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REPORT ON MISUSE OF FEDERAL FUNDS

TO: Northern Cheyenne Tribe

FROM: R. Trent Shores and Hillary K. Stuart

DATE: May 1, 2026

SUBJECT: Potential Criminal Liability for Identified Tribal Members

I. Executive Summary

This report has been prepared to document findings from a multi-source forensic financial examination of expenditures made from tribal and federally-administered fund accounts. The report draws from four sources: (1) tribal financial ledger data for the Government Services Fund, Homeowner Assistance Fund (HAF), EC-AG Fund, and LATCF; (2) a Travel Fraud Affidavit prepared by Special Prosecutors (GableGotwals, April 20, 2026); (3) the Forensic Examination weekly meetings and notes held from December through April 2026; (4) witness interviews given to FBI and HHS agents.

The financial record review identifies payments to the individuals identified from the reviewed fund sources. Beyond those direct fund payments, the prosecution and ongoing forensic exam have identified a broader pattern of conduct including payments to Melissa Fisher through her ex-husband's construction company, use of the Housing Improvement Program for an ineligible well installation, double-billing of education benefits, and a suspected scheme involving two non-profit organizations (the Northern Cheyenne Development Corporation and People's Partners for Community Development) through which federal COVID-19 relief funds may have been funneled for personal benefit.

This report does not make final legal conclusions. Those determinations rest with ongoing criminal proceedings and the FBI investigation to which certain matters have been referred. The



purpose of this report is to ensure Tribal leadership is fully informed of the scope and specific nature of findings to date.

II. Review Process and Methodology

A. Background

In March 2025, President Gene Small initiated a forensic exam of portions of the \$63 million in federal funds allocated to the Northern Cheyenne Tribe from 2021 to 2025, citing transparency concerns. On August 20, 2025, Tribal Members provided the FBI with allegations of fraud by former Tribal Council members. On November 1, 2025, Special Prosecutors were engaged to investigate fraud allegations and prosecute criminal charges stemming from an October 8th incident. The forensic exam has been conducted by BradyMartz, a certified public accounting firm, under attorney supervision.

B. Fund Sources Examined

Four primary fund sources were examined for direct payments to identified individuals:

1. Government Services Fund (Fund 850) — General administrative and operational account funding travel, salary advances, PR assistance, cultural activities, and member services.
2. Homeowner Assistance Fund (HAF, Fund 815) — Federally-administered program for qualifying homeowners; subject to HUD guidelines on eligible uses.
3. LATCF (Fund 773) — Federal fiscal relief fund for tribal governments with broad governmental use authorization.
4. EC-AG Fund — Economic cooperation and assistance fund, including powwow and cultural event programming.

Additionally, the prosecution and forensic exam team identified transactions and fund flows involving ARPA funds (SLFRF), the Housing Improvement Program, the WIOA federal education program, and funds flowing through NCDC and PPCD — two non-profit entities that are separately addressed in Section IV of this report.

C. Forensic Financial Examination

BradyMartz conducted a systematic review of check registers, bank statements, general ledgers, and award ledgers. Transactions were organized by payee and cross-referenced against supporting



documentation. Legal counsel reviewed patterns of expenditure for consistency with applicable fund guidelines and tribal policies. The forensic exam team met weekly with Special Prosecutors during the review period.

D. Travel Fraud Investigation

Special Prosecutors directed a parallel travel fraud investigation. Third-party records requests were submitted to conference sponsors including Falmouth Institute and KIVA Accounting to verify whether funds advanced for conferences were actually used. Open-source review of publicly available social media was also conducted. The resulting Travel Fraud Affidavit documents specific verified findings incorporated herein. Additionally, former FBI agent and CPA John Tealing is being retained by the Tribe specifically to support the travel fraud investigation.

E. Status of Legal Proceedings

Certain matters have been referred for criminal prosecution in Northern Cheyenne Tribal Court and for investigation by the FBI. The FBI has been provided with five hard drives of tribal financial records for imaging and analysis. The FBI's investigation is specifically focused on: (1) the NCDC and PPCD non-profit fund flows, and (2) wire fraud charges related to travel fraud. The October 8, 2025 trespass/criminal interference case (NCT v. Ontiveras et al.) is separately pending in Tribal Court, with trial anticipated in mid 2026.

F. Statute of Limitations

The conduct described in this memorandum is prosecutable under both tribal and federal law, subject to filing within applicable time limits.

Under the New Northern Cheyenne Law and Order Code (October 2025), theft and related charges must be filed within two years. The prior tribal code allowed a five-year filing period, which may still apply to conduct that occurred before that October 2025.

Unlike federal law and many other tribal codes, the revised Northern Cheyenne Law and Order Code has no savings clause that pauses (tolls) the statute of limitations until the fraud is discovered. The conduct must be prosecuted within two years, whenever it is discovered. For offenses that occurred before October 1, 2025, the tribal court will first need to decide which limitations period applies and when it started to run.

On the federal side, wire fraud charges carry a five-year limitations period, which currently reaches back to May 2021 — covering almost everything documented in this memorandum.



Because the fraud is charged as a continuing scheme, the clock runs from the most recent act, which occurred in August 2025, bringing the entire course of conduct comfortably within the federal window.

G. Limitations of Findings

This report was prepared for the exclusive use of the Tribal President and senior Tribal leadership. It is confidential. Travel fraud findings and content incorporated herein are attorney work product prepared in connection with ongoing criminal proceedings; distribution of those materials should be coordinated with Special Prosecutors before any public disclosure.

This report summarizes financial records and investigative findings as available to the review team at the time of preparation and does not constitute a complete financial audit. Inclusion of any individual does not constitute a finding of criminal guilt or civil liability.

III. Findings by Individual — Direct Fund Payments

The following section provides a summary of direct payments from tribal fund accounts to each identified individual. Financial totals are anchored to the attached spreadsheet ledger data. Travel fraud findings are drawn from the April 2026 attorney affidavit. Additional findings appear in Section IV.

1. Kristi Killsnight / Harris

Service Period: April 8, 2012 – September 19, 2025 | **Role:** Tribal Treasurer

Total Payments Identified:	\$59,522.58 (largest of all individuals reviewed)
Government Services Fund:	\$39,522.58
Homeowner Assistance Fund (HAF):	\$20,000.00 (HAF Req. REQ-1842/REQ-1850; Home Depot \$8,124 + Shoulderblade Construction \$11,876)
EC-AG / LATCF:	\$0

Kristi Killsnight/Harris received the largest aggregate total among individuals reviewed and is the subject of the most thoroughly documented travel fraud findings. As Tribal Treasurer, she occupied a position with authority over financial approvals and travel advance processing, which gave her both the ability to submit advances and, in some instances, to participate in approving others' requests. Government Services Fund records reflect extensive travel across multiple years



— Las Vegas (multiple trips), Temecula, Phoenix, Seattle, Bismarck, Denver, Missoula, and Billings among other destinations. HAF records reflect two disbursements totaling \$20,000 for stated displacement assistance, including payments to vendors. Education-related double-billing and additional PPCD matters are addressed in Section IV.

■ VERIFIED TRAVEL FRAUD FINDINGS — Kristi Killsnight / Harris	
Falmouth Institute — 'Managing Conflict in the Workplace' (Las Vegas, Sep. 18–21, 2024)	KK received Check No. 3473 for \$1,395.00. Records request to Falmouth Institute (signed by President Small, Feb. 20, 2026; responded Feb. 25, 2026 by Jennifer Newton) confirmed KK was a NO-SHOW and had an outstanding unpaid balance of \$935.00. The registration fee was never paid. Check 3473 has not been returned to the Tribe. Falmouth also disclosed KK was recorded as a no-show at other Falmouth conferences.
KIVA Accounting Conference (Las Vegas, Dec. 4–8, 2023)	KK received Check No. 2236 for \$1,053.00. KIVA's records (confirmed by Lynn Dalton-Nuvasma, March 2, 2026) show KK never paid the registration fee; payment status remained 'pending.' No evidence Check 2236 was returned to the Tribe. A separate KIVA inquiry also found KK not registered for the Sixth Tribal Finance Conference (Check 3069, \$1,682.89).
Sixth Tribal Finance Conference (Temecula, CA, June 17–20, 2024)	KK received Check No. 3069 for \$1,682.89 (approved by Debra Charette). KIVA official records do not reflect KK as registered for or attending this event. Only one KIVA event was ever registered by KK — a separate, already-documented fraudulent trip. Check 3069 has not been returned to the Tribe.
Seattle / Tribal Attorney Meeting (June 26–30, 2024)	KK received \$2,071.63 (Check 3294, approved by Debra Charette). Hotel confirmation was for the Muckleshoot Hotel and Casino in Auburn, WA — 45 minutes from Seattle — booked as a 'luxury 2 bedroom.' KK's son's basketball team (Rez Runners) participated in the MarJon Beauchamp All-Native Tournament at the Muckleshoot Community Center during the same dates. Publicly available photographs confirm KK's son's presence at the tournament.
Bismarck, ND — 'Support Tribal Members' (April 19–21, 2024)	KK received \$856.88 (Check 2969). The 9th Annual 'Missouri River Shootout' basketball tournament took place in Bismarck April 19–21, 2024. KK's son's team, the Rez Runners, was



