

EXHIBIT A

DECLARATION OF NAVAJO NATION PRESIDENT BEN SHELLY

I, Ben Shelly, President of the Navajo Nation, declare the following:

1. My name is Ben Shelly.
2. I am the President of the Navajo Nation (“Nation”).
3. As the President, I am the head of the Nation’s Executive Branch, which is one of the Nation’s three branches of government.
4. The other two Branches are the Legislative Branch, which is the Navajo Nation Council, and the Judicial Branch, which oversees and administers the District Courts of the Navajo Nation and the Navajo Nation Supreme Court.
5. I am aware that on June 27, 2014, Russell Begaye, Mel R. Begay, Charles Damon, and Kenneth Maryboy—purported to file suit against the five members of the Navajo Nation Oil and Gas Company (“NNOGC”) Board of Directors—Mae-Gilene Begay, Diandra Benally, Lennard Eltsosie, Jennifer Hatathlie, and Nelson Toledo—in their capacities as the Nation’s Shareholder Representatives to NNOGC.
6. I am also aware that these four individuals make express statements and imply through their representations that they act on behalf of the Nation in bringing the lawsuit filed with this Court on June 27, 2014.
7. Although these four individuals make such statements and representations purporting to act on behalf of the Nation, or otherwise NNOGC, throughout their pleadings filed with this Court, they do not actually represent the Nation.

8. These four individuals have no authorization from the Navajo Nation Office of the Attorney General or—to the best of my knowledge—any other body with even a colorable claim to be empowered to consent to a lawsuit such as the action brought here.
9. Nor is their legal counsel authorized to represent—*or even imply that they have the authority to represent*—the Nation here or elsewhere, whether directly or indirectly.
10. Instead, the Nation has its own proper legal counsel, the Navajo Nation Office of the Attorney General, which includes the Nation’s Department of Justice.
11. The Nation’s Office of the Attorney General and Department of Justice are the Nation’s chief legal counsel and officers pursuant to 2 N.N.C. §§ 1961-1965.
12. Moreover, to represent the Nation or its interests, legal counsel must have prior authorization from the Nation’s Office of the Attorney General pursuant to 2 N.N.C. §§ 1964(C).
13. Neither legal counsel for the four individuals here nor the four individuals themselves have any authority to do what they are purporting to do in the action filed with this Court on June 27, 2014.
14. I believe the actions of the four individuals to file in the Federal Court are not in the best interest of the NNOGC and the sovereign authority of the Navajo Nation.
15. The Parties filed in the Navajo Nation Supreme Court in the Window Rock District Court concerning NNOGC to address certain material issues and in order to resolve the dispute among the parties.
16. Pursuant to the requests of the parties to the dispute in the Window Rock District Court, the Navajo Nation Supreme Court acted in accordance with its authority and rendered an opinion that resolved the questions brought before it in a manner that promotes the best interests of the Nation, the Navajo People, and their asset, NNOGC.
17. This lawsuit filed in Federal Court is an attempt to avoid having to act consistent with the laws that govern the Nation's entity, NNOGC, the Nation, and the Nation's officials, officers,

employees, and designees charged with working in a fiduciary capacity to protect and promote the Nation's and the Navajo People's best interests.

18. This lawsuit is contrary to the four individuals' authorities and fiduciary duties otherwise exercised in their official capacities as the Nation's Shareholder Representatives to NNOGC, and they are, therefore, acting outside of their capacities as Shareholder Representatives by bringing this lawsuit against the members of the NNOGC Board of Directors in this Federal Court.
19. To emphasize, this lawsuit further represents the continuation of conflicts involving NNOGC. With the Navajo Nation Supreme Court decisions, it was my understanding that finality was clearly set forth by our Nation's highest court, and this valuable asset of the Navajo Nation and Navajo People, NNOGC, could now be back on track in restoring its financial footing and reputation in the industry. However, this lawsuit does the opposite.
20. For the reasons I have discussed in this Declaration, among others, this Court should accordingly dismiss this lawsuit brought by Russell Begaye, Mel R. Begay, Charles Damon, Kenneth Maryboy and who have acted to bring this lawsuit.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 30 , 2014.

