BradyMartz

Status Report of Forensic Accounting

As of July 30, 2026

Prepared For:
Northern Cheyenne Tribe
P.O. Box 128
Lame Deer, MT 59043

Prepared By:
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July 30, 2026

Northern Cheyenne Tribe
P.O. Box 128
Lame Deer, MT 59043

Introduction

Brady Martz was retained on behalf of the Northern Cheyenne Tribe (the "Tribe") to perform a forensic accounting of certain funds received and expended by the Tribe. On March 3, 2025, the Northern Cheyenne Tribal Council adopted Resolution No. DOI-100 (2025), authorizing a forensic audit of the Tribe's use of COVID-19 pandemic relief funds. On April 21, 2025, the Tribal Council adopted Resolution No. DOI-122 (2025), authorizing the retention of Brady Martz to perform the work. On June 30, 2025, Brady Martz received the authorization to proceed with our primary point of contact being the Director of Finance, Terrance Limpy and our scope of work to be:

1. Homeowner Assistance Fund (HAF) - Fund 815
2. Local Assistance and Tribal Consistency Fund (LATCF) - Fund 773
3. Governmental Services Fund - Fund 850
4. Economic Assistance Payments, Ag Operations and Small Business - Fund 830H
5. Morning Star Propane and Sanitation including but not limited to Funds 178B and 178C

The purpose of this engagement was to examine the disposition of the identified funds and to determine whether any funds were disbursed for purposes, or to recipients, that appeared inconsistent with the intended use of those funds. To complete this work, Brady Martz analyzed the available financial records, including bank statements and related documentation, and summarized the flow and use of the funds at issue. Due to the nature and complexity of this matter, Brady Martz coordinated its work with GableGotwals, legal counsel retained by the Tribe, as well as other professionals involved in related investigative efforts.

Clarification Regarding Terminology and Scope of Engagement

As a point of clarification, the term "forensic audit," which was used in the engagement documentation and in subsequent communications regarding this matter, is not a formally recognized accounting or auditing service under professional standards. While the term is sometimes used informally to describe investigative financial work, there is no professional engagement known as a "forensic audit."

An audit is a specifically defined service performed in accordance with professional auditing standards for the purpose of expressing an opinion on whether financial statements are fairly presented in accordance with generally accepted accounting principles (GAAP). The objective and procedures associated with an audit differ substantially from those of a forensic accounting engagement.

Brady Martz was engaged to perform forensic accounting procedures related to the specific funds identified in this report. The purpose of the engagement was to analyze available financial records, trace the flow and disposition of those funds, summarize how the funds were used, and identify transactions that may warrant further review by legal counsel, investigators, or other appropriate authorities.

Procedures Performed

Our analysis began by identifying the bank accounts through which the funds at issue were received and disbursed. Bank records generally provide the most reliable evidence for tracing the flow and ultimate disposition of funds. For the identified accounts, we obtained bank statements and available check images covering the period from early 2021 through mid-2025.

The bank statements were processed through specialized software to convert the activity into a format suitable for analysis. This process required substantial manual reconciliation due to the Tribe's extensive use of paper checks and because certain bank records and check images were incomplete or illegible. The process was further complicated by the issuance of a significant amount of checks in identical amounts, including distributions made under DOI-019, DOI-009, and DOI-022. In many instances, bank records contained limited or inconsistent identifying information, requiring additional procedures to properly match transactions to the appropriate payee. Additionally, the bank accounts used for the funds within the scope of our engagement also contained activity related to other Tribal funds and programs, requiring transactions associated with the funds under review to be identified and separated from unrelated account activity.

To identify transactions within the scope of our engagement, we compared bank activity to available general ledger records by fund. Through this process, we isolated and extracted the relevant transactions and summarized disbursements by fund, date, and payee. The volume of activity analyzed was substantial, consisting of several thousand transactions across multiple bank accounts. This phase of the analysis was completed in March 2026.

This analysis did not initially include Morning Star Propane and Sanitation, as detailed operational and transaction-level records were maintained separately from the Tribe's primary accounting records. The information initially provided consisted largely of summarized financial activity that did not contain the level of detail necessary to perform the same type of analysis conducted for the other funds included in this report. Access to the related QuickBooks records, which contained additional customer, sales, and transaction-level information, was not provided until June 2026.