	registered to participate. Lodging corresponded with the tournament venue, not a documented official meeting.
Denver — Gallagher Insurance Meeting (March 26–29, 2025)	KK received \$1,534.10 (Check 88759, approved by Melissa Fisher). Inquiry to Gallagher Insurance indicated it would be unusual for an insured to travel to the insurer's office. KK's public social media showed her in Denver in context consistent with a family basketball tournament (her son had a tournament there the same dates). No meeting agendas, minutes, or confirmation of an in-person meeting have been produced as of the affidavit date.
NAFOA Conference, Phoenix/Mesa, AZ (June 2023)	KK was fronted \$984 on June 23, 2023 for the stated NAFOA Conference. However, the NAFOA conference was in October 2023, not June. On June 24, 2023 — the day after receiving funds — KK's son's basketball team was in Mesa, Arizona (adjacent to Phoenix) for a tournament.
Missoula / AIMS Camp (June 2023)	KK received approximately \$450.00. Her public Facebook post dated June 6, 2023 stated the family received a last-minute call that a bed opened at AIMS Camp, so they rushed to take a child and 'off to the hot spring we went.' Taking a child to camp and visiting a spa is not an official tribal purpose.
Lawrence, Kansas / Haskell University (Aug. 26–30, 2025)	KK and Melissa Fisher each received \$1,496.00 (Check 90274). The only supporting document was a Haskell University orientation schedule. Open-source records show KK's daughter graduated high school in May 2025 and enrolled at Haskell that fall; travel dates correspond with freshman move-in. No official business justification was documented.

Name	Paid	Reconcil	Owes/Owe	Paid	Reconcil	Owes/Owe	Paid	Reconcil	Owes/Owe	Paid	Reconcil	Owes/Owe
FIRST INTERSTATE BANK							39,614.56			39,614.56		39,614.56
LONEBEAR, MELISSA	455.74	455.74	-	-	-	-	37,484.60	17,849.30	19,635.30	37,940.34	18,305.04	19,635.30
KILLSNIGHT, KRISTI	-	-	-	-	-	-	29,476.08	10,428.78	19,047.30	29,476.08	10,428.78	19,047.30
FISHER, MELISSA	455.74	455.74	-	-	-	-	21,479.01	16,318.54	5,160.47	21,934.75	16,774.28	5,160.47
CHARETTE, DEBBIE	455.74	455.74	-	-	-	-	20,411.34	20,429.98	(18.64)	20,867.08	20,885.72	(18.64)
LIMBERHAND JR., DONAVIN	-	-	-	-	-	-	18,432.35	11,948.02	6,484.33	18,432.35	11,948.02	6,484.33
LITTLEMOUTH SR., ERNEST	-	-	-	-	-	-	17,014.66	10,136.87	6,877.79	17,014.66	10,136.87	6,877.79
SPOTTED HORSE, GWEN	455.74	455.74	-	-	-	-	15,881.60	16,661.71	(780.11)	16,337.34	17,117.45	(780.11)
LITTLE EAGLE, SILVER	-	-	-	-	-	-	14,914.81	14,076.02	838.79	14,914.81	14,076.02	838.79
LATTITUDES TRAVEL	-	-	-	-	-	-	12,878.37	7,654.79	5,223.58	12,878.37	7,654.79	5,223.58
FOOTE, EVA M.	-	-	-	-	-	-	10,508.19	5,694.27	4,814.92	10,508.19	5,694.27	4,814.92
DAVIE, TORREY	455.74	455.74	-	-	-	-	9,065.56	5,184.23	3,881.33	9,521.30	5,639.97	3,881.33
FRIESZ, NIZHONI	-	-	-	-	-	-	8,324.75	4,801.54	3,523.21	8,324.75	4,801.54	3,523.21
GOURNEAU, NORMA	-	-	-	-	-	-	7,711.81	8,724.45	(1,012.64)	7,711.81	8,724.45	(1,012.64)
RED STAR, EDINA	-	-	-	-	-	-	7,564.34	5,763.10	1,801.24	7,564.34	5,763.10	1,801.24
WETHERELT, SERENA	-	-	-	-	-	-	7,000.55	9,088.17	(2,087.62)	7,000.55	9,088.17	(2,087.62)

Travel reimbursement chart — funds advanced vs. unreconciled across individuals



THE FRONT OF THIS DOCUMENT HAS A COLORED BACKGROUND AND WHITE PAPER

NORTHERN CHEYENNE TRIBE
TRIBAL GENERAL FUND
P.O. BOX 128
LAKE DEER, MONTANA 59043

FIRST INTERSTATE BANK OF COMMERCE
COLSTRIP, MONTANA

88759
88759

93-168/929

LITTLE WOLF AND MORNING STAR - Out of defeat and exile they led us back to
Montana and won our Cheyenne homeland that we still keep forever.

***One Thousand Five Hundred Thirty Four and 10/100 Dollars

DATE 3/20/2025 AMOUNT \$1,534.10

VOID AFTER 90 DAYS

KILLSNIGHT, KRISTI

AY
O THE
ORDER
IF:

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

⑈088759⑈ ⑆092901683⑆ 1501073736⑈

NORTHERN CHEYENNE TRIBE - TRIBAL GENERAL FUND

88759

payee KILLSNIGHT, KRISTI
endor ID PR6105 Account #: 88759
3/20/2025

Description	Amount
TRAVEL TO DENVER CO TO MEET WITH GALLAGHER INSURANCE FOR RENEWAL THAT ENDS 5/30/2025 00 1250 100G	\$1,534.10

Killsnight travel reimbursement: Denver / Gallagher Insurance trip (Check 88759, \$1,534.10)



Facebook: Killsnight at son's basketball tournament in Denver — same dates as “Gallagher Insurance” trip

4/15/2024	2648	KILLSNIGHT, KRISTI	TRAVEL TRAINING M&E MILEAGE LAS VEGAS, NV	(45,150.04)
4/16/2024	2914	KILLSNIGHT, KRISTI	TRAVEL TRAINING HOTEL LAS VEGAS NV	(45,150.04)
4/17/2024	2969	KILLSNIGHT, KRISTI	TRAVEL 4-19-21/24	856.88 (48,278.44)
4/18/2024	2987	KILLSNIGHT, KRISTI	TRAVEL 4-19-21/24	856.88 (48,278.44)

Las Vegas travel reimbursement records (April 2024)



Facebook: Killsnight Las Vegas personal vacation — travel charges billed to Tribe 4–5 days later

6/23/2023	1890	KILLSNIGHT, KRISTI	TRIP TO LAS VEGAS FOR PERSONAL VACATION	984.00	63,874.60
7/10/2023	1890	KILLSNIGHT, KRISTI	TRIP TO LAS VEGAS FOR PERSONAL VACATION	781.07	63,200.71

Killsnight travel packet: June 2023 “NAFOA Conference” advance (\$984)

This event has passed.

NAFOA 2023 Fall Finance & Tribal Economies Conference

October 1, 2023 5:00 pm - October 3, 2023 5:00 pm EDT

[ADD TO CALENDAR](#)

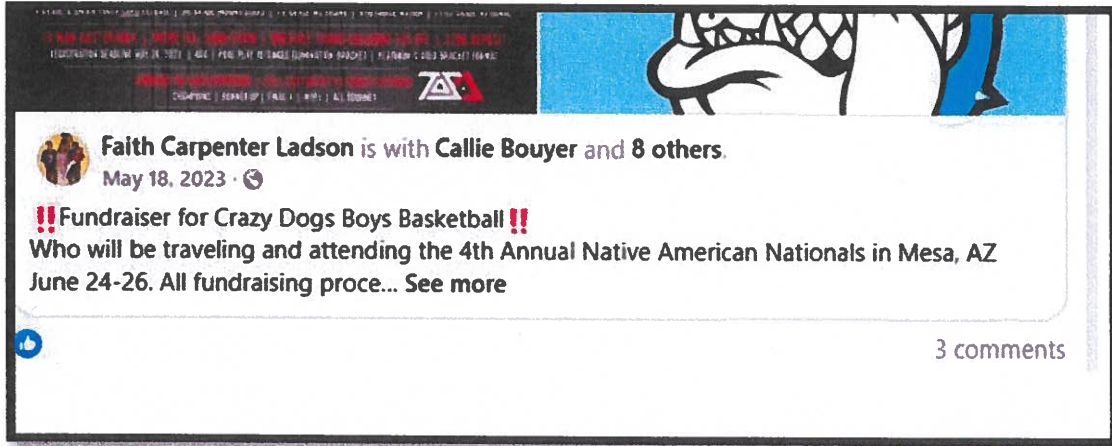
SHERATON GRAND AT WILD HORSE PASS
5594 W Wild Horse Pass Blvd.
Phoenix, 85226
United States

