

FINANCE COMMITTEE

FY24 – First Quarter Report (Oct. to Dec. 2023)

Approved by Official BC Action on: 7/19/95

PURPOSE: The Finance Committee (FC) is a working Sub-Committee of the Oneida Business Committee. Responsibilities include recommending financial decisions related to Nation policies, and oversight /guidance of organizational expenditures in support of the mission, values, and strategic goals of the Oneida Nation.

WHO WE SERVE: The FC works with all departments to ensure expenditures of any substantial amount are procured in the most cost effective and fair manner; as established by the processes and procedures of the Purchasing procurement manual. The FC also serves Oneida Community groups, tribal veterans' groups, local charitable organizations, and Oneida members through Finance Committee Donations and the Oneida Finance Fund.

FINANCE COMMITTEE MEMBERS: Members include three BC Council Members Jennifer Webster, Jonas Hill, and Lisa Liggins; the Treasurer, Lawrence Barton who chairs the meetings; Chief Financial Officer, Keith Doxtator who acts as the Vice-Chair; Gaming General Manager, Louise Cornelius; Purchasing Director, Sarah White; and a Community Elder Member (position is currently vacant). Chad Fuss, Assistant Gaming CFO and RaLinda Ninham-Lamberies, Assistant CFO are alternates for the GGM and CFO.

MEETINGS: Meetings are held twice a month, on the Thursday after a regularly scheduled BC meeting. In the 1st Quarter, the Finance Committee held six regular meetings on: Oct. 12th & 26th; Nov. 9th & 30th; and Dec. 14th & 28th, 2023. There was one work meeting on Nov. 30, 2023; the following are the items that were discussed and the actions.

- Review the Sole Source Resolution

Action was to place this item on the December 14th FC Meeting for a memo to be sent to the BC recommending an amendment or change to the BC Resolution #04-08-20-K. Finance Committee also recommended a work team/group to be formed to create an assessment on the BC Resolution #04-08-20-K.

- Review the FC By-Laws

The Finance Committee reviewed the FC By-Laws and some minor changes were brought up. Action was to update the FC By-Laws and place them on the December 14th FC Meeting for approval.

- Sign-Off Authority

Action was to place this item on the December 14th FC Meeting for Purchasing's team and the CFO's team to work together to update the Sign-Off Authority amounts to reflect on what the position does instead of the job title.

GOALS: The two identified goals of the Finance Committee are as follows:

1. To support and improve all processes, procedures, laws, budgets, and resolutions that pertain to responsible financial oversight/expenditures for the Nation.
2. Demonstrate consistent community commitment by providing Donations to Not-for-Profits, Veteran's groups, and charitable organizations; and by offering Oneida Finance Funds/Products to the Oneida membership and Oneida community groups.

INTERNAL OPERATIONS/DEPARTMENT ACTIVITIES

In the 1st Quarter the Finance Committee reviewed and approved Fifty-four (54) requests from the organization for a total of \$27,541,711.25. The requests consisted of FY24 Blanket Purchase Orders, Gaming & Program Capital Expenditures, Change Orders; vendor service contracts, and various service contracts.

Informational requests are reported to the Finance Committee to provide transparency within the organization of business activities/procedures; Intergovernmental Agreements; and Reports for and by the FC. In the First Quarter the FC reviewed Nineteen (19) informational items and internal reports including: FC Monthly Reports; Government to Government Agreements, and Slot Lease/Percentage/Free Trial Games.

INVESTMENT UPDATES

The CFO, Keith Doxtator, gave an investment update during the November 30th Finance Committee meeting. See attached investment update report.

ONEIDA FINANCE FUND

The Finance Committee reviews Oneida Finance Fund (OFF) requests at their first meeting of each month. The Fiscal Year 2024 funding for use is \$56,502.00. Per the FC Community Fund criteria all approved funding requests represent the following categories:

- 1.) Self-Development;
- 2.) Community Events; and
- 3.) Fundraising activities.

In the 1st Quarter the Finance Committee reviewed Sixty-nine (69) OFF funding requests and approved Sixty-two (62) of them for a total amount of \$29,611.82. The OFF balance at the end of the 1st Quarter is \$26,890.18. There was one product request this quarter in the amount of 25 cases. The balance for product is 401 cases. Attached is a listing of 1st Quarter requests.

