

**NATIVE AMERICAN LENDING STUDY/
ACTION PLAN REGIONAL REPORT**

**Midwest Region
Workshop
June 2-3 1999
Oklahoma City, Oklahoma**

Sponsored by
Community Development Financial Institutions Fund
U.S. Department of Treasury,
Oklahomans for Indian Opportunity
And
Oklahoma Department of Commerce



**THE COMMUNITY DEVELOPMENT FINANCIAL INSTITUTIONS FUND
DEPARTMENT OF THE TREASURY**

NATIVE AMERICAN LENDING STUDY/ACTION PLAN

OVERVIEW

This report summarizes the proceedings of the regional workshop conducted by the CDFI Fund in association with regional sponsoring Native organizations. The report also provides highlights of the study, the related CDFI Fund mission, the regional workshop process, affected stakeholders and a profile of participants. The results of the workshop are organized according to the major building blocks of the workshop agenda (also included) and accurately represents the wide range of issues, strategies and proposed actions that were developed through break-out teams of involved participants and stakeholders.

PURPOSE OF THE STUDY

The Native American Lending Study/Action Plan was authorized in the CDFI Fund's enabling legislation and requires the Fund to investigate and make recommendations to Congress and the President to eliminate barriers to private sector lending and investment on Native American Reservations and other land held in trust by the United States.

SCOPE OF REGIONAL REPORT

This report includes the following major sections:

- Native American Lending Study – An overview of the purposes of the study, a certification of authenticity of the contents and recognition of the co-sponsoring and supporting agencies.
- CDFI Fund Mission and Study Mandate – Summary of the overall CDFI Fund mission and outline of the major requirements established by Congress in Public Law 103-325.
- Workshop Process and Stakeholders – A summary of the process and principles that drive the workshop approach, as well as a listing of the major stakeholders involved in and affected by the proceedings of this report.
- Definitions – Definitions of terms used in defining barriers, impacts, strategies and actions as well as the responsibility and time frame codes used for the action planning step in the workshop process.
- Workshop Participants – A summary of the breakdown of the major types of stakeholders involved in the workshop.



- Workshop Agenda – The agenda for the two day session, noting the emphasis on team break-out sessions and presentations for maximum interaction among stakeholders, sharing of ideas and concerns, and bottom up planning on solutions to overcome identified barriers.
- Issues, Ideas and Remarks – Selected quotes from the court reporter transcript that represent the voices and visions of participants during the presentation segments of the workshop.
- Barriers and Impacts by Teams – A listing of the complete range of barriers and their related impacts developed by teams during the initial break-out sessions.
- Top Five Priority Barriers by Teams – The rank order priority barriers established by each team after reviewing and rating the entire range of barriers and impacts identified in the previous section.
- Priority Barriers and Their Impacts – A summary of the related impacts for each of the rank order priority barriers identified by each of the teams.
- Team Strategies and Actions – The strategies and action plans developed by the teams for each of the top five priority barriers. The action plans include identification of responsible parties and implementation timeframes.
- Participants – A list of workshop participants and their organizations.

DISCLAIMER

The contents of this report represents the recorded results of regional workshop proceedings. Materials in this report are derived from professional court reporter transcripts of proceedings, as well as presentation materials (flipcharts) prepared by workshop participants. As such, it is an authentic summary of participant issues and ideas and does not represent the policy or position of the U.S. Department of the Treasury.

CREDITS

The CDFI Fund expresses its deepest appreciation to the Oklahomans for Indian Opportunity and the Oklahoma Department of Commerce without whose extensive efforts this regional workshop would not have been possible.

WORKSHOP FACILITATOR

Charles W. Johnson, The Johnson Strategy Group, Inc.



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INTRODUCTION

CDFI FUND MISSION

The Community Development Financial Institutions (CDFI) Fund mission is to promote access and local economic growth by directly investing in and supporting community development financial institutions (CDFIs) and expanding financial service organizations' lending, investment, and service within under-served markets.

NATIVE AMERICAN LENDING STUDY MANDATE

Public Law 103-325-SEPT. 23, 1994 (108 STAT. 2187)

SEC.117.(c) Native American Lending Study –

- (1) In General. – The Fund shall conduct a study on lending and investment practices on Indian Reservations and other land held in trust by the United States. Such study shall –
 - (A) identify barriers to private financing on such lands; and
 - (B) identify the impact of such barriers on access to capital and credit for Native American populations.
- (2) Report. – Not later than 12 months after the date on which the Administrator is appointed, the Fund shall submit a report to the President and the Congress that-
 - (A) contains the findings of the study conducted under paragraph (1);
 - (B) recommends any necessary statutory and regulatory changes to existing Federal programs; and
 - (C) makes policy recommendations for community development financial institutions, insured depository institutions, secondary market institutions and other private sector capital institutions to better serve such populations.

WORKSHOP PROCESS

To assist in completing the study, the Fund is developing strategies and action plans to address key financing barriers and their impacts. These are being developed through thirteen regional workshops and one round table workshop in Washington, D.C. The regional workshops have the following major features:



1. Invitation to key stakeholders, including Native American organizations and populations, private for-profit and not-for-profit financial institutions, Federal financial regulatory agencies, and State/local agencies involved in the financing and economic development arena.
2. Workshops considered all types of lending and investing.
3. Ninety percent of the workshop involved break-out sessions where participants defined barriers, their impacts, strategies and action plans. Participants were encouraged to define solutions and strategies, not just problems and barriers.
4. Complete recording of results using professional court reporters and flipchart summaries of break-out sessions deliberations.
5. Maximum face-to-face networking among participants resulted in two-way education and built a foundation for future partnerships.
6. Results and relationship development are expected to have a “shelf-life” beyond the workshops and reports to Congress and the White House.

