

Native American Rights Fund, Inc.

Independent Auditor's Reports and Financial Statements

September 30, 2018 and 2017

Native American Rights Fund, Inc.
September 30, 2018 and 2017

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Independent Auditor's Report

Board of Directors
Native American Rights Fund, Inc.
Boulder, Colorado

Report on the Financial Statements

We have audited the accompanying financial statements of Native American Rights Fund, Inc. (NARF), which comprise the statements of financial position as of September 30, 2018 and 2017, and the related statements of activities and cash flows for the years then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Board of Directors
Native American Rights Fund, Inc.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of NARF as of September 30, 2018 and 2017, and the changes in its net assets and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Supplementary Information

Our audits were conducted for the purpose of forming an opinion on the financial statements as a whole. The schedule of functional expenses and the schedule of expenditures of federal awards, as required by Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, listed in the table of contents, is presented for purposes of additional analysis and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated February 4, 2019, on our consideration of NARF's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering NARF's internal control over financial reporting and compliance.

BKD, LLP

Denver, Colorado
February 4, 2019

Native American Rights Fund, Inc.
Statements of Financial Position
September 30, 2018 and 2017

	2018	2017
Assets		
Cash	\$ 1,575,812	\$ 7,771,676
Prepaid expenses and other assets	218,901	346,481
Other receivables, net of allowance of \$38,000 for 2018 and 2017	398,396	559,813
Government contracts receivable	755,609	439,535
Employee travel advances	25,157	45,002
Grants and contributions receivable, net	1,571,813	1,176,853
Investments	39,778,388	33,570,350
Assets held for others	27,354	562,310
Property and equipment	1,110,015	233,312
	<u>1,110,015</u>	<u>233,312</u>
Total assets	<u>\$ 45,461,445</u>	<u>\$ 44,705,332</u>
Liabilities and Net Assets		
Accounts payable	\$ 723,696	\$ 1,102,478
Funds held on behalf of others	27,354	562,310
Accrued vacation payable	341,791	308,016
Other accrued expenses	149,186	153,057
Deferred revenue	18,284	17,963
Capital lease obligations	46,197	31,508
Employee retirement obligation	276,864	284,765
	<u>276,864</u>	<u>284,765</u>
Total liabilities	<u>1,583,372</u>	<u>2,460,097</u>
Net Assets		
Unrestricted		
Future Legal Advocacy Fund	25,000,000	25,000,000
Undesignated	14,453,057	13,617,657
	<u>14,453,057</u>	<u>13,617,657</u>
	39,453,057	38,617,657
Temporarily restricted	3,397,513	2,612,748
Permanently restricted	1,027,503	1,014,830
	<u>1,027,503</u>	<u>1,014,830</u>
Total net assets	<u>43,878,073</u>	<u>42,245,235</u>
Total liabilities and net assets	<u>\$ 45,461,445</u>	<u>\$ 44,705,332</u>

Native American Rights Fund, Inc.

Statement of Activity

Year Ended September 30, 2018

	Unrestricted	Temporarily Restricted	Permanently Restricted	Total
Revenues, Gains and Other Support				
Governmental contracts	\$ 1,139,640	\$ -	\$ -	\$ 1,139,640
Foundation grants	849,800	3,730,691	-	4,580,491
Contributions	3,889,057	608,840	12,673	4,510,570
Legal fees	1,340,072	-	-	1,340,072
Other	38,859	-	-	38,859
Investment income	2,843,631	-	-	2,843,631
Net assets released from restrictions	3,554,766	(3,554,766)	-	-
	<u>13,655,825</u>	<u>784,765</u>	<u>12,673</u>	<u>14,453,263</u>
Expenses				
Program services				
Litigation and client services	8,782,554	-	-	8,782,554
National Indian Law Library	332,551	-	-	332,551
	<u>9,115,105</u>	<u>-</u>	<u>-</u>	<u>9,115,105</u>
Supporting services				
Management and general	1,036,746	-	-	1,036,746
Fundraising expenses	2,668,574	-	-	2,668,574
	<u>3,705,320</u>	<u>-</u>	<u>-</u>	<u>3,705,320</u>
Total expenses	<u>12,820,425</u>	<u>-</u>	<u>-</u>	<u>12,820,425</u>
Change in Net Assets	835,400	784,765	12,673	1,632,838
Net Assets, Beginning of Year	<u>38,617,657</u>	<u>2,612,748</u>	<u>1,014,830</u>	<u>42,245,235</u>
Net Assets, End of Year	<u>\$ 39,453,057</u>	<u>\$ 3,397,513</u>	<u>\$ 1,027,503</u>	<u>\$ 43,878,073</u>

Native American Rights Fund, Inc.