FINANCE COMMITTEE DONATIONS

The Finance Committee reviews Donation requests at their second meeting of each month. The Donation allocation for Fiscal Year 2024 is \$100,000. Per the FC Donation criteria all requests approved represent the following categories: Oneida Community Causes; Local Groups (charitable); and Nation Groups (Indian Affiliated). There were five Donation requests in the First Quarter for a total of \$15,000 leaving an end balance of \$85,000. See attached summary.

FY 2024 Oneida Finance Fund Requests

FIRST QUARTER REPORT

Q1	Mtg Date	Name of Requester	Req. Category	Title /Description	Req Amount	FC Action
1	10/12/23	Cindy John	SelfDev-Youth	WI Legends 16U Basketball fees for daughter	\$ 500.00	Approved
2	10/12/23	Jason Danforth	SelfDev-Youth	Basketball Registration fees for daughter	\$ 500.00	Approved
3	10/12/23	Jason Danforth	SelfDev-Youth	Piano Lessons/ Developmental Classes for son	\$ 500.00	Approved
4	10/12/23	Jason Widi	SelfDev-Youth	Boy Scouts Outings & Summer Camp for son	\$ 500.00	Approved
5	10/12/23	Jason Widi	SelfDev-Youth	Highschool College Credit Classes for son	\$ 348.42	Approved
6	10/12/23	Jennifer Berg-Hargrove	SelfDev-Youth	Sconnie Lacrosse Players fees for son	\$ 450.00	Approved
7	10/12/23	Favian Burgos	SelfDev-Youth	Soaring Eagles Boxing Club fees for daughter	\$ 450.00	Approved
8	10/12/23	Tana Aguirre	SelfDev-Youth	Bay Port Highschool Dance Team fees for daughter	\$ 500.00	Approved
9	10/12/23	Amanda Danforth	SelfDev-Youth	Fusion Athletics fees for daughter	\$ 500.00	Approved
10	10/12/23	Andrew Doxtater	SelfDev-Youth	NEW Fusion Dance and Performing Arts fees for daughter	\$ 500.00	Approved
11	10/12/23	Kristine Hill	SelfDev-Adult	YMCA Membership	\$ 500.00	Approved
12	10/12/23	Kristine Hill Annette	SelfDev-Youth	YMCA Membership for son	\$ 216.00	Approved
13	10/12/23	Cornelius	SelfDev-Adult	YMCA Membership	\$ 500.00	Approved
14	10/12/23	Kerry Smith	SelfDev-Youth	YMCA Gymnastics fees for daughter	\$ 500.00	Approved
15	10/12/23	Kerry Smith	SelfDev-Youth	Piano Lessons for daughter	\$ 450.00	Approved
16	10/12/23	Kerry Smith Margaret	SelfDev-Adult	YMCA Membership	\$ 500.00	Approved
17	10/12/23	VanDen Heuvel Margaret	SelfDev-Youth	Baseball Registration fees for son	\$ 500.00	Approved
18	10/12/23	VanDen Heuvel Margaret	SelfDev-Youth	Basketball Registration fees for son	\$ 500.00	Approved
19	10/12/23	VanDen Heuvel Maggie	SelfDev-Youth	Various Sports fees for son	\$ 500.00	Approved
20	11/9/23	Teunissen	SelfDev-Youth	Select Soccer Registration for daughter	\$ 500.00	Approved
21	11/9/23	Marcus Webster	SelfDev-Youth	Hockey League fees for son	\$ 306.90	Approved
22	11/9/23	Marcus Webster	SelfDev-Youth	Hockey League fees for son	\$ 94.50	Approved
23	11/9/23	Marcus Webster Melinda J	SelfDev-Youth	Hockey League fees for daughter	\$ 423.90	Approved
24	11/9/23	Danforth	SelfDev-Youth	Impact Sports Academy Baseball Program for son	\$ 500.00	Approved Approved
25	11/9/23	Elijah Metoxen	SelfDev-Youth	Lacrosse Registration fees for son	\$ 450.00	\$468.00
26	11/9/23	Tonya Webster Steven	SelfDev-Youth	Language & Friendship Program fees for daughter	\$ 500.00	Approved
27	11/9/23	Skenandore	SelfDev-Adult	Tai Chi Lessons	\$ 450.00	Approved

