 Julia (1) 31:6 July (1) 35:23 June (2) 3:18;21:3 jurisdiction (1) 24:17 justification (1) 10:13	later (4) 5:20;6:9;9:2;20:24 Lauren (1) 5:23 law (19) 4:25;5:11;25:13, 18;26:17;27:8;29:25; 30:1;44:14,15;49:18; 50:10,12,15,16,24; 51:23,24;53:9 laws (2) 20:6;26:19 lead (2) 34:18;50:14 leaders (1) 13:16 leadership (4) 7:6,22;11:17;20:12 leading (2) 6:18;16:21 leads (1) 38:19 learned (1) 13:15 lease (1) 24:8 leased (1) 30:21 leasing (1) 28:2 least (2) 5:10;51:13 legal (2) 6:15;51:18 legislation (9) 4:1;23:14;30:7; 32:2,8;35:15;41:8; 49:23;51:10 Lenexa (1) 11:11 Lesantee (6) 7:24;19:25;36:9; 39:23;40:12;46:21 less (3) 12:12;14:12;41:16 lessons (1) 13:15 letter (1) 35:23 letters (1) 29:3 level (2) 12:1;14:24 liable (3) 23:25;24:3;45:11 license (7) 22:5;24:15;25:7; 33:1;43:21,22;44:6 licensed (1) 6:16 licenses (1) 24:14 limit (2)	37:11;44:1 limited (4) 19:13;22:12;24:8, 16 limiting (1) 28:12 line (1) 34:12 links (1) 15:20 list (1) 43:19 litigation (2) 6:19,21 little (6) 17:2;31:25;34:12; 41:10;48:4;50:24 lives (1) 12:25 loan (2) 43:12;47:5 loans (1) 38:21 local (2) 12:1;37:19 located (8) 6:13;10:23;11:11; 14:24;15:19;16:15; 22:6,9 locations (2) 6:22;36:14 lockbox (1) 11:5 Logan (3) 5:20;6:9,24 Lois (4) 31:21;40:25;46:7; 52:4 long (4) 28:4;30:16;40:20; 41:5 longer (3) 35:7;36:17,17 look (13) 5:5;6:2;12:19; 15:15;27:17;31:17; 33:24;36:7;52:6; 53:5,6;54:2,13 looking (11) 4:11;21:22,24; 22:15;27:5,10;42:22; 49:17,22;50:5;53:18 Lords (1) 7:22 loss (1) 25:6 losses (1) 45:11 lot (6) 29:4,21;30:21; 38:15;43:5;53:25 loud (1) 42:15
Indians (11) 6:8;9:1;19:6;22:1; 26:8,23;28:25;31:7; 35:19,25;39:1 individual (16) 8:25;9:17;10:2; 11:8;22:1;23:2,18,20, 21;24:12;39:10,11, 24;52:20,21,23 individuals (4) 5:7;13:11;21:1; 40:19 industry (1) 12:11 infinite (1) 52:10 inform (2) 13:11;45:24 information (11) 12:5;13:22;18:9, 14;32:1;36:18,19,19; 44:12;45:21;47:17 informed (1) 10:4 initiatives (3) 13:13,24;47:19 innovation (1) 14:7 in-person (1) 54:8 input (6) 21:22;22:15;28:23; 44:16;45:24;54:13 inquiries (1) 12:4 inquiry (1) 12:9 instance (1) 40:8 Instead (1) 53:11 Institute (1) 37:18 insurance (1) 50:18 intended (1) 30:1 intent (8) 21:9;23:1;32:7; 36:2;39:9,19,25; 50:14 intention (2) 4:19;15:4	Interior (6) 3:12;4:13;8:5; 10:22;32:14;36:2 internal (1) 15:2 internally (1) 53:17 interrelated (1) 10:19 intestate (1) 50:21 into (4) 19:24;32:23;36:14; 38:2 invalid (1) 44:3 invested (2) 9:17,20 investing (1) 8:25 investment (2) 10:8,15 involve (2) 39:17,17 irreparable (1) 53:14 isolated (1) 43:3 issue (2) 52:5;53:13 issues (5) 43:15;48:2,11; 49:11;53:10 ITARA (6) 7:19;15:20;25:18; 39:25;40:4,14	K Kansas (1) 11:11 keep (3) 18:4;46:4;50:7 kick (1) 3:13 kind (6) 29:1;32:6;39:6; 43:12;44:1;46:11 kinds (2) 33:4;52:17 knowledge (1) 10:4 Kootenai (1) 6:12	L Land (26) 11:24;12:18;13:1, 4;14:6;18:6,25; 23:13;30:21;31:22; 33:13,23,25;34:16; 36:18,22;37:4,4; 39:12,13;45:13; 46:12,12;51:17,22; 52:21 land-based (1) 6:13 landowner (1) 50:14 landowners (4) 13:25;30:4;31:1; 49:20 lands (8) 9:3;11:21,22;34:7; 37:25;38:15,24;52:8 language (5) 32:4,7;36:2;41:9; 44:22 large (1) 6:13 larger (1) 37:6 Larry (3) 3:11;25:13;27:18 last (5) 5:10;16:18,19; 29:23;50:8	J James (1) 29:5 Jeremy (1) 8:1 Jim (1) 29:5 jobs (1) 54:1 John (4) 5:22;7:20;16:10,12 joined (1) 5:21 joining (3)

