EXHIBIT 45

NATIVE AMERICAN RESERVATIONS
IN WHICH
REPUBLIC OF TURKEY IS INTERESTED
A PLANNED COINCIDENCE?

DEFENSE-RELATED URANIUM MINES REPORT TO CONGRESS

http://energy.gov/lm/articles/doe-submits-its-defense-related-uranium-mines-report-congress

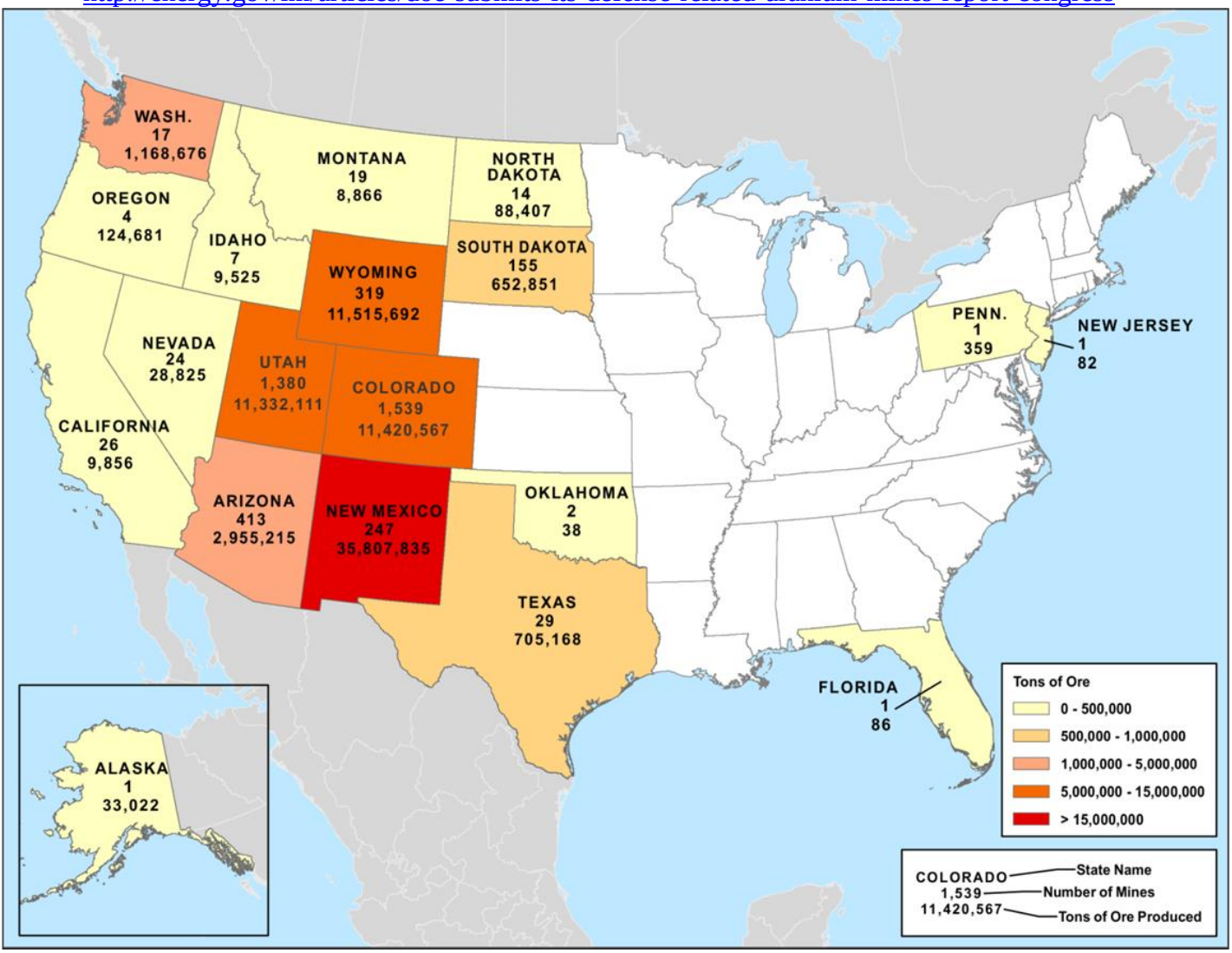

Illustration of Total Uranium Ore Production by State

Reservations Located Within 100 Miles of a Nuclear Power Plant, Registered Nuclear Fuel Facility or Registered Uranium Mine or Deposit and Also a Water Source