In addition, Funds 178B and 178C are maintained within the Tribe's General Fund, which contains financial activity for numerous Tribal programs. Although bank records for the accounts containing these funds were obtained and reviewed, the commingling of significant unrelated activity limited the usefulness of bank records alone for purposes of evaluating Morning Star operations. Upon obtaining access to the QuickBooks records, we performed a preliminary review of the available information. Based on that review, we did not identify significant issues requiring the same level of detailed analysis and transaction testing that was performed for the COVID-related funds discussed elsewhere in this report. Accordingly, our work related to Morning Star remains limited but may be expanded as work progresses.

Due to the complexity of the analysis and the time required to obtain, organize, and reconcile the underlying financial records, the Tribe retained legal counsel and additional investigative professionals during the course of our engagement. To avoid unnecessary duplication of effort and to promote an efficient investigative process, Brady Martz coordinated with those professionals and provided analysis and support related to the tracing and summarization of the funds within the scope of our engagement. Our role was limited to the forensic accounting and financial analysis described in this report, and should be considered in conjunction with the work performed by legal counsel and other investigators.

Funds Examined

The funds within the scope of this examination, and the federal programs from which they originated, are described below.

Homeowner Assistance Fund (HAF) — Fund 815

The Homeowner Assistance Fund (HAF) was established by the U.S. Department of the Treasury to assist homeowners financially impacted by the COVID-19 pandemic. Eligible uses included mortgage assistance, utility assistance, housing-related expenses, and certain home repair costs. The Tribe received deposits totaling $2,363,141 beginning in July 2021. Disbursements began in February 2023, with total expenditures of $2,319,711 identified during the period examined.

Local Assistance and Tribal Consistency Fund (LATCF) — Fund 773

The Local Assistance and Tribal Consistency Fund (LATCF) was established under the American Rescue Plan Act and administered by the U.S. Department of the Treasury. The program provided eligible tribal governments with funding to support governmental services, infrastructure, operations, and other authorized activities. The Tribe received $4,158,707, which was deposited in February 2023. Disbursements began in March 2023, with total expenditures of $2,325,463 identified during the period examined.

Government Services Fund — Fund 850

Fund 850 reflects amounts received under the State and Local Fiscal Recovery Fund (SLFRF) program established by the American Rescue Plan Act. The program allowed tribal governments to address the effects of the COVID-19 pandemic, including supporting government services and replacing certain lost revenues. The Tribe received $8,520,745, which was deposited in August 2022. Disbursements began in October 2022, with total expenditures of $4,916,641 identified during the period examined.

Economic and Agriculture Assistance Fund (EC-AG) — Fund 830H

The Economic and Agriculture Assistance Fund (EC-AG) was established to provide economic and agricultural assistance related to the impacts of the COVID-19 pandemic. Based on available records, the revised budget and related expenditures associated with this fund totaled $2,735,099.

Morning Star Propane and Sanitation — Fund 178B and Fund 178C

Funds 178B and 178C relate to Morning Star Propane and Sanitation, a tribally owned enterprise established in November 2018 to provide propane and related services to community members and Tribal programs on the Northern Cheyenne Reservation. As discussed previously, our review of Morning Star was limited due to the availability of detailed records and was not performed to the same extent as the analysis of the other funds included in this report.

Summary of Where Funds Went

The major categories of disbursements from each fund are summarized below.

Fund	Received / Funded	Documented Disbursements
Homeowner Assistance (HAF) — 815	$2,363,141	$2,319,711
Local Assistance & Tribal Consistency (LATCF) — 773	$4,158,707	$2,325,463
Government Services (SLFRF) — 850	$8,520,745	$4,916,641
Economic & Agriculture Assistance (EC-AG) — 830H	$2,735,099	$2,735,099
Total	**$17,777,692**	**$12,296,914**

Homeowner Assistance Fund (HAF) — Fund 815

- Home repair contractors — $874,574
- Building supplies — $652,880
- Roofing (Bugle Ridge Roofing) — $358,660
- Payroll (program staff) — $181,157
- Direct homeowner assistance (mortgage lenders, utilities, direct assistance) — $98,872
- Miscellaneous vendors and administrative costs — $153,568