Statement of Activity

Year Ended September 30, 2017

	Unrestricted	Temporarily Restricted	Permanently Restricted	Total
Revenues, Gains and Other Support				
Governmental contracts	\$ 1,001,888	\$ -	\$ -	\$ 1,001,888
Foundation grants	225,580	681,485	-	907,065
Contributions	25,835,010	53,766	4,368	25,893,144
Legal fees	2,123,889	-	-	2,123,889
Other	55,646	-	-	55,646
Investment income	2,115,776	-	-	2,115,776
Net assets released from restrictions	2,187,784	(2,187,784)	-	-
	<u>33,545,573</u>	<u>(1,452,533)</u>	<u>4,368</u>	<u>32,097,408</u>
Expenses				
Program services				
Litigation and client services	7,738,649	-	-	7,738,649
National Indian Law Library	356,178	-	-	356,178
	<u>8,094,827</u>	<u>-</u>	<u>-</u>	<u>8,094,827</u>
Supporting services				
Management and general	902,350	-	-	902,350
Fundraising expenses	2,068,248	-	-	2,068,248
	<u>2,970,598</u>	<u>-</u>	<u>-</u>	<u>2,970,598</u>
Total expenses	<u>11,065,425</u>	<u>-</u>	<u>-</u>	<u>11,065,425</u>
Change in Net Assets	22,480,148	(1,452,533)	4,368	21,031,983
Net Assets, Beginning of Year	<u>16,137,509</u>	<u>4,065,281</u>	<u>1,010,462</u>	<u>21,213,252</u>
Net Assets, End of Year	<u>\$ 38,617,657</u>	<u>\$ 2,612,748</u>	<u>\$ 1,014,830</u>	<u>\$ 42,245,235</u>

Native American Rights Fund, Inc.
Statements of Cash Flows
Years Ended September 30, 2018 and 2017

	2018	2017
Operating Activities		
Change in net assets	\$ 1,632,838	\$ 21,031,983
Items not requiring (providing) cash		
Depreciation expense	66,150	68,629
Net realized and unrealized gains on investments	(1,571,063)	(1,446,210)
Contribution of securities	-	(32,821)
Changes in		
Other receivables	161,417	(169,882)
Government contract receivable	(316,074)	159,940
Grants and contributions receivable	(394,960)	2,010,278
Bequests receivable	-	76,346
Prepaid expenses and other assets	147,425	(59,165)
Accounts payable and accrued expenses	(348,878)	638,873
Retirement recognition program	(7,901)	(22,577)
Deferred revenue	321	(4,239)
	<u>(630,725)</u>	<u>22,251,155</u>
Net cash provided by (used in) operating activities		
Investing Activities		
Proceeds from sales of investments	179,889	121,317
Purchases of investments	(4,816,864)	(15,297,641)
Purchase of furniture and equipment	(910,714)	(29,443)
	<u>(5,547,689)</u>	<u>(15,205,767)</u>
Net cash used in investing activities		
Financing Activities		
Principal payments under capital lease obligation	(17,450)	(21,700)
	<u>(17,450)</u>	<u>(21,700)</u>
Net cash used in financing activities		
Increase (Decrease) in Cash	(6,195,864)	7,023,688
Cash, Beginning of Year	<u>7,771,676</u>	<u>747,988</u>
Cash, End of Year	<u><u>\$ 1,575,812</u></u>	<u><u>\$ 7,771,676</u></u>
Supplemental Disclosure of Cash Flow Information		
Interest paid	<u>\$ 1,701</u>	<u>\$ 2,676</u>
Equipment purchased under capital lease	<u>\$ 32,139</u>	<u>\$ 9,813</u>

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Note 1: Nature of Operations and Summary of Significant Accounting Policies

Nature of Operations

Native American Rights Fund, Inc. (NARF) is a not-for-profit organization whose mission and principal activities are to provide legal representation, assistance and education to Native American people. NARF's revenues and other support are derived principally from support from private foundations, the United States government, public contributions and a limited fee policy, with the majority of its funding derived from grant and contribution support and legal fees.

The activities of NARF include the following programs:

Litigation and Client Services

NARF provides legal representation, assistance and education to Native American people. The major areas of concentration include tribal restoration and recognition, land claims settlements, hunting and fishing rights, the protection of Indian religious freedom and education rights.

National Indian Law Library (NILL)

NILL is the national repository of, and clearinghouse for, materials in Indian law. NILL collects and distributes catalogues and other materials used for legal and educational purposes. NILL also provides reference and research assistance.

Effective in 2018, NARF became fiscal sponsor to two charitable groups. Both groups operate under the umbrella of NARF's 501(c)(3) status and receive administrative support, including accounting services and guidance regarding non-profit management best practices. The charitable groups consist of:

- An organization formed to manage land associated with efforts to preserve the culture and education of the Native American people which have a unique and particular interest in the lands of South Texas and another organization;
- A joint initiative of various Indian Tribes to protect and collaboratively manage a National Monument to honor: the land; the Tribes' past and present; and the Tribes' relationship to the land.

Prior to 2018, NARF recorded activity for one of these charitable groups as funds held on behalf of others in the statement of financial position. Once NARF became fiscal sponsor, amounts held on behalf of others were released to the appropriate revenue and expense accounts. As fiscal sponsor, NARF assumes all fiscal and administrative responsibility for these groups. Amounts received and expended on behalf of these groups constitute NARF activities and are recognized in the statement of activities.

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Use of Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues, expenses, gains, losses and other changes in net assets during the reporting period. Actual results could differ from those estimates.

Cash

Cash consists of bank deposits in federally insured accounts. At September 30, 2018, NARF's cash accounts exceeded federally insured limits by approximately \$1,505,000.