'Federally Recognized' Tribe	Reservation Location City, State	Nuclear Facility or Uranium Deposit	Water Source
Bay Mills Indian Reservation	Brimley, Michigan	---	Lake Michigan, Lake Huron, Lake Superior
Stockbridge-Munsee Band of Mohican Indians (w/in 100 miles)	Spans cities of Bartelme & Red Springs, in Shawano County, Wisconsin	Point Beach Nuclear Plant Units 1 and 2[1]	Lake Michigan, Shawano Lake, Legend Lake, Lower Red Lake, Red River
Navajo Tribe (w/in 100 miles)	Spans Northeast corner, of Arizona, Northwest corner of New Mexico, and Southern Utah	Arizona has 413 *defense-related* uranium mines producing 2,955,215 tons of uranium ore. New Mexico has 247 *defense-related* mines producing 35,807,835 tons of uranium ore. Significant mining at Laguna Pueblo, NM. Utah has 1,380 mines producing 11,322,111 tons of uranium ore.[2]	Lake Powell, Navajo Reservoir, San Juan River, Morgan Lake, Many Farms Lake
Couer d'Alene Tribe of Idaho (w/in 100 miles)	Northcentral, Idaho	Idaho has 7 *defense-related* uranium mines producing 9,525 tons of uranium ore. Lenty and Varney[3] Prospects on Reservation; Sunshine and Coeur d'Alene Mines.	Lake Coeur d'Alene, Chatcolet Lake
Tunica-Biloxi Tribe	Central Eastern Louisiana	River Bend Nuclear Station	La Vielle Riviere, La

[1] *See* United States Nuclear Regulatory Commission, *Operating Nuclear Power Reactors (by Location or Name)*, available at: http://www.nrc.gov/info-finder/reactor/.

[2] *See* U.S. Department of Energy, *Defense-Related Uranium Mines*, Report to Congress (Aug. 2014) at 5, Fig. 2 – "Illustration of Total Uranium Ore Production by State," available at: http://energy.gov/sites/prod/files/2014/09/f18/Defense-RelatedUraniumMinesReporttoCongress-FINAL.pdf.

[3] *See* J. J. Satkoski , Paul L. Weis and Thor H. Kiilsgaard, *Status of Mineral Resources Information for the Kootenai and Coeur D'Alene Indian Reservations, Idaho*, Administrative Report BIA-54 (1979), at 20, Fig. 9, available at: http://bia.gov/cs/groups/xieed/documents/text/idc010791.pdf; Western Mining History, *Lenty Uranium Prospect*, available at: http://westernmininghistory.com/mine_detail/10093714; Western Mining History, *Varney Prospect*, available at: http://www.westernmininghistory.com/index.php/mine_detail/10073417.

(w/in 100 miles)			Petite Riviere, Grand Lac, Petite Lac, Lac a Deux Bouts, Premier Bayou, Atchafalayer River, Mississippi River
Seneca Nation (w/in 100 miles)	Western New York State	R. E. Ginna Nuclear Power Plant	Lake Erie, Lake Ontario, Niagara Falls
Rosebud Sioux and Sicangu Oyate (approx. 200 miles)	East Todd, South Dakota	South Dakota has 155 *defense-related* uranium mines producing 652,851 tons of uranium ore. Southern Black Hills, SD; Edgemont, SD.	Rosebud Lake, Rosebud Creek, Indian Scout Lake, Antelope Lake, Antelope Creek, Mission Lake, He Dog Lake, Dry Creek
Multiple (see below)	Montana	Montana has 19 *defense-related* uranium mines producing 8866 tons of uranium ore.	Multiple (see below)
Assiniboine & Sioux Reservation	Northeastern Montana	Oil & Gas	
Crow Reservation (w/in 100 miles)	South Central Montana	Little Mountain Mining District; Pryor Mountain Mining District[4]	Bighorn River, Bighorn Lake, Pryor Creek
Confederated Salish and Kootenai Tribes Flathead Reservation (w/in 100 miles)	Northwestern Montana	**To be discussed**	Flathead Lake, Flathead River, Clark River, Jocko River
Colville Reservation tribes (w/in 100 miles)	Northeastern Washington	Washington has 17 *defense-related* uranium mines producing 1,168,676 tons of uranium ore. Dawn Mine; Midnite Mine; Sherwood Mine; [5]	Columbia River, Grand Coulee Dam (largest in U.S.)*
Yakama Nation Reservation (w/in 100 miles)	South Central Washington	Columbia Generating Station, 10 miles from Richland, WA; Hanford Nuclear Site.	Columbia River, Snake River
Multiple (see below)	Oklahoma	Oklahoma has 2 *defense-related*	

[4] *See* Margaret J. Eggers, Anita L. Moore-Nall, John T. Doyle, Myra J. Lefthand , Sara L. Young, Ada L. Bends and Anne K. Camper, *Potential Health Risks from Uranium in Home Well Water: An Investigation by the Apsaalooke (Crow) Tribal Research Group*, Geosciences 2015, 5(1), 67-94, at 79, available at: http://www.mdpi.com/2076-3263/5/1/67/htm.