Local Assistance and Tribal Consistency Fund (LATCF) — Fund 773

- Construction and community facilities — $697,388
- Payroll (program staff) — $336,948
- Vehicles and heavy equipment — $290,717
- Indirect and administrative costs — $223,194
- Playground and recreation equipment — $156,493
- Bison and buffalo program — $151,159
- Tribal security systems — $110,703
- Consulting services — $100,843
- Utilities and infrastructure — $52,481
- Professional fees — $49,252
- Other payees — $156,285

Government Services Fund (SLFRF) — Fund 850

- Tribal payroll — $2,813,791
- Attorney fees (Ziontz Chestnut) — $498,396
- Council member & tribal travel and related expenses — $359,246
- Propane (Morning Star Propane) — $182,413
- Insurance — $176,167
- Utilities and office operations — $132,057

- Financial software and systems — $73,310
- Other payees: $681,261

Economic and Agriculture Assistance Fund (EC-AG) — Fund 830H
- Economic stimulus pass-through (People's Partner for Community Development), including a $45,000 administrative fee — $1,545,000
- Casino revenue-loss reimbursement (Charging Horse Casino) — $1,000,000
- Cultural and community events — $171,830
- Individual business assistance — $18,269

Detailed transaction summaries and payee-level schedules were prepared as part of our analysis and have been provided separately to Tribal legal counsel and investigators. Those schedules are not included in this report due to the volume of transactions and the ongoing nature of investigative activities.

Findings and Matters Requiring Further Review

During the course of our analysis, we identified a number of transactions and disbursements that warrant additional review. While the procedures performed as part of this engagement were primarily focused on tracing and summarizing the disposition of the funds identified in the scope of our work, certain transactions and payment patterns were noted that appeared inconsistent with the stated purpose of the underlying funding programs or otherwise raised questions requiring further investigation.

These matters have been communicated to the Tribe's legal counsel and other investigative professionals involved in this matter. Due to the ongoing nature of those investigations, this report does not include all information currently under review and should not be interpreted as a final determination regarding any individual, transaction, or potential violation.

Examples of matters identified during our analysis include:
- Travel, per diem, and expense reimbursements for which supporting documentation was incomplete, unavailable, or did not clearly demonstrate a Tribal business purpose.
- Payments made to, or for the benefit of, Tribal officials under programs for which eligibility or qualification criteria require additional review.
- Disbursements in which the ultimate recipient of funds differed from the intended recipient.
- Use of funds from programs with specific eligibility requirements in circumstances that require further examination to determine compliance with program guidelines.

The identification of these matters does not constitute a finding of wrongdoing. Rather, they represent transactions and circumstances that, in our professional judgment, warrant additional review by legal counsel, investigators, and other appropriate authorities.

Scope Limitations

The findings and observations contained in this report should be considered in the context of certain limitations encountered during the course of this engagement.

Brady Martz's role was primarily focused on the forensic accounting analysis of financial records and the tracing of funds within the scope of the engagement. To avoid duplication of effort, Brady Martz coordinated with legal counsel and other investigative professionals retained by the Tribe, who conducted additional investigative procedures, including obtaining records, conducting interviews, and pursuing information from individuals with knowledge of selected transactions.

Through regular communications with these professionals, Brady Martz was made aware that challenges were encountered in obtaining certain records, supporting documentation, and explanations relating to selected transactions. In some instances, requested records were unavailable, incomplete, or could not be located. In other instances, individuals believed to possess relevant knowledge either declined to provide information or did not provide information sufficient to fully explain the purpose, authorization, or disposition of certain transactions.

Brady Martz was also informed that federal law enforcement agencies obtained computers and other records for purposes of their own review. Brady Martz has not participated in or been provided the results of any such review. Accordingly, this report does not reflect any conclusions, findings, or determinations that may result from investigations being conducted by federal authorities or other investigative agencies.

Because certain records, explanations, and investigative procedures remain outstanding, the matters discussed in this report should not be viewed as the final resolution of all questions identified during the course of this engagement. Rather, this report summarizes the results of the forensic accounting procedures performed by Brady Martz and should be considered in conjunction with the work of legal counsel, investigators, law enforcement agencies, and any additional reviews conducted after the date of this report.

Qualifications and Compensation

This report was prepared by Tahnee Magnus, CPA, CFE, CFF with the assistance of Devon Westerlund, CFE, under her supervision and direction. Mrs. Magnus's qualifications are included in Appendix 1. Her standard hourly rate is $375.