Accounts Receivable

Accounts receivable are stated at the amount billed to customers plus any accrued and unpaid interest. NARF provides an allowance for doubtful accounts, which is based upon a review of outstanding receivables, historical collection information and existing economic conditions. Delinquent receivables are written off based on individual account evaluation and specific circumstances of the client.

Investments and Investment Return

Investments in equity securities having a readily determinable fair value and all debt securities are carried at fair value. Other investments are valued at the lower of cost (or fair value at time of donation, if acquired by contribution) or fair value. Investment return includes dividend, interest and other investment income; realized and unrealized gains and losses on investments carried at fair value; and realized gains and losses on other investments.

Investment returns that are initially restricted by donor stipulation and for which the restriction will be satisfied in the same year are recorded as temporarily restricted and then released from restriction. Other investment returns are reflected in the statements of activities as unrestricted, temporarily restricted or permanently restricted based upon the existence and nature of any donor or legally imposed restrictions.

Collections

Collections of works of art, historical treasures and similar assets are not capitalized in as much as the items are preserved and cared for continuously. Purchases of collection items are reported in the year of acquisition as decreases in unrestricted net assets, or in temporarily or permanently restricted net assets if the assets used to purchase the items were restricted to that use by donor stipulation. Contributions of collection items are not reported in the financial statements. Proceeds from disposal of and insurance recoveries related to collection items are reported as increases in the appropriate net asset classes.

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

NARF's collections consist of rare books and maps. These collections are held for educational and research purposes. They are subject to a policy that requires proceeds from the disposition of collection items to be used to acquire other collection items.

No collection items were sold or removed in 2018 and 2017.

Property and Equipment

Property and equipment are depreciated on a straight-line basis over the estimated useful life of each asset. Assets under capital lease obligations are depreciated over the shorter of the lease term or their respective estimated useful lives.

Deferred Revenue

Revenue from fees for legal services is deferred and recognized over the periods to which the fees relate.

Funds Held on Behalf of Others

Funds held on behalf of others represent assets collected from external donors for the benefit of other groups. NARF and the groups' mission statements align and NARF has not been granted variance power over how the funds received are spent. The unspent balance of the funds collected is accounted for as a liability by NARF.

Temporarily and Permanently Restricted Net Assets

Temporarily restricted net assets are those whose use by NARF has been limited by donors to a specific time period or purpose. Permanently restricted net assets have been restricted by donors to be maintained by NARF in perpetuity.

Future Legal Advocacy Fund

The Fund consists of amounts designated by the Board of Directors for future costs associated with representation of tribes and native organizations who do not have the resources to pay for the costs of preparing for protracted litigation. As the amounts are designated by the board and not donors, the amounts are considered unrestricted as the board can change the designation.

Contributions

Gifts of cash and other assets received without donor stipulations are reported as unrestricted revenue and net assets. Gifts received with a donor stipulation that limits their use are reported as temporarily or permanently restricted revenue and net assets. When a donor stipulated time restriction ends or purpose restriction is accomplished, temporarily restricted net assets are reclassified to unrestricted net assets and reported in the statements of activities as net assets released from restrictions. Gifts and investment income that are originally restricted by the donor and for which the restriction is met in the same time period are recorded as temporarily restricted and then released from restriction.

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Gifts of land, buildings, equipment and other long-lived assets are reported as unrestricted revenue and net assets unless explicit donor stipulations specify how such assets must be used, in which case the gifts are reported as temporarily or permanently restricted revenue and net assets. Absent explicit donor stipulations for the time long-lived assets must be held, expirations of restrictions resulting in reclassification of temporarily restricted net assets as unrestricted net assets are reported when the long-lived assets are placed in service.

Unconditional gifts expected to be collected within one year are reported at their net realizable value. Unconditional gifts expected to be collected in future years are initially reported at fair value determined using the discounted present value of estimated future cash flows technique. The resulting discount is amortized using the level-yield method and is reported as contribution revenue.

Conditional gifts depend on the occurrence of a specified future and uncertain event to bind the potential donor and are recognized as assets and revenue when the conditions are substantially met and the gift becomes unconditional.

In-kind Contributions

Contributed goods and services are recorded as in-kind contributions and corresponding expenses at their estimated fair values at the date of donation. In-kind contributions for the years ended September 30, 2018 and 2017 consisted of in-kind public service announcements, which are not reflected in the accompanying financial statements because NARF provided minimal input in producing and placing the announcements.

Government Grants

Support funded by grants is recognized as NARF performs the contracted services or incurs outlays eligible for reimbursement under the grant agreements. Grant activities and outlays are subject to audit and acceptance by the granting agency and, as a result of such audit, adjustments could be required.

Income Taxes

NARF is exempt from income taxes under Section 501(c)(3) of the Internal Revenue Code and a similar provision of state law. However, NARF is subject to federal income tax on any unrelated business taxable income.

Functional Allocation of Expenses

The costs of supporting the various programs and other activities have been summarized on a functional basis in the statements of activities. Certain costs have been allocated among the programs and supporting services benefited.

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Transfers Between Fair Value Hierarchy Levels

Transfers in and out of Level 1 (quoted market prices), Level 2 (other significant observable inputs) and Level 3 (significant unobservable inputs) are recognized on the actual transaction date.

