



NAVAJO NATION DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

KRIS O. BEECHER
ACTING ATTORNEY GENERAL

JOANN B. JAYNE
ACTING DEPUTY ATTORNEY GENERAL

Fiscal Year 2026, First Quarter

Report of the Attorney General

The Office of the Attorney General (OAG) is led by Kris O. Beecher, the Acting Attorney General, and JoAnn B. Jayne, the Acting Deputy Attorney General. The Office of the Attorney General oversees and works in collaboration with the Office of the Prosecutor (OTP) and the 7 Units of the Department of Justice (DOJ). Pursuant to 2 N.N.C. §§ 1961-1965, the Navajo Nation Department of Justice provides legal services to the three governmental branches of the Navajo Nation Government, including its chapters and entities, in matters in which the Navajo Nation government has an interest. The Attorney General also initiates and defends all litigation against the Navajo Nation and supervises all outside attorney contractors who assist the Nation with various cases. The First Quarter of FY2026 was very productive for OAG, OTP, and the Units within DOJ. DOJ's key accomplishments included the following:

Office of the Prosecutor

During the first quarter of FY 2026, the Office of the Prosecutor demonstrated strong and consistent productivity across district and program offices, with overall case completion rates holding near or above expected performance benchmarks (see Chart 1). High-volume offices such as Kayenta and Shiprock carried the largest caseloads while maintaining solid closure rates, reflecting effective case throughput despite workload pressure. Several mid-volume offices also showed balanced performance, closing a substantial portion of their inventories and limiting case stagnation.

While a small number of offices exhibited lower completion percentages—largely attributable to staffing levels, specialized caseloads, or emerging matters, the overall distribution reflects a system that is functioning, responsive, and actively moving cases forward. Pending case volumes remain controlled, indicating that new filings are not overwhelming prosecutorial capacity. Taken together, first-quarter data confirms that OTP continues to prioritize case resolution, manage workload disparities across districts, and maintain prosecutorial momentum at the outset of FY 2026.