	maximum (1) 26:5	minimum (11) 5:7;20:18,23;21:1, 8,20,23;24:18;25:10;	3:10;6:6;16:12; 27:24;31:21;37:22	Oasis (1) 31:13
M	may (13)	7:12;12:16;14:16; 23:21;25:20;26:12; 28:16,23;37:2;38:16; 42:13;43:8,8	Nation (2) 6:12;36:23	objectives (2) 9:18;38:18
mail (1)	7:12;12:16;14:16; 23:21;25:20;26:12; 28:16,23;37:2;38:16; 42:13;43:8,8	31:4;46:8	Nations (2) 13:2;23:14	objects (1) 23:6
49:7	maybe (5)	mission (4)	Natural (3)	obviously (3)
main (1)	29:15;30:7,23; 32:5;36:25	12:17;16:1;31:7; 39:1	11:23;12:17;52:7	4:1,14,18
29:20	mean (4)	model (1)	Navajo (2)	occasionally (1)
Mainly (1)	44:25;45:4,4,14	10:17	3:7,9	18:10
47:10	meaning (2)	modern (1)	necessarily (1)	occasions (1)
maintain (1)	24:4;25:5	9:8	33:8	18:6
14:24	means (5)	mold (1)	necessary (2)	October (4)
maintained (1)	12:8;21:3,5;32:7; 44:20	53:11	10:3;26:14	3:24,25;16:8;54:11
27:13	meantime (1)	Monday (1)	need (19)	off (1)
maintaining (1)	15:24	3:13	34:14,16;39:20; 40:6;44:7;45:17,19; 46:1,2,16,20;50:17, 17,18;52:5;53:8,16, 22;54:2	3:13
15:2	media (2)	monetary (1)	46:1,2,16,20;50:17, 17,18;52:5;53:8,16, 22;54:2	offers (1)
MAIs (1)	7:12,16	10:19	needed (4)	13:2
37:9	meet (7)	monitor (1)	22:22,23;31:16; 41:10	office (26)
major (3)	9:17;14:16;20:13, 16;42:6;47:9;50:1	51:6	needs (6)	5:21,23;6:7;7:11; 8:13,16;11:9,23; 14:20,23;16:18,20, 21;17:4,6,19;19:1,5, 6,8;29:11,11;32:3; 35:24;43:24;48:5
9:24;11:14;48:2	meeting (5)	monitored (2)	20:13,17;24:12; 37:14;45:21;53:6	officer (3)
majority (1)	7:13;23:4;44:23; 47:23;48:16	45:15,16	networked (1)	26:17,19;29:5
38:23	meets (1)	monitoring (1)	37:18	officers (4)
making (3)	43:20	29:17	new (4)	11:20;26:13;30:3; 49:19
4:2;48:17;50:7	member (2)	Montana (3)	5:18;25:18;27:8,13	offices (3)
malpractice (1)	16:14;53:14	6:13,16;51:7	next (5)	10:22;26:4;35:21
50:18	members (4)	month (1)	6:19;8:11;9:6; 21:3;25:12	Oklahoma (2)
managed (3)	7:6,12;22:3;52:7	47:23	nine (2)	36:23;51:22
9:7,8,21	mention (1)	months (3)	14:10;30:15	Once (3)
management (19)	11:7	5:1;30:15;41:6	nobody (1)	17:23;31:10;32:22
4:10;8:15,19,24; 10:7,10,14,25;11:5, 24;13:17;16:13;19:7; 31:22;44:18,20;45:9, 13;53:20	mentioned (4)	more (25)	53:7	one (33)
10:7,10,14,25;11:5, 24;13:17;16:13;19:7; 31:22;44:18,20;45:9, 13;53:20	6:9;16:8;25:13; 27:18	4:20;6:22;9:12,13; 12:6,23,23;20:13; 26:3;29:7,11;30:25, 25;35:20;37:15; 38:13,20;41:2,10; 44:8,9;45:6;48:19; 53:21;54:8	non-complex (1)	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
13:17;16:13;19:7; 31:22;44:18,20;45:9, 13;53:20	met (3)	25:3;29:7,11;30:25, 25;35:20;37:15; 38:13,20;41:2,10; 44:8,9;45:6;48:19; 53:21;54:8	37:1	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
13:53:20	Methodology (2)	month (1)	4:10;8:5;10:10,20; 28:8,12,14,17	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
manager (1)	14:16;49:3	46:15;54:7,12	norm (1)	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
8:1	microphone (1)	morning (16)	49:4	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
Managers (1)	27:23	3:2,5,6,10,13;4:8; 5:4,20;6:10;16:12; 20:2;27:24;40:24; 46:15;54:7,12	Northeast (1)	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
37:17	Midwest (1)	Morongo (3)	16:15	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