• [Google Map](#)
602-225-0100
[View Vono Website](#)

[View larger map](#)

[Compare the City](#)

NAFOA Conference 2023 — actual conference dates were October, not June



Facebook: Killsnight at son's basketball tournament in Mesa, AZ — June 24, 2023

6/5/2023	1833	KILLSNIGHT, KRISTI	ONB TRAINING LAS VEGAS NV			49,853.95
6/5/2023	1852	KILLSNIGHT, KRISTI	TRVL ASST TO MISSOULA, MT FOR MONTANA AIMS		450.00	49,545.67
6/5/2023	1852	KILLSNIGHT, KRISTI	TRVL ASST TO MISSOULA, MT FOR MONTANA AIMS	450.00		49,015.67
6/6/2023	1841	KILLSNIGHT, KRISTI	FINAL LAYOUT OF P222 BILLINGS, MT			64,550.00

MT AIMS Camp (Missoula) travel reimbursement records



Facebook: Killsnight AIMS Camp post — "off to the hot spring we went"



ORIENTATION DATES, TIMES, AND LOCATION FOR FALL 2025		
THURSDAY, AUGUST 28		
Check in	8:30 am – 12:00 pm	Navarre Hall – Room 114
NEW & TRANSFER	1:15 pm – 3:00 pm	
Family Orientation	11:00 am – 12:00 pm	Auditorium
Lunch and Learn	12:00 pm – 1:00 pm	Curtis Hall
Campus Tours & Open House	1:00 pm – 1:50 pm	Gazebo

Haskell University / Lawrence, KS travel reimbursement (Check 90274, \$1,496 each)

 NORTHERN CHEYENNE TRIBE TRIBAL GENERAL FUND P.O. BOX 159 LAME DEER, MONTANA 59043	 FIRST INTERSTATE BANK OF COMMERCE COLUMBIA, MONTANA	90274 90274
LITTLE WOLF AND MORNING STAR - Out of defeat and exile they led us back to Montana and won our Cheyenne homeland that we will keep forever.		03-168/929
****One Thousand Four Hundred Ninety Six and 00/100 Dollars		
DATE 8/4/2025		AMOUNT \$1,496.00
VOID AFTER 90 DAYS		
KILLSNIGHT, KRISTI		
PAY TO THE ORDER OF:		AUTHORIZED SIGNATURE
⑆090274⑆ ⑆092901683⑆ ⑆501073736⑆		AUTHORIZED SIGNATURE

Haskell orientation schedule — only document in travel packet

 NORTHERN CHEYENNE TRIBE TRIBAL GENERAL FUND P.O. BOX 159 LAME DEER, MONTANA 59043	 FIRST INTERSTATE BANK OF COMMERCE COLUMBIA, MONTANA	90273 90273
LITTLE WOLF AND MORNING STAR - Out of defeat and exile they led us back to Montana and won our Cheyenne homeland that we will keep forever.		03-168/929
****One Thousand Four Hundred Ninety Six and 00/100 Dollars		
DATE 8/4/2025		AMOUNT \$1,496.00
VOID AFTER 90 DAYS		
FISHER, MELISSA P.O. BOX 211 ASHLAND, MT 59003		
PAY TO THE ORDER OF:		AUTHORIZED SIGNATURE
⑆090273⑆ ⑆092901683⑆ ⑆501073736⑆		AUTHORIZED SIGNATURE

Additional Haskell orientation materials from travel packet

2. Melissa Lonebear

Service Period: November 21, 2022 – September 19, 2025 | **Role:** Tribal Council Member



Total Payments Identified:	\$52,024.26
Government Services Fund:	\$49,806.68 (highest travel volume of any individual reviewed)
HAF:	\$367.58
PR Assistance (Gov't Svcs):	\$1,850.00
Unreconciled Travel (Pros. Memo):	Over \$19,000 — funds advanced but receipts never submitted

Melissa Lonebear received the second-largest aggregate total. She also had the highest frequency of travel reimbursement requests of any individual reviewed. She had over \$19,000 in unreconciled travel — meaning she was fronted the money but never submitted receipts or closed out the travel packets, as required by tribal policy and 41 CFR § 301-52.1. Notable individual payments include \$4,075 for 'NC Day at Indian Relay Season Opener,' \$1,373.91 for Denver/Xcel Energy meetings, \$1,166.55 for Sand Creek Massacre Commemoration, and multiple Helena trips as STED commissioner. Salary advances appear repeatedly for 'personal,' 'medical,' and 'death' purposes.

Her daughter Kari Lonebear is a current Finance Employee at the Tribe and is identified as having approved the \$3,979.08 check made directly to Melissa Fisher (detailed in that section below).

**■ VERIFIED
TRAVEL FRAUD
FINDINGS — Melissa
Lonebear**

Helena / STED Quarterly Meeting (Feb. 21, 2024)	ML received \$571.70 (Packet 2779). Official STED meeting minutes for Feb. 21, 2024 do not list ML among commissioners present. A publicly available YouTube video of the meeting includes a roll call during which it is stated ML was not able to attend. The advance was submitted the prior day. No return of funds has been identified.
Sand Creek Massacre Historical Site (Nov. 28–30, 2023)	ML received \$1,166.55 (Check 2386, approved by Melissa Fisher). Her hotel confirmation email in the packet shows a Hilton in Denver — approximately three hours from the actual site in Eads, Colorado. The mileage reimbursement route in the packet directs to 'Aurora, Colorado,' not Eads. Staying in Denver



	for multiple nights at a three-hour distance from the stated destination is not consistent with the purpose.
Rocky Boy, MT — 'Tribal Youth Rodeo' (July 31–Aug. 4, 2024)	ML received \$768.67 (Check 3430, approved by Donavin Limberhand). ML's public Facebook contains a time-stamped video from August 4, 2024 showing her son Kort Lee Campbell competing in the rodeo. The trip was for her son's own competition, not a tribal youth program. ML is also noted to have returned home early, raising questions about the validity of additional meal and mileage claims for the full trip duration.

3. Melissa Fisher

Service Period: November 16, 2020 – September 19, 2025 | **Role:** Tribal Council Member,
Budget & Finance Chair

Total Payments Identified (fund ledgers):	\$47,095.68
Government Services Fund:	\$28,840.52
HAF:	\$14,455.16
EC-AG:	\$3,000.00
PR Assistance (Gov't Svcs):	\$800.00
Unreconciled Travel:	Over \$5,000 — advances not reconciled with receipts
Herman Horse / Construction Payment:	\$3,979.08 — additional payment addressed below
Housing Improvement Program Well:	\$51,808 — additional payment addressed below
PPCD Agricultural Program:	\$6,000 (PPCD funds; addressed in Section IV)

Melissa Fisher received the third-largest total from direct fund payments and is implicated in a broader pattern of financial conduct detailed in the prosecution memorandum. As Budget and Finance Chair of the Tribal Council, she had authority over financial oversight and travel



advance approvals — a position that appears to have been used both to obtain personal benefit and to approve questionable advances for others.

Melissa Fisher's Government Services Fund (Fund 850) records reflect \$28,840.52 in direct payments across 119 transactions spanning October 2022 through October 2024, with descriptions falling into several categories. Melissa Fisher's Travel has NOT been verified — the packets were not yet pulled or investigated.

The largest portion of payments, approximately \$10,633, covers named out-of-town trips described as transporting or picking up tribal members: Fort Robinson/Crawford, Nebraska (January 2023, two separate advances totaling ~\$1,600); Bismarck, North Dakota (July 2023, \$675, described as picking up a tribal member); multiple trips to Bozeman (including taking enrolled students to tour college campuses at Montana State and the University of Montana); trips to Butte to take tribal members to treatment; Thermopolis to pick up cedar (\$1,056); Miles City for Indian relay horse races; Rapid City for a Great Plains meeting; Helena to meet with the Governor (\$706); and Bear Butte, South Dakota to meet with Cheyenne River Sioux representatives (\$480).

The second largest category is PR Assistance, events, and gifts — approximately \$8,211 — including payments described as food baskets for the inauguration (\$300), Christmas gifts (\$300), an XMAS event (\$300), a tree lighting ceremony (\$413), a town hall meal (\$900, appearing twice including once as "Fisher, Melissa R."), funeral assistance for Anthony Costilla (\$500), council PR (\$400), PR assistance for a Princess Pageant giveaway and speaking event (\$500), youth basketball team assistance (\$300 and \$800), and advertising for the Ashland groundbreaking (\$800).