Note 2: Investments and Investment Return

Investments at September 30 consisted of the following:

	2018	2017	Unfunded Commitments	Redemption Frequency	Redemption Notice Period
Cash equivalents	\$ 2,733,465	\$ 2,089,954			
Fixed income securities	2,792,599	9,899,588			
Equities					
Domestic	11,027,151	7,133,363			
International	1,221,568	1,231,922			
Mutual funds					
Fixed income	12,407	142,870			
Equities	4,111,538	4,259,235			
Exchange traded funds	6,387,287	-			
Alternative investments					
REIT (A)	3,289,183	3,140,468	None	Quarterly	30 days
Equity long/short fund (B)	5,723,332	4,102,723	None	Quarterly	14 days
Private equity (C)	1,568,473	771,227	1,552,554	N/A	N/A
Non-traded REIT (D)	911,385	799,000	None	Quarterly	30 days
Total investments	<u>\$ 39,778,388</u>	<u>\$ 33,570,350</u>			

- (A) This category consists of an investment in the Carey Watermark Investors 2 Fund (the Fund) which is a non-traded real estate investment trust (REIT) formed for the purpose of acquiring, owning, disposing of, and managing and seeking to enhance the value of interests in lodging and lodging-related properties. Liquidity varies based on the amount the owners collectively wish to redeem and executed sales by the investment managers of the underlying real estate properties. Fund liquidation is planned in five to seven years depending on market conditions. After one year of investment, upon written request with one month notice, funds can be redeemed on a quarterly basis. All valuations are based on annual appraisals of underlying properties conducted by independent appraisers. NARF's position in the fund is valued using net asset value per share.
- (B) This category consists of an investment in the ACAP Strategic Fund (the Fund), a marketable alternative investment, which employs a long-short equity investment strategy with underlying investments being liquid in nature. Management of the Fund has the ability to shift investments among differing investment strategies. Investments can be liquidated with proper notice as indicated above. The Fund is priced daily and is therefore valued using the fair value method.

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

- (C) This category consists of an investment in the Owl Rock Capital Corporation (the Corporation) which is a direct lending platform to U.S. middle market companies. NARF's investment in the corporation is illiquid until the fund experiences a liquidity event. Therefore, NARF's funds are not redeemable. A significant portion of the underlying investments do not have readily determinable market prices. Valuation of underlying investments is based upon a third party valuation report. NARF's position in the fund is valued using net asset value per share.
- (D) This category consists of an investment in the Black Creek Group – Industrial Property Trust (the Trust) which is a non-traded real estate investment trust (REIT) formed for the purpose of acquiring and operating distribution warehouses that generate rental revenue through leasing spaces to corporate customers. Liquidity of up to 5% of total assets is allowed on a quarterly basis after one year of ownership and with one month's notice. Fund liquidation is planned in five to eight years. All valuations are based on annual appraisals of underlying properties conducted by independent appraisers. NARF's position in the fund is valued using net asset value per share.

Total investment return is composed of the following:

	2018	2017
Interest and dividend income	\$ 1,272,568	\$ 669,566
Net realized and unrealized gains	1,571,063	1,446,210
	<u>\$ 2,843,631</u>	<u>\$ 2,115,776</u>

Note 3: Grants and Contributions Receivable

Grants and contributions receivable at September 30 consist of the following:

	September 30, 2018		
	Unrestricted	Temporarily Restricted	Total
Due within one year	\$ 150,000	\$ 644,178	\$ 794,178
Due in one to five years	-	802,532	802,532
Discount for time value of money	-	(24,897)	(24,897)
	<u>\$ 150,000</u>	<u>\$ 1,421,813</u>	<u>\$ 1,571,813</u>

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

	September 30, 2017		
	Unrestricted	Temporarily Restricted	Total
Due within one year	\$ -	\$ 704,027	\$ 704,027
Due in one to five years	-	500,000	500,000
Discount for time value of money	-	(27,174)	(27,174)
	<u>\$ -</u>	<u>\$ 1,176,853</u>	<u>\$ 1,176,853</u>

Note 4: Property and Equipment

Property and equipment at September 30 consist of the following:

	2018	2017
Land	\$ 941,066	\$ 58,937
Building and leasehold improvements	331,893	331,894
Equipment and furniture	<u>1,029,554</u>	<u>1,002,190</u>
	2,302,513	1,393,021
Less accumulated depreciation and amortization	<u>(1,192,498)</u>	<u>(1,159,709)</u>
	<u>\$ 1,110,015</u>	<u>\$ 233,312</u>

In 2018, NARF, acting as fiscal sponsor for one of its charitable groups, received a contribution to purchase land in south Texas. The south Texas land was purchased on behalf of the group for \$882,129, resulting in an increase in land for the year ended September 30, 2018.

Note 5: Line-of-Credit

NARF had a \$600,000 line of credit, which expired during the year ended September 30, 2017 and was not renewed.