manages (1)	36:24	31:7;38:25;51:20	Northwest (1)	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
9:10	might (3)	most (3)	6:13	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
managing (1)	4:12;22:16;32:5	28:2;36:11;49:10	note (2)	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
15:10	miles (1)	move (1)	16:5;18:16	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
mandated (1)	43:11	4:16	notice (3)	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
27:8	million (6)	much (2)	27:3;40:3;53:18	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
many (1)	9:14,19;12:6,24; 18:18;52:11	27:15;40:20	notify (1)	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
44:25	mind (1)	multiple (2)	42:20	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
market (4)	18:4	52:2,3	number (4)	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
36:19;38:23;47:15, 17	mindful (1)	multiple-owned (2)	9:8;28:6;37:22; 38:1	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
Masilon (8)	21:23	41:11,19	O	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:18
38:25,25;39:18,20; 40:5,17;51:20,20	mineral (8)	must (7)	OAS (4)	20:24;21:12;23:1; 26:3;31:24;32:23,25; 35:20;36:7;37:24; 38:17;40:13,13;41:6, 11;43:24;44:8,11,23, 23,25;45:4,5,6;47:20, 25;48:17;49:7,16,17, 18;50:8;53:1

<p>12:2 operating (1) 15:4 operational (1) 8:23 operations (1) 15:5 Operations' (1) 12:14 opinion (1) 9:23 opportunity (7) 4:3;8:6,10;15:17; 16:19;50:3;53:10 Ops (1) 7:23 option (8) 19:3,5,7,8,9,10,11; 44:8 options (5) 19:3,19;43:17; 44:10;49:6 Order (3) 8:23;19:14;27:7 orderly (2) 26:2;35:19 organizational (2) 4:23;27:3 organizationally (1) 4:22 originally (1) 3:22 OSC (2) 4:5,11 OST (44) 5:22;6:17;7:1,22; 8:6,14,18;9:2,9,10, 12,22,25;10:8,13,16; 11:9,19;12:2,14;13:8, 19,23;14:5,10;15:13, 24;17:8;26:2,3; 28:12;29:7,8,11,13, 20;30:14;34:11;35:3; 47:19,23;48:17;53:6, 24 OST's (4) 8:22;13:13;14:19; 15:14 others (1) 30:7 otherwise (3) 26:16,22;42:24 out (29) 4:21;13:2;18:7,13, 15,20,21;20:11; 25:17;26:15;29:24; 30:5,12,24;31:12; 32:4;34:24;35:12,13; 38:14,22;42:1;45:8, 21;49:8,12;50:22; 52:2,16 outreaches (2) 12:21;14:8</p>	<p>outside (1) 24:6 over (7) 9:16,20;12:22; 15:14;18:18;43:11; 52:1 overall (2) 12:8;47:11 overseeing (1) 8:20 overview (3) 8:12;15:12;19:15 own (5) 20:21;26:9,24; 31:12;41:12 owner (3) 23:5;40:13;41:11 owners (3) 13:3;40:19;41:16 Oyate (1) 16:14</p>	<p>20:3;33:9;38:8,10, 13,16,17;43:12; 46:19;49:24;52:6; 54:1 percentage (1) 41:12 perfect (1) 51:3 perform (1) 23:23 performed (2) 4:19;5:2 performing (1) 27:1 performs (3) 8:6;10:8;47:9 period (3) 3:22;42:19,23 person (7) 38:13;42:3,5,6; 43:21;52:15;53:2 personal (3) 52:9,11,22 personnel (1) 26:11 pie (1) 9:15 piece (1) 41:14 pilot (1) 14:11 Pima-Maricopa (1) 28:1 place (1) 30:22 plan (7) 15:18;28:11,19; 29:25;35:6,6;50:1 planning (4) 13:25;28:10;49:25; 50:13 play (2) 48:5;50:22 please (1) 11:17 point (1) 5:4 points (1) 48:7 policies (2) 26:6,7 Policy (1) 19:7 political (1) 6:25 pool (1) 37:11 pooled (1) 9:20 portfolios (2) 9:17;11:8 portion (2) 39:4;53:23</p>	<p>position (8) 5:18;6:23;14:19; 25:14,19,20;27:12; 35:16 position's (1) 25:17 possibility (3) 32:5;33:24;36:24 