STAKEHOLDERS IN THE NATIVE AMERICAN LENDING STUDY

- U.S. President
- U.S. Congress
- Tribes and Native American Organizations
- Not-for-Profit Organizations
- Federal Financial Regulatory Agencies
- Federal Agencies
- Financial Institutions
- Secondary Market Organizations
- State Agencies

PARTICIPANT STATISTICS

Of the 47 participants attending the workshop:

- 25 were from Tribes
- 5 were from the private sector
- 17 were from the Federal, public, not-for-profit or educational sectors



DEFINITIONS OF TERMS

The following definitions were used by workshop participants and apply to this report:

- Barrier** Any impediment to lending and investment practices on Indian Reservations and other land held in trust by the United States. Barriers occur in a variety of forms, including Tribal, private sector, not-for-profit, State, Federal and regulatory settings.
- Impact** The effects on Native American populations on the inability to gain access to credit or capital for many types of financing or lending purpose. Each barrier can have more than one impact.
- Priority** The top five barriers in rank order with 1 being the highest priority.
- Strategy** A well thought out course of action to be taken to remove barriers and minimize their impacts. Strategies are generally longer term, involve a variety of resources and move toward measurable results. Each priority barrier can have more than one strategy.
- Action** The implementation of a strategy, having an outcome, a responsible party and a schedule for completion.
- Responsibility** The party or parties accountable for completing an action. For the purposes of this report, the following responsibility parties are used:
- Federal Agency (SBA, BIA, CDFI Fund, HUD, etc.)
 - Federal Regulatory Agency (Federal Reserve System, Office of Thrift Supervision, FDIC, etc.)
 - Financial Institution (commercial bank, credit unions, savings & loan, etc.)
 - Intertribal Organization (Inter-Tribal Council, Tribal business association, etc.)
 - Other (specify)
 - State Entity (State government, State Financing Authority, etc.)
 - Tribal Entity (Tribal government, Tribal enterprise, etc.)
 - U.S. Congress
 - U.S. President

Time Frame Time frames are as follows:

- Short term or up to 1 year
- Medium term or from 1 to 5 years
- Long term or 6 plus years



WORKSHOP AGENDA
CDFI FUND NATIVE AMERICAN LENDING STUDY/ACTION PLAN
MIDWEST REGION WORKSHOP
Oklahoma City, Oklahoma
June 2-3, 1999

This agenda is not designed as a conference or panel of speakers, but a workshop where participants, through facilitated workgroups, will identify barriers to accessing capital and credit on Indian Reservations and Indian Lands describe the impacts of such barriers, and create strategies and action plans to overcome barriers.

Wednesday, June 2

- 7:45 A.M. Continental Breakfast
- 8:30 Opening: Greeting and Remarks
- 8:45 Welcome and CDFI Fund/Process Overview – Rodger Boyd, Program Manager, CDFI Fund
- 9:15 Workshop Ground Rules and formats – Facilitator
- 9:30 Team Break-out No. 1: Identification of Barriers, Impacts and Priorities
- 11:30 Team Presentations of Barriers, Impacts and Priorities
- 12:15 P.M Lunch
- 1:15 Guidelines for Developing Strategies
- 1:30 Team Break-out No. 2: Strategies Development
- 4:00 Team Presentations of Strategies
- 5:00 Adjourn

Thursday, June 3

- 7:45 A.M. Continental Breakfast
- 8:30 Opening-Recap of Strategies from Day One - Rodger Boyd, CDFI Fund
- 8:45 Guidelines for Creating Action Plans - Facilitator
- 9:00 Team Break-out No. 3: Action Plans
- 11:30 Team Presentations of Action Plans
- 12:15 P.M. Open Forum (any remaining issues or opportunities)
- 1:00 Closing Remarks and Adjournment – Rodger Boyd, CDFI Fund



OVERVIEW

In order to provide a sense of the perspective and passions of participants, selected quotes from participant presentations have been abstracted from the court reporter transcript. This is a representative mix of the voices and visions and helps tell the story about concerns raised during the course of the workshop.

“ . . . think about what we're doing here today, why it is important, why we're doing this in Indian country. It is because our Indian Tribes and our Indian communities are involved in that effort of lifting themselves up. As we leave this 20th century, we look back on what life was like at this time 100 years ago. It was pretty bad, folks. Really bad.

The problems in Oklahoma were unique to the Tribes in Oklahoma, compared to the United States. And now we have a situation where although there are barriers and problems, we have incredible opportunities. A lot of these opportunities and the change in the political and social dynamic here in the United States has come from the hard fought efforts of several generations of Tribal leaders.

But those Tribal leaders were also inspired by their heritage, and the spiritual charge that they have to look out for their people. As each generation goes by, it is handed to them and they are told, ‘You're a leader now. Take care of your people in this modern way.’

At the same time, never forget the ancestors, and the spirit of our culture which makes us unique and different, and will indeed be part of the barriers that you look at, is that social and cultural difference that Indian people have, and how that can be reconciled and dealt with so that Indian people can also be a part of this growing, booming economy that's continuing to make the United States the leader in the world.”