[5] *See* Warren Cornwall, *Radioactive Remains - The Forgotten Story of the Northwest's only Uranium Mines*, Seattle Times (Feb. 20, 2008), available at: http://www.seattletimes.com/pacific-nw-magazine/radioactive-remains-the-forgotten-story-of-the-northwests-only-uranium-mines/ .

		uranium mines producing 38 tons of uranium ore.	
Cherokee nation (w/in 25 miles)	Northeastern Oklahoma	Sequoyah Fuels Corporation, Gore, OK - (licensed as a fuel cycle facility regulated by the Nuclear Regulatory Commission to convert yellowcake (concentrated uranium ore) into gaseous uranium hexaflouride)	Arkansas Rivers, Webbers Falls Reservoir,
Cheyenne & Arapaho nation			
Fort Sill Apache nation			
Osage nation			
Quapaw nation			
Hopi Indians (w/in 100)	Reservation located w/in Navajo Reservation in Northeastern Arizona	Uranium is only one of two known fuels on the Hopi Reservation.[6]	Grand Falls, Ganado Lake
Oglala Sioux Tribe (w/in 100)	Pine Ridge Reservation in Southwestern South Dakota	South Dakota has 155 defense-related uranium mines producing 652,851 tons of uranium ore. Southern Black Hills, SD; Edgemont, SD.	Little White River Pool Reservoir, Oglala Lake

The reservations of 10 of the 17 tribes from 10 states that previously traveled to Turkey, as well as the Hopi and Pine Ridge Reservations of the Hopie and Oglala Sioux Tribes are each located within 100 miles from a nuclear power plant,[7] registered nuclear fuel facility *or* registered uranium mine or deposit *and* also a water source. This is more than a coincidence, and should give this Court pause to require FERC to undertake an in-depth review of the Kerr Project transaction before it decides to approve it.

It must be recalled that the Kerr Dam is a "black start" facility. This means that it can start and restart and can generate electrical power in the absence of an external power source, and can independently generate energy

[6] *See* Robert M. Thompson and Jean A. Dupree, *Status of Mineral Resource Information, Hopi Indian Reservation, Coconino and Navajo Counties, Arizona*, Administrative Report BIA-111 (Jan. 1987), at 5 et seq., available at: http://bia.gov/cs/groups/xieed/documents/text/idc010764.pdf.

[7] *See* United States Nuclear Regulatory Commission, *Facility Locator - Operating Nuclear Power Reactors (by Location or Name)*, available at: http://www.nrc.gov/info-finder/reactor/.

without connecting to the grid, in both normal and emergency operating scenarios. According to the Commission Congress appointed in the Floyd D. Spence National Defense Authorization Act for Fiscal Year 2001[8] to assess the threat to and impact of a cybersecurity or electromagnetic pulse attack on U.S. water and other critical infrastructures,

> "Black-start generation is that kind of generator that is independent of outside power sources to get started, hence the term black start. Most black start units today are *hydroelectric plants*, small gas peaking units, small oil-fired peaking units and diesel units. In some cases the black start unit may be collocated with a larger power plant in order to get the larger one started for system restoration" (emphasis added).[9]

i. Possible Access Sought to Uranium and Water Surrounding Flathead Reservation For Possible Production of Yellowcake Capable of Later Conversion to Gaseous State and Use in Incendiary Devices[10]

To begin with, the U.S. Department of Energy has reported[11] that 11 percent (approx. *453*) of the 4,225 mines providing uranium ore to the Atomic Energy Commission for defense-related purposes from 1947 to 1970 are located *on* tribal lands.[12]

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[8] *See* Public Law 106-398; 114 STAT. 1654A-345 (Oct. 30, 2000); Commission to Assess the Threat to the United States from Electromagnetic Pulse (EMP) Attack, EMP Commission website, available at: http://www.empcommission.org/.

[9] *See* Report of the Commission to Assess the Threat to the United States from Electromagnetic Pulse (EMP) Attack, *Critical National Infrastructures* (April 2008), at 31, available at: http://www.empcommission.org/docs/A2473-EMP_Commission-7MB.pdf.