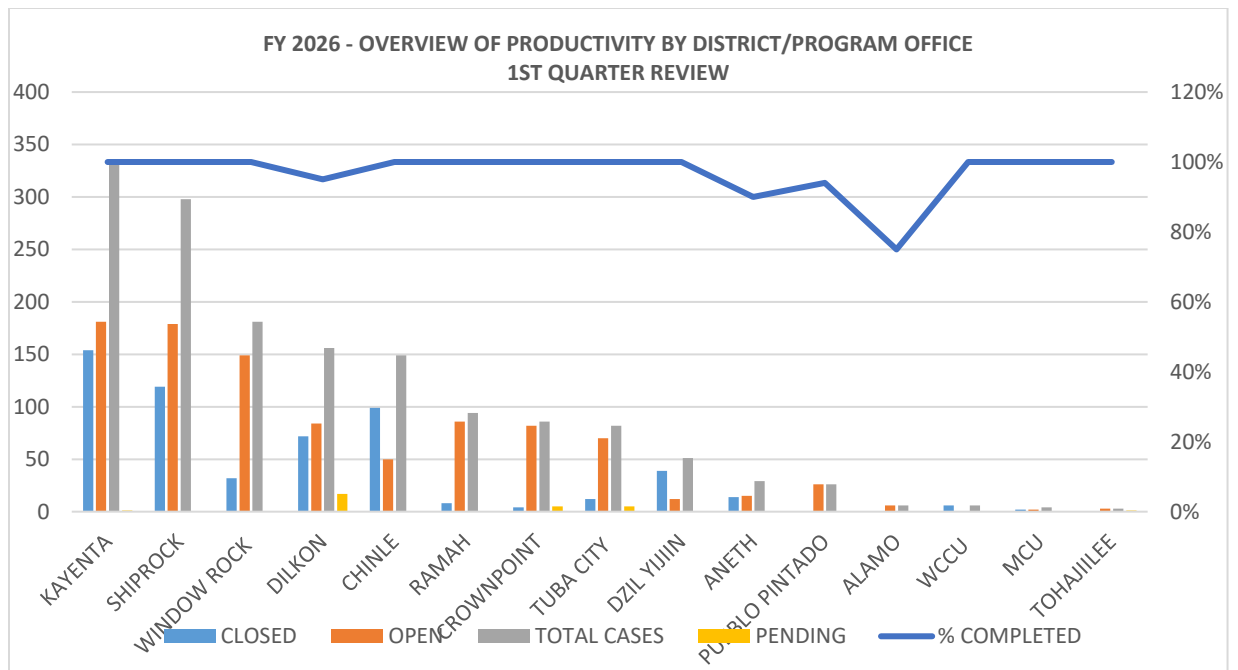


Chart 1

1. Federal Detainer and High-Risk Litigation Oversight

Ensuring continuity of prosecution and protection of jurisdictional interests

During the first quarter of FY 2026, the Office of the Prosecutor (OTP) remained actively engaged in complex litigation, legislative collaboration, and institutional oversight in furtherance of its responsibility to uphold public safety and the rule of law across the Navajo Nation. Throughout the reporting period, OTP leadership and staff worked to address high-risk criminal matters, participate meaningfully in statutory reform efforts, and maintain prosecutorial standards necessary for fair and effective case resolution. These efforts reflected a continued commitment to balancing day-to-day prosecution demands with broader system responsibilities, including inter-agency coordination, accountability, and the long-term strengthening of the Navajo Nation justice system.

2. Legislative and Council Engagement

Supporting statutory reform and informing policy decision-making

At the request of a Navajo Nation Council delegate, the office prepared a prosecution progress report addressing cattle-rustling cases, an area of continuing concern in several districts. OTP further conducted a formal presentation before the Law & Order Committee and the Missing and Murdered Diné Relatives (MMDR) group, addressing proposed statutory amendments and systemic challenges affecting case progression.

3. Inter-Agency Coordination and Ethics-Related Matters

Clarifying evidentiary responsibilities and protecting prosecution readiness

Inter-agency coordination remained a priority during the quarter as the Office of the Prosecutor worked to ensure that investigative and administrative processes aligned with prosecutorial requirements and legal standards. OTP engaged with the Ethics Office on matters involving the service of subpoenas, evidence retention practices, maintenance of photo logs, and the authentication of audio and video evidence anticipated for use in potential proceedings. These discussions were necessary to clarify roles, responsibilities, and

evidentiary expectations at an early stage to avoid downstream complications affecting admissibility and case viability.

4. Investigations Branch Development

Strengthening investigative capacity and case follow-through

Within the Investigations Branch, OTP conducted interviews and completed the selection and recommendation process for new criminal investigators, including preparation of supporting memoranda and hiring guidance. The office also exercised oversight of investigative activity in matters where initial police action was incomplete or improperly classified, ensuring appropriate follow-up.

5. Internal Management and Workforce Oversight

Maintaining operational continuity and professional standards

Internally, OTP convened an all-prosecutor meeting focused on inclusion, communication, quarterly reporting expectations, and the identification of operational issues. Leadership engaged prosecutors on chain-of-command clarity and internal communication gaps and exercised active supervision in addressing staffing challenges impacting court operations.

6. Public Communication and Institutional Transparency

Providing accurate public information while safeguarding prosecutorial integrity

OTP advanced public communication and transparency efforts by revising and coordinating press releases, expanding media contact lists, and exploring alternative communication tools to provide concise public-facing updates on office activity.

7. Administrative and Institutional Governance

Ensuring compliance, accountability, and sound governance practices

From an administrative standpoint, OTP engaged with the Acting Deputy Attorney General regarding revisions to the Office's Plan of Operation, oversaw workforce compliance systems including Dayforce timekeeping requirements, and reviewed inter-agency requests for sensitive personnel information, determining when such information could not be released to protect institutional integrity.

Operational Challenges and Constraints

Systemic factors affecting prosecution readiness and case progression

(October 1, 2025 – December 31, 2025)

1. Investigative and Referral Deficiencies

Barriers to timely charging and case development

Investigative and referral deficiencies remained a recurring issue. In several instances, law enforcement agencies failed to timely forward complete reports in serious violent crime investigations. OTP also encountered reports labeled as "documentation only," which prevented meaningful prosecutorial review and delayed justice for victims. Missing or incomplete evidence, photographs, and inconsistent log numbering further complicated charging decisions and required additional follow-up by the office.