possible (2) 29:22;42:12 possibly (1) 29:19 posted (1) 16:9 potential (1) 35:4 Powell (1) 38:11 power (2) 5:4;48:7 practicable (1) 26:5 practical (2) 29:11,13 practices (4) 8:7;13:14;15:11; 22:11 prayer (2) 3:7,9 preamble (1) 47:2 pre-approve (1) 44:5 preapproved (1) 42:2 pre-certification (1) 42:16 preference (1) 26:23 prepare (1) 21:2 prepared (1) 24:9 preparing (1) 21:18 present (3) 7:21;19:12;23:16 presentation (6) 5:7;6:1;7:17;9:5; 19:23;28:7 presentations (1) 45:23 presented (1) 19:22 presenter (1) 46:14 President (1) 25:23 press (1) 7:13 pretty (2) 29:8;40:20 price (1)</p>	<p>37:5 prices (1) 37:11 primary (2) 8:18;47:25 principles (1) 15:11 print (1) 48:8 priorities (1) 53:10 priority (1) 19:14 private (1) 37:19 privilege (1) 7:3 probably (2) 29:24;30:14 probate (24) 13:23;14:1;23:13; 34:9,10,11;39:17; 49:16,24;50:2,5;51:8, 13,14;52:5,8,9,18,19, 24;53:3,3,13,18 probates (1) 50:9 problem (3) 29:15;36:10;38:1 problems (3) 34:18;43:7;52:14 process (29) 14:12,14;17:10,13, 14,15,15,17;19:17, 18;24:6;30:4,18,24; 31:16;34:25;37:7; 39:7;41:13;42:16,18; 43:2;44:3;47:12,16; 48:10,22;49:22; 51:14 processes (6) 7:20;9:12;13:14; 14:4;35:14;43:16 productive (1) 48:13 Professional (2) 22:10;29:8 Program (12) 13:1;14:6;16:13, 22;17:3,5,8,20,22; 18:8;19:18;23:14 programs (7) 10:13;14:10;20:9, 13;28:3;47:21;53:25 progress (2) 8:11;13:18 project (15) 8:1;14:15,16,16; 44:18,19,21,23,24, 25;45:3,5,5,6,9 Project' (1) 44:20 projects (1)</p>
	P			
	<p>page (1) 18:11 Palm (3) 6:6;38:4,5 paperless (1) 48:21 paragraph (1) 26:17 part (8) 6:5,20;21:17; 35:17;45:7;47:2,8; 51:18 participate (1) 48:20 Participating (1) 45:3 participation (3) 7:8;16:2;27:16 particular (2) 4:20;14:20 partner (2) 7:3;11:22 partners (1) 12:16 parts (2) 22:20;32:25 passed (1) 3:17 passes (1) 18:1 past (2) 6:17;15:14 path (1) 8:9 pay (2) 34:11;42:8 pending (1) 51:16 people (12)</p>			

45:1 promote (1) 13:7 promoting (1) 14:3 proper (2) 11:12;16:3 properties (5) 33:6;37:10,20,21; 38:6 property (29) 13:10;16:24;21:3, 19;22:6,8;23:6;24:1, 7,16,20,21;25:11; 32:12,17,18,19,20, 21;37:12;41:14,17; 43:9;46:10,11;47:13; 52:9,12,22 Proposed (5) 21:17;31:3;32:11, 25;41:3 protecting (1) 11:15 proud (1) 12:13 provide (6) 8:12;13:6,24;26:8, 25;27:11 provided (4) 10:24;15:19,20; 26:16 provides (7) 4:9;25:5;11;13:8; 15:9;25:19;35:5 providing (5) 4:15;12:5;15:1; 16:2;51:17 provision (4) 5:14;25:14;47:10, 11 provisions (3) 22:11;26:11;47:2 proximity (1) 11:22 publish (1) 20:25 purchase (3) 13:2;23:12;24:9 purpose (3) 8:18;31:19;32:15 purposes (2) 21:14;42:24 pursuant (1) 45:13 put (4) 21:4;32:23;42:20; 53:8 putting (1) 20:11	5:7;20:19,23;21:1, 8,21,24;24:19,22; 25:2,2,6,10;31:4; 34:1;36:21;39:3; 41:23;46:8 qualified (7) 21:21;23:4;24:2,9; 25:4;36:10;37:2 quality (1) 51:4 quick (4) 15:12;19:15;30:25; 39:2 quickly (1) 30:6 quite (2) 12:12;29:5	37:3 recognized (1) 46:14 recommendations (2) 8:8;49:15 reconciling (1) 47:14 reconsider (1) 46:20 record (2) 46:1,3 recordkeeping (1) 39:6 Records (7) 11:10,10,13;14:4; 48:23,24;53:19 redirection (1) 15:7 reducing (1) 14:2 refer (1) 7:19 reference (1) 15:23 reflect (2) 8:6,10 Reform (12) 3:3,17;6:18;7:18; 8:11,15;13:18,23; 14:1;15:16;49:16; 54:19 reforms (1) 8:21 regalia (1) 