[10] *See* World Nuclear Association, *How Uranium Ore is Made into Nuclear Fuel*, available at: http://www.world-nuclear.org/Nuclear-Basics/How-is-uranium-ore-made-into-nuclear-fuel-/.

[11] *See* U.S. Department of Energy Office of Legacy Management, *DOE Submits Its Defense-Related Uranium Mines Report to Congress*, Press Release (Oct. 14, 2014), available at: http://energy.gov/lm/articles/doe-submits-its-defense-related-uranium-mines-report-congress.

[12] *See* U.S. Department of Energy, *Defense-Related Uranium Mines*, Report to Congress (Aug. 2014) at 4, available at: http://energy.gov/sites/prod/files/2014/09/f18/Defense-RelatedUraniumMinesReporttoCongress-FINAL.pdf.

The DOE also has reported that there are 19 abandoned defense-related mines located in the State of Montana, 10 of which are designated in size as "small" mines (0-100 tons of ore produced), 8 of which are designated in size as small-medium mines (100–1,000 tons of ore produced), and 1 of which is designated in size as a "medium" mine (1,000–10,000 tons of ore produced).[13] In total, these 19 mines produced 8,866 tons of ore.[14]

In addition to these abandoned defense-related mines, there is also evidence of substantial other underground uranium deposits on or in the mountains and forests located within 25-50 miles of the northern, southern and eastern portions of the Flathead Indian Reservation. Los Alamos National Laboratories, for example, had made the following findings:

a. **Two sediment samples collected in the Dry Fork Creek drainage, approximately 35 km east of Libby**, have anomalous uranium concentrations. The sample from location No. **304747** (Lat. 48° 22'01", Long. 115° 02'16") had a measured uranium content of 17-60 ppm. This sample was collected from a dry stream bed which drains to the southwest into Dry Fork Creek. (Ex.) Approximately 2 km to the northwest of this site, on Dry Fork Creek itself, a wet stream sediment sample having 16.6 ppm uranium was collected at location No. **304748** (Lat. 48° 22'28", Long. 115° 03'4l"); (Ex.)[15]

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[13] *Id*., at Table 1. *Summary of Mine Sites by Production-Size Category and State*; Executive Summary at iv. *See also* U.S. Department of Energy Legacy Management, *Defense-Related Uranium Mines Location and Status Topic Report*, Doc. No. LMS/10693 (Aug. 2014), Table 20 – "Mine Counts by State with Production-Size Categories," at 63, available at: http://www.lm.doe.gov/WorkArea/DownloadAsset.aspx?id=10676.

[14] *See* U.S. Department of Energy Legacy Management, *Defense-Related Uranium Mines Location and Status Topic Report*, Doc. No. LMS/10693 (Aug. 2014), *supra* Table 22 – "Mine Counts by State with Ore Production Information," at 66.

[15] *See* Paul L. Aamodt, *Uranium Hydrogeochemical and Stream Sediment Reconnaissance in Lincoln and Flathead Counties, Northwest Montana*, Los Alamos Scientific Laboratory of the University of California and the United States Energy Research and Development Administration Division of Uranium Resources and Enrichment, LA-6652-MS (May 1977), at 29, available at: http://www.osti.gov/scitech/servlets/purl/7305456.

b. "**Three streams draining a mountainous area north and northwest of Dahl Lake (about 40 km west of Kalispell) [in or near Lost Trail National Wildlife Refuge]** provide sediment samples with relatively high uranium contents. A sediment sample taken from a stream which flows directly into Dahl Lake from the north (location No. **304712**, Lat. 48° 09'45", Long. 114° 48'35"), shows a uranium content of 15.0 ppm. (Ex.) (Ex.). About 8 km to the northwest, a stream sediment sample collected on a tributary of Pleasant Valley Creek (location No. 303781, Lat. 48° 12'42", Long. 114° 54'17") shows a uranium content of 14.7 ppm. About 4 km north of this location, on Coniff Creek, there are three additional sample locations where the uranium concentrations in stream sediment are notably above average for this general area. These are location Nos. 303783 (Lat. 48° 14'21", Long. 114° 55'45") with 13.9 ppm uranium; 303784 (Lat. 48° 14'67", Long. 114° 52'47") with 10.8 ppm uranium; and 303785 (Lat. 48° 14'14", Long. 114° 56' 19") with 10.8 ppm uranium. All of these locations are in drainages originating on Pleasant Valley Mountain […] Possible contamination due to agricultural activity was noted at all five locations. Even so, the source of uranium in these sediment samples is again most likely mineralized veins cutting the local country rock, but this cannot be verified without a field check." [16]

c. "**Approximately 15 to 20 km west of Flathead Lake**, along the southern boundary of the study area, there are four stream sediment sample locations which have notably high uranium concentrations (Plate IV). These locations, Nos. 303394 (Lat. 48° 03'21", Long. 114° 25'36") with 10.8 ppm uranium; 303396 (Lat. 48° 01'55", Long. 114° 24'44") with 15-7 ppm uranium; 303397 (Lat. 48° 00'51", Long. 114° 24'15") with 13.4 ppm uranium; and 303398 (Lat. 48° 00'04", Long.