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Note 6: Capital Lease Obligations

Capital leases include leases covering office equipment such as copiers, postage and fax machines. The capital leases expire in various years through 2023. Remaining payments on capital lease obligations, excluding interest, at September 30, 2018, are as follows:

Year Ended September 30,	
2019	\$ 14,100
2020	7,843
2021	8,671
2022	8,077
2023	<u>7,506</u>
	<u>\$ 46,197</u>

Property and equipment include the following equipment under capital leases at September 30:

	<u>2018</u>	<u>2017</u>
Equipment	\$ 95,869	\$ 97,091
Less accumulated depreciation	<u>54,684</u>	<u>69,074</u>
	<u>\$ 41,185</u>	<u>\$ 28,017</u>

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Note 7: Net Assets

Temporarily Restricted Net Assets

Temporarily restricted net assets at September 30 are available for the following purposes or periods:

	2018	2017
Purpose restrictions		
Alaska Native Global Warming	\$ 15,949	\$ 15,949
Bears Ears National Monument	1,018,099	-
Bering Sea Protection	618,370	70,321
Boarding School Healing Coalition	16,183	35,000
Client Representation against Kestone XL Pipeline	13,821	-
Indian Child Welfare Act Web Log	57,161	60,544
Indigenous Peyote Conservation Initiative	37,334	-
Law Clerk Program	-	15,000
Native Vision Project	-	29,603
Representation of Alaskan Villages	1,215,547	1,610,208
Supreme Court Project	166,667	366,667
Traditional Waters Project	-	75,000
Tribal Elders' Film Project	3,797	-
Voting Rights	84,585	84,456
Time restrictions		
Grants and contributions receivable for unrestricted purposes	150,000	250,000
	<u><u>\$ 3,397,513</u></u>	<u><u>\$ 2,612,748</u></u>

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Net Assets Released from Restrictions

Net assets were released from donor restrictions by incurring expenses satisfying the restricted purposes or by occurrence of other events specified by donors.

	2018	2017
Purpose restrictions accomplished		
Alaska Native Global Warming	\$ -	\$ 766
American Indian Heritage Day	1,500	-
Bears Ears National Monument	644,147	-
Bering Sea Protection	220,925	222,045
Boarding School Healing Coalition	18,817	82,688
Client Representation against Keystone XL Pipeline	38,025	-
Indian Child Welfare Act Trainings	-	169,327
Indian Child Welfare Act Web Log	3,383	3,486
Indigenous Peyote Conservation Initiative	1,046,634	80,572
Law Clerk Program	48,500	56,180
National Indian Law Library	-	2,000
Native Vision Project	29,603	68,397
Peacemaking Project	100	-
Representation of Alaskan Villages	533,368	465,046
Standing Rock	-	9,326
Supreme Court Project	200,000	200,000
Traditional Waters Project	75,000	-
Tribal Elders' Film Project	6,203	-
Voting Rights	438,561	224,951
Water Symposium	-	3,000
Time restrictions expired	250,000	600,000
	<u>\$ 3,554,766</u>	<u>\$ 2,187,784</u>

Permanently Restricted Net Assets

Permanently restricted net assets at September 30 are restricted to the following:

	2018	2017
21st Century Endowment	<u>\$ 1,027,503</u>	<u>\$ 1,014,830</u>

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Note 8: Endowments

NARF's endowment consists of two funds established for a variety of purposes. The endowment includes both donor-restricted endowment funds (21st Century Endowment) and funds designated by the governing body to function as endowments (board designated endowment funds titled Future Legal Advocacy Fund). As required by accounting principles generally accepted in the United States of America (GAAP), net assets associated with endowment funds are classified and reported based on the existence or absence of donor-imposed restrictions.

NARF has interpreted the State of Colorado's Prudent Management of Institutional Funds Act (UPMIFA) as requiring preservation of the fair value of the original gift as of the gift date of the donor-restricted endowment funds absent explicit donor stipulations to the contrary. Although NARF is incorporated in Washington, D.C., its headquarters are located in Boulder, Colorado. Management has compared the acts from the two jurisdictions and does not believe differences between the two jurisdictions to be significant. As a result of this interpretation, NARF classifies as permanently restricted net assets (a) the original value of gifts donated to the permanent endowment, (b) the original value of subsequent gifts to the permanent endowment and (c) accumulations to the permanent endowment made in accordance with the direction of the applicable donor gift instrument at the time the accumulation is added to the fund. The remaining portion of donor-restricted endowment funds is classified as temporarily restricted net assets until those amounts are appropriated for expenditure by NARF in a manner consistent with the standard of prudence prescribed by UPMIFA.

The composition of net assets by type of endowment fund at September 30, 2018 and 2017:

2018				
	Unrestricted	Temporarily Restricted	Permanently Restricted	Total
Board-designated endowment funds	\$ 25,000,000	\$ -	\$ -	\$ 25,000,000
Donor-restricted endowment funds	-	-	1,027,503	1,027,503
	<u>\$ 25,000,000</u>	<u>\$ -</u>	<u>\$ 1,027,503</u>	<u>\$ 26,027,503</u>
2017				
	Unrestricted	Temporarily Restricted	Permanently Restricted	Total
Board-designated endowment funds	\$ 25,000,000	\$ -	\$ -	\$ 25,000,000
Donor-restricted endowment funds	-	-	1,014,830	1,014,830
	<u>\$ 25,000,000</u>	<u>\$ -</u>	<u>\$ 1,014,830</u>	<u>\$ 26,014,830</u>

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Changes in endowment net assets for the years ended September 30, 2018 and 2017:

	2018			Total
	Unrestricted	Temporarily Restricted	Permanently Restricted	
Endowment net assets, beginning of year	\$ 25,000,000	\$ -	\$ 1,014,830	\$ 26,014,830
Contributions	-	-	12,673	12,673
Endowment net assets, end of year	<u>\$ 25,000,000</u>	<u>\$ -</u>	<u>\$ 1,027,503</u>	<u>\$ 26,027,503</u>
	2017			Total
	Unrestricted	Temporarily Restricted	Permanently Restricted	
Endowment net assets, beginning of year	\$ -	\$ -	\$ 1,010,462	\$ 1,010,462
Designation	25,000,000	-	-	25,000,000
Contributions	-	-	4,368	4,368
Endowment net assets, end of year	<u>\$ 25,000,000</u>	<u>\$ -</u>	<u>\$ 1,014,830</u>	<u>\$ 26,014,830</u>

NARF has adopted investment and spending policies for endowment assets that attempt to invest all available endowment fund assets in a manner that will provide the highest total return while seeking to provide for the long- and short-term financial needs of NARF and maintain the original donated value of the endowment. Endowment assets include donor-restricted endowment funds NARF must hold in perpetuity or for donor-specified periods, as well as those of board-designated endowment funds.

Under NARF's policies, endowment assets are invested in a manner that is intended to produce results that exceed the rate of inflation as measured by the Consumer Price Index plus 4.5% while accepting a high level of risk tolerance.

To satisfy its long-term rate of return objectives, NARF relies on a total return strategy in which investment returns are achieved through both current yield (investment income such as dividends and interest) and capital appreciation (both realized and unrealized). NARF targets a diversified asset allocation that places a greater emphasis on equity-based investments to achieve its long-term return objectives within prudent risk constraints.

NARF has a spending policy of appropriating for expenditure each year the amounts needed and available for spending. NARF has interpreted that investment return generated by the endowment assets are unrestricted in accordance with donor stipulations. Under NARF's spending policy, any anticipated investment return from the endowment is included in NARF's internal budgeting process and fully appropriated for spending upon adoption of the budget. Management has elected

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

to combine its investments related to the endowment with other investments. As the proceeds from endowment earnings are unrestricted, management has not allocated the earnings between those earned by endowment funds and other investments. As such, management has not included investment return in the tables above.

Note 9: Operating Leases

Noncancelable operating leases for office space and equipment expire in various years through 2022. Total rent expense for the years ended September 30, 2018 and 2017 was \$204,020 and \$184,579, respectively.

Future minimum lease payments at September 30, 2018:

2019	\$	180,254
2020		156,160
2021		72,338
2022		<u>74,508</u>
	\$	<u><u>483,260</u></u>

Note 10: Retirement Benefits

On August 6, 1994, NARF's Board of Directors authorized the adoption of a noncontributory defined contribution plan for its employees. Effective March 18, 2005, this plan was amended to a Safe Harbor 401(k). Benefits payable under the plan include a 3% minimum safe harbor contribution plus an additional election of 3%, at the yearly discretion of the corporate officers, for those employees who have achieved a minimum of one year of employment and attainment of age 21. Pension expense was \$235,573 and \$237,241 for 2018 and 2017, respectively.

On August 17, 2007, NARF's executive committee authorized the adoption of the NARF Retirement Program. This program provides a one-time cash award payable at the date of retirement for eligible employees. The amount of this award is determined by incorporating years of service, age and average three-year salary. As of September 30, 2018 and 2017, NARF recognized a liability of \$276,864 and \$284,765, respectively, relating to this program.

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Note 11: Allocation of Joint Costs

It is NARF's policy to allocate costs of activities that include requests for contributions, as well as program and management and general components to applicable functions. Activities include distribution of informational materials that included fundraising appeals. In 2017, all activities conducted included requests for contributions. As a result, 100% of such activities were fundraising related and did not contain a programmatic component. In 2018, activities included program communications included with requests for contributions. As a result, the activities allocated costs between fundraising related and programmatic as noted below during 2018.

Program expenses	\$ 472,715
Fundraising expenses	877,900
	<hr/>
	\$ 1,350,615

Note 12: Disclosures about Fair Value of Assets and Liabilities

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. Fair value measurements must maximize the use of observable inputs and minimize the use of unobservable inputs. There is a hierarchy of three levels of inputs that may be used to measure fair value:

- Level 1** Quoted prices in active markets for identical assets or liabilities
- Level 2** Observable inputs other than Level 1 prices, such as quoted prices for similar assets or liabilities; quoted prices in markets that are not active; or other inputs that are observable or can be corroborated by observable market data for substantially the full term of the assets or liabilities
- Level 3** Unobservable inputs that are supported by little or no market activity and that are significant to the fair value of the assets or liabilities

Following is a description of the inputs and valuation methodologies used for assets and liabilities measured at fair value on a recurring basis and recognized in the accompanying statements of financial position, as well as the general classification of such assets and liabilities pursuant to the valuation hierarchy. There have been no significant changes in the valuation techniques during the year ended September 30, 2018.