Las Vegas trips account for approximately \$3,131 across four separate trips — two described as supporting Northern Cheyenne INFR (Indian National Finals Rodeo) contestants in October 2022 and October 2023, and two in March–April 2023 described as flying out of Billings to Las Vegas for a "resort." The October 2023 INFR trip alone was \$1,729.50.

Travel mileage reimbursements to Billings total approximately \$7,159 across 52 transactions, with stated purposes including supply pickups, supporting youth, delivering checks to elderly tribal members, attending a BIA fish and wildlife meeting, a broadband meeting, Western Native Voice meetings, OMB training (\$354), the Dean Smith criminal hearing and sentencing, a St. Labre boarding school investigation, picking up Christmas lights, and picking up snacks for local basketball teams.

Salary advances described as "personal" total \$1,100 across three pay periods (PP#22 in October 2022, PP#3 in January 2023, and PP#17 in August 2023).

Potential Charges: Must charge by July 2026 for Sawhorse Construction Check



1. Theft — N.C.T.C. § 7.7.6 (Class A — up to 1 year / \$5,000)

The code is broad and explicitly covers multiple theories, all of which apply to Fisher:

- **§ 7.7.6(A)(1)** — *Intentionally exercises unauthorized control over property of another with intent to deprive* — applies to the \$3,979.74 construction payment directed to herself instead of the contractor, and to unreconciled travel advances where she took money and never reconciled it.
- **§ 7.7.6(A)(2)** — *Intentionally obtains property of another by misrepresentation or deception* — applies to the HIP well application (\$51,808) where she misrepresented her eligibility, and to every travel advance submitted for a trip with no legitimate tribal purpose.

**■ ADDITIONAL
PAYMENT FINDINGS
— Melissa Fisher
(Beyond Fund Ledgers)**

**\$3,979.74 Check —
Herman Horse /
Construction Work**

A check in the amount of \$3,979.08 was made directly to Melissa Fisher for construction work performed on her home by her ex-husband, Herman Horse (doing business as what is referred to in meeting notes as 'Sawhorse Construction'). The payment should have been made directly to Herman Horse as the contractor. Fisher directed the Tribe to pay the money directly to her instead. The check was approved by Kari Lonebear, who is Melissa Lonebear's daughter and a current tribal finance employee.

**\$51,808 — State and
Local Fiscal Recovery
Funds (SLFRF) Well
Drilling**

Melissa Fisher used State and Local Fiscal Recovery Funds (SLFRF) to drill a well on her personal property. She was not eligible for this program given her status as a sitting Tribal Council member, and she would not have qualified under the Department of Health and Human Services income criteria based on her monthly council compensation. This expenditure is distinct from the fund ledger amounts shown above.

**Lawrence, Kansas /
Haskell University (Aug.
2025)**

***Attempt / Needs Verification:** Fisher initially received \$1,496.00 (same advance as Killsnight, Check 90274). Supporting documentation was only the Haskell orientation schedule. Open-source information indicates Fisher's daughter is a senior in high school and appears to have been touring the campus. No official business justification was documented. The check was not cashed, and it is not clear if Fisher took the trip. The check was issued in the same packet as Killsnight's check, which was cashed.



**Approval Role in
Killsnight Travel
Advances**

Fisher's signature appears as approver on Killsnight's Gallagher Insurance Denver advance (Check 88759, \$1,534.10 — a trip for which no meeting documentation has been produced) and on Lonebear's Sand Creek advance (Check 2386, \$1,166.55 — the trip where ML stayed in Denver instead of Eads). Fisher's approval authority appears to have been used to authorize advances that benefited her colleagues while they in turn approved hers.

Carolyn Oldman

From: terrance.limpy@cheyennenation.com
Sent: Monday, July 8, 2024 9:26 AM
To: Carolyn Oldman
Cc: sandy.bruisedhead@cheyennenation.com
Subject: REQ Liquidation

Carolyn,
Can you please liquidate the remaining amount for REQ-3512? This should be for roughly \$3,979.08 for Herman Horse.
Thank you.

*Terrance Lee Limpy
Staff Accountant
Northern Cheyenne Tribe - Central Finance
PO Box 128
Lame Deer, MT 59043
PH: (406) 477-4869*

Check to Melissa Fisher (\$3,979.08) — should have been paid directly to contractor Herman Horse / Sawhorse Construction



Northern Cheyenne Tribe
April 29, 2026
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Form 39213, dated 7/12/2024, for \$3,979.74. Issued by Northern Cheyenne Tribe, American Rescue Plan Act, to Melissa Fisher. Includes a table with 5 items and a total of \$3,979.74.

Form 39213, dated 7/12/2024, for \$3,979.74. Issued by Northern Cheyenne Tribe, American Rescue Plan Act, to Melissa Fisher. Includes a table with 5 items and a total of \$3,979.74.

Construction payment approval record — approved by Kari Lonebear

Gary's Drilling Inc. Invoice #: 100201

5407 Powder Rd, Billings, MT 59105

Email: garysdrilling58@yahoo.com Gary: 406-671-0406 Brandon: 406-860-4488

Attention: Northern Cheyenne Tribe
Company Name: Northern Cheyenne Tribe
Address: P.O. Box 128
City, State ZIP: Lame Deer, Montana 59043
Date: March 10, 2025

Description: Melissa Fisher
Term: Payment due upon receipt. We appreciate your prompt payment.

Description	Quantity	Unit	Cost
Mobe	1.00	\$600.00	\$ 600.00
6" steel casing 1st 100'	100'	\$70.00	\$ 7,000.00
6" steel casing	290.00	\$40.00	\$ 11,600.00
6" borehole drilling	463'	\$28.00	\$ 13,624.00
50# bags of bentonite	7.00	\$25.00	\$ 175.00
50# bags 10/20 silica	18.00	\$35.00	\$ 630.00
6" well cap, 6" driveshoe, 4" bottom cap	1.00	\$450.00	\$ 450.00
4" clic sch. 40 slotted casing	100.00	\$21.00	\$ 2,100.00
4" clic sch. 40 solid casing	380.00	\$19.00	\$ 7,220.00
well development	2.00	\$500.00	\$ 1,000.00
casing centralisers	22.00	\$55.00	\$ 1,210.00
11/2hp, 230 volt 2wire Faradyne motor	1.00	\$1,504.00	\$ 1,504.00
Webtrol 10WS15 pumpend	1.00	\$1,695.00	\$ 1,695.00
1" sch 120 drop pipe, couplers and check valve	100.00		\$ 555.00
10-2w/grd sub cable and splice kit and misc.	400.00		\$ 1,225.00
Misc. fittings and parts	295.00		\$ 295.00
10-2w/grd UF cable & 8-4 jacketed cable	25.00	\$5.00	\$ 125.00
Labor	5.00	\$180.00	\$ 900.00
Total			\$ 51,808.00

Thank you for your business.

SLFRF check to Melissa Fisher (\$51,808) — well drilling on personal property



PRIVACY ACT NOTICE: Pursuant to Section 3(e) (3) of the Privacy Act of 1975 (P.L. 93-579), individuals furnishing information on this application form are hereby advised:

1. The authority for solicitation of the information is 25 U. S. C. 13 and the Bureau of Indian Affairs HIP regulation at 25 CFR Part 256.
2. The information collected will be used to determine an applicant's eligibility and to set priority ranking for assistance under the HIP regulations.
3. The disclosure of this information is voluntary. Failure to provide the information required to support the verification process will result in the denial of the application. Incomplete applications will not be considered. The information provided in this application may be made available to authorized sources for verification purposes upon request.

USE OF SOCIAL SECURITY NUMBER: The disclosure of your Social Security Number is not required in the completion of this application.

HIP well installation records — Fisher did not meet program eligibility criteria as a sitting council member

4. Norma Gourneau

Service Period: November 16, 2020 – November 15, 2024

Total Payments Identified:	\$35,119.86
EC-AG:	\$26,000.00 (single transaction — 'Payment for Dancers: White River Cheyenne Days Powwow,' June 2022)
Government Services Fund:	\$8,869.86
PR Assistance (Gov't Svcs):	\$250.00

Norma Gourneau received the second-largest EC-AG payment — a \$26,000 single transaction described as dancer payments for the White River Cheyenne Days Powwow. Transaction records show this check was issued, reversed, and reissued across multiple check numbers on proximate dates. Government Services records include conference travel to Las Vegas (RES 2023, \$1,876.88), Helena (governor meeting, \$938.23), Phoenix/Chandler (NTTA Broadband Summit, \$1,518.15), Denver (Xcel Energy, \$1,436.38), and Billings (FCC Tribal Workshop, \$579.98). No specific travel fraud affidavit findings are directly attributed to Gourneau at this stage of the investigation, but her travel has not been verified.