[16] *Id*., at 29-30.

114° 26'32") with 12.0 ppm uranium, are located on Wild Bill Creek and a tributary which runs nearly parallel to it on the east. Both creeks originate on Blacktail Mountain [2-4 miles west of Lakeside] and flow northward toward Smith Lake [Smith Lake Water Fowl Production Area]. […] It is possible that mineralized veins equivalent to those in the mining area also occur in the vicinity of Wild Bill Creek. If so, they could be the source of the increased content of the sediment sample. Possible contamination due to agricultural activity was noted at all locations except No. 303394, though it is doubtful that this is affecting appreciably the uranium. The pH and specific conductance values of the stream waters were all within normal ranges. […] A sediment sample taken from a pond at location No. 303387 (Lat. 48° O7'47", Long. 114° 26'22"), below Smith Lake (about 10 km downstream from the Wild Bill Creek locations), has a uranium content of 24.7 ppm. This location is described as being a marshy area, with the sediment being rich organic muck. The site is also described as being within a recreational area [Smith Lake Fowl Production Area]." [17]

d. "[…] **Approximately 10 km due north of Smith Lake** is a spring, at sample location No. 303365 (Lat. 48° 13'26", Long. 114° 26'00"), which has anomalous uranium in both the sediment (16.6 ppm) and the water (31.4 ppb). As mentioned in the previous section, this is the only location in the survey area having high concentrations of uranium in both the water and sediment samples. The location is along a fault contact between Precambrian Lower Piegan argillite and/or quartzite and Precambrian Ravalli, quartzite and argillite, undifferentiated (Plate I). The site is described as densely vegetated with nearby agricultural activity. The spring sediment is described as a gray mud, and an above-average content of clays and/or organics, if present, could account for the high uranium content of the sediment. The pH (7-2 pH units) and conductivity (625 umhos/cm) are slightly higher than usual

[17] *Id.*, at 30.

for the area, but still not abnormal, particularly for groundwater. The temperature of the water was 13.2°C. It is also possible that uranium mineralization along the fault (at an unknown depth) is being reflected at the surface here in both the water and sediment. A follow-up investigation at this site and along the northwest-trending fault is definitely suggested by these data." [18]

e. "**East of Flathead Lake, in Flathead Valley**, there are seven stream locations with anomalous, or notably high, uranium concentrations in the sediment. Each of the streams have their headwaters in the Swan Range to the east. The sample location Nos. 303502 (Lat. 48° 00'38", Long. 113° 55'38") through 303506 (Lat.48° 03 '27", Long. 113° 58'10") and 303509 (Lat. 48° 06'21", Long. 113° 56'31") are all shown on Plate I as being in an area of alluvial cover. Their headwaters are in an area of Precambrian argillites and quartzites comprising the Grinnell and Appekuny formations. One small fault, trending to the northeast, is mapped near location No. 303509 on Wolf Creek. Possible contamination sources were not noted in the field data at any of these sites. The recorded pH ranges from 4.8 at location No. 303509 to 5.8 at No. 303503, and the specific conductance of the waters is between 44 umhos/cm at location No. 303504 and 88 umhos/cm at No. 303505. The uranium content of the sediment from these locations ranges from a 1ow of 5.0 ppm at location No. 303506 to 40.7 ppm at No. 303504, on Schmidt Creek. The source of the uranium in the sediments of these streams is unknown, but an examination of the geology in the area of their headwaters in the Swan Range is certainly called for. The high uranium content of the pond sediments from location Nos. 303322 (Lat. 48° 09'38", Long. 114° 04'43") with 26.0 ppm uranium and 303337 (Lat. 48° 05 35",

[18] *Id*., at 31.