52:24 regard (3) 25:12;26:11;35:3 regarding (3) 8:8;28:23;47:24 regards (1) 49:2 Regina (1) 8:2 Region (2) 30:3;38:11 regional (2) 12:1;29:11 Register (2) 21:1,4 regular (1) 26:8 regulation (3) 42:14;43:17;45:13 Regulations (4) 22:21;32:15,15; 53:12 regulatory (1) 22:8 relate (1) 10:9 related (1) 14:21 relationship (3)	7:4;29:7;30:2 relevant (2) 22:16;26:7 relying (1) 21:18 remain (3) 4:13;12:16;15:25 remote (1) 36:14 rent (1) 38:22 replace (1) 5:16 report (11) 4:15;5:13;6:24; 17:18,24;18:9;25:21; 28:18;35:5;42:23; 43:23 reports (2) 15:21;18:20 Repository (1) 11:10 representative (1) 7:10 re-prioritizing (1) 15:7 request (4) 7:14;17:18,23; 23:23 requested (1) 10:6 requestor (3) 17:18;18:2,2 requests (1) 18:12 require (6) 21:12;22:19;23:2; 39:10;46:17,20 required (5) 19:16;21:16;46:23; 47:1,4 requirement (2) 42:2;46:25 requirements (5) 14:17;22:13;23:5; 26:16;47:4 requires (4) 8:4;16:23;17:17; 47:8 requiring (6) 23:15;25:2;33:11, 12,18;41:18 Reservation (6) 31:23;33:15;34:23; 48:4;51:20;52:14 reservations (1) 34:21 reserved (1) 7:16 reside (1) 28:24 residential (5) 33:5,16,17;36:24;	37:3 resolution (2) 12:7,8 Resource (3) 11:23;13:16;52:7 resources (5) 10:10,20;12:18; 15:6;26:9 respect (1) 27:6 respectfully (1) 7:14 respective (1) 9:18 responded (1) 12:6 response (3) 8:16;12:10;29:12 responsibilities (4) 16:1;25:17;26:25; 27:6 responsibility (4) 8:23;14:22;16:4; 45:10 responsible (2) 18:5;24:5 rest (1) 35:1 result (1) 45:12 results (1) 50:21 Revenue (1) 11:23 review (16) 14:17;21:13;22:25; 23:3,7,15;24:4;30:14, 15,18,24;31:14;32:4; 39:10;40:18;41:24 reviewed (1) 23:11 reviews (2) 37:12;49:9 rewarding (1) 6:20 rid (1) 29:19 Riggs (4) 3:4,5;5:22;7:10 right (14) 30:17;33:7;39:13, 18;40:9,20;41:8,9,22; 44:7;46:2,21;49:10; 53:6 right-of-ways (1) 37:21 rights (5) 37:22,22;39:25; 40:4,14 Risling (11) 31:21,21;35:11; 40:25,25;43:1;46:7, 7;47:18;52:4,4
Q	R			
qualifications (19)	rarity (1) 40:7 rate (3) 9:12;12:7,8 rather (1) 14:20 reach (6) 18:7,13,15,20,21; 52:2 read (3) 28:5;32:10;44:21 readily (1) 36:19 real (16) 13:10;17:21;19:15; 24:21;25:11;30:6; 32:17,21;34:18; 37:12;38:19;39:2; 47:11;50:18;52:13; 53:13 really (21) 5:24;20:5,8;25:15; 27:16;30:1,18;34:4, 6;38:7,14;44:8;49:6; 50:10,17,19,22; 52:25;53:20;54:7,13 realty (1) 28:3 reasons (1) 22:14 receipting (2) 10:14;11:4 receipts (1) 9:10 receive (1) 10:3 received (1) 9:23 receiving (1) 54:14 recently (2) 31:8;38:11 recognize (1)			

River (5) 27:25;29:2;30:12; 38:3;51:1	3:15;33:24;42:1; 46:1	14:18;15:9	45:19	32:10;38:10;40:1; 51:7
Rob (1) 7:23	scenario (2) 49:8,12	September (2) 3:23;16:7	situations (1) 38:16	specifically (3) 10:9;21:20;32:14
ROBERTS (13) 3:10,11;6:3,8;7:9; 16:7;27:20;35:2; 40:23;42:13;46:3; 49:2;54:5	schedule (1) 44:15	serve (3) 7:3;15:18,25	six (2) 19:13;41:6	spot (1) 30:18
Rogers (1) 8:1	School (2) 51:23,24	serves (1) 31:19	sixth (1) 19:10	spread (1) 37:5
role (1) 8:22	schools (4) 49:18;50:10,15,24	service (10) 10:3;11:1;12:3,12, 15;15:2;26:18;30:25; 31:11;51:19	slide (3) 9:6;11:2;16:5	Springs (3) 6:6;38:4,5
roles (2) 25:17;27:6	scope (2) 31:12;35:9	Services (25) 7:24,25;10:1,11, 17;11:19;13:20,25; 14:8,24;15:8;16:21, 21;17:2,6,7,8,16,19, 22,23;18:4,17;19:9; 28:25	slides (2) 8:12;19:21	Stacy (1) 28:1