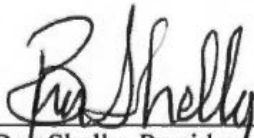

Ben Shelly, President
The Navajo Nation

EXHIBIT B

DECLARATION OF LOUIS DENETSOSIE

I, Louis Denetsosie, declare:

1. I am the Chief Executive Officer of the Navajo Nation Oil and Gas Company ("NNOGC").
2. I was selected to be the Chief Executive Officer of NNOGC by resolution of the NNOGC Board of Directors at a duly noticed meeting on June 7, 2014. A true and correct copy of that resolution is attached hereto as Exhibit A. After the Navajo Nation Supreme Court ruled that the Majority Board had never been validly removed or suspended on June 20, 2014, I executed an employment agreement with NNOGC, as provided in such resolution.
3. Attached as Exhibit B is a true and correct copy of my current Resume.
4. I know the above facts on my personal knowledge and they are true to the best of my knowledge, information and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 1, 2014



Louis Denetsosie

EXHIBIT A

EXHIBIT A

**RESOLUTION OF THE
BOARD OF DIRECTORS OF THE
NAVAJO NATION OIL AND GAS COMPANY**

Conditionally Authorizing the Hiring of Louis Denetsosie as Chief Executive Officer on an Emergency Basis and Directing that Such Position be Advertised Forthwith

WHEREAS:

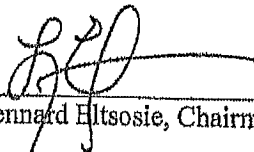
1. The Navajo Nation Oil and Gas Company ("NNOGC") is a wholly owned corporation of the Navajo Nation organized under section 17 of the Indian Reorganization Act, as amended, and charged with developing and operating a profitable integrated oil company for the benefit of the Navajo Nation; and
2. The position of the President and Chief Executive Officer ("CEO") of NNOGC has been vacant since January 21, 2014, when the Board terminated the employment of former CEO Robert Joe for cause; and
3. NNOGC's reputation with the banks and in the oil and gas industry has suffered over the past several months, and NNOGC's growth for future generations of Navajo people has been and is jeopardized by the lack of competent and ethical executive leadership; and
4. The Navajo Nation Supreme Court or other Navajo court of competent jurisdiction is expected to decide on key NNOGC governance issues in the near future and this Board has determined that it is imperative that new executive leadership be ready to step in immediately if the courts determine, either expressly or by reasonable implication that no member of the Board of Directors was validly terminated or suspended from December 1, 2013 to the date of this resolution and, either expressly or by implication that Joe was validly terminated by Board action on January 21, 2014 or otherwise is no longer CEO; and
5. Louis Denetsosie has served the Navajo Nation and NNOGC with honor and distinction, and has stated his willingness to assist NNOGC in this emergency situation by assuming the role of CEO conditioned on the negotiation of acceptable contractual terms and conditions, and has also stated that such contract may include a provision that requires NNOGC to immediately advertise the CEO position and allows NNOGC to install any successful candidate (if not Denetsosie) as CEO upon completion of all steps required by applicable law; and
6. Although action on this resolution is necessary in the best interest of NNOGC on an emergency basis, the present uncertainty in the proper composition of the Board of Directors militates in favor of delaying the effectiveness of this resolution until the Navajo Nation Supreme Court or other Navajo court of competent jurisdiction confirms expressly or by reasonable implication that no member of the Board of Directors has been validly removed or suspended from December 1, 2013 to the date of this Resolution.

NOW, THEREFORE, BE IT HEREBY RESOLVED THAT:

1. The NNOGC Board of Directors hereby approves the engagement of Louis Denetsosie as President and Chief Executive Officer, subject to the negotiation of contractual terms and conditions acceptable to the parties and consistent with the provisions of the above recitals.
2. The NNOGC Board of Directors hereby authorizes the Chairman of the Board to negotiate and execute such an employment agreement with Mr. Denetsosie upon consultation with the Board on the terms thereof.
3. Upon execution of such agreement and upon his receipt and review of any reserve report or other report required to be delivered to the Administrative Agent for NNOGC's banking group, Mr. Denetsosie as the NNOGC CEO shall be authorized to ratify any such report if desired by such Administrative Agent, and to review and ratify, as appropriate, any other report either submitted or due to be submitted to other agencies, businesses and/or government officials.
4. This resolution shall not become effective and shall not be disseminated until and unless the Navajo Nation Supreme Court or other Navajo court of competent jurisdiction rules expressly or by reasonable implication that no member of the Board of Directors has been validly removed or suspended from December 1, 2013 to the present. Upon such ruling, the CEO shall promptly advertise the position of President and CEO for a long-term selection in accordance with all applicable law.