28	11/9/23	Tanya Danforth	SelfDev-Youth	AAU Basketball fees for son	\$	500.00	Approved
29	11/9/23	Gerald Danforth	SelfDev-Youth	Impact Sports Academy Baseball Program for son	\$	500.00	Approved
30	11/9/23	Gerald Danforth	SelfDev-Youth	NEW Fusion Dance & Performing Arts fees for daughter	\$	500.00	Approved
31	11/9/23	Emily Webster	SelfDev-Youth	The Workshop Basketball fees for son	\$	500.00	Approved
32	11/9/23	Emily Webster	SelfDev-Youth	The Workshop Basketball fees for son	\$	500.00	Approved
33	11/9/23	Chad Metoxen	SelfDev-Adult	FIRE Fitness Camp fees	\$	500.00	Approved
34	11/9/23	Laura Cornelius	SelfDev-Youth	Purdy Performance Soccer fees for grandson	\$	500.00	Approved
35	11/9/23	Danforth Constance	SelfDev-Adult	Workout App fees	\$	500.00	Approved
36	11/9/23	Danforth Stevi	SelfDev-Youth	Various Sports fees for son	\$	500.00	Approved
37	11/9/23	Skenandore	SelfDev-Adult	Honorbound Fitness Membership	\$	500.00	Approved
38	11/9/23	Jessica Danforth	SelfDev-Youth	Air Force Gymnastics fees for daughter	\$	500.00	Approved
39	11/9/23	Jessica Danforth Jamison	SelfDev-Youth	Air Force Gymnastics fees for daughter	\$	500.00	Approved
40	11/9/23	Skenandore	SelfDev-Youth	Askren Wrestling Academy fees for son	\$	500.00	Approved
41	11/9/23	Lisa Liggins	SelfDev-Youth	Highschool AP & Dual Enrollment College Credit Classes for son	\$	500.00	Approved
42	12/14/23	Mildred Flores	SelfDev-Adult	Cerebral Palsy Aquatic Classes	\$	500.00	Approved
43	12/14/23	Lorraine Frias	SelfDev-Youth	Piano Lessons for daughter	\$	360.00	Approved
44	12/14/23	Reva Danforth Nicole	SelfDev-Youth	FC Flite Volleyball Club fees for daughter	\$	500.00	Approved
45	12/14/23	VanDenHeuvel Nicole	SelfDev-Youth	Barb's Centre for Dance fees for daughter	\$	500.00	Approved
46	12/14/23	VanDenHeuvel Nicole	SelfDev-Youth	Birder Studio of Performing Arts fees for daughter	\$	500.00	Approved
47	12/14/23	VanDenHeuvel Nicole	SelfDev-Youth	Various Sports fees for son	\$	500.00	Approved
48	12/14/23	VanDenHeuvel	SelfDev-Youth	Various Sports fees for son	\$	500.00	Approved
49	12/14/23	Irene Danforth Margaret	SelfDev-Youth	NEW Fusion Dance & Performing Arts fees for daughter	\$	500.00	Approved
50	12/14/23	VanDen Heuvel Margaret	SelfDev-Youth	Various Sports fees for son	\$	500.00	Approved
51	12/14/23	VanDen Heuvel	SelfDev-Youth	Various Sports fees for son	\$	500.00	Approved
52	12/14/23	Yena Danforth	SelfDev-Youth	Volleyball Club fees for daughter	\$	500.00	Approved
53	12/14/23	Melanie Ramey	SelfDev-Adult	YMCA Membership for daughter	\$	500.00	Approved
54	12/14/23	Kelli Lake	SelfDev-Adult	Mindvalley Membership	\$	449.10	Approved
55	12/14/23	Janice Yglesias	SelfDev-Youth	All That Dance fees for granddaughter	\$	500.00	Approved Approved w/ Receipts
56	12/14/23	Betty Willems	CommEvent	Bead Circle - Moose Tufting Lessons	\$	750.00	Approved
57	12/14/23	Ruth Montano	SelfDev-Adult	Raised Beadwork Workshop	\$	225.00	Denied