—Curtis Zunigha, Oklahomans for Indian Opportunity

“Most of the Tribes in Oklahoma, their constitutions were formed under the 1936 Oklahoma Indian Welfare Act, and some of the Tribes in Kansas have the same form of constitution. It's an old fill in the blank Tribal Constitution form that [made] the “General Council”, the supreme governing body of the Tribe, and some powers were delegated by that General Council to a business committee. And it wasn't a real clear delegation, and it wasn't a real clear role that the General Council played. In our case, in 1971, we had 11, 000 members -- the General Council had 50 [members and a quorum of 26]. So, 26 people could decide for all 11,000 Potawatomis.

What they didn't have was the specific authority to waive Tribal sovereignty and dollar amounts for contracts. That authority was not granted to them. And that's the only way that a Tribe can make a viable contract, is to have the authority in its governmental documents to specifically waive Tribal sovereignty.

Within that 1936 constitutional act, most of the Tribes were given Federal corporations. That's the entity that should be doing business, that should be borrowing money, that should be making contracts. That Federal corporation has the authority to pledge assets, to waive Tribal sovereign [immunity, to enter into contracts] and to name a Court of Common Jurisdiction, if necessary.



And until Tribes get ready to make that step -- because of the Kiowa decision and other reasons, Tribes have to get to the point where they are willing to make, and able to make, a viable contract that's equitable on both sides.”

—John Barrett, First National Bank and Trust Company

“. . . originally, trust land was all about keeping the Indians from making contracts, because they weren't smart enough to keep from losing their land, or there was a predatory local taxing authority, State, county, municipal, whatever, that was taking the land away from them. It was to protect the Indians. Now that trust land is all about Tribal jurisdiction, it is a different status.”

—John Barrett, First National Bank and Trust Company

“. . . we are having a real transition within all Indian Tribes right now. We have 38 in Oklahoma. We are all under NAHASDA, which is Native American Housing and Self Determination Act. We have tended to start calling this the Self Termination Act, because it is really giving us some problems, and I think that we need some dialogues with lenders and bankers and underwriters and secondary market on the effects of NAHASDA, and the leveraging that we have.”

—Deanne Linn, retired from Apache Tribe of Oklahoma Housing Authority

“We are a Federally chartered corporation. . . That's what all Indian Tribes need to do. They need to have a Federal charter.

[Our corporation] has a sue and be sued clause in there, [that does not] limit the Tribe's sovereignty, there is a firewall [between the corporation and the Tribe]. We can enter into any kind of a contractual arrangement that corporate America wants to do.

There's a lot of opportunity for Indian Tribes to do business with corporate America, but they are not going to do it as long as they are afraid that -- just like that Kiowa situation, if they are going to say, 'I'm sorry. We're not going to honor that contract'.”

—Ed Allen, Chickasaw Nations Industries, Inc.

So this is a new kind of thinking that we have to go through. Banking and finance are critical for any community to grow. And we're an Indian community, and that's the only way that we're going to be able to grow, is through banking. We have to obtain the capital.”

“And although the Federal government expects us to be self-sustaining and self-governing, we keep hitting these catch 22 situations where you have to do this before you can do this. ‘Well, you can't be recognized this way until you're recognized another way.’ And it just doesn't work very well.”

“The Federal government expects us to be self-reliant, self-governing, but after 200 years of being on some kind of a Federal dole, you just can't go into the business world automatically. It takes time to develop this.



And all of us, as business people, know that most businesses -- 90 percent of all businesses that start up fail within the first three years. So how can they expect a Tribal government to automatically succeed just because they have been given business opportunities? You can't take us off of Federal programs and expect us to be financially secure and successful within two decades. It just doesn't work that way."

—Ed Allen, Chickasaw Nations Industries, Inc.

"It appears that in order for us to really be taken seriously, we have got to make the first move. We have to express who we are as Indian Tribes. We have to define sovereignty and if we wait around for a grant to hire somebody to do it for us, then we might as well wait around for, you know, the big mechanism of Federal government to do it for us. I thought we were in this age of self-determination.

. . .we recognize that we're the ones that have to go in there and make it happen, and we have to take a pro-active stand to identify who we are, what we stand for, what we want, and to be able to identify the opportunities and position ourselves to take advantage of those opportunities.

—Curtis Zunigha, Oklahomans for Indian Opportunity



OVERVIEW

Immediately after introductory remarks and presentation of workshop guidelines, participants were organized into teams, with each team representing a proportionate mix of stakeholder types who attended the workshop. Teams identified as many barriers and their related impacts as they could so as to provide an understanding of the issues that drive needed changes.

BARRIERS AND IMPACTS BY TEAMS

1 TEAM

BARRIERS	IMPACTS
1. Lenders, State and Federal agencies have varied interpretations of rules and regulations regarding Native American Tribes	<ul style="list-style-type: none"> • Refused loans or Letters of Credit for startups • Creates an atmosphere of stereotyping • Stops progress, development grants, economic development, etc.
2. Diminishing resources (trust lands, natural resources). Federal law is a barrier	
3. Tribal and State politics (nepotism)	<ul style="list-style-type: none"> • Prevents intertribal cooperation
4. Changes in Tribal government	
5. Cultural barriers	<ul style="list-style-type: none"> • Prevents empowerment and re-enforces entitlement
6. Cannot mortgage property (Tribal Government land) because of the Tribal Constitution	<ul style="list-style-type: none"> • When land cannot be used as collateral, loans don't get made
7. Individual lending requirements of SBA and other lenders	<ul style="list-style-type: none"> • No guaranteed loans from SBA
8. Ignorance of the workings of the financial world and individuals	<ul style="list-style-type: none"> • Limits progress