2. Court and Case Management Risks

Procedural pressures impacting case viability

Court and case management risks persisted in certain districts, including court clerks warning of potential dismissal for lack of prosecution. Cattle-rustling cases continued to present jurisdictional, evidentiary, and investigative challenges, requiring sustained coordination and resource attention.

3. Staffing and Operational Strain

Workforce challenges affecting service delivery

Staffing and operational strain also affected the office during the reporting period. OTP addressed the termination of an employee following sustained workplace conflict and refusal to comply with court expectations. This separation resulted in increased workload demands on remaining staff and necessitated interim coverage solutions. The office further faced difficulty in immediately replacing vacated positions due to recruitment timelines and workload realities.

4. Policy and Capacity Constraints

Balancing reform initiatives with implementation realities

Finally, OTP continued to navigate policy and capacity constraints as discussions progressed regarding potential enhancements to the Navajo Nation's criminal jurisdiction, including VAWA, TLOA, and STCJ authorities. The office exercised caution in these discussions, recognizing that staffing levels, detention capacity, funding, and compliance infrastructure must be in place to support sustainable implementation. Similarly, OTP balanced legislative momentum for Title 17 amendments with practical considerations related to training, resources, and system readiness.

Natural Resources Unit

The Natural Resources Unit (NRU) handles in general all legal matters pertaining to the development and use of the Nation's land and natural resources and protection of the environment. NRU provides legal assistance to the Division of Natural Resources, the Navajo Nation Environment Protection Agency and the Navajo Division of Transportation. This quarter work featured a significant amount of document reviews (rights-of-way, leases, contracts, memorandum of agreements, intergovernmental agreements, grant applications and agreements with various federal agencies), meetings, legal research, and addressing procurement issues.

Quarterly highlights include the review, revision, and finalization of Tribal Ranch Leases, as well as collaboration with the Navajo Nation Department of Agriculture to process a budget modification request to address outstanding payments on Arizona and New Mexico leases. Additionally, the quarter concluded with the completion of negotiations with the University of New Mexico on a contract to develop a database and web portal that will provide NDOT, stakeholders, and the public with access to comprehensive transportation infrastructure condition and traffic safety data.

This quarter featured efforts toward the drafting of an Energy Office Plan of Operation. The Minerals Department retained Red Streak, L.L.C. to support the Department of Justice (DOJ) and the Office of Legislative Counsel (OLC) in developing statutory and regulatory language, including a proposed Plan of Operation. As part of this engagement, Red Streak prepared a comparative matrix evaluating three structural options for the Energy Office: 1) establishment of a Navajo Holding Enterprise, 2) creation of an Energy Office, and 3) creation of a Navajo Energy Authority. These options were presented to the Resources and Development Committee (RDC) on October 29, 2025. The RDC selected the Energy Office model and directed that the draft Plan of Operation be further refined. At the RDC's request, the internal work group circulated the draft to Navajo Nation enterprises for review and comment, followed by a meeting with the enterprises on December 22, 2025, to discuss their feedback. An update on the revised Plan of Operation has since been provided to the RDC, and a work session is scheduled for January 23, 2025.

NRU participated in multiple meetings with the Navajo Nation Department of Agriculture, the Department of Resource Enforcement, and the Bureau of Indian Affairs (BIA) to address grazing-related issues. Discussions included proposed amendments to Title 3, development of proof-of-ownership documentation, livestock sales, overgrazing, trespass concerns, BIA permit verification and range inventory, NEPA compliance, drafting a

joint NN-BIA Standard Operating Procedure, challenges with probate and inactive permits, grazing permit management, and the use of TAAMS for permit tracking and planning.

NRU also continues its involvement with the Bears Ears Coalition and Commission. The Commission is actively engaging federal and state officials to prevent any reduction of the Monument's boundaries and to protect tribal co-management authority. Recent concerns involve potential congressional language that could diminish Bears Ears. The Commission is seeking to verify this information and has contacted Rep. Tom Cole of Oklahoma to request clarification and express opposition to any proposed reduction.