58	12/14/23	April Jordan	SelfDev-Adult	Raised Beadwork Workshop	\$ 225.00	Denied
59	12/14/23	Lue Rutherford	SelfDev-Adult	Raised Beadwork Workshop	\$ 225.00	Denied
60	12/14/23	Terri Bohn	SelfDev-Adult	Raised Beadwork Workshop	\$ 225.00	Denied
61	12/14/23	DeAnna Perry	SelfDev-Adult	Raised Beadwork Workshop	\$ 225.00	Denied
62	12/14/23	Debra Valentino	SelfDev-Adult	Raised Beadwork Workshop	\$ 225.00	Denied
63	12/14/23	Laurie Metoxen Tasheba	SelfDev-Adult	Raised Beadwork Workshop	\$ 225.00	Denied
64	12/14/23	Danforth Amber VanDen	SelfDev-Adult	YMCA Family Membership	\$ 459.00	Approved
65	12/14/23	Heuvel Amber VanDen	SelfDev-Youth	Volleyball Club fees for daughter	\$ 468.00	Approved
66	12/14/23	Heuvel	SelfDev-Youth	Volleyball Club fees for daughter	\$ 468.00	Approved
67	12/14/23	Vanessa Miller	SelfDev-Youth	The Workshop Basketball Program fees for daughter	\$ 500.00	Approved
68	12/14/23	Yena Danforth	SelfDev-Youth	ETS Performance Membership for son	\$ 500.00	Approved
69	12/14/23	Yena Danforth	SelfDev-Adult	XO Fitness Membership	\$ 500.00	Approved
					\$ 29,611.82	

	Mtg Date	Name of Requester	Req. Category	Title /Description	Req Amount	FC Action
1	10/12/23	Aliskwet Ellis	CommEvent	Woodland Indian Art Show & Market Nov. 10-11, 2023 - Refreshments	25 Cases	Approved

Finance Committee Donations

FY 2024– Allocation & Expenditures

Budgeted Amount - \$100,000.00

1st Quarter Requests	Amount Approved
1. Safe Shelter Inc.	\$3,000.
2. Oneida Nation Veteran Services Department	\$3,000.
3. WI Alzheimer’s Association	\$3,000.
4. Bay Port Dance Team	\$3,000.
5. NATOW	\$3,000.

\$85,000. Currently Available

FINANCE COMMITTEE DONATIONS QUARTERLY FUND BALANCE BY CATEGORY

FIRST QUARTER DONATIONS			
Designations /Percentages	Allocation	Expenditures	Balance
1. Oneida Community Causes - 40%	\$40,000.	\$6,000.	\$34,000.
2. Local Groups (Charitable) & Nat'l Groups (Indian Affil.) - 60%	\$60,000.	\$9,000.	\$51,000.
	\$100,000.	\$15,000.	\$85,000.

Article I. Purpose and Policy
Article II. Adoption, Amendment and Repeal
Article III. Definitions
Article IV. Roles and Responsibilities

Article V. Objectives
Article VI. Asset Allocation
Article VII. Communications

ONEIDA TRIBE OF INDIANS OF WISCONSIN INVESTMENT POLICY STATEMENT

Article I. Purpose and Policy

1-1. The purpose of this policy statement is to provide a clear understanding between the Oneida Tribe of Indians of Wisconsin (Tribe) and its selected Investment Consultant, money managers custodians and other interested parties concerning the investment policies and objectives of the Tribe. The overall philosophy will be outlined and will have enough flexibility to allow for changing market conditions.

Article II. Adoption, Amendment and Repeal

- 2-1. This policy statement is adopted by the Oneida Business Committee, following an adoption by the Finance Committee.
- 2-2. Amendments to this policy statement are allowed, as needed, by a majority vote of the Finance Committee and of the OBC, and any such amendment will be forwarded in writing to the Chief Financial Advisor.
- 2-3. All other policy statements which are inconsistent with this policy statement are hereby repealed unless specifically re-enacted after adoption of this policy statement.

Article III. Definitions

- 3-1. This article shall govern the definitions of words and phrases as used herein. All words not defined herein shall be used in their ordinary and everyday sense.
- 3-2. "Prudent Man Rule" means all parties are subject to the Prudent Man Rule which states: Assets shall be invested with the care, skill, prudence, and diligence under the circumstances prevailing from time to time that a prudent man acting in a like capacity and familiar with such matters would use in the investment of a fund of like character and aims.
- 3-3. "Equity" means stock certificate(s) representing ownership interest in a company/corporation.
- 3-4. "Short Term" means one to three year time frame.
- 3-5. "Long Term" means time frame longer than three years.
- 3-6. "Market Cycle" means the time period between the two latest highs or lows of the S&P 500 Index, showing net performance of a fund through both an up and a down market.
- 3-7. "Index" means a recognized grouping of securities used to measure the general performance of a market or market sector.
- 3-8. "Watch Status" means signifies concern over the recent performance of a selected money manager. Ensuing performance will be "watched" in a more guarded manner.
- 3-9. "Fixed income" means securities which represent promises to pay specific interest over specific periods of time, plus the principal investment.
- 3-10. "Compound" means adding the interest earned from an investment to its principal, so that it also earns interest in ensuing time periods.