BARRIERS	IMPACTS
9. Native American Tribes have not marketed themselves very well	<ul style="list-style-type: none"> • Creates a precondition for lack of cooperation
10. Under-utilization of media	
11. Tribes are afraid to invest their money	<ul style="list-style-type: none"> • Opportunities missed
12. Sovereign immunity	<ul style="list-style-type: none"> • No waiver of sovereign immunity - no loan
13. Native Americans misunderstand financial mechanisms and personal responsibility	<ul style="list-style-type: none"> • No home buyer training
14. Sec. 184 and NAHASDA	<ul style="list-style-type: none"> • Tribes are forced to adopt foreclosure and eviction
15. HUD	<ul style="list-style-type: none"> • HUD taught Native Americans to compete with each other for money; pit one against the other • Creates Tribal non-cooperation • Does not empower
16. Banks require appraisals in rural areas	<ul style="list-style-type: none"> • There are no comps in rural areas so there are no appraisals
17. Environmental issues regarding: <ul style="list-style-type: none"> • Codes and zoning issues • Tribal Jurisdictional Statistical Areas 	
18. Redlining by lenders	
19. Native Americans cannot access low income tax credits	<ul style="list-style-type: none"> • No access to profit development dollars
20. Native Americans have been taught to use entitlement rather than empowerment	

“But those Tribal leaders were also inspired by their heritage, and the spiritual charge that they have to look out for their people. As each generation goes by, it is handed to them and they are told, ‘You’re a leader now. Take care of your people in this modern way.’ ”
–Curtis Zunigha, Oklahomans for Indian Opportunity



2 TEAM

BARRIERS	IMPACTS
1. Sovereign immunity	<ul style="list-style-type: none"> • Banks request waiver of sovereign immunity • Limits awareness of business issues by Tribal members • Prevents Tribal members from learning how to deal with the business environment • Limits access to capital • Limits ways to use capital
2. Lack of trust in banking	<ul style="list-style-type: none"> • Tribal members do not have trust in the financial community • Creates wider division between social groups • Indians don't feel comfortable with banks so they won't open a savings account, then they don't have access to capital, then there's no credit history and no savings
3. Fragmentation and lack of communication among the Tribes	<ul style="list-style-type: none"> • Makes each Tribe financially and politically less powerful • Unity is depleted • Discourages community participation • Tribes don't trust each other
4. Confusion between Reservation Indians and allotment Indians in Oklahoma	<ul style="list-style-type: none"> • Creates confusion in the State and Federal governments on Tribal issues (Laws written in Congress apply to Reservation Indians.) • Allotted land can be sold out of trust
5. Federal and State agencies are unaware of Tribal issues	<ul style="list-style-type: none"> • Increases time in submitting and approving Tribal applications – creates delay • Major impact on loans made • Tribes do not access lending or programs

“And that's the only way that a Tribe can make a viable contract, is to have the authority in its governmental documents to specifically waive Tribal sovereignty.”
–John Barrett, First National Bank and Trust Company



BARRIERS	IMPACTS
6. Lack of business education within Tribes	<ul style="list-style-type: none"> • No business • Expense goes to the Tribal member for turned down loans
7. Mergers of large banks	<ul style="list-style-type: none"> • They don't want to do business with Native Americans • They want collateral loans • Do not know about local issues • Obtaining unsecured loans, depersonalizing bank customers • Don't care about character loans
8. No credit history or banking relationship	<ul style="list-style-type: none"> • No loans
9. Lack of Tribal capital and collateral	<ul style="list-style-type: none"> • Cannot leverage funds for growth • Needs of Tribal members cannot be met
10. Spiritual, cultural and language differences	<ul style="list-style-type: none"> • No business growth • Remoteness from mainstream • Indians are not materialistic and cannot be placed into a free enterprise system



Teams discuss strategies and impacts during a break-out session.





BARRIERS	IMPACTS
1. Understanding sovereignty	
2. Lack of collateral	<ul style="list-style-type: none"> No loans for housing and businesses
3. Discrimination against Tribal organizations	
4. Lack of agency funding and resources; BIA, HUD and USDA have declined in funding over the years	<ul style="list-style-type: none"> Lack of needed funding for the most needy; those who need help can't get it Lost opportunities
5. Lack of market perception by lenders and lack of knowledge about Reservations and their issues	<ul style="list-style-type: none"> Little or no lending in Indian Country Missed opportunities to do business
6. Tribal lack of financial literacy	<ul style="list-style-type: none"> Detrimental impact on number of Native American applicants Missed opportunities
7. Regulatory illiteracy by agencies	<ul style="list-style-type: none"> Native Americans pay higher rates and fees
8. Tribal politics, infrastructure, legal structure and governance continuity	<ul style="list-style-type: none"> Lack of stability impacting policy, contracting and commerce Arbitration
9. Lack of partnerships and cooperation among Tribes	<ul style="list-style-type: none"> Reduced resources
10. Agencies: <ul style="list-style-type: none"> Have a history of not helping Lack sensitivity Are not changing with the times Are politically motivated Lack diversity Lack focus on rural issues 	<ul style="list-style-type: none"> Resources are not efficiently and effectively reaching people

“The Federal government expects us to be self-reliant, self-governing, but after 200 years of being on some kind of a Federal dole, you just can't go into the business world automatically. It takes time to develop this.”
 –Ed Allen,
 Chickasaw Nations Industries, Inc.