Water Rights Unit

The Water Rights Unit ("WRU") handles in general all legal matters pertaining to the Nation's water rights, primarily pursuing the Nation's water rights claims through settlement and enforcing the Nation's water rights in tribal, state, and federal tribunals. WRU has both legal and technical experts under contract to assist with litigation and non-litigation matters and the multi-jurisdictional nature of water rights. WRU also works closely with the Natural Resources Unit on energy matters.

This quarter featured a continuance of efforts directed toward water rights settlements pending in the 119th Congress: The Northeastern Arizona Indian Water Rights Settlement Act (S.953 & H.R.2025); the Navajo Gallup Water Supply Project Amendments Act (S.637 & H.R.1482) (including technical corrections for the Trust Fund interest); and the Navajo Nation Rio San José Water Rights Settlement Act (S.565 & H.R.1324). Accomplishments for the quarter include development of a revised storage pool proposal for the Northeastern Arizona Indian Water Rights Settlement Agreement and facilitating three meetings of the three settling tribes with representatives from the Department of the Interior and the Bureau of Reclamation providing language input. The Arizona Department of Water Resources also provided input on the storage pool proposal, and we had a meeting with the Upper Division States attorneys to discuss the storage pool proposal at the Colorado River Water Users Association Conference on December 17, 2025. With an effective date of November 19, 2024, WRU is coordinating implementation of certain obligations in the Settlement Agreement in addition to providing legal assistance to the Department of Water Resources, the Navajo Nation Environmental Protection Agency's Surface and Groundwater Protection Department, and other divisions and departments on water-related matters.

Litigation Unit

LU has one open senior legal secretary position and one open senior attorney position. The open senior legal position has been accepted by an applicant with an expected start date of February 2, 2026 and our open senior attorney position has been accepted by an applicant with an expected start date of January 20, 2026. LU will be fully staffed if both new staff start as expected.

LU continues to see a high volume of employment-related Request for Services (RFS) and employment-related cases filed. OHA still has no hearing officer, so all OHA hearings remain on hold until further notice. Though we have received second-hand information that a new hearing officer has been selected. We are prepared for an influx of OHA hearings if and when a hearing officer starts.

At the request of former AAG Erika Pirotte, the Nation intervened in a rate increase case in the Arizona Corporation Commission this quarter. LU spent a significant amount of time on the following Nation to Nation cases; Federal, Tribal, and State.

1. Federal Litigation

A) Opioid Litigation

The direct settlement agreement between the tribes and the Sacklers (the owners of Purdue Pharma) was finalized and the Nation agreed to participate. This will result in additional settlement funds to the Nation in the coming years, though not as large as our previous settlement amounts.

2. Navajo Litigation

A) District Court Litigation

- i. LU filed several motions to dismiss and answer in WRDC this quarter.
- ii. LU represented the Office of the Controller and the Office of Management and Budget in the ongoing intra-governmental litigation. This case took the bulk of LU time and resources this quarter.

B) OHA/NNLC

- i. OHA has no hearing officer so all hearings have been continued until further notice.

3. State Litigation

- A) Nation intervened in Arizona Corporation Commission Case regarding utility increases. Sage Metoxen is the attorney of record, but anticipate outside counsel taking this case over.

4. Other Projects

A) NNPPM Amendments

- i. LU and DPM presented the NNPPM amendments to HEHCS again, which resulted in disagreement with DOJ advice by HEHSC. HEHCS requested additional research from DOJ regarding division directors with codified authorities. LU provided this research and all further efforts on the NNPPM have stalled.