5. Donovan Limberhand, Jr.

Service Period: November 21, 2022 – September 19, 2025

Total Payments Identified:	\$33,377.45
Government Services Fund:	\$22,907.45
HAF:	\$10,000.00 (HAF Req. REQ-2363 — Down Payment Assistance)
PR Assistance (Gov't Svcs):	\$470.00

Donovan Limberhand, Jr. received payments across two fund sources. Government Services records include travel to Great Falls (multiple trips described as visiting or delivering medications to tribal members), Canon City, CO (picking up tribal member, \$785), Riverton, WY rodeo (\$866.99), Casper, WY, and Billings. A \$1,301.49 hotel reimbursement for a Washington, D.C. trip was reversed and reissued. HAF records show a \$10,000 Down Payment Assistance disbursement. He is notably identified as an approver on Melissa Lonebear's Rocky Boy rodeo advance — the trip identified as personal family travel in the travel fraud affidavit. There has not been investigation into or confirmation of his trips, so no travel fraud is currently known.

6. Eva Foote

Service Period: November 19, 2018 – September 19, 2025 (two terms)

Total Payments Identified:	\$18,670.98
Government Services Fund:	\$15,120.98
PR Assistance (Gov't Svcs):	\$3,550.00 (largest PR assistance total of any individual reviewed)

Eva Foote's payments were entirely from the Government Services Fund. Direct payments include frequent Billings travel to visit hospitalized tribal members, a trip to Lovell, WY to pick up tribal members from welding school, Bozeman for the Federal Indian Boarding School event,



and a film screening. Multiple salary advances for 'personal' and 'death' reasons appear, with some exceeding \$1,000. PR assistance to third parties (\$3,550) was the most notable feature of her account — payments of \$50–\$500 each were disbursed to multiple individuals characterized as community assistance in her district. The volume and variety of these small third-party payments warrants review of the underlying authorization and documentation. There has not been investigation into nor confirmation of these payments, so no fraud is currently known.

7. Gwen Spotted Horse / Talawyma

Service Period: November 16, 2020 – September 19, 2025 | **Role:** Tribal Council Member

Total Payments Identified:	\$30,034.77
HAF:	\$2,887.03 — HAF Travel: \$367.58 — HAF Displacement Assistance (Mike's Tool Box): \$2,519.45
Government Services Fund:	\$26,197.74
PR Assistance (Gov't Services)	\$950.00

Gwen Spotted Horse, also referenced by her traditional name Talawyma, served as a Tribal Council Member from November 2020 through her removal in September 2025. She is a named defendant in the consolidated Tribal Court criminal proceedings (AR 26-043, NCT v. Gwen Spotted Horse), which has been consolidated for trial with the cases against Melissa Fisher, Melissa Lonebear, and Howard Ontiveros.

Government Services Fund records reflect an extensive pattern of travel reimbursements, including multiple trips to Lawrence, Kansas described as transporting tribal members and picking up school supplies and donated goods, with mileage typically ranging from \$1,100 to \$1,293 per trip. Additional documented travel includes attendance at a Sundance ceremony in Riverton, Wyoming, and a trip to Miranda, Texas in October 2023 described as purchasing peyote medicine (\$2,034.23).

A separate PR Assistance payment of \$950 was also disbursed, along with \$2,000 separately characterized as "purchasing peyote medicine." The legality and federal fund eligibility of expenditures explicitly characterized as procurement of a controlled substance is a matter flagged by the legal review team for further scrutiny.



HAF records reflect a total of \$2,887.03: \$367.58 for travel and \$2,519.45 paid to Mike's Tool Box for displacement assistance. As with other HAF disbursements in this review, the extent to which these payments complied with HUD eligibility and documentation requirements may warrant review.

8. Rhyal Rowland

Employment: Tribal Employee — Media Specialist (PR1806)

Total Payments Identified:	\$20,965.33
HAF:	\$20,565.33 (largest HAF disbursement to any non-council individual) — Home Depot (Req. REQ-2065 / REQ-2066): \$10,611.05 — Boltus Hurff (Req. REQ-2085): \$9,954.28
Government Services Fund:	\$400.00 (INFR rodeo tickets)
Total ARPA Hazard + Premium Pay:	\$11,733.24 ARPA Hazard Pay (Fund 805 / 830M): \$3,915.24 ARPA Premium Pay (Fund 830J): \$7,818.00

Rhyal Rowland was a paid tribal employee serving as Media Specialist (payroll record PR1806) during the COVID-19 relief period. In that capacity she received ARPA hazard pay and premium pay totaling \$11,733.24 across Funds 805, 830M, and 830J between March 2021 and May 2022. Whether a Media Specialist position qualified as an essential worker for purposes of hazard and premium pay eligibility under applicable ARPA guidelines is a question for the broader forensic exam of COVID-era disbursements.

The more significant financial finding is her HAF disbursement: at \$20,565.33, Rowland received the largest HAF displacement assistance payment identified among any non-council-member payees in the fund ledgers. Three requisitions (REQ-2065, REQ-2066, REQ-2085) in September 2023 directed payments to Home Depot (\$10,611.05) and Boltus Hurff (\$9,954.28) on her behalf. An additional \$400 from the Government Services Fund was paid for INFR rodeo tickets.



9. Ernest Littlemouth, Sr.

Service Period (Council): May 25, 2016 – October 17, 2020 | **Vice President:** September 6, 2022

Total Payments Identified:	\$24,029.70
Government Services Fund:	\$24,029.70

Ernest Littlemouth, Sr.'s payments were entirely from the Government Services Fund and reflect cultural and community activities — Bear Butte trips (multiple), Thermopolis for traditional medicine, Scott City, KS for the Battle of Punished Woman's Fork Commemoration, and Washington, D.C. for the Tribal Sovereignty Summit. Salary advances for 'personal' reasons appear periodically. His employment in the council ended October 17, 2020, and his service as Vice President began on September 6, 2022. The volume of transactions during and between those periods warrants confirmation that each payment corresponds to an active period of compensable service.

10. Debra (Debbie) Charette

Service Period: November 21, 2016 – November 2024

Total Payments Identified:	\$23,201.67
Government Services Fund:	\$23,201.67

Debra Charette's payments were entirely from the Government Services Fund. Records reflect travel for youth sports events, governor's office meetings, broadband conferences, renewable energy meetings, and transporting tribal members to medical appointments. Notable payments include Denver/Xcel Energy (\$1,447.52), Rapid City for KLJ and Black Hills Powwow (\$1,109.66), and Bozeman. Salary advances for 'personal' and 'ceremonial' purposes appear. She is identified in the travel fraud affidavit as the approver on Killsnight's KIVA Accounting conference advance (Check 2236, \$1,053 — confirmed non-attendance) and the Seattle/Muckleshoot trip (Check 3294, \$2,071.63 — hotel at casino 45 minutes from stated meeting location). Former counsel Tori Davey is reported to have confirmed information that



11. Howard Ontiveros

Service Period: November 18, 2024 – present

Total Payments Identified:	\$10,892.06
HAF:	\$10,892.06 (Fireplace Center \$8,158 + Home Depot \$2,734.06; Req. REQ-2398/REQ-2323)

HAF payments in his name relate to displacement assistance requests.

12. Christian Keene Bends

Total Payments Identified:	\$9,475.62
HAF:	\$9,475.62 (Francisco Garcia x2: \$4,744.24; Home Depot: \$4,731.38; Req. REQ-3211/REQ-3212)

Christian Keene Bends received payments entirely from HAF in March–April 2024, disbursed to a contractor and Home Depot.

13. Donna Fisher

Role: Former Tribal President (removed February 2022); Former Corporate Manager, Northern Cheyenne Development Corporation (NCDC)

Direct Fund Payments Identified:	\$8,600.00 (Government Services Fund — catering and event services)
Inauguration Catering (Nov. 2022):	\$5,000.00
'Feast for Geraldine Fisher' (Nov. 2023):	\$2,000.00



State of Montana Meeting Catering (June 2024):	\$700.00
'PR Assistance — Melissa Fisher':	\$400.00
PPCD Agricultural Program:	\$6,000 (addressed in Section IV)
D&R Disposal (Septic, ARPA funds):	\$8,127.00 (addressed in Section IV)

4. The Tribe has not updated, nor maintained agricultural permits in the Trust Asset Accounting Management System (TAAMS).
- a. There is a balance of delinquent debt in the amount of ~~\$654,451.27~~ owed to trust landowners and the Tribe for past due invoices, previously issued or that still need to be issued to operators/permittees for annual rental in:
- i. FY2018 delinquent debt = \$27,606.61
 - ii. FY2019 delinquent debt = \$64,978.12
 - iii. FY2020 delinquent debt = \$130,335.60
 - iv. FY2021 to date, delinquent debt = \$431,630.94.
 - v. Annual rental payments for grazing permits are due on February 15th of each year, as established in the terms of the permit and the Tribe's Grazing Ordinance. No documentation is available that show cause notices for violations of non-payment have been submitted to the Agency Superintendent for signature. Federal regulations in 25 CFR 166.415 clearly identify the process and 5-day timeframe for the issuance of notices of violation for non-payment.