Investments

Where quoted market prices are available in an active market, securities are classified within Level 1 of the valuation hierarchy. Level 1 securities include fixed income securities, equities and mutual funds. If quoted market prices are not available, then fair values are estimated by using pricing models, quoted prices of securities with similar characteristics or discounted cash flows. Invested funds as reported by the investment manager and no further adjustments have been made. There were no Level 2 securities for fiscal year 2018 or 2017. In certain cases where Level 1 or Level 2 inputs are not available, securities are classified within Level 3 of the hierarchy. NARF does not have any Level 3 investments.

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

The following tables present the fair value measurements of assets and liabilities recognized in the accompanying statements of financial position measured at fair value on a recurring basis and the level within the fair value hierarchy in which the fair value measurements fall at September 30, 2018 and 2017:

	2018			
	Fair Value Measurements Using			
		Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
	Total			
Investments				
Fixed income securities	\$ 2,792,599	\$ 2,792,599	\$ -	\$ -
Equities				
Domestic	11,027,151	11,027,151	-	-
International	1,221,568	1,221,568	-	-
Mutual funds				
Fixed income	12,407	12,407	-	-
Equities	4,111,538	4,111,538	-	-
Exchange traded funds	6,387,287	6,387,287	-	-
Equity long/short fund	5,723,332	5,723,332	-	-
Alternative investments				
REIT (A)	3,289,183	-	-	-
Private equity (A)	1,568,473	-	-	-
Non-traded REIT (A)	911,385	-	-	-
	37,044,923	\$ 31,275,882	\$ -	\$ -
Cash equivalents	2,733,465			
	<u>\$ 39,778,388</u>			

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

	2017			
	Fair Value Measurements Using			
		Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
	Total			
Investments				
Fixed income securities	\$ 9,899,588	\$ 9,899,588	\$ -	\$ -
Equities				
Domestic	7,133,363	7,133,363	-	-
International	1,231,922	1,231,922	-	-
Mutual funds				
Fixed income	142,870	142,870	-	-
Equities	4,259,235	4,259,235	-	-
Equity long/short fund	4,102,723	4,102,723	-	-
Alternative investments				
REIT (A)	3,140,468	-	-	-
Private equity (A)	771,227	-	-	-
Non-traded REIT (A)	799,000	-	-	-
	31,480,396	\$ 26,769,701	\$ -	\$ -
Cash equivalents	2,089,954			
	<u>\$ 33,570,350</u>			

- (A) Certain investments that are measured at fair value using the net asset value per share (or its equivalent) practical expedient have not been classified in the fair value hierarchy. The fair value amounts included above are intended to permit reconciliation of the fair value hierarchy to the amounts presented in the statements of financial position.

Note 13: Significant Estimates and Concentrations

Accounting principles generally accepted in the United States of America require disclosure of certain significant estimates and current vulnerabilities due to certain concentrations. Those matters include the following:

Concentrations

Approximately 58% of all contributions were received from one donor in 2017. No individual contributions exceeded 10% of total contribution revenue in 2018.

Native American Rights Fund, Inc.

Notes to Financial Statements

September 30, 2018 and 2017

Note 14: Related-party Transactions

During the years ended September 30, 2018 and 2017, NARF used the services of a consulting agency that is owned by a relative of NARF's executive management. Payments to the consulting agency amounted to \$15,000 and \$55,000, respectively. There was \$0 and \$5,000 owed to the related party as of September 30, 2018 and 2017, respectively.

Supplementary Information

Native American Rights Fund, Inc.
Statement of Functional Expenses
Year Ended September 30, 2018
(With Comparative Totals for September 30, 2017)

	Litigation and Client Services	National Indian Law Library	Total Program Expenses	Management and General	Fund Raising	Total Supporting Expenses	Total Expenses	2017 Total Expenses
Salaries and wages								
Professional staff	\$ 2,933,399	\$ 206,788	\$ 3,140,187	\$ 331,137	\$ 460,164	\$ 791,301	\$ 3,931,488	\$ 3,791,926
Support staff	558,430	13,101	571,531	137,409	90,355	227,764	799,295	812,982
Fringe benefits	871,095	74,025	945,120	59,119	220,276	279,395	1,224,515	1,184,165
Total salaries and related costs	4,362,924	293,914	4,656,838	527,665	770,795	1,298,460	5,955,298	5,789,073
Contract fees and consultants	2,533,872	-	2,533,872	208,289	24,000	232,289	2,766,161	2,185,795
Travel	712,065	4,299	716,364	72,923	83,155	156,078	872,442	858,823
Space costs	263,054	8,674	271,728	9,104	7,815	16,919	288,647	267,316
Office expenses	703,484	8,635	712,119	57,107	1,749,629	1,806,736	2,518,855	1,667,627
Equipment maintenance and rental	83,198	14,205	97,403	41,476	8,165	49,641	147,044	143,925
Litigation costs	31,412	-	31,412	-	-	-	31,412	20,828
Bad debt expense	-	-	-	115,000	-	115,000	115,000	-
Depreciation	43,265	1,731	44,996	4,799	16,355	21,154	66,150	68,629
Library costs	49,280	1,093	50,373	383	8,660	9,043	59,416	63,409
Total expenses	<u>\$ 8,782,554</u>	<u>\$ 332,551</u>	<u>\$ 9,115,105</u>	<u>\$ 1,036,746</u>	<u>\$ 2,668,574</u>	<u>\$ 3,705,320</u>	<u>\$ 12,820,425</u>	<u>\$ 11,065,425</u>