Tax & Finance Unit

The following are TFU's notable projects for the first quarter of FY2026. TFU responded to approximately 20 legal requests that were not submitted as formal Requests for Services (RFS), completed five formal RFSs, and surnamed two 164 reviews. TFU advised the Fiscal Recovery Fund Office (FRFO), the Office of the Controller (OOC), the Office of Management and Budget (OMB), the Office of the Navajo Tax Commission (ONTC), the Office of the President and Vice President (OPVP), the Investment Committee (IC), the Budget and Finance Committee (BFC), and the Navajo Nation Council. TFU advised the BFC, OMB, and OOC on budget related matters. TFU advised the Division of Human Resources (DHR), OMB, and OOC on budget procedures for the personnel vacancy pool as well as the DHR account for personnel bonuses and step increases that were funded in the FY2026 Comprehensive Budget. TFU advised clients on FRF-related matters, such as interpretation of Treasury guidance, Council resolutions CMY-28-24 and CD-54-24, and proposed modifications to legislatively approved expenditure plans. TFU participated in meetings with OMB, OOC, KPMG, and programs as part of the FY2024 audit process and assisted OMB and OOC in drafting and editing planned corrective actions on FY2023 Single Audit findings to be included in the FY2024 Single Audit Report. TFU drafted multiple Investment Committee resolutions. TFU reviewed a proposed agreement with Dayforce and helped negotiate terms to protect the Nation's interests. TFU assisted OMB in drafting letters to the Interior Business Center of the U.S. Department of the Interior regarding the delay in DOI's review of the Nation's indirect cost rate proposals. TFU assisted with appealing two Management Decision Letters from the U.S. Treasury regarding audit findings in the FY2020 and FY2022 Single Audit Reports. TFU worked with OLC on drafting legislation to establish the Capital Development Financing Fund.

Economic & Community Development Unit

ECDU spent a lot of time this quarter on large ongoing complex projects, including the exploration of new gaming technology, the transfer of operations at Antelope Point Marina to a new operator, and the development of the Navajo Small Business Credit Initiative program. Provided daily assistance to DED to increase efficiency and complete outstanding tasks for the NSBCI program. ECDU continued ongoing work with CPMD to complete contracts and procurements for chapters and constructions projects on the Navajo Nation.

1. Division of Community Development (DCD)

ECDU continued its work this quarter to provide support to DCD on their various construction projects, including projects funded by Fiscal Recovery Funds (FRF), New Mexico Capital Outlay Funds, and Navajo Nation funds. ECDU answered questions regarding the use of FRF monies and provided general legal support for FRF housing, bathroom additions, and chapter project. ECDU worked with CPMD this quarter to address concerns regarding the language in the New Mexico Intergovernmental Agreement. ECDU identified specific language to address with the State of New Mexico related to a 2025 change in state law related to the procurement code that needs to be harmonized in future agreements. A meeting to discuss the language in the agreement with the New Mexico Indian Affairs Department and Department of Finance and Administration is scheduled after the conclusion of New Mexico's 2026 legislative session. Met with Division Director Candice Yazzie and CPMD Director Michele Petersen in an effort to understand the current struggles for the Division and department and to help establish ongoing plans for work over the next year. As part of this, ECDU will be updating all of the template construction contracts for DCD and assisting CPMD with development of training for staff on contract development, oversight, and review and understanding. Construction project reviews this quarter did not focus on new projects, rather they focused on getting older projects further along. For example, the Cameron Chapter building that was approved last quarter is still pending with OOC to receive a contract number. ECDU is working to ensure this is taken care of, since the contract was deemed legally sufficient. One reason for contract numbers not being assigned is a lack of "Bid number" on a solicitation granted by OOC, which is not a legal requirement. We are working to address this as OOC cannot refuse to process legally binding contracts for arbitrary reasons.

2. Services Contract

Issued the final, updated Services Contract, including updated debarment/suspension and non-collusion forms for the Navajo Nation. This went live to the Navajo Nation October 21, 2025, and provided comprehensive in-house training to all of the Department of Justice attorneys and staff on the changes, including providing a contract review checklist they may use to assist in working with clients. Additional contracts, forms, checklists, etc. remain to be completed.

3. Division of Economic Development (DED)

- A) *Antelope Point Marina (APM)*. Continued to provide support to DED and serve as liaison among DED, Navajo Nation Hospitality Enterprise (NNHE), Antelope Point Holdings, LLC (APH)(non-Navajo company), and National Park Service (NPS) on issues involving transition of business operations to NNHE. Attended multiple meetings and two briefings about the transition of APH to the NNHE. A lot of progress was done in November and December, and it looks like transition of current management to NNHE will happen this year.
- B) *Navajo Small Business Credit Initiative (NSBCI)*.