Tribal Council resolution regarding Donna Fisher's removal as Tribal President

Donna Fisher's direct Government Services Fund payments reflect catering services at tribal events (Inauguration catering, Feast for Geraldine Fisher, State of Montana Meeting Catering and PR Assistance – Melissa Fisher). However, she may be involved in a broader potential conspiracy involving misuse of ARPA and other federal funds through the NCDC and PPCD non-profits. That broader pattern is addressed in Section IV. Tribal leadership is already aware that Donna Fisher was removed as Tribal President in February 2022 for misuse of funds and financial management failures that prompted multiple deficiency notices from the DOI. Following her removal, she became Corporate Manager of NCDC — a role that may have been used to continue accessing tribal and federal funds, but there is no confirmation of wrongdoing in that role at this time.



14. Colton Small

Total Payments Identified:	\$1,950.00 (17th Annual Native American Economic Development Conference, June 2024)
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Colton Small received one net identified payment. A separate Billings travel entry (\$171.89) for a cannabis consultation was reversed. No travel fraud findings are attributed to him.

15. Stefan Raining Bird

Total Fund Payments Identified:	\$0 — No payments from reviewed fund sources identified
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Stefan Raining Bird appears on the identified persons list but no payments from reviewed fund sources were identified in his name during the review period.

16. Shauna Cooper

Total Fund Payments Identified:	\$0 — No payments from reviewed fund sources identified
Investigation Status:	Ongoing — COVID fund payments and broader role under review

Shauna Cooper appears on the identified persons list and no direct payments from the Government Services, HAF, or EC-AG fund ledgers were identified in her name during the review period.

17. Latitudes Travel — Airfare (Gourneau, Lonebear, Limberhand)

Total:	\$1,164.91 (Check 1666, March 2023, Gov't Services Fund)
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Recipients:	Norma Gourneau, Melissa Lonebear, Donovan Limberhand, Jr. — Las Vegas, NV, RES 2023 Conference
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Airfare for three individuals to Las Vegas booked through Latitudes Travel. These amounts are also partially reflected in the individual totals for each named individual above.

IV. NCDC, PPCD, and ARPA Funds

Beyond the direct fund payments captured in the ledger data, the ongoing forensic exam has identified a pattern of conduct suggesting that federal ARPA funds were misused through two non-profit organizations: the Northern Cheyenne Development Corporation (NCDC) and People's Partners for Community Development (PPCD). The following is a summary of the allegations and findings documented to date.

A. Northern Cheyenne Development Corporation (NCDC)

NCDC is a tribally affiliated development corporation. Donna Fisher — former Tribal President, removed February 2022 for financial mismanagement — became NCDC's Corporate Manager following her removal from the presidency. The prosecution identifies two specific NCDC-related concerns:

★ NCDC — Key Findings (Prosecution Memorandum)	
\$348,000 ARPA Premium Pay Payment	NCDC received \$348,000 from ARPA funds in 2022 as a 'tribal enterprise' for premium pay. Premium pay under ARPA was designed for essential workers during COVID-19. A non-profit development corporation would generally not qualify for this category.
Food Bank Lease — \$360,000 (\$100/sq ft/year)	NCDC, while funded in part by the Tribe, leased a former Tire and Lube Center in Lama Deer back to the Tribe for use as a Food Bank at \$36,000 per month for 10 months (\$360,000 total; 3,600 sq ft at \$10/sq ft/month). The average commercial space in Billings, MT is \$8–15 per square foot per year. At \$100 per



	square foot per year, this lease rate exceeded rates for Seattle waterfront or New York City commercial space.
Ongoing Investigation	NCDC records have not yet been obtained via subpoena.

NORTHERN CHEYENNE TRIBE
AMERICAN RESCUE PLAN ACT
P.O. BOX 128
LAME DEER, MONTANA 59043

FIRST INTERSTATE BANK OF COMMERCE
COLSTRUP, MONTANA
93-168/929

27794

LITTLE WOLF AND MORNING STAR - Out of defeat and exile they led us back to Montana and won our Cheyenne homeland that we will keep forever
***Three Hundred Sixty Thousand and 00/100 Dollars

DATE 7/8/2022 AMOUNT \$360,000.00

VOID AFTER 90 DAYS

PAY TO THE ORDER OF: NCDC

AUTHORIZED SIGNATURE

027794 09290168301004794051

NORTHERN CHEYENNE TRIBE - American Rescue Plan Act

27794

NCDC lease contract: \$36,000/month for former Tire & Lube center (ostensibly for Food Bank)

WHEREAS, the Tribe and NCDC have negotiated a 10-month rental lease agreement at \$10/sq. ft per month for 3600 sq. ft. commercial space for a total amount of \$360,000; now

NCDC lease document showing \$10/sq ft/month rate (\$100/sq ft/year)

1. Premises; Agreement to Lease; Term. Tenant hereby agrees to lease from Landlord and Landlord hereby agrees to lease to Tenant that certain Lube Center in Lame Deer, Montana (the "Premises") upon the terms hereinafter contained and for a term that shall commence on the Effective Date and end 10 months later, unless sooner terminated as provided herein.

2. Payment of Rent and Utilities.

a) Except as otherwise provided herein, Tenant shall pay to Landlord, without notice or demand, and without any set-off, counterclaim, abatement, or deduction whatsoever, except as expressly set forth herein, in lawful money of the United States, by unendorsed check or money order or, at Landlord's option, by wire transfer of immediately available funds, \$ 360,000 (the "Rent"), on the Effective Date.

NCDC lease — additional pages



money to be approved. How are they going to pay them, monthly or a big check?

Lane Spotted Elk: In advance, yeah. I had a meeting with Keene and he researched and found it was allowable. And I think that's what NCDC prefers.

June 8, 2022 Tribal Council meeting minutes — Food Bank lease discussion (excerpt 1)

Serena Wetherelt: If we can make a decision today, if it's only going to be for one year...I mean 10 months. They've already been there for two months. But we do need to start going on that Food bank. We really need to get it going, we shouldn't stall on it anymore. Because that really is the best thing that we're doing for our people.

June 8, 2022 Tribal Council meeting minutes — Food Bank lease discussion (excerpt 2)

Serena Wetherelt: I guess I don't understand, do they need to fundraise too, to get grants and to build up their NCDC? Because he told me this, he said, "If we don't lease this out, then we're going to have to come begging for money from the Tribe." That's what he told me.

Debra Charette: They have all the capability of fundraising, but they have to start just like the rest, with an audit. And get all of that in place. And we haven't had our yearly report from them either. So, and the same with some of the other programs. We haven't had our yearly report, and we have yet to see any of them come in. Or have them do their audits. We have audits for the Casino.

Tribal Council discussion: Food Bank lease vs. permanent structure option

B. People's Partners for Community Development (PPCD)

PPCD is a 501(c)(3) non-profit whose Executive Director is Sharon Small — who a sister-in-law to Donna Fisher. PPCD received \$1.5 million in ARPA funds in July 2021 specifically designated for farming and cattle operations. PPCD banks at Morning Star Credit Union, where Sharon Small also works. Subpoenas of PPCD records from both PPCD and Morning Star Credit Union are needed.

★ PPCD — Key Findings (Prosecution Memorandum)

\$1.5M ARPA Agricultural Funds — Payments to Connected Individuals

Cash payments from the \$1.5M PPCD award were made to the following individuals from July through September 2021. Payments are listed as documented in records provided to the FBI:



	(1) Sharon Small — \$12,000; (2) Ron Burns — \$12,000; (3) Eleece Lei (Tribal property/supply manager) — \$12,000; (4) Delancy Fisher (Sharon Small's daughter, DOB 4/10/2007) — \$12,000; (5) Kristi Harris/Killsnight (Tribal Treasurer) — \$12,000; (6) Peyton Killsnight (Kristi's son, DOB 2/17/2008) — \$12,000; (7) Suzanne Trusler (Sharon Small's sister, does not live on reservation) — \$12,000; (8) Mary Trusler (Sharon Small's niece, does not live on reservation) — \$6,000; (9) Thomas Trusler (Sharon Small's brother-in-law, does not live on reservation) — \$12,000; (10) Thomas J. Trusler (Sharon Small's nephew) — \$6,000; (11) Donna Fisher (former president, sister-in-law to Sharon Small) — \$6,000; (12) Melissa Fisher (Donna's daughter, Budget & Finance Chair) — \$6,000. Total identified: \$108,000. Investigation is needed to determine whether recipients owned cattle or otherwise qualified for the agricultural program.
Minor Recipients / Eligibility Concerns	Records indicate that individuals including Peyton Killsnight (born 2/17/2008 — approximately 13 years old at time of payment) and Delancy Fisher (born 4/10/2007) received payments in their own names, not as dependents. Payments to non-reservation residents (three Trusler family members) who would not be tribal members also raise eligibility questions. These findings have not yet been fully verified.
Bison Purchase / Warrior Meats — Food Not Distributed	Sharon Small, through PPCD, purchased approximately 50 head of bison from the Fort Peck reservation using USDA funds. PPCD owns Warrior Meats and Groceries in Ashland. The bison were processed at Warrior Meats, but the food reportedly was not appropriately or fully distributed. Kristi Killsnight was the identified project director for this bison program. A related LATCF-funded bison purchase (Check 38711, Nov. 29, 2023, 25 bison from Warrior Meats) is also under review for distribution confirmation.



