



**MEMORANDUM**

**TO:** Chapter Officials

**CC:** Community Service Coordinators  
Cameron Chapter  
Coalmine Canyon Chapter  
Coppermine Chapter  
Kaibeto Chapter  
Tolani Lake Chapter

**FROM:** *Sarah Slim*  
Sarah Slim, Executive Director  
Navajo Hopi Land Commission Office

**DATE:** December 19, 2025

**SUBJECT:** ESCROW Funds for Non-Certified Chapters in the Former Bennett Freeze Area

Dear Chapter Officials,

On **July 9, 2025**, the Navajo Hopi Land Commission Office (NHLCO) met with representatives from the **Navajo Department of Justice (DOJ)** to clarify how non-governance certified Chapters in the Former Bennett Freeze Area (FBFA) can access the ESCROW funds. Based on the discussion, I have decided to move forward with the development of an **Intra-governmental Agreement** between the NHLCO and the FBFA non-governance-certified Chapters, which will outline our combined duties and responsibilities when a Chapter project is awarded using **ESCROW funds**. This approach ensures compliance with applicable Navajo Nation laws and policies while also enabling local-level implementation of community-prioritized projects.

**Key Objectives of the Intra-Governmental Agreement:**

- In accordance with Section VII of the ESCROW Policy Plan and Section 102 of the Local Governance Act, the NHLCO will manage the Escrow Fund.
- The Chapter will identify projects that qualify under the ESCROW Policy Plan, which will be verified by the NHLCO.
- When an eligible project is awarded, the Chapter will use the Navajo Nation Procurement Regulations, but the resulting contract will be between the NHLCO and the vendor. This also means the contract will need to go through the 164(B) Review Process.
- The Chapter will be responsible for gathering support documents, such as invoices, and submitting them to the NHLCO, and the NHLCO will be responsible for paying the invoice(s).

The NHLCO will begin coordinating with each of your chapters individually to draft and tailor the Intra-governmental Agreement based on your chapter's identified priorities and readiness. In accordance with 2 N.N.C. §110(O), the Intra-governmental Agreement will not need to go through the 164(B) Review Process. In other words, the Intra-governmental Agreement will be signed by the NHLCO Executive Director and the Chapter President (upon Chapter Resolution). We are committed to working collaboratively and transparently throughout this process to ensure these funds are used effectively to benefit your communities.

Should you have any immediate questions or would like to schedule a planned meeting, please feel free to reach our office at your earliest convenience. We appreciate your ongoing partnership and look forward to moving this effort forward together.

Thank you!

Cc: Honorable Otto Tso, Chairman, Navajo Hopi Land Commission  
Honorable Casey Allen-Johnson, Vice-Chairman, Navajo Hopi Land Commission  
Honorable Helena Nez-Begay, Member, Navajo Hopi Land Commission  
Kris Beecher, Esq., MBA, Chief of Staff, Office of the President and Vice President  
Katherine Belzowski, Delegated Deputy Attorney General, Navajo Department of Justice  
Rodgerick Begay, Assistant Attorney General, Navajo Department of Justice  
Cynthia Freeman, Attorney Candidate, Navajo Department of Justice  
Candice Yazzie, Division Director, Division of Community Development  
Jaron Charley, Department Manager II, Administrative Support Center  
Milford Maloney, Senior Program Projects Specialist, Tuba City ASC