- Loan Guarantee (LGP) and Loan Participation Program (LPP). Created templates for the LGP and LPP lender agreements that could be used by DED and given to any potential lenders. Negotiated the terms of LGP and LPP contracts with TransPecos Bank and Native American Bank. Negotiated Change Labs Technical Assistance (TA) program agreement. Created a modification to the Subrecipient Subaward Agreement for Change Lab's technical assistance program. Assisted with amendments to the TA program and the main agreement. Created Terms at a Glance sheets for LGP and LPP contracts as well as for the SRSA and SA. Drafted Maximum Feasible Cost justification memo.
 - Participating Lenders. Provided support to DED to obtain documents needed for 164 Review of Participating Lender Agreements with TransPecos Banks for large loan LGP and LPP and with First Southwest Bank for large loan LGP. Updated Participating Lender Agreement templates to incorporate lessons learned through implementation and negotiations.
 - TA Program. Finalized Subrecipient Subaward Agreement with Change Labs to provide technical assistance to Navajo owned businesses to enhance their loan readiness and ability to access loans supported by NSBCI. This Agreement will move forward in the next quarter after receiving program approval from U.S. Treasury.
 - Coordinated SSBCI training with outside counsel for new SSBCI team members at DED and NNDOJ.
- C) *New Market Tax Credits (NMTC)*. Currently working with DED and Sage Brush Hill to see if NMTC's could be a good fit for the Red Rock Factory, once a tenant is found.
- D) *Intellectual Property*. Continued work on trademark and Indian Arts and Crafts Act enforcement actions, including moving the two previously sent to Navajo Power and Navajo Power Homes to negotiation of a licensing agreement for use of the mark NAVAJO in their name. Met with the CEO of NACE to discuss ongoing efforts to protect Navajo artisans and assist in providing education on ways to use the Navajo flag and seal respectfully in creations. Last, we were able to apply for registration of the mark NAVAJO PEARLS. Because of the government shutdown, there is a delay in processing applications and we do not expect to receive approval until Spring 2026. Additionally, NACE agreed to forward reports of sellers and vendors in person and online that it comes across offering machine made Navajo Pearls by non-Navajo people for us to pursue enforcement actions against.
- E) *Business Regulatory Department*. Continued to engage in general representation of the Business Regulatory Department in its management and enforcement of business registration matters, including assisting BRD and the Tourism Department as it develops a process for permitting short term rentals on homesite leases, such as through Airbnb. Worked with BRD on identifying a process for building a program that permits Navajo homesite lease holders to offer their house for short term rental, such as what is done when someone rents a house on Airbnb. The program is still in its early stages and has been identified to involve multiple stages in the long run so that homesite lessees will be able to offer for lease structures on the homesite that are not the main dwelling, but this quarter brought the Tourism Department, Land Department, and others together to start discussions on exactly what policies, certifications, clearances, and permits would be needed.
- F) *Administrative and Management Plan Amendments*. Obtained confirmation from BIA Regional Office that the Business Site Leasing Plan Amendments do not require Secretarial approval. The Plan Amendments have gone through the Executive Review process and are ready for legislative action by the Resources and Development Committee.
- G) *Notable Lease Transactions*. Reviewed and supported DED sponsors to obtain approval by the DED Business Site Lease Approving Committee for new leases, including for the Lower Highway 89 project. Supported DED

to negotiate with Lessee and establish deadline for Crownpoint C-Store project benchmark. Also coordinated with Crownpoint Chapter, RDC Chair Jesus, Delegate Simpson, and OPVP to address concerns relating to the Crownpoint Hotel project. Assisted Fort Defiance RBDO in addressing holdover tenants on an abandoned trailer park in Ganado. Worked with various Navajo Nation entities including Real Estate Department, Land Department, and the Ganado Chapter to organize assistance (including funding and expedited home site lease applications) to move the 5 tenants off the premises. Provided guidance to DED on the Shonto Hotel lease based on the RDC resolution directing DED to negotiate a lease for the facility with NNHE.

4. Voting

Focused on meetings with Apache County to figure out how to best support the County in the upcoming election cycle. Met with the Attorney's Office regarding ongoing collaboration to address resource challenges and promote successful state and federal elections and voter education. Attended various voting meetings with Native American Voting Rights Coalition (NAVRC), All Voting Is Local, and ASU Indian Legal Clinic regarding support for Navajo election coordination efforts. Attended Tribal-County-State election convening at Ak-Chin Casino and the NAVRC Tribal Voting Conference at Wild Horse Pass and Brennan Center convening at Arizona State University. Maintained communication with Coconino County and Navajo County Election Directors regarding coordination for Navajo Nation voting locations. Tracked *Turtle Mountain v. Howe* case, pending review by United States Supreme Court, which could impact Navajo Nation's ability to protect Navajo voters by limited right of action for Voting Rights Act cases.