ROSIER (6) 27:24,25;29:1; 30:10;31:5;50:8	second (1) 19:5	session (1) 7:16	smart (1) 44:9	staff (9) 4:5;7:1,6;8:1; 11:15,20;12:19; 15:24;45:24
Ross-Petherick (1) 51:24	secondly (1) 44:4	set (3) 8:3;31:13;42:17	Society (1) 37:17	staffing (1) 26:24
routine (1) 37:1	Secretarial (4) 8:23;21:5;22:20; 30:24	settled (1) 6:21	sole (1) 40:19	stagnant (1) 13:17
routinely (1) 38:2	Secretary (35) 4:9;5:1,11,12,13, 15,15,17;7:8;8:4; 19:4,5,7,9;20:25; 21:7,13;25:13,20,21, 22;26:1,1,12,14,22, 24;27:4,7,14;35:16, 17,22;45:8,19	settlement (3) 6:21;9:22;14:6	solicit (1) 20:14	stand (1) 3:7
RTAs (1) 13:6	Secretary's (3) 16:4;22:22;25:14	seven (1) 19:3	Solicitor's (2) 5:23;7:10	standard (4) 12:11;41:19;43:20; 47:5
Rule (4) 21:17;31:3;32:11; 41:3	Section (19) 7:17;8:4,8;16:11, 23;19:16;20:18,23; 21:11;25:12,18; 26:15;27:18;35:5,15, 16;41:3;45:2,7	seven- (1) 34:23	solution (1) 29:16	Standards (2) 22:10;24:25
rules (1) 22:11	Secretary's (3) 16:4;22:22;25:14	seventh (1) 19:11	solution-oriented (1) 29:9	standing (1) 22:7
rule's (1) 23:4	Section (19) 7:17;8:4,8;16:11, 23;19:16;20:18,23; 21:11;25:12,18; 26:15;27:18;35:5,15, 16;41:3;45:2,7	several (2) 44:24;45:5	somebody (5) 31:17;40:8;50:20; 51:2;52:1	stands (1) 31:16
rural (2) 37:9,18	seeing (1) 29:21	shall (11) 20:25;21:12,13; 25:21,22;26:1,18,20, 22;45:8,11	somehow (1) 52:10	standstill (1) 30:20
S	seeking (4) 5:3;28:19;35:8,10	shad (1) 50:10	someone (1) 47:23	start (2) 3:15;42:3
sad (1) 50:22	seem (1) 43:1	shied (1) 50:10	sometime (4) 7:19;37:5;41:15; 54:2	started (4) 29:2;30:11;34:22; 54:1
safeguarding (1) 11:13	Selection (1) 45:3	short (3) 5:4,6;6:1	somewhat (1) 51:4	state (9) 6:16;11:24;22:6,8; 52:1,18,23;53:1,3
sale (3) 24:8;39:12,13	self-governance (3) 6:14;28:3;34:5	show (2) 18:10;39:24	somewhere (1) 28:22	statement (1) 13:9
sales (2) 47:13,15	self-sufficiency (1) 13:7	showing (2) 3:13;14:15	sorry (1) 19:4	statements (1) 9:24
Salish (1) 6:12	sell (1) 36:18	sign (2) 39:20;40:21	sort (2) 42:18,19	states (5) 16:5;24:15;26:21; 35:23;45:11
Salt (5) 27:25;29:2;30:12; 38:3;51:1	Senate (2) 6:24;25:24	similar (1) 24:14	sound (1) 15:11	stating (1) 39:21
same (9) 4:13;32:24;36:10; 41:19,24;47:16; 48:16,21;54:3	send (5) 31:12;43:22;44:2; 49:8,12	single (9) 5:2;16:25;17:11, 12;18:23,25;19:20, 20;32:13	South (2) 3:25;16:15	status (1) 42:21
satisfactory (1) 12:10	sent (3) 35:12,13;45:21	singular (1) 14:21	sovereignty (1) 23:8	step (4) 4:2;17:17,17;27:23
satisfies (1) 21:7	separate (3) 24:20;32:20;46:10	Sisseton-Wahpeton (1) 16:14	Special (14) 5:19;6:7,8;7:23; 8:13,16;16:13,18; 17:4;19:6;32:3; 35:18,20,24	stewardship (2) 12:17;16:3
saw (1) 29:18	separately (1) 15:3	site (3) 45:22;49:9,13	specialize (1) 37:9	still (4) 25:3;29:17;44:6,6
saying (4)	Separation (2)	sites (1) 37:21	specialized (2) 38:6,9	stop (1) 41:13
		sitting (1)	specially (1) 11:14	stopped (1) 41:16
			specific (4)	storage (2)