A separate \$50,000 payment to the Northern Cheyenne Food Pantry is documented but lacks confirmation of whether funds were distributed as food or cash.



Sharon K. Small
EXECUTIVE DIRECTOR

Sharon Small, [Netsema'aestsehe'e, Red Eagle Woman] has served as the Executive Director for PPCD since 2010. In her role, Sharon oversees all operations for PPCD and Courtesy Cash, Inc., including fundraising where she has been instrumental in earning over \$4 million in federal, private, and state grants. Sharon has assisted local small businesses throughout her time, helping in a variety of ways from business plans to applying for grant funding. She previously worked for the Northern Cheyenne Tribe's Economic Development Committee where she was responsible for grant management and reporting, overseeing the budget and external communications with partners and the public. Sharon earned her bachelor's degree in Communications from Montana State University. Sharon owns multiple small businesses, including a cattle operation where she is a third-generation cattle rancher. Ms. Small, the mother of three children, is an enrolled member of the Northern Cheyenne Tribe.



WARRICK ASSOCIATES GREEN CO. FUNDING BACK MICRO FINANCING INTERNATIONAL ALABAMA REPRESENTATIVE OF GRANTS

NORTHERN CHEYENNE TRIBE
AMERICAN RESCUE PLAN ACT
P.O. BOX 129
LAME DEER, MONTANA 59043

FIRST INTERSTATE BANK OF COMMERCE
COLSTRIP, MONTANA
93-168/929

10014
10014

LITTLE WOLF AND MORNING STAR - O.J. of death and exile they led us back to Montana and with our Cheyenne homeland that we will keep forever.

One Million Five Hundred Thousand and 00/100 Dollars

DATE: 7/28/2021
AMOUNT: \$1,500,000.00

VOID AFTER 90 DAYS

PAY TO THE ORDER OF: PEOPLE'S PARTNER FOR COMM. DEV
P.O. BOX 955
LAME DEER, MT 59043

AUTHORIZED SIGNATURE: [Signature]

UNAUTHORIZED SIGNATURE: [Signature]

⑆0 100 14 ⑆ ⑆09 290 168 3⑆ 1004 79405 1⑆

Security Features: See Warning Band and Back for Details

DDA Debits - 7/28/2021 - \$1,500,000.00

PPCD program summary document

Peoples Partners for Community Development (PPCD) disbursed \$1,500,000.00 in ARPA funding in grants to Small Business owners and Farmers/Ranchers in 2021 through the Northern Cheyenne Small Business Grant and the Northern Cheyenne Farmers and Ranchers Assistance Program that was created in 2020 through CARES funding from the Northern Cheyenne Tribe.

Assistance was provided to Farmers/Ranchers and Small Business owners that are enrolled Northern Cheyenne Tribal Members. Farmers/Ranchers were required to provide proof of cattle operation or farm operation through any of the following: grazing lease paperwork, land ownership documents, farmland documents, operating loan documents, cattle purchase documents, proof of cattle sales, proof of farm equipment. All Farmers/Ranchers received \$12,000.00 until funds were limited, which was then disbursed to owners of horses. Small Business owners were required to provide the following: business taxes, invoices/purchase orders/payments for work, business receipts (payroll, supplies, etc), business plan, business asset listing. Businesses were provided an amount based on the paperwork provided: \$6,000.00 for all documents and/or \$10,000.00+ in documented expenses or income, \$3,000.00 for some documents and/or \$5,000.00+ in documents expenses or income, and \$1,500.00 for limited business documents provided.

PPCD payment distribution records



The People's Partners For Community Development
Transaction Detail By Account
July 1 through September 14, 2021

Type	Date	Num	Adj	Name	Mem	Class	Cr	Split	Debit	Cr
Check	07/28/21	1285		Small, Gail (V)	COVID Rel.	NC Trib.		Operations I.	1,476.40	
Check	07/28/21	1299		Kinzel, Albert Jr.	COVID Rel.	NC Trib.		Operations I.	12,000.00	
Check	07/29/21	1300		Kinzel, Oscar (V)	COVID Rel.	NC Trib.		Operations I.	12,000.00	
Check	07/29/21	1301		Wilson, Roseanne	COVID Rel.	NC Trib.		Operations I.	12,000.00	
Check	07/28/21	1309		Parish, Henry A.C.	COVID Rel.	NC Trib.		Operations I.	12,000.00	
Check	07/28/21	1310		Spang, Richard E.	COVID Rel.	NC Trib.		Operations I.	12,000.00	
Check	07/28/21	1317		Kamara, Patricia (V)	COVID Rel.	NC Trib.		Operations I.	8,000.00	
Check	07/28/21	1318		Smith, Steve (V)	COVID Rel.	NC Trib.		Operations I.	12,000.00	
Check	07/28/21	1319		Spang, Kenneth (V)	COVID Rel.	NC Trib.		Operations I.	12,000.00	
Check	07/28/21	1320		Whitman, Phillip	COVID Rel.	NC Trib.		Operations I.	3,344.00	
Check	07/28/21	1321		Fox, David (V)	COVID Rel.	NC Trib.		Operations I.	2,870.00	
Check	07/28/21	1323		Osby, Troy (V)	COVID Rel.	NC Trib.		Operations I.	12,000.00	
Check	08/02/21	1325		Whitman, Phillip	COVID Rel.	NC Trib.		Operations I.	4,556.00	
Check	08/09/21	1336		Smith, Charles (V)	COVID Rel.	NC Trib.		Operations I.	4,320.00	
Check	09/09/21	1357		Small, Susan (V)	COVID Rel.	NC Trib.		Operations I.	4,720.00	
Total Small Business									1,104,000.00	
Total Grants									1,104,000.00	
TOTAL									1,104,000.00	

Many names
on list were
under 18 yrs old
at this time.

Records showing minor recipients of PPCD agricultural funds (Delancy Fisher DOB 4/10/2007; Peyton Killnight DOB 2/17/2008)

CFDA#: 10.182

Project Director: KRISTI KILLSNIGHT

Project Title: Local Food Purchase Assistance Cooperati

Period of Performance: December 15, 2024-December 14, 2026

AMS Award Amount: \$1,386,000.00

Matching Funds Amount: \$0.00

PPCD bison purchase records — Warrior Meats / food distribution documentation

JOHN MCGEE CONTRIBUTIONS, LLC	\$	(9,500.00)
WARRIOR MEAT COMPANY, LLC	\$	(9,500.00)

Check #38711 (Nov. 29, 2023) to Warrior Meat Company — LATCF funds, 25 bison



Invoice to:	Payable to	Due Date	
Northern Cheyenne Tribe	Warrior Meat	Feb 25, 2025	
Alt: Kristi Harris			
(406)477-6284			
Description	Qty	Unit price	Total price
Buffalo Burger	8000	\$18.00	\$144,000.00
Buffalo Stew Meat	4500	\$18.00	\$81,000.00
Northern Cheyenne Food Pantry	1	\$50,000.00	\$50,000.00
Produce	31000	\$3.85	\$119,350.00
			\$0.00
			\$0.00
Cash or checks accpeted			\$0.00
		Subtotal	\$394,350.00
		Adjustments	\$0.00
			\$394,350.00

2025 Tribe purchases from Warrior Meats; \$50,000 to Northern Cheyenne Food Pantry

C. Additional Fraud Allegations Under Investigation

★ Other Areas of Active Investigation	
Donna Fisher — D&R Disposal / Personal Septic System (\$8,127)	While serving as Tribal President, Donna Fisher directed a check from ARPA funds (D&R Disposal, Oct. 25, 2021, \$8,127.00) for cleaning and installation of a personal septic tank. ARPA infrastructure funds required projects to involve publicly owned sewer and water systems; privately owned systems were ineligible. This is a potential basis for a false certification/false statement charge in addition to wire fraud.
Kristi Killsnight — Education Double-Billing	Killsnight was enrolled in school and received tribal Education Program funds covering tuition, books, and subsistence payments. She then also received a refund through the Workforce Innovation and Opportunity Act (WIOA) federal program for the same books. Investigation is ongoing to identify and secure the relevant checks.