Long. 114° 04'23") with 15.1 ppm uranium might also be a reflection of mineralization farther east in the Swan Range." [19]

In addition, the DOI's U.S. Geologic Survey, in cooperation with the Jefferson Valley Conservation District and Jefferson County, has sampled 40 ground-water wells in Jefferson County in water year 2007 for uranium and other radioactive elements. Most of the wells included in the study provide water for human and (or) domestic-animal consumption. The objectives of the USGS study were to evaluate the geologic setting in which elevated uranium concentrations occur in Jefferson County and to provide information about the occurrence and concentration of uranium and other radioactive elements that had not been studied previously. The presence of uranium in area ground water had previously been documented by required monitoring of public-supply systems, information from private citizens, and a Montana Department of Health and Human Services biomonitoring study." [20]

Furthermore, the Montana Bureau of Mines and Geology has determined that there is at least one abandoned uranium mine located in Una Mountain in the Bear Ranger District, which is approximately 30 air miles due east of the town of Charlo located on the Flathead Indian Reservation. However, this mine, identified as "PO005400" with coordinates (NE 19N 14W 15), was "screened out and not visited by MBMG."[21] According to the report, it was

[19] *Id*., at 31-32.
[20] *See* P.B. Ladd, W.R. Berkas, M.K. White, K.A. Dodge, and F.A. Bailey, *Compilation of Water-Resources Data for Montana, Water Year 2007*, U.S. Geological Survey Open-File Report 2008–1325, U.S. Department of the Interior U.S. Geologic Survey (2008), at 5, available at: http://pubs.usgs.gov/of/2008/1325/pdf/ofr2008-1325.pdf.
[21] *See* Catherine McDonald, Phyllis A. Hargrave, Michael D. Kerschen, John J. Metesh and Robert Wintergerst, *Abandoned-Inactive Mines of the Flathead National Forest-Administered Land*, Montana Bureau of Mines and Geology Open-file Report 462 (2002), at Table 16, p. 36, available at: http://www.mbmg.mtech.edu/pdf-open-files/mbmg462_fhn-flathead.pdf.

screened out because "there were no references to it in the MILS database and the location was too general (+/-1 km). The location in the MILS database is listed as section 15, T19N, R14W (Una Mountain quadrangle)." [22]

Whether or not it can be confirmed that it is the Turkish Government's ambition to acquire raw nuclear materials[23] that can later be refined for military purposes from Indian reservation lands, including from the Flathead Indian Reservation, it remains plausible that members of Turkish enterprises interested in and/or currently doing business with the CSKT on the Flathead Indian Reservation could have affiliations with terrorist organizations the Turkish Government has harbored or have employees bearing such affiliations that have their own bold agenda. And, given the CSKT's technical capabilities and apparent gullibility/naivety and such persons' or organizations' intent and means, Plaintiffs and similarly situated persons, not to mention, the CSKT themselves, may be at peril.

ii. Possible Access Sought to CSKT Technical Expertise in DOE & USACE Uranium Mill Tailings Cleanups & in U.S. & Foreign (Middle Eastern) Military Hardware Component Manufacturing & Logistics Software Management for Possible Acquisition and Use of Incendiary Devices to Comprise Kerr Dam or Other Off-Reservation Targets

Since, at least 2009, S&K Technologies, Inc. has been engaged in "Uranium Mill Tailings Remediation for the Department of Energy."[24] The S&K Moab Technical Assistance Contract (TAC) Team of S&K Aerospace, Environmental Division, one of a several subsidiaries of S& K Technologies, Inc., a CSKT-owned family of companies, provides technical assistance to the U.S. Department of Energy (DOE) on a uranium mill tailings cleanup project located in Moab, Utah. During 2015, the TAC Team was recognized for its outstanding support to DOE and collaboration with the Remedial Action Contractor (RAC) in response to a significant rockslide that

[22] *Id*., at p. 60.
[23] *See* Ami Rojkes Dombe, *Turkey's Nuclear Aspirations*, Israel Defense (April 8, 2015), available at: http://www.israeldefense.co.il/en/content/turkeys-nuclear-aspirations.
[24] *See* Confederated Salish & Kootenai Tribes of the Flathead Reservation, *2009-2010 Annual Report – Preserving Our Heritage*, at 27, available at: http://www.cskt.org/gov/docs/2009AnnualReport.pdf.

occurred at the Moab site last November. When rail operations were halted at the remediation site, the DOE requested an investigative engineering study to assess the rockslide situation. Within the span of one week, the TAC Team had prepared a proposal to respond to DOE's request, received a contract modification incorporating the work, and finalized the subcontract with the engineering expert."[25] "S&K Aerospace, Environmental Division [also previously] received the US Secretary's Honor Award for Achievement from the Department of Energy Office of Environmental Management in recognition of their achievements on the Moab UMTRA Remediation Project [in] August 2011."[26]