BARRIERS

IMPACTS

11. Lack of micro loans in the \$20,000 to \$25,000 range

- Rural areas don't get the small loans they need

12. Lack of grants for seed capital, especially through the BIA because the people go to other sources but they don't have the equity they need to qualify for SBA loans

- No loans are made



Presentations of barriers, impacts, strategies and actions by teams



4 TEAM

BARRIERS	IMPACTS
1. Lack of knowledge and misconceptions by bankers about Indian Country, and Tribes about banking	<ul style="list-style-type: none"> • Bankers are unable to analyze the risk and don't make loans • Tribes are unable to access credit
2. Lack of continuity and inherent instability in the current form of government that is predominant in Oklahoma	<ul style="list-style-type: none"> • Fear, lack of trust, and lack of investment/loans
3. There is no specific constitutional authority to waive Tribal sovereignty and dollar amounts for contracts	<ul style="list-style-type: none"> • Can't make a contract and don't have private sector participation
4. Racism	<ul style="list-style-type: none"> • Lack of access to credit • Lack of access to fair market prices • Lack of business opportunities
5. Trust land as collateral	<ul style="list-style-type: none"> • People can't enjoy benefits of their land • Difficult collateralization for banks
6. Lack of uniform documentation between the banks, regulatory community, Federal agencies and Tribes	<ul style="list-style-type: none"> • No uniform documentation that everyone knows will stand up. • Cost of doing business and bank reluctance to do business
7. Anti-Indian congressmen proposing laws before Congress to penalize Tribes for doing business on trust land	<ul style="list-style-type: none"> • Creates an uncertain tax structure for Tribal economic activity
8. Low income housing tax credit non-discrimination requirement	<ul style="list-style-type: none"> • Lack of utilization by Tribes
9. Lack of marketing of resources	<ul style="list-style-type: none"> • Under-utilization of Tribal assets



OVERVIEW

After identifying as many barriers as possible, teams were asked to establish a rank order of the top five barriers using a weighted rating system where each participant, basically, voted on the relative importance of the barriers. This section summarizes the rank order priorities of the barriers by team with number one being the most important and number five being the fifth in importance.

TOP FIVE PRIORITY BARRIERS BY TEAMS

	1 TEAM	2 TEAM	3 TEAM	4 TEAM
ONE	Lack of Knowledge About the Financial World	Sovereign Immunity There's a complete lack of understanding about the importance, even among Tribal people	Understanding Sovereignty	Lack of Knowledge
TWO	Sovereign Immunity	Spiritual and Cultural Differences	Lack of Collateral	Tribal Government Structure
THREE	Cultural Barriers	Lack of Trust in Banking	Lack of Market Perception by Lenders	Anti-Indian Congressmen
FOUR	Tribal and State Politics	Lack of Tribal Capital and Collateral	Tribal Financial Literacy	Trust Land as Collateral
FIVE	Varied Interpretations of Rules and Regulations	Federal and State Agencies are Unaware Regarding Tribal Issues	Lack of Funding and Resources	Lack of Uniform Documentation



OVERVIEW

For each of the top five priority barriers listed in the previous section, a summary of their impacts is listed. These impacts assist in understanding the effects of the barriers that need to be overcome in identifying solutions and strategies for change.



PRIORITY BARRIERS AND THEIR IMPACTS

	BARRIERS	IMPACTS
1	Lack of Knowledge About the Financial World	<ul style="list-style-type: none"> Limits Native Americans' progress
2	Sovereign Immunity	<ul style="list-style-type: none"> No loan if sovereign immunity is not waived
3	Cultural Barriers	<ul style="list-style-type: none"> Prevents empowerment and re-enforces entitlement
4	Tribal and State Politics	<ul style="list-style-type: none"> Prevents intertribal cooperation
5	Varied Interpretations of Rules and Regulations	<ul style="list-style-type: none"> Native Americans are refused loans or letters of credit for startups Creates an atmosphere of stereotyping Stops progress, development grants, economic development



2 TEAM

	BARRIERS	IMPACTS
1	Sovereign Immunity	<ul style="list-style-type: none"> • Banks request waiver of sovereign immunity • Limits awareness of business issues by Tribal members • Prevents Tribal members from learning how to deal with the business environment • Limits access to capital • Limits ways to use capital
2	Spiritual and Cultural Differences and Lack of Communication	<ul style="list-style-type: none"> • No business growth • Remoteness from mainstream • Indians are not materialistic and cannot be placed into a free enterprise system
3	Lack of Trust in Banking	<ul style="list-style-type: none"> • Tribal members do not have trust in the financial community • Creates wider division between social groups • Indians don't feel comfortable with banks so they won't open a savings account, then they don't have access to capital, then there's no credit history and no savings
4	Lack of Tribal Capital and Collateral	<ul style="list-style-type: none"> • Cannot leverage funds for growth • Needs of Tribal members are not met
5	Federal and State Agencies Are Unaware of Tribal Issues	<ul style="list-style-type: none"> • Increases time in submitting and approving Tribal applications – creates delay • Major impact on loans made • Tribes do not access lending or programs



3 TEAM

	BARRIERS	IMPACTS
1	Understanding Sovereignty	<ul style="list-style-type: none"> • Banks won't loan unless sovereignty is waived • Limits access to capital
2	Lack of Collateral	<ul style="list-style-type: none"> • Lenders not lending for housing and businesses
3	Lack of Market Perception by Lenders	<ul style="list-style-type: none"> • Little or no lending in Indian Country • Missed opportunities to do business
4	Tribal Financial Literacy	<ul style="list-style-type: none"> • Detrimental impact on number of Native American applicants • Missed opportunities
5	Lack of Funding and Resources	<ul style="list-style-type: none"> • Lack of needed funding to the most needy; those who need help can't get it • Lost opportunities