We reserve the right to revise and supplement the report as further information becomes available and based on further work performed.

Sincerely,

Brady Martz

Brady Martz, PLLC

By,

Tahnee Magnus

Tahnee Magnus, CPA, CFE, CFF

BradyMartz

APPENDIX 1

STATEMENT OF QUALIFICATIONS

BRADY MARTZ, PLLC

Brady Martz is a regional accounting firm with offices in Grand Forks, Minot, Bismarck, Dickinson, and Fargo, North Dakota; Crookston and Thief River Falls, Minnesota; Sioux Falls and Marion, South Dakota; and Corinth, Texas. We provide full range of traditional public accounting services and have individuals that specialize in providing these services to specific industries. In addition, the Firm has a consulting practice within which we provide a wide range of business and litigation support services including litigation and forensic support services.

TAHNEE J. MAGNUS, CPA, CFE, CFF

Professional Background
Educated at University of Mary, Bismarck, ND

- Bachelor of Science in Accounting, Summa Cum Laude, December 2007
- Master of Business Administration, August 2009

Joined Brady Martz, Bismarck, ND, September 2011

Certifications
Certified Public Accountant - CPA (2009) – Awarded ND Top Performer on CPA Exam award
Advanced Defined Contribution Plans Audit Certificate (2019) – Issued by AICPA
Certified Fraud Examiner – CFE (2020)
Certified in Financial Forensics – CFF (2026)

Current Status
Principal at Brady Martz

Member: AICPA - American Institute of Certified Public Accountants
NDSCPA - North Dakota Society of CPAs
ACFE - Association of Certified Fraud Examiners
AICPA Forensics and Valuation Services Section

Work Experience
I have eighteen years of accounting experience which includes almost fifteen years in public accounting specializing in for-profit work and employee benefit plans. I started working in litigation support in 2018.

Testified in the following cases:

- Marilyn A. Keating, et al. vs. Janice G. DeFoe and Charles E. DeFoe, Southwest Judicial District, Civil case no. 01-2018-CV-00013, June 2020.
- Mitzel Contractors, Inc. vs. Eddy Mitzel vs. Leeroy Mitzel, et al., South Central Judicial District, Civil case no. 30-2019-CV-00322, February 2023.
- Brett Michael Kingstone vs. Trisa Ranae Tedrow Kingstone, Southeast Judicial District, Civil case no. 14-2023-DM-00006, December 2023.
- Jacob Hollingsworth vs. Katie Hollingsworth in District Court, South Central Judicial District, Divorce case no. 30-2023-DM-00125, February 2024
- Steven Holte, et al. vs. Tiah E. Rigby, as the Personal Representative of the Estate of Nathan Holte, et al., Northwest Judicial District, Civil case no. 53-2021-CV-01204, February 2024
- Chance Berger vs. Kimberly Berger in District Court, South Central Judicial District, Divorce case, Civil case no. 30-2024-DM-00200, October 2025

Deposed in the following cases:

- Freeway 147, Inc., aka Flying J-511 vs. Glass Concrete Construction, Inc, South Central Judicial District, Civil case no. 30-2018-CV-00214, 2022
- Northern Improvement Company vs. Marilyn Koch as Personal Representative for the Estate of Michael P. Koch, South Central Judicial District, Civil case no 30-2018-CV-00159, July 2022
- Mitzel Contractors, Inc. vs. Eddy Mitzel vs. Leeroy Mitzel, et al., South Central Judicial District, Civil case no. 30-2019-CV-00322, October 2022.
- Hammer-Up Construction, LLC vs. Alton Hot Shot Services, Inc. d/b/a 3 Forks Services, Northwest Judicial District, Civil case no. 53-2024-CV-00392, July 2025

Speaking Engagements

"Emerging Fraud Trends and AI in Banking" presented to the ICBND's Emerging Leaders Program, June 2025

Continuing Education

CFF Learning Pathway courses, AICPA, June 2026
Forensic & Valuation Services Conference, AICPA, November 2021, October 2024, October 2025
Analyzing Bank Statements, ACFE, December 2023
Expert Witness Skills Workshop, AICPA & CIMA, November 2022
Core Forensic Accounting courses, AICPA, October 2020 through October 2021
Various courses on tax, accounting and fraud related issues