11:12,13 stories (1) 12:24 Strataweb (1) 13:21 strategized (1) 37:14 streamline (5) 4:4,21;13:13; 14:12;30:4 streamlining (2) 7:20;35:14 strengthening (1) 4:2 strong (3) 8:16;10:1;15:18 strongly (1) 29:24 structure (2) 4:23;15:5 structures (1) 11:8 struggle (1) 28:6 struggled (2) 29:4,10 students (2) 50:16;51:25 stuff (3) 37:16;38:4,5 submission (4) 21:9;23:1;39:9,21 submissions (1) 54:11 submit (6) 22:17,19;29:18; 30:14;31:14;39:4 submits (1) 21:6 submitted (8) 23:12,19,20;24:2; 25:3,5;39:6;41:24 submitting (1) 41:4 subsection (3) 21:8;22:4;45:14 success (1) 12:24 suggest (1) 39:14 suggesting (1) 22:15 suggestion (1) 48:16 suggestions (3) 5:5;27:10;49:15 suited (1) 24:22 sunset (1) 32:3 superior (1) 16:3 supervise (1)	26:5 supervised (2) 50:17;51:3 support (6) 7:25;12:4;13:24; 14:5;29:3;53:21 sure (6) 20:8;22:2;28:8; 29:25;48:18;53:22 surface (1) 33:23 sustained (1) 45:11 switches (1) 36:2 system (5) 9:9;11:1,4;31:1; 48:19	though (2) 18:6;40:13 thought (1) 27:12 thoughts (1) 5:14 thousand (2) 38:16,17 thousands (1) 13:3 three (6) 9:25;23:5;31:15; 32:25;39:16;48:7 throughout (2) 7:2;30:19 Thus (1) 12:22 timber (6) 24:20;32:17,19; 46:9,21;47:6 timelines (1) 31:13 timely (1) 12:5 times (5) 18:13;28:6;29:10, 14;52:3 timetable (1) 28:11 Title (14) 4:8;7:17;14:17; 22:20,21;26:20; 35:13;44:17,19; 45:20,20;46:4,5,6 titles (1) 44:14 today (10) 6:6;7:1,7,12;10:24; 15:19;28:22;29:19, 21;48:17 together (3) 8:9;53:8,16 toll-free (1) 12:2 took (1) 48:6 tool (5) 14:11;47:20,24; 48:10,12 tools (1) 13:19 total (1) 9:21 totaled (1) 18:17 totaling (1) 9:13 toward (1) 53:10 town (1) 43:11 towns (1) 48:3	train (1) 53:23 trained (1) 11:15 training (2) 13:6;50:18 trains (1) 51:24 transaction (4) 18:3;21:15;24:1,7 transactions (4) 9:13,14;22:19; 38:19 transferred (4) 4:12;17:3;26:15; 36:1 transferring (1) 18:24 transition (6) 26:2;28:11,19; 35:6,6,19 transparency (2) 8:17;10:12 travel (1) 36:17 Tribal (34) 3:14,16,24;4:2; 6:11,22;7:5,6,6,15; 9:1;11:8,16,21; 12:16;13:2,15,22; 14:16;17:20;20:12; 22:3,3;23:14;34:7; 38:21;45:13;49:2; 52:7,24;53:10,11,14; 54:19 tribe (24) 6:13;9:18;16:14; 20:4;21:6,10;23:2,18, 19,21;24:11;34:5,15; 37:13;39:9,24;41:1; 45:12;48:1;52:4,5,19, 25;53:4 Tribes (33) 6:12;9:17;10:2,22; 11:25;13:11,22;14:9, 11,13;20:20;22:1; 23:7;24:13;26:9; 28:23;34:18,19; 36:23;43:2,17;44:22, 23,24;45:4,5;47:21; 48:13,19;53:8,16,23; 54:2 tribe's (1) 24:17 tried (2) 52:16;53:8 trips (1) 34:24 true (1) 51:10 Trust (61) 3:17;6:18;7:18,24; 8:11,15,18,19,20,20,	24;9:3,3,7,16,19; 10:5,8,10,15,17,18; 11:7,9,13,20,25;12:2; 13:16,18;14:4,4,9,22; 15:1,5,10,11,16;16:1, 3,4,24;18:2,6;21:2; 26:9,10;29:5;32:12; 37:24;44:17,20;45:8, 10;47:21;49:19;50:2; 51:11;53:9;54:18 Trustee (18) 5:19;6:7,8;7:23; 8:13,16;16:13,19; 17:4;19:6;32:3; 35:18,20,24;53:5,6,7, 7 try (3) 50:1;51:13;53:11 trying (5) 20:8,20;25:15; 42:4;43:12 turn (1) 53:10 turned (1) 50:16 two (7) 16:19;21:13;23:3; 31:15;35:7;44:3;49:6 type (3) 19:24;34:16;37:1 types (1) 36:22 typical (1) 36:16
	T			U
	Tab (1) 9:5 talk (3) 17:11;18:23;41:4 talked (1) 39:23 talking (1) 50:9 talks (2) 28:10;44:22 TBCC (1) 12:6 teaching (1) 54:1 tear (1) 29:12 technical (3) 17:25;19:24;37:13 telecommunication (1) 37:21 telephonic (2) 3:20;54:9 tens (1) 13:3 Tenure (2) 51:17,22 term (1) 44:19 termination (2) 28:11;35:4 terms (3) 32:10;35:9;41:21 testimony (1) 36:5 thanks (2) 3:15;31:5 Theresa (1) 27:24 thinking (1) 44:9 Third (1) 19:6			ultimate (1) 52:6 unclear (1) 41:14 Under (35) 5:12,15;21:11; 22:20;23:13,13; 25:12,14,18,21;26:1, 12,14,15,22,24;27:7, 13,13;30:17;32:2; 35:16,17;39:3,25; 40:4,14;44:1,19; 45:14,19;47:8;52:23; 53:1,2 undergone (1) 28:3 underground (1) 11:12 unfortunately (1) 50:13 Uniform (2) 22:10;34:17 United (2) 26:21;45:10 universities (1) 53:21