Article IV. Roles and Responsibilities

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February 25, 2005

Approved by Business Committee:
April 6, 2005

- 4-1. Oneida Business Committee
 - a. The Oneida Business Committee (OBC) is charged with the authority in this Policy Statement to hire and fire investment managers with the advice and upon the recommendation of the Finance Committee. The OBC is responsible for all investments under management, but as a practical matter, will delegate day-to-day management of the assets to the Finance Committee, the Chief Financial Advisor, or to money managers and consultants hired for that purpose.
- 4-2. Treasurer
 - a. The Treasurer is charged with maintaining fiduciary responsibility for all funds governed by this Policy Statement. The Treasurer shall report to the Business Committee, or cause to be reported, the performance of investment portfolios governed by this policy statement on at least a quarterly basis.
- 4-3. Finance Committee
 - a. In support of the Treasurer, the Finance Committee is charged with the direct oversight of money managers when hired, asset allocation of the Tribe's funds and oversight of outside consultants hired to assist the above. As a practical matter, the Committee may assign day-to-day management to the Chief Financial Advisor.
- 4-4. Finance Department
 - a. The Finance Department serves as the main point of contact for the Tribe and its selected consultants and money managers. The Finance Department will monitor and report to the Finance Committee. Responsibilities will include negotiation of fees on behalf of the Tribe and coordination of presentations by the consultant or money managers to the OBC or the Finance Committee, and review and provide recommendation for policy updates to the Finance Committee.
- 4-5. Consultants
 - a. The Oneida Business Committee may hire an investment broker or financial planner to perform duties which include, but are not limited to, advice on asset allocation, screening and day-to-day monitoring of money managers, independent reporting of investment results, and any other duties the Board or the Committee deems appropriate.

Article V. Objectives

- 5-1. The Tribe seeks to maximize income, growth of income, and long-term appreciation of capital while seeking to minimize principal fluctuations. The assets must be invested with care and diligence with the overriding prudent man rule as a guide to investment management. The Tribe will, as a general guideline, make occasional disbursements, and care should be taken to ensure available funds.
 - a. Equity fund objectives.
 - 1. Long term objectives.
 - (a). The Tribe seeks as a total return (income and growth) over a market cycle, or at a minimum of three years, a compounded return that should equal or surpass an agreed-upon recognized Equity Index that will parallel the style of the equity manager. Underperforming the three-year return of the selected equity index for three consecutive quarters will result in the manager being placed on a watch status.
 - 2. Short term objectives.
 - (a). The assets should be managed in such a fashion so that each manager should outperform the benchmark index in at least 50% of the quarters that the benchmark index shows a negative return.
 - b. Fixed income objectives.

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1. Long term objectives.
 - (a). The Tribe seeks as a total return (income and growth) over a market cycle, or at a minimum of three years, a compounded return that should equal or surpass the Lehman Brothers Government/ Credit Intermediate Bond Index. If appropriate, the Finance Committee may use, in addition to the Lehman Brothers Government/ Credit Intermediate Bond Index, other recognized fixed income indices that may more closely parallel the style of the fixed income manager. Underperforming the three-year return of the selected index for three consecutive quarters will result in the manager being placed on a watch status.
2. Short term objectives.
 - (a). The Merrill Lynch Government/Corporate 1 to 3 year Bond Index shall be used to measure performance of any short term fixed income manager. The assets should be managed in such a fashion so that each manager should outperform the benchmark index in at least 50% of the quarters that the benchmark index shows a negative return.
3. Cash and equivalent objectives.
 - (a). It is expected that equity and fixed income managers will be generally fully invested. Cash that is allocated by the Finance Committee will be subject to the rules described herein.