CERTIFICATION

I hereby certify that the foregoing resolution was considered by the Board of Directors of the Navajo Nation Oil and Gas Company at a duly called meeting at which a quorum was present in Albuquerque, New Mexico, and that the same was passed by vote of 5 in favor, 0 opposed, and 0 abstained, this 7th day of June 2014.


Lennard Hltsosie, Chairman

Attest:



Mac-Gilene Begay, Secretary

EXHIBIT B

EXHIBIT B

LOUIS DENETSOSIE - RESUME

EDUCATION

Legal: Arizona State University School of Law
1971-1974 (Juris Doctorate, 1974)

Business: W. P. Carey School of Business – Online Program
Arizona State University
2007-2009 (MBA, June 2009)

Undergraduate: University of Arizona College of Engineering
1965-1970 (BSEE with Distinction, 1970)

High School: Valley High School, Albuquerque, New Mexico
Graduated 1965

EMPLOYMENT EXPERIENCE

6/14 – Present Navajo Nation Oil and Gas Company

Chief Executive Officer

9/13 – 5/14 BuckleySandler, LLC, Washington, D.C.

Member of litigation team in Navajo Nation v. United States, No. 06-945 (Fed. Cl.), that litigated and negotiated a \$554 million dollar settlement approved by the Navajo Nation Council on May 30, 2014.

3/11 – 8/13 Navajo Nation Oil and Gas Company, Window Rock, Arizona.

General Counsel. Interim CEO for last year.

1/03 – 1/11 Navajo Nation Attorney General, Window Rock, Arizona

Managed Navajo Nation Department of Justice including supervision of 41 employees (20 attorneys). Supervised the Office of the Chief Prosecutor. Provided leadership and participated in negotiations, including but not limited to: settlement with Hopi Tribe of litigation over title to the 1934 Navajo reservation (lifted Bennett Freeze); settlement of post partition rents and Hopi Owelty claim; with Minerals Department, negotiation of compensation for rights-of-ways for natural gas pipelines and electric transmission lines across the Navajo Nation; with Renewable Energy Team, negotiation of a tribally-owned and controlled wind power project on the Big Boquillas Ranch; with Minerals Department, negotiation of Four Corners power plant leases and Peabody coal royalty adjustments. Provided leadership and participated in negotiation of water rights settlements in New Mexico and Arizona. Served on Investment Committee.

12/93 – 12/02 Sole Practitioner, Window Rock, Arizona

Practice emphasized representation of Navajo Nation-owned businesses including the Nation's public electric, water and gas utility, an agribusiness and construction company. With NTUA management, negotiated and prepared contracts for wholesale power supply, transmission, wholesale natural gas

Resume of Louis Denetsosie – April 23, 2011

supply, retail power supply and transmission, and loans from the Rural Utilities Service (Department of Agriculture) for the Navajo Tribal Utility Authority (NTUA). Served as bond counsel for the NTUA with RUS and the Cooperative Finance Corporation. Represented NTUA in the purchase of Continental Divide's electric facilities on the Navajo reservation and obtained approval of the transfer by the regulatory commissions in Arizona and New Mexico. Advised NTUA on re-allocation by FERC of the El Paso Natural Gas Pipeline west-flow capacity on its western pipeline system. Obtained an Internal Revenue Service private letter ruling to establish Navajo Engineering and Construction Authority's tax exempt status under the Indian Tribal Governmental Tax Status Act.

1/95-8/02

Chairman of the Board and President of the Navajo Nation Oil and Gas Company, Window Rock, Arizona

Provided leadership and management for start-up activities of Navajo Nation-owned corporation: acquisition and construction of five service stations on the Navajo reservation; acquisition of a Chevron distributorship for the reservation; negotiation of agreement to sell in-kind royalties of crude oil for the Navajo Nation, increasing the revenues to the Nation; acquisition of the former Texas-New Mexico crude oil pipeline between Aneth, Utah and Bisti, New Mexico; negotiation of a tax-sharing agreement between the Navajo Nation and Arizona Department of Transportation returning significant tax revenues to the Nation; establishment of an Oil and Gas Revenue Fund by the Navajo Nation Council for the purpose of investing in exploration and production activities. Established Audit, Nominating, Compensation and other committees of the Board.

1/87-11/93

Hale & Denetsosie, P.A., Window Rock, Arizona: Federal Indian Law practice with emphasis on representation of Indian tribes and tribal business enterprises. The firm, in addition to its business clients, represented the Navajo Nation Council providing legislative counsel services, rendering advice to the Council's standing committees and presenting legislation (including Title 2 Amendments).

