



***“Privileged and Confidential”***

**To:** Sagkeeng First Nation  
**From:** Candice S. Metallic & Ryan Lake  
**File:** Treaty Land Entitlement Claim 128.01  
**Date:** May 25, 2018  
**Subject:** TLE Specific Claim Update

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**MEMORANDUM**

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Since our last update on January 16, 2018, we have confirmed agreement with Canada which increased the TLE shortfall to 5,812.6 acres. Currently, we are in discussions with qualified experts to quantify the monetary value of the TLE shortfall land which will enable us to prepare a settlement proposal for Sagkeeng’s consideration and approval and ultimately to be submitted to Canada.

**Joint Case Management Brief and Direction of the Tribunal**

On March 30, 2018, the Parties advised the Tribunal that Sagkeeng and Canada reached a *without prejudice* agreement with respect to all issues related to the TLE shortfall. We further advised the Tribunal that Sagkeeng was proceeding to quantify the monetary value of the claim and required an additional six months to prepare the necessary expert reports.

In light of the progress made in these settlement discussions, the Tribunal granted an additional three months for the Parties to continue to reach a settlement. The Parties were asked to report back to the Tribunal on their progress no later than August 15, 2018.

**Experts on Valuation**

On March 19, 2018, we met with Chief and Council to discuss the various options to determine the monetary value of the claim. We were instructed to approach the best experts to request proposals that seek to achieve the highest and best claim value for Sagkeeng. To this end, we have been in discussions with the appropriate experts to develop valuation approaches designed to maximize the value of Sagkeeng’s TLE. We hope to have proposals from the experts in June, which we will review with Chief and Council to decide upon the best valuation approach for Sagkeeng. Following this, a full valuation analysis and report will be prepared by the expert(s), which we will then use to develop a draft settlement proposal for consideration by the Chief and Council, which will ultimately be submitted to Canada. We endeavor to have the expert



study(ies) initiated prior to August 15<sup>th</sup>, 2018 so we can provide the Tribunal with a positive progress report. We are also hopeful that we can have a settlement proposal ready for Chief and Council's review and consideration this fall.

We are happy to discuss this further with Council upon your availability.

CSM / RML