During the fall of 2010, "the Moab TAC team performed a radiological characterization and inclusion/exclusion survey of a property located near Tuba City, Arizona, known as the Highway 160 Site. The property is on Navajo Nation land and consists of about 10 acres of vacant land across the highway from the U.S. Department of Energy Tuba City Disposal Site. In addition, 15 nearby residences were surveyed for potential contamination. Prior to commencing fieldwork, SKA prepared a Characterization Plan that was approved by the Navajo Nation Environmental Protection Agency (NNEPA). Moab TAC staff collected more than 50 soil samples from the residential properties and the vacant land, and a Geoprobe was used to drill holes for logging gamma and to confirm the arrangement and depth of several buried trenches. Gamma radiation logging of the drill holes was used to estimate the volume of soil over the U.S. EPA limits for radium-226.SKA submitted a draft Characterization Report and Inclusion Report for the Highway 160 Site to NNEPA in December. SKA will also provide technical assistance and oversight during cleanup and restoration of the site, perform independent verification, and review documentation of the remediation."[27]

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[25] *See* S&K Group Spirit, *S&K Quarterly Awards* (Spring 2015), at 8, available at: http://www.sktcorp.com/wp-content/uploads/2015/05/groupspirit_2015_02_spring.pdf.
[26] *See* Confederated Salish & Kootenai Tribes, *2011 Annual Report, S&K Technologies, Inc. – Accomplishments for the Year*, at 31, available at: http://www.cskt.org/gov/docs/2011AnnualReport.pdf.
[27] *See* S&K Group Spirit, Vol 3., Issue 4 (Winter 2011), *supra* at 7.

"Since 2002, S&K Technologies, S&K Aerospace, and S&K Global Solutions have all been contract holders for the U.S. Army Department of Public Works at Fort Richardson. S&K Global Solutions employees have become part of the 673rd Civil Engineering Squadron, the equivalent to the U.S. Army's Department of Public Works. Our responsibilities include providing support to the Asset Management Flight and the Resources Flight."[28] "On October 1, 2010, S&K Global Solutions took over the contractor positions for the Helpdesk at Puget Sound Naval Shipyard, located on Naval Base Kitsap, Bremerton, Washington."[29]

During 2012-2013, "S&K Global Solutions launched a new office in Oklahoma City, Oklahoma and is the newest contractor to support the U.S. Air Force at Tinker Air Force Base. The company was recently awarded the Tinker Advisory and Assistance Services Contract II (TAASC) vehicle. The TAASC contract vehicle is a multiple-award contract whereby S&K will perform acquisition and sustainment support for three Air Logistic Complexes. One is located at Tinker Air Force Base in OKC and the other two are at Hill AFB in Utah and Warner Robins AFB in Georgia."[30] In addition, during 2013, one S&K Global Solutions employees was lauded for her "assisting with an international and *protocol-sensitive In-Kingdom logistics review with senior military members of the Royal Saudi Air Force*. Brenda *was lauded by the Royal Saudi Air Force F-15* *Weapons System Support Team Chief*, Col Atyah J. Al-Atyah, for her superb administrative support during the 2012 RSAF/USAF Logistics Management Review held in Warner Robins, GA" (emphasis added).[31]

[28] *Id*., at 3.
[29] *Id*., at 6.
[30] *See* S&K Group Spirit (Summer 2013), at 3, available at: http://www.skercorp.com/pdf/s&k_groupspirit_2013_summer.pdf.
[31] *Id*., at 6.

During the third quarter of 2013, "the S&K Moab Technical Assistance Contract (TAC) Team was *contracted by the U.S. Army Corps of Engineers to conduct a survey of buildings and infrastructure at the Green River Test Site in Utah*. The test site covers more than 3,500 acres and is managed by White Sands Missile Range in New Mexico. The demolition of 37 buildings, underlying slabs, and associated infrastructure on 350 acres at the test site is scheduled as part of the Army Facilities Reduction Program. However, during the preparation of an environmental assessment for the demolition, the possibility was raised that some of the buildings and infrastructure may be radiologically contaminated. *During the 1950s and 1960s, builders commonly used mill tailings materials in concrete for mineral aggregate during construction of buildings*. Because test site facilities were built about 1962, readily accessible contaminated mill tailings may have been used for the construction of foundations, slabs, and sub-grade material at the site. *The test site is adjacent to a former uranium mill, though much smaller than the former mill in Moab. The Green River mill was remediated in the late 1980s. The test site was also used as a launch, observation, and radar tracking facility for rockets, including those in the Pershing and Athena programs*. The Team's scope of work was to develop a plan for the radiological assessment of 37 buildings scheduled for demolition and to perform the assessment on 30 of them. The plan also addressed how to determine whether the remaining facilities/infrastructure at the test site have any radiological contamination. […] The vast majority of the buildings and infrastructure assessed were not contaminated. *Naturally occurring radioactive material (uranium ore) was identified at two locations within the test site* " (emphasis added).[32]