Native American Rights Fund, Inc.
Schedule of Expenditures of Federal Awards
Year Ended September 30, 2018

Federal Grantor/Pass-through Grantor/ Program or Cluster Title	Assistance Identification Number	Federal CFDA Number	Total Federal Expenditures	Passed Through to Subrecipients
U.S. Department of Justice - Office of Justice Programs				
Bureau of Justice Assistance				
Tribal Criminal Legal Assistance	2015-AL-BX-0002	16.815	\$ 587,022	\$ 574,999
Tribal Civil Legal Assistance	2015-AL-BX-0001	16.815	<u>552,618</u>	<u>537,575</u>
Total			<u>\$ 1,139,640</u>	<u>\$ 1,112,574</u>

Notes to Schedule

1. The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of Native American Rights Fund (NARF) under programs of the federal government for the year ended September 30, 2018. The accompanying notes are an integral part of this Schedule. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only a selected portion of the operations of NARF, it is not intended to and does not present the financial position, changes in net assets or cash flows of NARF.
2. Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, wherein certain types of expenditures are not allowable or are limited as to reimbursement. NARF has elected not to use the 10 percent de minimis indirect cost rate allowed under the Uniform Guidance.

**Independent Auditor's Report on Internal Control Over Financial
Reporting and on Compliance and Other Matters Based on an Audit
of the Financial Statements Performed in Accordance with
*Government Auditing Standards***

Board of Directors
Native American Rights Fund, Inc.
Boulder, Colorado

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of Native American Rights Fund, Inc. (NARF), which comprise the statement of financial position as of September 30, 2018, and the related statements of activities and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated February 4, 2019.

Internal Control Over Financial Reporting

Management of NARF is responsible for establishing and maintaining effective internal control over financial reporting (internal control). In planning and performing our audit of the financial statements, we considered NARF's internal control to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of NARF's internal control. Accordingly, we do not express an opinion on the effectiveness of NARF's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of NARF's financial statements will not be prevented or detected and corrected on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Board of Directors
Native American Rights Fund, Inc.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether NARF's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

We noted certain matters that we reported to NARF's management in a separate letter dated February 4, 2019.

Purpose of This Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering NARF's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

BKD, LLP

Denver, Colorado
February 4, 2019

Independent Auditor's Report on Compliance for Each Major Federal Program and Report on Internal Control Over Compliance

Board of Directors
Native American Rights Fund, Inc.
Boulder, Colorado

Report on Compliance for Each Major Federal Program

We have audited Native American Rights Fund, Inc.'s (NARF) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on its major federal program for the year ended September 30, 2018. NARF's major federal program is identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with federal statutes, regulations, contracts and the terms and conditions of its federal awards applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for NARF's major federal program based on our audit of the types of compliance requirements referred to above.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about NARF's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of NARF's compliance.

Board of Directors
Native American Rights Fund, Inc.

Opinion on NARF's Major Federal Program

In our opinion, NARF complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on its major federal program for the year ended September 30, 2018.

Report on Internal Control Over Compliance

Management of NARF is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered NARF's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing our opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of NARF's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

BKD, LLP

Denver, Colorado
February 4, 2019

Native American Rights Fund, Inc.

Schedule of Findings and Questioned Costs

Year Ended September 30, 2018

Summary of Auditor's Results

Financial Statements

1. The type of report auditor issued on whether the financial statements were prepared in accordance with accounting principles generally accepted in the United States of America (GAAP) was:
☒ Unmodified ☐ Qualified ☐ Adverse ☐ Disclaimed
2. The independent auditor's report on internal control over financial reporting disclosed:
 Significant deficiency(ies)? ☐ Yes ☒ None reported
 Material weakness(es)? ☐ Yes ☒ No
3. Noncompliance considered material to financial statements was disclosed by the audit? ☐ Yes ☒ No

Federal Awards

4. The independent auditor's report on internal control over compliance for major federal awards programs disclosed:
 Significant deficiency(ies)? ☐ Yes ☒ None reported
 Material weakness(es)? ☐ Yes ☒ No
5. The opinion expressed in the independent auditor's report on compliance for major federal awards was:
☒ Unmodified ☐ Qualified ☐ Adverse ☐ Disclaimed
6. The audit disclosed findings required to be reported by 2 CFR 200.516(a)? ☐ Yes ☒ No
7. NARF's major programs were:

Cluster/Program	CFDA Number
Tribal Civil and Criminal Legal Assistance	16.815

8. The threshold used to distinguish between Type A and Type B programs was \$750,000.
9. NARF qualified as a low-risk auditee? ☒ Yes ☐ No

Native American Rights Fund, Inc.
Schedule of Findings and Questioned Costs (continued)
Year Ended September 30, 2018

Findings Required to be Reported by *Government Auditing Standards*

Reference Number	Finding	Questioned Costs
No matters are reportable		

Findings Required to be Reported by Uniform Guidance

Reference Number	Finding	Questioned Costs
No matters are reportable		

Native American Rights Fund, Inc.
Summary Schedule of Prior Audit Findings
Year Ended September 30, 2017

Reference Number	Summary of Finding	Status
	No matters are reportable	