4 TEAM

	BARRIERS	IMPACTS
1	Lack of Knowledge	<ul style="list-style-type: none"> • Bankers are unable to analyze the risk and don't make loans • Tribes are unable to access credit
2	Tribal Government Structure	<ul style="list-style-type: none"> • Fear, lack of trust, and lack of investment/loans • Can't make a contract and don't have private sector participation
3	Anti-Indian Congressmen	<ul style="list-style-type: none"> • Creates an uncertain tax structure for Tribal economic activity
4	Trust Land as Collateral	<ul style="list-style-type: none"> • People cannot enjoy the benefits of their land • Difficult collateralization for banks
5	Lack of Uniform Documentation	<ul style="list-style-type: none"> • No uniform documentation that everyone knows will stand up • The cost of doing business and bank reluctance to do business



OVERVIEW

After prioritizing barriers and identifying the top five priority barrier impacts, the teams conducted two follow-up break-out sessions. The first session focused on identifying a range of strategies for each of the top five priority barriers. Each team then presented their strategies to the entire group and plenary session. The teams then returned to their break-outs and identified action plans, including responsibilities and time frames, for selected strategies. Please note that there may not be an action plan for every strategy since teams decided which are the most critical strategies that require action. Please refer to Definitions of Terms in the introduction for an explanation of responsibilities and time frames.

TEAM 1 STRATEGIES AND ACTIONS

BARRIER #1: LACK OF KNOWLEDGE ABOUT THE FINANCIAL WORLD

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Develop and implement education forums with bankers and Tribes	1. To get the NCAI (National Congress of American Indians) finance committee and AICC (American Indian Chamber of Commerce) to author a brochure for the financial community on how to work with Indian Tribes; how they're structured, what their barriers are and their financing needs	Intertribal Org. NCAI AICC	Short Term
	2. To get the ABA (American Bankers Association), State Bankers Associations to author a brochure for the Indian Community on what needs must be met to work with the financial community	Financial Inst. ABA State BA's	Short Term
B. Tribes will own and control banks			
C. Establish a Native American desk at lending institutions			



STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
D. Differentiate Tribal loans vs. individual Tribal members' loans, e.g. economic development vs. car loans			
E. Develop publications that explain banking and Tribes			
F. Identify catalysts for change to eliminate the status quo in lending practices			
G. Show opportunities in Indian Country to financial institutions			
H. Encourage the growth of Tribal enterprises			

BARRIER #2: SOVEREIGN IMMUNITY

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Educate all parties on the strengths and weaknesses of sovereignty; make bankers aware of the importance (Books and publications are available)			



STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
B. Utilize Sec. 17, Federal Cooperation for Tribal Business Activities	The American Indian Chamber of Commerce will conduct seminars or conferences on Section 16.17 of the Oklahoma Indian Reorganization Act, which relates to Federal corporations	Intertribal Org. AICC	Short to Medium Term
C. Tribes to develop their own commercial codes and provide financial institutions with the information they need	The AICC will also conduct seminars or conferences on commercial codes, i.e, UCC, Contract Law. Maybe the co-sponsor could be the National Indian Business Association	Intertribal Org. AICC	Short to Medium Term

BARRIER #3: CULTURAL BARRIERS

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Recognize and respect the cultural backgrounds of each diverse Tribe - afford Tribes the opportunities that banks afford to outside countries	1. Participate in annual national or State banking seminars or conferences and provide speakers; have informational books and materials	Intertribal Org. NCAI AICC NIBA	Short Term to Ongoing
B. Tribes to show banks the opportunities that exist in Indian Country through dialogue	2. Provide the financial community with opportunities to increase their participation and increase their market share		



BARRIER #4: TRIBAL AND STATE POLITICS

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Develop a uniform lobbyist group to encourage Native American growth and protect Native American issues	1. The State Commissioner of Indian Affairs provide a report card to Tribes on the voting records of State Congressional representatives	State Entity Intertribal Organization	Short, Continuing
B. Implement a public information campaign on behalf of Tribal issues	2. Also a national report through a national association such as NCAI, AICC, etc. Tribes need to understand that elected officials' voting records shows who they are and how they're going to react to the needs of the people		
C. Develop an inter-tribal discussion to recognize common opportunities			

BARRIER #5: VARIED INTERPRETATIONS OF RULES AND REGULATIONS

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Establish uniform rules and regulations throughout financial institutions and Federal agencies	Recommend a presidential executive order which mandates clarification and uniformity of rules and regulations that apply to Native American Indians	U.S. President	Short Term



BARRIER #1: SOVEREIGN IMMUNITY

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Develop outreach and educational initiatives for both lending and Tribal communities	1. Develop a mailing list from banks and Tribes for distribution of newsletters and other publications that would keep everyone informed of the sovereign issues	Financial Inst. Intertribal Org. Other (State Bank Associations)	Short Term
	2. Develop ongoing training class for regulators, banks, and Tribal leaders, and nonprofit groups on Tribal and banking culture, concepts, and definitions	Financial Inst. Intertribal Org. Tribal Entity Fed. Reg. Agency State Entity	Short Term
B. Research other Tribes' successful legal structures and programs	Research successful legal structures and programs and utilize them	Intertribal Org. Fed. Reg. Agency State Entity Federal Agency Other (American Bankers Association CD Committee)	Short Term
C. Examine existing codes and regulations for financial transactions to help with lending procedures so lenders can lend to Tribes without affecting their Tribal sovereignty	1. Review existing Tribal codes and make the recommended changes or develop the new codes	Tribal Entity Intertribal Org. Federal Agency (BIA)	Short Term
	2. Implement the changes and new codes into Tribal law	Tribal Entity	Short Term
	3. Notify Tribal members, lenders and regulators to keep them informed of the changes	Tribal Entity	Short Term