SF-425 Federal Financial Report Certifications	The USAO in Montana has charged other tribal officials with false statements (18 U.S.C. § 1001) for falsifying SF-425 Federal Financial Reports. This is a potential charging avenue if the relevant SF-425s reflect false certifications of ARPA fund use.
Hay and Cattle — Possible Theft/Misallocation	Information has been received regarding hay theft, sales, and misallocation involving both private and tribal hay and the BIA. Three Tribe hay purchases have been identified; the broader scope needs investigation.
Dialysis Building — Boldt Company	The Tribe funded a dialysis clinic project (Indigenous Pact Feasibility Study), with construction contracted to the Boldt Company. Melissa Fisher pushed for Tribal Council approval of the project despite a feasibility study recommending against it. The building is not yet open (scheduled completion was summer 2025). A January 2025 Boldt payment of \$225,417.56 was made by voucher rather than through the required requisition process, which is procedurally irregular. Some of these funds came from ARPA; others from Tribal Health and Indian Health Services carryover.

D&R DISPOSAL PAYMENT – DON FISHER'S PERSONAL SEPTIC	
 NORTHERN CHEYENNE TRIBE AMERICAN RESCUE PLAN ACT P.O. BOX 552 LATE 2000, MONTANA 59023	 FIRST INTERSTATE BANK OF MONTANA CULF TWP, MONTANA 93-168/829
17928	
TITLE WOLF AND CROWING STAR - Out of district and some may not be in the same district with the Cheyenne reservation but we will keep track of it	
Eight Thousand One Hundred Twenty Seven and 00/100 Dollars	
PAY TO THE ORDER OF D & R DISPOSAL P.O. BOX 552 COLSTRIP, MT 59023	DATE 10/25/2021 AMOUNT \$8,127.00 VOID AFTER 60 DAYS  AUTHORIZED SIGNATURE
⑆0⑆7928⑆ ⑆092901683⑆100479405⑆⑆	
NORTHERN CHEYENNE TRIBE - American Rescue Plan Act	
Payee Vendor ID 16493	D & R DISPOSAL Account # 17928 10/25/2021
Description PAYMENT FOR 4 INVOICES: 21-080, 21-081, 21-082 & 21-083 630F-7890 AS22028ARPA-1	Amount \$8,127.00



NCT check to D&R Disposal (Oct. 25, 2021, \$8,127) — Donna Fisher personal septic tank, paid from ARPA funds

D&R DISPOSAL		INVOICE	
Eric Sprague P.O. Box 882 Cody, MT 59023 (406) 749-4122 Fed ID#: 83-0843898			
SOLD TO: Northern Cheyenne Tribe ATT: Shawna Cooper P.O. Box 128 Lame Deer MT 59043		Invoice Number: 21-000 Invoice Date: 18-Jun-21 Terms: Net 10 Days, Past due 30 day accounts will be charged 1.5% per month (18% per year)	
SHIPPED TO: Shawna Cooper 406 477 4813			
Quantity	Description	Price	Amount
1	Yvette Archambault septic tank cleaning tank needs new lids and floors (2)		200
1	Donna Fisher septic tank Cleaning tank was 3 feet over full water not draining properly drainfield needs added on to.		200.00
46	mileage		138.00
Monthly Total			\$538.00
Past Due			
TOTAL Due			\$538.00
THANK YOU FOR YOUR BUSINESS			

D&R Disposal check detail / ARPA fund source coding

Date	Stmt Amount	
1/7/2025	\$ (30,582.44)	
7/23/2024	\$ (244,000.00)	

Indigenous Pact feasibility study payments



Date	Stmt Amount
6/27/2025	\$ (164,042.93)
1/22/2025	\$ (225,417.56)
7/30/2024	\$ (500,000.00)

Boldt Company — Jan. 2025 payment (\$225,417.56) processed by voucher rather than requisition

V. Aggregate Payment Summary — Direct Fund Ledger Payments

The table below summarizes payments identified from tribal fund ledgers. It does not include the PPCD agricultural payments (\$108,000 total), the Housing Improvement Program well (\$51,808), the ARPA septic payment (\$8,127), or the Herman Horse construction payment (\$3,979) — all of which are addressed separately in Sections III and IV above.

Individual	Total Payments	Primary Fund Source(s)	Status / Findings
Kristi Killsnight / Harris	\$59,522.58	Gov't Svcs, HAF	✓ Multiple verified
Melissa Lonebear	\$52,024.26	Gov't Svcs, HAF	✓ Multiple verified
Melissa Fisher	\$47,095.68	Gov't Svcs, HAF, EC-AG	✓ Findings noted
Norma Gourneau	\$35,119.86	Gov't Svcs, EC-AG	—
Donovan Limberhand, Jr.	\$33,377.45	Gov't Svcs, HAF	—
Ernest Littlemouth, Sr.	\$24,029.70	Gov't Svcs	—
Debra (Debbie) Charette	\$23,201.67	Gov't Svcs	—
Rhyal Rowland	\$20,965.33	Gov't Svcs, HAF	—
Eva Foote	\$18,670.98	Gov't Svcs	—



Individual	Total Payments	Primary Fund Source(s)	Status / Findings
Howard Ontiveros	\$10,892.06	HAF	—
Christian Keene Bends	\$9,475.62	HAF	—
Donna Fisher	\$8,600.00	Gov't Svcs	★ NCDC / broader scheme
Colton Small	\$1,950.00	Gov't Svcs	—
Latitudes Travel (Airfare)	\$1,164.91	Gov't Svcs	—
Stefan Raining Bird	\$0.00	—	—
Shauna Cooper	\$0.00	—	

Note: Grand total reflects net payments from NCT fund ledgers as documented in the attached spreadsheet. Some airfare costs are captured under both Latitudes Travel and individual totals. The PPCD, HIP, ARPA, and construction payments listed in Sections III and IV represent additional amounts beyond this total.

VI. Additional Findings

A. Conference Funds Advanced But Not Used / Not Returned

The travel fraud investigation documents a recurring pattern in which conference advances were approved and disbursed but third-party records confirm the funds were never used for the stated purpose — registration fees went unpaid and attendance was not recorded. In confirmed cases (Falmouth Institute, KIVA), this was verified by formal third-party records requests signed by the Tribal President. In no confirmed case has the unused advance been returned to the Tribe.

B. Personal Family Travel Disguised as Official Business

In at least four documented instances, the actual purpose of a reimbursed trip coincided precisely with a personal family event — a child's basketball tournament, a college move-in, or a son's



rodeo competition — occurring at the same location and dates as the stated official purpose. This pattern is documented across Killsnight (four or more trips) and Lonebear (Rocky Boy rodeo).

C. Mutual Approval Network

A consistent pattern in the approval records is that travel advances were cross-approved among a small group of individuals. Fisher approved Killsnight's Gallagher Insurance advance. Charette approved Killsnight's KIVA and Seattle/Muckleshoot advances. Limberhand approved Lonebear's Rocky Boy rodeo advance. Lonebear and Kayla Russell approved Killsnight's Falmouth conference advance. This mutual approval structure created limited independent oversight of individual travel requests within the group.

D. Unreconciled Travel — Failure to Submit Receipts

The prosecution memorandum notes that Melissa Lonebear had over \$19,000 in unreconciled travel advances (money fronted but receipts never submitted), and Kristi Killsnight had over \$19,000 in unreconciled trips. Melissa Fisher had over \$5,000 unreconciled. Tribal policy, mirroring 41 CFR § 301-52.1, requires travel claims with receipts within 5 working days of trip completion. None of the travel packets reviewed contained any receipts.

E. Non-Profit Pass-Through Pattern

Federal COVID-19 relief funds were directed through NCDC and PPCD — non-profit entities overseen by Donna Fisher and Sharon Small respectively — and then distributed in ways that appear to have benefited connected individuals, including council members and their family members, who would not have qualified for the programs under applicable eligibility criteria. This warrants further investigation.

VII. Conclusion

The Special Prosecutors submit this memorandum and the supporting record to the FBI and to tribal leadership for their review and analysis. The evidence assembled to date, including fund ledger data, check images, travel packets, third-party conference records, social media records, and witness interviews, provides a sufficient factual basis to support referral for federal investigation and the filing of tribal charges where appropriate. Applicable statutes of limitation under both tribal and federal law are addressed herein and do not appear to present a barrier to timely prosecution.

The Special Prosecutors remain available to provide any additional analysis or materials needed to further the investigation and charging.