9/82 -1/87

Deputy Attorney General, Navajo Nation Department of Justice, Window Rock, Arizona: Hired in 1982 as staff attorney, promoted to Deputy Attorney General in 1984 by Attorney General Claudeen Bates Arthur. Supervised the Natural Resource Unit of the Department: appeared as counsel on numerous occasions in Federal Court on Navajo-Hopi Land Dispute Litigation over the 1882 reservation; supervised contracting attorneys handling 1934 reservation litigation against Hopi Tribe; had primary supervisory responsibility over natural resource leases and water litigation. Briefed and argued on behalf of the Nation two appeals from contempt orders against the Navajo Nation Chairman in the Ninth Circuit Court of Appeals related to the Navajo Hopi Land Dispute. Obtained an injunction in the U.S. District Court of Utah enjoining Superior Oil Company from proceeding with seismic testing without obtaining tribal approval and successfully defended the District Court decision in the 10th Circuit Court of Appeals. Superior Oil Company, et al. v. United States, et al., 798 F.2d 1324 (1986) (Requiring oil company seeking seismic permits to first exhaust tribal court remedies). With the Minerals Department, drafted and obtained Navajo Nation Council approval of legislation providing rights of first refusal to the Navajo Nation on assignments of oil and gas leases.

9/80-7/81

Director, Navajo Legal Aid & Defender Service, Navajo Nation, Window Rock, Arizona: Supervised staff of one attorney and two tribal court advocates. Provided legal defense in state and tribal courts.

- 9/79-9/80 Senior Citizen's Unit Managing Attorney, DNA People's Legal Services, Inc., Chinle, Arizona: Provided education on the Navajo-Hopi Settlement Act to members of the Navajo Nation impacted by the relocation law. Assisted clients with Social Security disability appeals.
- 4/75-9/79 Sole Practitioner, Window Rock, Arizona.
- Civil and criminal practice in federal, state and tribal courts. First major case involved defense of a first degree murder charge disposed of by plea bargain after extensive investigation, discovery and preparation. Began a specialty in motor vehicle accidents and catastrophic injuries, including federal tort claims against the BIA and IHS.
- 9/74-4/75 Staff Attorney, DNA People's Legal Services, Inc., Window Rock, Arizona
- Handled a variety of civil matters for indigent clients of legal services corporation..
- 5/73-6/74 Law Clerk in Field Solicitor's Office, U.S. Department of the Interior, Phoenix, Arizona:
- Wrote legal opinions and researched laws on Arizona Indian land and water issues, including the preparation of a report recommending litigation of the San Xavier (now Tohono O'dham) Indian Reservation water rights claim by the United States. Researched and wrote a comprehensive update of the Indian reserved water rights doctrine under Winters v. United States to include the right to groundwater underlying Indian reservations. Drafted legal memorandum of advice on Indian water rights of the Quechan and Colorado River Tribes on modifying the decree in Arizona v. California and an opinion supporting the restoration of surplus lands to the Quechan Indian reservation by the United States of America (restored under the Carter administration).

SPECIAL MEMBERSHIP AWARDS AND HONORS

President, Navajo Nation Bar Association (1977-1978)
Member, Tau Beta Pi National Engineering Honorary Fraternity
Dean's List, College of Electrical Engineering, University of Arizona
State Bar of Arizona - One Hundred Women and Minority Lawyers Award

BAR MEMBERSHIPS

Arizona Bar Association, 1974
Arizona Federal Bar, 1974
New Mexico Bar Association, 1975
Navajo Nation Bar Association, 1975
New Mexico Federal Bar, 1976
Ninth Circuit Court of Appeals, 1983
Tenth Circuit Court of Appeals, 1985
United States Court of Appeals for the Federal Circuit, 2006
United States Supreme Court, 2009
United States Court of Federal Claims, 2014

HOBBIES AND TECHNOLOGY SKILLS

Golfing, Skiing, Horseback Riding, Woodworking, Reading
MicroSoft Office
MicroSoft Project
Statistical Software

REFERENCES

Joe Shirley, Jr., Apache County Supervisor
Mark Grant, Controller, Navajo Nation
Sam Buffone, BuckleySandler, Washington, D.C.