Article VI. Asset Allocation

6-1. Asset allocation of the Tribe will be derived through the use of optimization techniques that consider the risks, expected returns, and correlation's of various asset classes.

a. The following general guidelines will be used to govern the overall asset allocation of the Fund:

	Minimum	Maximum
Equities	10%	70%
Bonds	20%	65%
Cash	none	70%

b. If separate portfolios are used, the following allocation restrictions based on the total value of the Equity Fund will apply:

	Minimum	Maximum
Large Value Equity	25%	75%
Large Growth Equity	25%	75%

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Small Cap Equity	5%	25%
International Equity	5%	25%

- 6-2. The Finance Committee must evaluate and adjust the portfolio when any asset class exceeds its limits by 5% of the total fund value for two consecutive quarters. The Finance Committee has the authority to change the Minimum and/or Maximum and to Add and/or Delete portfolios.
- 6-3. The Finance Committee will review the asset allocation guidelines at least every three years, and may adjust the guidelines to meet the changing needs of the Tribe.
- 6-4. Each manager when hired will have up to three months to bring the portfolio to a "fully invested" status. Uninvested balances will be held in an interest bearing account.
- 6-5. The Finance Committee will make the overall allocation of equities, fixed income and cash investments as they deem appropriate. The worst-case scenario of the allocation model shall reach a point of no expected losses over a five year period of time.
- 6-6. The investment managers will have discretion, within the guidelines and prohibitions in this article to make individual security and industry decisions within their own discipline. The prudent man rule will apply to both individual securities and industry/sector weightings.
- 6-7. Equity securities.
- a. The equities managers may not exceed 5% (at cost; 8% at market value) of managed portfolio to be concentrated in any one security.
 - b. The managers may not exceed 15% (at cost; 25% at market value) of managed portfolio to be concentrated in any one industry sector. The managers will divest of a portion of the securities in a sector if the concentration in that sector exceeds 25% of market value for more than one full calendar quarter.
- 6-8. Fixed Income.
- a. Fixed income securities may be either U.S. Government and its Agencies, municipal debt, corporate debt and preferred securities as well as convertible issues issued only in U.S. dollars. The minimum quality credit rating for non-convertible debt is "BBB" rated.
 - b. In addition, a maximum of 20% of the portfolio may be in Mortgage Backed Securities that either implicitly or explicitly have the backing of the U.S. Government.
 - c. Asset Backed Securities may be a maximum of 10% of the portfolio, but must constitute Senior Debt with a minimum "AA" rating.
 - d. The Manager will maintain a portfolio duration of + or - 30% of the agreed upon benchmark index.
- 6-9. Cash and equivalents.
- a. Cash and Cash Equivalents may be invested directly in the money markets in Commercial Paper, Bankers Acceptance, Bank CD's, and Corporate Notes with a minimum rating of A-1 by Standard & Poor's or P-1 by Moody's Investment Services. Maturities may not exceed 90 days.
 - b. In place of, or in addition, cash may be invested in money market mutual funds which have the same general investment restrictions as in 6-9.a..
 - c. All cash and equivalent investments must be in US dollars.
- 6-10. Prohibitions.
- a. The money managers are prohibited from investing in letter stock, private placements, options, short sales, margin transactions, financial futures, commodities, or other specialized activities, unless specifically authorized by the Oneida Finance Committee. No fund assets should be invested in speculative securities. With permission of the Finance Committee some speculative securities may be

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allowed for the purpose of reducing overall risk in the portfolio.

- b. Additionally, specific Collateralized Mortgages that are Interest & Principal Only Strips (I/O's, P/O's). Inverse Floaters. Z-Bonds, and Accruals are strictly prohibited.
- c. Socially Responsible Investing: The Tribe recognizes the responsibility to invest in a manner that does not enable harm to the environment or the spiritual and cultural values of Native Americans. The Tribe prefers to invest in companies that make positive contributions to alleviating the problems facing society and the environment. Further, the Tribe intends to utilize its funds for the benefit of its people, while attempting to avoid supporting certain businesses that engage in practices which the Tribe deems harmful. Some of these practices are as listed below:
 - 1. The destruction of rain forests.
 - 2. Heavily polluting industries.
- d. Investments not specifically addressed by this policy statement are forbidden without the Finance Committee's written consent. The Finance Committee may amend these prohibitions as deemed necessary.

Article VII. Communications

7-1. Meetings between the OBC and the consultant and/or money managers will be held on an annual basis at a location selected by the OBC. The performance of investments will be evaluated quarterly. Investment reviews will be sent quarterly to the Chief Financial Advisor, who will disseminate to the Finance Committee, and the consultant and/or money managers must be available for phone consultation on an as needed basis.

APPROVED:

FINANCE COMMITTEE CHAIRPERSON

DATE

ONEIDA TRIBAL SECRETARY, JULIE BARTON

DATE

Approved by Finance Committee:
February 25, 2005

Approved by Business Committee:
April 6, 2005