S&K Technologies, Inc.'s "offices are maintained throughout the United States **and Saudi Arabia"** and the companies "work on a wide-range of projects that include Uranium Mill Tailings Remediation for the US

[32] *See* S&K Group Spirit (Winter 2014), *Assessing Radiological Contamination in Utah*, at 7, available at: http://www.skglobalsolutions.com/newsletters/groupspirit_2014_01_winter.pdf.

Department of Energy, and telephony."[33] Apparently, offices are maintained throughout the United States *and Saudi Arabia* "with a wide-range of projects that include *Foreign Military Sales efforts in support of U.S. allies*" (emphasis added).[34] For example, during 2013-2014, "S&K Technologies, LLC won an Individual Aircraft Tracking Program for the C-5. We will use base and flight history to predict corrosion damage potential; Our work was reviewed and summarized during the Aging Aircraft Office era for the Air Force Corrosion Prevention and Control office; The Israeli F-15 Technical Order program was renewed on Sole Source basis; We have also setup and are operating a Print-On-Demand server for Israeli Air Force." In addition, "*S&K Aerospace [was] awarded follow-on to Royal Saudi Air Force Third Party Logistics – November 2013*; S&K Aerospace [was] awarded option period for *U.S. Air Force Medium Altitude Unmanned Aerial System support* – December 2013; [and] S&K Aerospace continues to provide Tri-Service support to over 90 FMS countries through PROS IV – March 2014" (emphasis added). "*S&K Aerospace has an established presence in the Middle East. The company has maintained an office in Riyadh, Saudi Arabia since 2011*."[35]

"In June 2014, S&K Aerospace entered its third year as the prime contractor for Parts and Repair Ordering System (PROS). PROS represents the largest contract **[$1 BILLION**] ever awarded to an S&K company, and the team has reached many milestones in this shared journey. The PROS Mission The PROS contract is a procurement program that supports the logistics requirements of over 95 Foreign Military Sales (FMS) customers. *The Department of Defense (DoD) recognizes the PROS program as the government's source of supply for tri-service (Air Force, Army, Navy) components that the DoD no longer actively manages*. Managed by the Air Force Security Assistance Center (AFSAC), PROS provides and repairs these non-standard parts. Based out of Wright-Patterson

[33] *See* Confederated Salish & Kootenai Tribes of the Flathead Nation, *2012-2013 Annual Report, S&K Technologies*, at 32, available at: http://www.cskt.org/gov/docs/2012annualreport.pdf.
[34] *See* Confederated Salish & Kootenai Tribes of the Flathead Nations, *2013-2014 Annual Report, S&K Technologies – Accomplishments for the Year*, at 33, available at: http://www.cskt.org/gov/docs/2013AnnualReport.pdf.
[35] *See* S&K Group Spirit (Winter 2014), *supra* at 9.

Air Force Base in Ohio, AFSAC's mission is to develop and execute international agreements that provide FMS customers support for both standard and non-standard items. *PROS offers allied countries the best value for out-of-production parts in support of their weapon systems*. Through PROS, S&K is committed to providing these requirements by focusing on timely support, competitive pricing, and quality program management" (emphasis added).[36] Moreover, "[a]s of late July, the Moab Uranium Mill Tailings Remedial Action (UMTRA) Project had moved another million tons of uranium mill tailings from the former processing site in Moab, Utah. *This brought the total tailings shipped to an engineered disposal cell near Crescent Junction, Utah, to 7 million t*ons. The project is nearly 45 percent complete in relocating the 16-million ton uranium mill tailings pile away from the Colorado River. In addition to tailings removal operations, the project is beginning the process of segregating and sizing debris from the former ore mill buildings that were buried in the southern corner of the pile. Plans are to begin shipping the debris to the disposal cell, mostly by rail, in fiscal year 2015. Also, interim and final cover materials are being placed on a portion of the disposal cell where tailings have reached the design height."[37]

[36] *See* S&K Group Spirit, *The Story of a Billion Dollar Federal Contract* (Fall 2014), at 3, available at: http://www.skglobalsolutions.com/newsletters/groupspirit_2014_04_fall.pdf.
[37] *Id*., at 5.