EXHIBIT C

DECLARATION OF JOHNNY NAIZE

I, Johnny Naize, declare the following:

1. My name is Johnny Naize.
2. I am a delegate and the Speaker of the 22nd Navajo Nation Council.
3. I have been a delegate for almost 16-years.
4. With regard to the Navajo Nation Oil and Gas Company (“NNOGC”), in my capacity as the Speaker, I am and have always been aware that the Navajo Nation (the “Nation”) is the sole owner and Shareholder of NNOGC.
5. I am and have also always been aware of my role as an official of the Nation with regard to NNOGC, and the actions I may request pursuant to its Federal Charter of Incorporation (the “Charter”) and Bylaws. Specifically, I am and have always been aware that—in my capacity as the Speaker—my request to be made on behalf of the Nation’s Shareholder Representatives (the “Shareholder Representatives”) is necessary to properly hold a special meeting of the Shareholder Representatives pursuant to Article X(B) of the Charter and Section 2.4 of the Bylaws.
6. However, at the outset of the litigation in the Window Rock Judicial District Court of the Navajo Nation in Case No. WR-CV-32-14, I asked staff members to review the Charter and report to me whether the Shareholder Representatives could validly call and conduct a special meeting pursuant to the Charter and the amended Title II of the Navajo

Nation Code (“Title II”) with only five of them having been appointed by the Standing Committees of the 22nd Navajo Nation Council.

7. Based on the reports back to me and my discussions with the Nation’s staff members, I understood the answer to be that the Nation needed 11 Shareholder Representatives to be appointed by the 22nd Navajo Nation Council’s five successor Committees to the preceding Councils’ 11 Committees pursuant to Article V(D) of the Charter, Sections 300 through 700 of Title II, and Sub-Sections 5(A) through 5(E) of Title II.

8. The answer also meant that only having the five existing Shareholder Representatives was and is not consistent with the requirement of Article V(D) of the Charter that “[a]ll rights of the [S]hareholder of [NNOGC] . . . be exercised by eleven (11) [S]hareholder [R]epresentatives, composed of one member from each of the eleven (11) [S]tanding [C]ommittees of the Navajo Nation Council or their successor [C]ommittees . . .,” *id.*

9. Moreover, the answer meant that the existing five Shareholder Representatives could not form the quorum of at least seven Shareholder Representatives required by Article X(D) of the Charter.

10. Although I raised this issue and it was discussed formally and informally among the Nation’s officials, officers, and staff at various times after January 17, 2014, some of the Nation’s officials were (and some apparently still are) resistant to acting in

compliance with Navajo Nation law here, namely, Title II and the Charter; and so the deficiencies were not and have not been thoroughly addressed and remedied.

11. However, pursuant to traditional Diné teachings and values, it was imperative that I act to promote a potential resolution of the dispute that was at hand through non-adversarial means to avoid actions being taken that could not be reversed with considerable efforts or would cause irreparable harm to any of the parties to the dispute that was at hand.

12. So on February 25, 2014, in my capacity as the Speaker, I issued a letter that was designed bring the parties to the dispute together to try and “talk things out.”

13. This was not a call, however, for a special meeting of the Nation’s Shareholder Representatives pursuant to the Charter for purposes of enabling any suspension or removal of any of the members of NNOGC’s Board of Directors.

14. Instead, this was a directive to the parties to the dispute, their legal counselors, and other related parties to come together consistent with our fundamental traditional Diné values and teachings of K’é,¹ which is to say this directive was designed to bring the five existing Shareholder Representatives together with the members of NNOGC’s Board of Directors—namely, Mae-Gilene Begay, Diandra Benally, Lennard Eltsosie, Jennifer

¹ Although sometimes translated to mean “relationships,” or refer to the principle that all people are related to each other, the animals, and the plant life of this planet. But this is not a truly complete and accurate translation of what K’é fully means. Because I do not otherwise know of a manner in which to accurately and faithfully translate the full meaning of K’é into English, for the sake of brevity, K’é should be understood to be the key reasons for my having tried to bring the parties to the dispute in question together for purposes of attempting to facilitate an amicable resolution by and between the parties and those related to the dispute.

Hatathlie, and Nelson Toledo—and Mr. Robert Joe together to try and “talk things out” among themselves, their legal counselors, and other related parties.

15. In my letter, I directed that the “special meeting” be called “for March 7th, 2014, at 9:00 a.m. at the conference room of NNOGC in St. Michaels, AZ.”

16. I further directed the parties stated above “to invite all parties involved with these issues so that the best interest of the Navajo Nation can be served.”