BARRIER #2: SPIRITUAL AND CULTURAL DIFFERENCES

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Develop a plan to educate Tribal leaders on financing and economic development	Develop a plan to educate Tribal leaders on financing and economic development	Tribal Entity Financial Inst. Fed. Reg. Agency State Entity Intertribal Org.	Short Term
B. Develop a plan to educate the non-Indian community on the value of traditional Native American culture	Develop a plan to educate the non-Indian community on the value of traditional Native American culture and distribute the information, possibly through a brochure	Tribal Entity Intertribal Org.	Short Term



BARRIER #3: LACK OF TRUST IN BANKING

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Develop a banking outreach program identifying the purpose and benefits of a bank	Adapt a banking outreach program to the Native American community. Get the banking industry more involved in the local areas and local issues	Financial Inst. Fed. Reg. Agency Other (ABA)	Short Term
B. Develop a Tribal training program on how to use banking services	Develop a Tribal training program on “how to use banking services”	Tribal Entity Financial Inst. Fed. Reg. Agency	Short Term
C. Encourage banks to hire and promote Native Americans	<ol style="list-style-type: none"> 1. Create a human resource action plan to hire and promote Native Americans into their programs 2. Recruit Native Americans from colleges into the banking industry 	Financial Inst.	Short Term
D. Encourage regulatory understanding of Native American issues and needs, i.e., understand what Native Americans need and help the banks incorporate that into their community reinvestment (CRA)	Hire and promote Native Americans into the Federal area	Fed. Reg. Agency	Short Term



BARRIER #4: LACK OF TRIBAL CAPITAL AND COLLATERAL

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Identify Tribal capital resources and potential opportunities with those resources	Identify Tribal capital resources and utilize them	Tribal Entity Fed. Reg. Agency	Medium Term
B. Tribes develop an overall strategic plan for the use of Tribal capital, including benchmarks	Develop a long-term Tribal financial strategy and action plan	Tribal Entity Financial Inst.	Long Term
C. Explore the establishment of alternative community financial institutions, e.g., CDFI, credit union, national bank, CDCs, etc.	1. Research the need in the marketplace of the local communities to determine if alternative financing is needed	Tribal Entity	Short Term
	2. Determine the feasibility of establishing alternative financial institutions	Tribal Entity	Short Term
	3. Establish a reference guide of alternative financial institutions for Native American communities	Financial Institution Fed. Reg. Agency	Short Term



BARRIER #5: FEDERAL AND STATE AGENCIES ARE UNAWARE OF TRIBAL ISSUES

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
<p>A. Improve or establish the relationship between State and Federal agencies and Tribal organizations</p>	<p>1. Develop a Tribal clearing-house to distribute, educate and provide information regarding Tribal issues and concerns, etc.</p>	<p>Tribal Entity Intertribal Org. State Entity</p>	<p>Medium Term</p>
	<p>2. Research Federal and State policies regarding Tribal issues</p>	<p>Tribal Entity Intertribal Org. Other (Federal Inter-Agency Council)</p>	<p>Short Term</p>



BARRIER #1: UNDERSTANDING SOVEREIGNTY

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
<p>A. Develop educational materials that explain the legal complexities of Tribal sovereignty and the Tribal specifics with relation to the trust lands where a particular Tribe is; also, the concept of a limited waiver of sovereign immunity and the impact on future contractual or lending opportunities</p>	<p>1. Develop, print and disseminate educational documents to financial institutions and government agencies about what each Tribe’s interpretation of sovereignty is and how it can be used in business</p>	<p>Tribal Entity Intertribal Org. (OIO) Other (Nonprofit) Federal Agency</p>	<p>Short Term</p>
	<p>2. Post an identifiable symbol or Statement of what sovereignty is at a point of “purchase” site such as an Indian funding project, government agencies, contractors or at that Tribe’s location</p>	<p>Federal Agency Tribal Entity</p>	<p>Short Term</p>
<p>B. Educate business communities particularly about sovereign immunity and its affect on business and how Tribes can leverage their sovereignty for Tribal and community development</p>			
<p>C. Educate State and Federal agencies about Tribal sovereignty and the particular Tribe’s status in the State and the business community</p>			



BARRIER #2: LACK OF COLLATERAL

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Identify the collateral requirements of the lenders and match them with available resources			
B. Promote debt equity and bonding capabilities			
C. Personal guarantees should be defined			
D. Tribes and lenders need to agree on who determines the appraisal value of collateral			
E. Reduce the risks for lenders and borrowers when making a loan	Have uniform documents on “How to Perfect a Collateral Agreement” in Indian Country and put in UCCs, leases, etc.	Tribal Entity Intertribal Org. State Entity (Oklahoma Dept. of Commerce)	Short Term
F. Evaluate the collateral provider, the value of their collateral and what the ultimate intent of the financial transaction is, i.e., home ownership			



BARRIER #3: LACK OF MARKET PERCEPTION BY LENDERS

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Determine Tribal long range planning needs in housing and economic development and approach lenders with this information			
B. Educate lenders about multiple legal and regulatory jurisdictions when trying to find capital for investment in a project	Put together a uniform “Banker Package” of leasehold agreements the Tribe has and UCCs to take to lenders when they are reluctant to lend to the Tribe	Tribal Entity State Entity (Oklahoma Dept. of Commerce)	Short Term
C. Educate lenders about the impact of the social welfare culture on today’s generation of consumers and how that is being overcome			
D. Educate the secondary market about the uniqueness of the Indian consumer market	Put together a uniform “Banker Package” of leasehold agreements the Tribe has and UCCs to take to lenders when they are reluctant to lend to the Tribe	Tribal Entity State Entity (Oklahoma Dept. of Commerce)	Short Term



