

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

AGUA CALIENTE BAND OF	)	
CAHUILLA INDIANS, et al.,	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:20-cv-1136
	)	
STEVEN MNUCHIN, in his official	)	
Capacity as the Secretary of the United	)	
States Department of the Treasury,	)	
1500 Pennsylvania Ave., N.W.	)	
Washington, D.C. 20220	)	

DECLARATION OF THE CHICKASAW NATION

1. I serve as Senior Counsel to the Chickasaw Nation (Nation), an undersecretarial position within the executive department of the Nation's government. I occupy this position by appointment of the Nation's Governor, Bill Anoatubby.
2. The Nation has 70,924 citizens and occupies a treaty territory that spans 4,764,180 acres of present-day Oklahoma. The Nation has approximately 42,196 acres of land, which lands are either held by the Federal government in trust or by the Nation in fee simple or subject to Federal law restrictions on alienation. Individual Nation citizens hold an additional 34,758 acres as restricted allotments.
3. The Nation provides government programs and services to citizens and communities throughout this treaty territory, as well as throughout much of the rest of Oklahoma.
4. The Nation directly employs 13,248 persons, each of whom is either engaged directly in developing and providing government programs and services to our citizens and communities or in developing and generating the revenues necessary for the provision of the those programs and services.
5. The Nation's government programs and services include health care, food distribution, housing, family and social services, law enforcement, natural resource management, and other critical community infrastructure protection and maintenance functions. To develop and generate the revenues necessary for these programs and services, the Nation operates several gaming facilities under the Indian Gaming Regulatory Act, 25 U.S.C. § 2701, et seq., as well as other economic development enterprises.
6. In response to the current pandemic, Governor Bill Anoatubby issued an executive declaration of Tribal public health emergency and ordered the closure of all non-essential offices and programs, a necessary measure which required the suspension of our primary revenue-generating activities and placed thousands of employees on emergency leave.

7. Notwithstanding suspended revenue-generating activities, the Nation continues to provide essential programs and services on which its citizens and communities depend and continues to provide paychecks and benefits to employees who are unable to work. In addition, the Nation is incurring numerous unforeseen expenses associated with increases in basic operational costs, emergency public health measures, and other economic burdens imposed by the COVID-19 pandemic.
8. To meet these burdens, the Nation is incurring monthly expenses of approximately \$100 million, which we cannot offset due to the emergency suspension of revenue-generating activities. Our shouldering of this burden comes at significant cost to the Nation, but it reduces demands that would otherwise increase burdens on Federal and State public health and social safety net programs.
9. As the pandemic continues, the economic burden continues to mount.

I have personal knowledge of the facts stated herein, and if called on to do so, I would competently testify to each and all under oath. I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed May 3, 2020.



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Stephen Greetham  
Senior Counsel  
Chickasaw Nation