17. Finally, I strongly encouraged “everyone involved at this meeting to talk things out utilizing our Navajo Fundamental concept of K'e.”

18. Moreover, I was aware that the four of five existing Shareholder Representatives who otherwise desired to suspend or remove Mae-Gilene Begay, Diandra Benally, Lennard Eltsosie, Jennifer Hatathlie, and Nelson Toledo would have to find a way to talk things out, because they do not constitute the number of the Nation’s Shareholder Representatives necessary to properly form a quorum of seven, much less the 11, Shareholder Representatives necessary to conduct business and validly accomplish such things as suspensions and removals.

19. My letter of February 25, 2014 was simply meant to accomplish what I stated therein: “I strongly encourage everyone involved at this meeting to talk things out utilizing our Navajo Fundamental concept of K'e.” My letter was not designed to provide for any of the parties to attempt a “do over” of what had previously been attempted (wrongful suspension or removal or any member of the NNOGC Board).

20. However, contrary to my letter and directions, on February 25, 2014, through an e-mail and attachment, Mr. Robert Joe issued a “Notice of Special Meeting [of the] Shareholder Representatives [of the] Navajo Nation Oil and Gas Company” that stated as follows:

The purpose of the special meeting of the Shareholder Representatives is to review the actions of the Board of Directors (BOD) as a body and the actions of its purported members individually, from August 1, 2012 to the present time, to determine if there has been a violation of the oath of office, the Charter of Incorporation, the bylaws, as amended, and the duty to act in the best (business) interest of the Navajo Nation as a NNOGC board member. This special meeting is also intended to resolve any and all procedural and substantive issues that may be alleged to have arisen from the conduct of the December 21, 2013 meeting of the Shareholder Representatives. From such review, a determination shall be made as to whether there is cause or additional cause for immediate removal from the board. Such actions are being taken as a for-profit business separate from the government of the Navajo Nation.

21. Mr. Joe’s notice was absolutely inconsistent with my letter, and did not embody at all what I was trying to achieve.

22. Instead of being designed to be the impetus for a special meeting “to review the actions of the Board of Directors . . . to determine if there has been a violation of the oath of office, the Charter of Incorporation, the bylaws . . . [or] the duty to act in the best (business) interest[s] of the Navajo Nation . . . ;” my letter was designed to “encourage everyone involved at this meeting to talk things out utilizing our Navajo Fundamental concept of K’e.”

23. Encouraging the people involved with this matter to try and talk things out was not supposed to be used for calling a meeting to attempt or purport to suspend or remove anybody, and certainly not Mae-Gilene Begay, Diandra Benally, Lennard Eltsosie, Jennifer Hatathlie, or Nelson Toledo.

24. However, it appears from the documents I have seen, that on March 7, 2014, my letter was used to attempt other actions beyond what I had directed, or otherwise intended the parties to attempt to accomplish, through the issuance of my letter regarding the issues and disputes underlying Case No. WR-CV-32-14 on February 25, 2014.

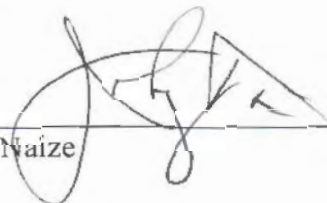
25. This was wrong, as I never issued anything for purposes of four of the existing Shareholder Representatives to even purport to suspend or remove any of Mae-Gilene Begay, Diandra Benally, Lennard Eltsosie, Jennifer Hatathlie, or Nelson Toledo.

26. Furthermore, again, the existing Shareholder Representatives are insufficient for meeting the quorum requirement of seven and the total requirement of 11 Shareholder Representatives, which is an issue that is to be resolved by the five Standing Committees that are the successor Committees to the former 11 Committees of the Council appointing additional Shareholder Representatives of the Nation to NNOGC in accordance with Articles V(D) and X(D) of the Charter, Sections 300 through 700 of Title II, and Sub-Sections 5(A) through 5(E) of Title II.

27. Although I and other officials of the Nation have tried to promote resolution of this deficiency, some officials (such as Mr. Russell Begaye) have unfortunately blocked

and exercised every effort to stifle such attempts to remedy this problem. Moreover, Mr. Russell Begaye and others in this federal case and otherwise are now the disingenuously complaining about not being able to satisfy the predicates of Navajo law, despite having perpetuated this situation for so long as a self-serving means of promoting their own interests, no matter what the costs may be to the Nation and the Navajo People.

Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I declare that the foregoing is true and correct.



Johnny Naize