BARRIER #4: TRIBAL FINANCIAL LITERACY

STRATEGY	ACTION	RESPONSIBILITY	TIMEFRAME
A. Overcome racism by investing in training and educating Tribal people in finances the Tribe won't need to hire a non-Indian			
B. Develop a market analysis of financial institutions and opportunities available to Tribes; know all the banks in the area, the Federal and State lending institutions, and all their requirements and rates	Develop an inventory of banks, financial institutions, funding agencies and identify criteria for eligibility; compare prices	Tribal Entity C.F.O.	Short Term
C. Create a database based upon market analysis findings and use it as a powerful tool to do planning and pursuing financial opportunities			
D. Initiate accountability through audited financials; a complete audited set of financial statements that can be presented to lenders	Develop complete legal, political, economic infrastructure, UCCs and supporting documentation (balance sheet)	Tribal Entity	Short Term



BARRIER #5: LACK OF FUNDING AND RESOURCES FROM AGENCIES

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Federal and State agencies provide additional appropriations			
B. Federal and State agencies reactivate the BIA grant and lending program			
C. Federal and State agencies identify resources across the board and complete a in-depth, exhaustive analysis of those resources; then network to find the best resource to fit the need for that particular Tribe or individuals	Develop a website or booklet that identifies all State and Federal funding institutions and agencies available to Indian Country - use for education and referral	State Entity (Oklahoma Dept. of Commerce) Federal (Dept. of Commerce, Treas. Dept.)	Medium Term



BARRIER #1: LACK OF KNOWLEDGE

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Provide information about Native American economic development	1. Provide a forum to disseminate information on resources, best practices, opportunities for education by inviting providers to share partnering opportunities and resources	Newly established Native American Economic Development Council to include ODOC, State Indian Affairs Commission, OIO, Financial Inst., Federal Agency, Intertribal Org., State Entity, Tribal Entity, U.S. Congress, City and County Council and Officials, Nonprofit	Short to Long Term
B. Educate the public			
C. Form effective marketing and outreach	2. Identify audiences and fashion a marketing/ outreach and education campaign (i.e., financial institutions, Federal agencies, intertribal organizations, State entities, Tribal entities, U.S. Congress, city and county council and officials, non-profits)		
D. Identify and research other resource providers and look for partnering opportunities; agencies and financial institutions partner to find out what opportunities are out there	3. Establish a Native American economic development council to include financial institutions, Federal agencies, intertribal organizations, State entities, Tribal entities, U.S. Congress, city and county council and officials, non-profits 4. Establish a follow-up mechanism including participants of CDFI workshop to discuss <u>NEXT STEPS</u>		



BARRIER #2: TRIBAL GOVERNMENT STRUCTURE

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Incorporate limited sovereign immunity waiver			
B. Networking and sharing best practices			
C. Tribal culture and constitution must support economic development opportunities and initiatives			

BARRIER #3: ANTI-INDIAN CONGRESSMEN

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Increase voter registration of Tribal members to vote congressmen out	Increase opportunities to register voters (tribal meetings, mail campaign for Tribal members out of State, Pow-wows, churches)	Tribal Entity Intertribal Org.	Short to Long Term
B. Provide an educational forum or medium to educate and inform Tribal members about relevant issues, what the candidate is doing, and suggest who to vote for	Public forums, Tribal newspapers, candidate debates	Tribal Entity Intertribal Org. Other (League of Women Voters)	Short to Long Term



STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
C. Build coalitions to promote economic development and educate voters on how this would impact them	<ol style="list-style-type: none"> 1. Identify other organizational common interests 2. Articulate benefits of Native American Tribe to local and region 	Tribal Entity Intertribal Org.	Short to Long Term
D. Identify and promote other viable candidates	<ol style="list-style-type: none"> 1. Identify issues for candidates to address 2. Identify State and local races that provide a good chance of winning 	Tribal Entity Intertribal Org.	Short to Long Term
E. Build rapport with regional government organizations and non-government organizations to work together	<ol style="list-style-type: none"> 1. Identify other organizational common interests 2. Articulate benefits of Native American Tribe to local and region 	Tribal Entity Intertribal Org.	Short to Long Term
F. Participate in local politics and forums and school board races and explain how this impacts the Tribe	<ol style="list-style-type: none"> 1. Identify issues for candidates to address 2. Identify State and local races that provide a good chance of winning 	Tribal Entity Intertribal Org.	Short to Long Term



BARRIER #4: TRUST LAND AS COLLATERAL

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Create leasehold provisions that satisfy all parties			
B. Explore alternatives on how to work around the trust land issue			
C. Disseminate and use best practices			
D. Develop uniform documentation to protect all parties to avoid starting from scratch in each individual case			

BARRIER #5: LACK OF UNIFORM DOCUMENTATION

STRATEGY	ACTION	RESPONSIBILITY	TIME FRAME
A. Ensure OMB will recognize and develop simplified, uniform document requirements whenever possible			
B. Reduce number and amount of forms for loans and make forms consistent from agency to agency			
C. Networking, educating, and sharing best practices			



WORKSHOP PARTICIPANTS



Workshop Participants

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