5. Office of Navajo Tax Commission (ONTC).

Worked on multiple projects for the ONTC. Provided support to ONTC regarding implementation of new Nicotine Products and E-Smoking Products Tax, amended Tobacco Products Tax, and the Utah's Tax Commission questions about implementation. Met with ONTC to discuss the priorities for the including the fuel excise tax waiver language, non-taxable transaction certificates, and requests for clarifications on sections of the Navajo tax code.

- A) *NTUA Reserve Funds*. BFD-51-18 and CO-16-17 pertain to setting aside 60% of collected taxes from public water and wastewater projects for NTUA to maintain utility systems through the Navajo Nation. Multiple meetings were held this quarter, and we are getting close to getting this operating. There are some challenges to implementation, such NTUA being required to file the forms for the contractors, when the contractors can submit the forms. Also, there is no process for reporting the numbers for accuracy, especially when only 60% of those collected taxes should be set aside. ONTC and NTUA are working on collecting retroactively to set aside the reserve fund. Lastly, there was a goal to reach \$10 million after sitting in a reserve fund and then being dispersed, however, the funds have not been set aside. There will have to be new legislation to correct some of these challenges.

6. Gaming:

ECDU provided support to Navajo leaders while they explore developments in the gaming market and the potential for changes to gaming in Arizona. Continued representation of NNGRO, including attending regularly scheduled meetings and assisting with contract negotiations and reviews for all NNGRO's needs and with NNGRO in-house amendments to Gaming Ordinance, which will ultimately be submitted to NNDOJ for review. Provided a half-day training to all NNGRO managers on the Navajo Nation Procurement Act, the updated services contract, and how to prepare a legally sufficient contract packet under the 2 N.N.C. § 164(B) documents review process. This was one of the first of soon to

be many client training courses that will help clients better understand the requirements when procuring, building and negotiating a contract, and overseeing the contract to completion.

Human Services & Government Unit

To assist with the safety and public welfare of our Navajo People, HSGU continues to provide assistance to the Navajo Police Department (NPD) with the negotiation and review of various law enforcement agreements with surrounding state, county, tribal agencies, and FBI to assist with mutual law enforcement services and also removing barriers to communication and information between law enforcement agencies throughout State in order to increase responsiveness and successful MMIP case outcome. In addition, three (3) law enforcement agreements, Coconino County, Navajo County, and Hopi Tribe, that were previously negotiated by HSGU have been approved and awaiting execution. Through HSGU and NPD monthly meetings, HSGU has been able to move agreements forward with direction and communication from NPD. To support the Navajo Nation's self-determination, HSGU continues to provide assistance to the Office of Management and Budget and 638-funded programs in processing contract renewals and attending Committee meetings for those renewals which had not been completed by the end of last quarter. The contract renewals were authorized by the Naabikiyati Committee and submitted to the Bureau of Indian Affairs. Further, HSGU advocated that federal agency's claim for disallowed cost against the Navajo Nation was unreasonable and that all funds were spent in accordance with applicable laws.

In this quarter, HSGU continues to work with the Navajo Department of Child Support Services (DCSS) by working on long-term policy amendments and to find creative ways to encourage compliance with child support obligations. HSGU conducts case staffing in every Agency of the Navajo Nation and also participates in hearings to ensure Navajo children are provided for in a meaningful way. HSGU has also begun pursuing enforcement of Navajo Nation child support obligations in foreign jurisdictions to ensure that all Navajo children benefit from the efforts of DCSS. To assist with the overall best interests and protection of the Navajo Nation, HSGU continues to work with the Risk Management Program and other Navajo Nation departments on the defense of both tribal and Federal Tort Claims Act administrative claims and cases filed in federal and tribal courts, as well as ensuring workers compensation claims are reviewed consistently with Navajo Nation law and policies. Furthermore, HSGU continues to review, negotiate contracts and agreements with non-Navajo Nation entities to ensure compliance with Navajo Nation laws.

