

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

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IN RE:

Docket No. TC10-026

SPRINT COMMUNICATIONS  
COMPANY L.P.,

Complainant,

**AFFIDAVIT OF SCOTT G. KNUDSON**

v.

NATIVE AMERICAN TELECOM, LLC,

Respondent.

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COUNTY OF HENNEPIN )  
  ) S.S.  
STATE OF MINNESOTA )

Scott G. Knudson, being duly sworn, states under oath as follows:

1. My name is Scott G. Knudson. I am an attorney licensed to practice in Minnesota and representing the Complainant, Sprint Communications Company, L.P. ("Sprint"), in this action. I provide this affidavit in support of Sprint's Memorandum in Opposition to NAT's Motion to Stay or Dismiss.

2. Attached are true and correct copies of filings made by Native American Telecom, LLC ("NAT") with the South Dakota Secretary of State. These copies were obtained from the Secretary of State's website found at [www.sdsos.gov](http://www.sdsos.gov). Exhibit A is NAT's Articles of Organization filed with the Secretary of State on August 29, 2008. The forms shows the organizer was LegalZoom.com, Inc., which is apparently a California-based web enterprise that will prepare legal forms for a fee, using information

provided by LegalZoom's customer. NAT listed Thomas Reiman as NAT's registered agent, and Reiman and Gene DeJordy as the members of NAT personally responsible for NAT's debts under SDCL § 47-34A-303(c). Reman, DeJordy and NAT all listed Reiman's Split Rock Circle Sioux Falls residence as their addresses.

3. Exhibit B to my affidavit is NAT's Answer filed in Case No. 10-4110, currently pending in the United States District Court for the District of South Dakota. In paragraph 13, NAT admits that neither Reman nor DeJordy are enrolled members of the Crow Creek Tribe.

4. DeJordy is being sued by Alltel Communications, LLC in United States District Court for the Eastern District of Arkansas, Docket No. 4:10-CV-130 BSM. Alltel is alleging DeJordy has breached his severance agreement with Alltel. The affidavit of service on DeJordy, Exhibit C to my affidavit, disclosed that DeJordy lives in Fairfield, Connecticut.

5. Exhibit D to my affidavit is NAT's annual report filed September 28, 2009 with the Secretary of State. It lists Reiman as its president and registered agent, with the same Sioux Falls address as in Exhibit A.

6. Exhibit E to my affidavit is NAT's tariff it filed with the FCC on September 14, 2009, with an effective date of September 15, 2009.

7. Exhibit F to my affidavit is NAT's tariff it filed with the Tribal Utility Authority on September 1, 2009, ostensibly effective that very day.

8. Exhibit G to my affidavit is the Articles of Organization for Native American Telecom Enterprise, LLC ("NAT Enterprise"). These were filed with the

Secretary of State on May 14, 2009. Reiman is one of the organizers and its registered agent, again at the Split Rock Circle Sioux Falls address as NAT. DeJordy is another organizer, with the same address. Reiman and DeJordy are listed as the members of NAT Enterprise responsible for its debts under SDCL § 47-34A-303(c).

9. Exhibit H to my affidavit is the annual report of NAT Enterprise that was filed with the Secretary of State on June 21, 2010. Reiman is listed as the president and registered agent, again at the Split Rock Circle Sioux Falls address.

10. Exhibit I to my affidavit are the amendments to NAT's FCC tariff that NAT filed with the FCC in a filing dated October 21, 2009, and effective October 22, 2009. In the Amendment you will see symbols in the margin they stand for:

- (C) To signify changed regulation
- (D) To signify discontinued rate or regulation
- (I) To signify increase
- (M) To signify matter relocated without charge
- (N) To signify new rate or regulation
- (R) To signify reduction
- (S) To signify reissued matter
- (T) To signify a change in text but no charge in rate or regulation
- (Z) To signify a correction

11. Attached to my affidavit as Exhibit J is NAT's PUC Application for Certificate of Authority, dated September 8, 2008.

12. Attached to my affidavit as Exhibit K is the Order of the Tribal Utility Authority, dated October 28, 2008.

13. Attached to my affidavit as Exhibit L are the Comments of the Crow Creek Sioux Tribe to PUC, dated December 11, 2008.

14. Attached to my affidavit as Exhibit M is the PUC Order Granting Motion to Dismiss and Closing Docket, dated February 5, 2009.

15. Attached to my affidavit as Exhibit N is the Order, dated March 29, 2009 from the Crow Creek Sioux Tribe Utility Authority.

16. Attached to my affidavit as Exhibit O is NAT's Civil Complaint filed with the Crow Creek Tribal Court on July 7, 2010.

17. Attached to my affidavit as Exhibit P is NAT's Motion for Scheduling Order, dated August 30, 2010.

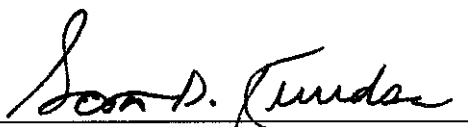
18. Attached to my affidavit as Exhibit Q is census data found on the U.S. Census Bureau website, <http://factfinder.census.gov>, accessed September 23, 2010.

19. Attached to my affidavit as Exhibit R is NAT's FCC License, granted on December 16, 2008.

20. Attached to my affidavit as Exhibit S is the Director of Equalization of Buffalo County's letter regarding land on Crow Creek Reservation, dated September 24, 2010.

21. Attached to my affidavit as Exhibit T is the Director of Equalization of Hughes County's letter regarding taxable and non-taxable land, dated September 23, 2010.

This concludes my affidavit.

By :   
Scott G. Knudson

Subscribed and sworn to before  
me this 21<sup>st</sup> day of September, 2010.

Elizabeth Wold  
Notary Public

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