University (1) 51:23	video (1) 14:15	within (16) 4:12,23,25;5:2; 8:21;14:19;17:1; 24:16;26:4;31:15; 32:13;35:21;36:1,13; 43:14;48:9		13:19
unknown (1) 12:20	videos (1) 48:5	without (2) 23:7;25:2	1	22nd (1) 21:3
unless (1) 42:23	Vince (1) 5:19	woman (2) 48:12;52:16	1 (4) 17:17;26:17;45:20, 20	25 (1) 22:20
Unlike (1) 20:10	visiting (1) 11:17	work (26) 4:4,22;8:3;9:7; 12:15;13:15,18,23; 15:14,25;16:20;29:4, 5,14;30:4;31:2,12; 36:11,15;37:15; 38:10,23;49:20;51:2, 21;53:12	1% (1) 41:16	250 (1) 9:17
unmodified (1) 9:23	volume (1) 38:19	worked (2) 31:16;36:22	1.8 (1) 12:6	26 (1) 16:16
unusually (1) 36:15	W	working (8) 4:3;6:17;7:2; 15:15;29:9;35:8; 50:6;53:16	10 (2) 6:15;9:14	3
up (14) 3:11,13;12:11; 20:10;27:20,22,23; 37:11;42:17;43:25; 44:9;48:12,18;54:10	wait (1) 31:10	workshops (1) 51:25	10:16 (1) 54:18	3 (6) 4:9;7:17;18:11; 35:13;45:2;46:5
upload (1) 31:13	waiting (3) 53:2,3,4	worried (1) 44:2	100 (2) 6:22;21:17	3,099 (2) 18:12,19
upon (3) 8:7;21:18;33:25	waive (4) 39:13,18;40:9,19	worst (2) 49:8,12	100% (1) 41:18	3,300 (1) 9:16
use (8) 23:6,22;32:23; 43:13;47:4,13,14,16	waiver (2) 39:12;40:21	write (1) 29:3	11 (1) 6:17	30 (2) 23:13;30:17
used (5) 11:12;33:7;48:10; 52:2;53:25	water (1) 37:22	writing (2) 40:6;51:25	12 (2) 16:16;30:11	303 (3) 25:18;35:15,17
using (1) 36:24	way (8) 24:25;29:25;31:20; 37:25;39:15;43:18, 19;48:24	written (7) 16:6;29:25;32:16; 35:12;40:2;42:14; 54:10	13 (1) 35:23	304 (3) 7:17;8:4;35:5
utilize (1) 49:7	website (3) 15:20,22;16:9	Y	14 (1) 16:18	305 (1) 20:23
V	week (2) 3:23;54:11	year (6) 3:18;9:11;20:24; 21:3;30:20;41:6	15 (1) 30:13	305a (3) 16:11,23;19:16
vacant (1) 37:4	weeks (1) 31:15	years (13) 6:15,17;9:25; 15:15;16:16,17,18, 19;20:10;30:11,13, 19;35:7	17% (1) 9:19	305b (1) 20:18
valuable (1) 4:18	Welcome (4) 3:2;7:13;15:17; 19:12	young (1) 52:16	18 (1) 4:25	30th (2) 3:23;16:7
Valuation (10) 17:7;19:8;21:7,11, 12,15;23:24;24:4; 37:7;47:12	welcoming (1) 3:4	Z	1994 (1) 8:15	330,000 (1) 12:23
valuations (26) 5:2;16:24;19:1; 21:25;22:23;24:16, 19,21,23;32:12,16, 17,19,21;36:13,25; 37:1,4,10;38:3,21; 46:9,10,24;47:6,14	Western (2) 30:3;38:11	zero (1) 46:19	1996 (1) 8:22	4
value (3) 14:19;31:19;38:23	what's (3) 4:3;34:2;37:25	0	2 (7) 14:17;17:17;44:17; 45:2,20;46:4,6	40,000 (1) 9:12
values (1) 46:12	whenever (1) 42:21	04 (1) 30:20	2% (2) 18:14,20	400,000 (1) 9:20
various (1) 15:20	Whereupon (1) 54:18		20 (1) 15:15	43 (3) 21:17;22:21;23:13
vendors (3) 37:6,11,15	whichever (1) 43:24		200 (1) 47:8	5
verbal (1) 40:2	White (5) 5:22;7:21;16:10, 12,12		2002 (1) 17:3	5 (2) 9:5;26:20
verification (2) 41:21,22	whole (3) 32:18;41:14;42:8		2004 (1) 12:7	50% (1) 12:12
verify (1) 25:1	willing (2) 28:15;48:20		2005 (1) 17:4	6
	wills (2) 51:2;52:17		2009 (1) 17:4	6% (2) 18:12,21
	Winter (1) 7:23		2010 (1) 17:7	7
	wisdom (1) 52:10		2016 (2) 15:16;35:23	7,000 (1) 12:22
	wishes (1) 50:23		203 (1) 45:7	7th (4) 3:24,25;16:8;54:11
			21st (1)	

8				
80 (1) 43:11 80% (1) 9:16				
9				
94% (1) 12:7 98% (1) 12:11 99% (2) 9:21;41:15 99.99% (1) 9:11				