Chapter Unit

A significant amount of work is generated from Chapter Officials, Chapter Staff, and the Administrative Service Centers (Division of Community Development) which includes attending all or most of the Agency Council Meetings and traveling to various venues to provide PowerPoint presentations to Chapter Officials and Staff. CU also provides legal guidance to other Navajo Nation Government Officials and Staff on subject matters related to Chapter governments. CU successfully completed seventy-six (76) requests for legal services ("RFS") this quarter which was nearly double the production from the prior quarter despite the resignation of one CU staff member in November. In spite of having one less team member, the amount of pending RFS has grown to one hundred and thirty-six divided among three (3) CU attorney staff. CU pleads with Leadership to consider additional staff for CU.

1. Amendments to the Local Governance Act (“LGA”). CU has been reporting on this project since 2023. In the first quarter, CU participated in a work session with the Resources and Development Committee and as a result, CU drafted new language to consider for Model A and Model B. CU also created a PowerPoint for the Public Hearing scheduled for January 12, 2026 at St. Michaels Chapter.
2. Shonto Hotel. Although the Chapter’s business site leasing authority has been temporarily suspended and given to the Division of Economic Development to carry out a lease for the Shonto Hotel, CU continued to participate in certain discussions involving the Hotel. On a related matter, the C-Store lease raised other matters which CU is currently reviewing. More details can be provided in a confidential setting
3. Use of Housing Discretionary Funds for Septic Tank Cleaning. CU issued guidance clarifying that septic tank cleaning qualifies as “plumbing” under the template Housing Discretionary Fund Management Plan.
4. Virtual-Hybrid Chapter Meetings. CU reminded all Chapters that in-person meetings are generally required but if they wish to authorize virtual-hybrid meetings for themselves, each Chapter needs to approve it by resolution or by referendum prior to conducting a virtual-hybrid chapter meeting. CU also reminded Chapters that CU developed a template Resolution and a template policy and procedures.
5. Navajo Transitional Energy Company (NTEC) Grants to Non-Governance Certified Chapters. CU participated in discussions surrounding historical practice of non-governance certified Chapters receiving NTEC grants despite not having a certified Five Management System and lacking contract authority under section 103 of the Local Governance Act. With the assistance of Delegate Dr. Nez, a process was developed for those Chapters to involve the Office of Management and Budget so such Chapters can benefit from those grants.
6. Community Land Use Plan Amendments by Governance Certified Chapters. CU reminded Chapters that section 103(E)(1) of the Local Governance Act, allows governance certified Chapters to amend their land use plans by following the ordinance procedures in section 2001 of the Act. Whereas, approval from the Resources and Development Committee is still required for plans arising from non-governance certified Chapters. There are a few land use plans pending legal review under the CU.
7. Old Ganado Trailer Park. CU participated in discussions surrounding the old trailer park and the attempt to evict tenants who remain on the property. At the end of the quarter, this matter was being handled by other DOJ Units.
8. Senior Center Plan of Operation. During the quarter, CU learned that Chapters are being asked to approve a plan of operation for their senior centers even though senior centers are managed by the DALTCS program. This will be an ongoing issue which we hope to resolve in the next quarter.
9. Disciplinary Action Reviews. CU continues to review disciplinary actions in coordination with the DOJ Litigation Unit. CU reviewed several disciplinary actions during the quarter to ensure compliance with applicable personnel policies.
10. Sales Tax for new Chapter Personnel. All Chapters receive a distribution of Navajo Nation Sales Tax which, under the statute and fund management plan, can be used for infrastructure, economic development,

and other governmental purposes. The question posed to CU is whether the fund can be used to hire additional Chapter personnel? CU hopes to finish its analysis in the next quarter.

11. OAG Assistance. When assigned, legal research provided for the Office of the Attorney General.
12. Chapter Trainings. In addition to the oral and written reports provided at Agency Council meetings, CU performed the following:
 - a. Five Management System Training at Red Mesa Chapter on October 28, 2025.
 - b. Procurement Training for Crownpoint Area Chapters at Crownpoint on November 12, 2025.

To conclude, during the 2025 calendar year, the Office of the Attorney General issued and published four Attorney General Opinions, which are attached for review.