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TO: Mike Shambaugh, Senior Advisor of Public Safety and Special Envoy to the U.S.
Department of Justice
FR: Chuck Hoskin, Jr.
Principal Chief
CC: Bryan Warner, Deputy Chief
Cabinet / Sub-cabinet
Leadership, Council of the Cherokee Nation
Chuck Garrett, CEO of CNB

Administration Memorandum Directing a Review of Security of Certain Cherokee Nation and Housing Authority of the Cherokee Nation Work Sites and Evaluating Potential Shared Security Services Across Cherokee Nation and Entities

The purpose of this memorandum is to direct Senior Advisor for Public Safety Mike Shambaugh to: (1) review of security at Cherokee Nation, Housing Authority of the Cherokee Nation work sites and (2) evaluate the potential for shared security services across Cherokee Nation and its entities in certain “security vulnerable” communities.

I. Review Work Site Security

Cherokee Nation and the Housing Authority of the Cherokee Nation manages over 100 work sites across Cherokee Nation. Every work site presents security challenges for both staff and visitors to the work site. The establishment of the position of Senior Advisor for Public Safety in August 2024 was, in part, designed to centralize analysis and advice on matters of public safety on Cherokee Nation properties in view of the exponential growth of our work sites over the course of the past decade. This creates an opportunity to conduct a thoughtful deliberative review of our work site security without burdening existing departmental management, Cherokee Nation Marshal Service or other personnel with conducting such review. Most importantly, such a review enables Cherokee Nation to meet its obligations to keep work sites optimally safe and secure for staff and visitors.

A. Scope of Review

1. Geographic / Entity Scope

The review should be limited to work sites at properties managed by Cherokee Nation and the Housing Authority of the Cherokee Nation (HACN) within the Cherokee Nation reservation. The safety and security of all Cherokee Nation entities is, of course, important. However, there is a relatively stronger nexus between Cherokee Nation and the management and operation of HACN work sites and some sites include occasional co-use of physical space. With respect to HACN, the review can include residential areas of HACN's operations to the extent the safety and security of those areas are impacted by work sites. For example, when the safety and security of a low-income housing unit office is reviewed it may make sense to extend the review to the common areas of the housing units.

2. Security elements to be reviewed.

Senior Advisor Shambaugh should develop a written evaluation instrument for the conduct of a threshold review of basic physical work site security. Such an instrument should include basic categories relating to security, such as lighting, ingress and egress, physical separation of visitors from staff, panic alarms, etc. Ultimately the Senior Advisor for Public Safety's expertise will determine the elements of security suitable for this threshold review.

3. Coordination

Coordination is critical to any effective evaluation that involves multiple sites, multiple departments, multiple entities and which implicates multiple governmental interests of the Cherokee Nation. Accordingly, the Senior Advisor for Public Safety Should engage the following, at minimum, in advance of any field work:

- Marshal of the Cherokee Nation
- Cabinet and Sub-cabinet
- Executive Directors

The basic element of coordination is sharing this memorandum and inviting feedback. Secondarily, after an evaluation instrument is drafted but prior to substantial field work, sharing the evaluation instrument will help departments understand the objective of your visits. Additionally, scheduling visits with as much notice as possible to EDs and local management is important. Inasmuch as HACN has an operation legal and functionally separate from Cherokee

Nation, we must give particular deference to guidance and input from HACN management.

B. Time Frame of Review, Issuing Report on Security Status of Cherokee Nation and HACN Work Sites

Reviewing each job site using a custom created standardized survey instrument involving in person inspection with appropriate coordination and concrete recommendations will take considerable time. Rather than issue a single report at the conclusion of the review, the Senior Advisor for Public Safety should consider issuing interim reports and/or maintaining a spreadsheet updated on a rolling basis. In that regard, the Senior Advisor for Public Safety should determine the appropriate priority or categorization of job sites as appropriate. At minimum, an interim report should issue no later than June 30, 2026, and at the conclusion of each calendar quarter thereafter until the review is complete.

II. Evaluate the Potential for Shared Security Services for “Security Vulnerable Outlying Communities.”

By May 30, 2025, the Senior Advisor for Public Safety should provide analysis and recommendations as to whether Cherokee Nation and its entities should share security services in order to increase security in communities with multiple assets across entities and security vulnerabilities.

A. Discussion

In a number of communities outside of Tahlequah, Cherokee Nation and its entities have a number of assets but lack independent human security resources for each site and where a relatively lower concentration of Cherokee Nation Marshal Service resources are present as compared to Tahlequah. In isolation, each entities' asset in a particular community may not warrant the hiring of a full time equivalent (FTE) security guard. Collectively, though, these assets, ultimately the responsibility of Cherokee Nation even if managed by various of its entities, may benefit from full time or even 24/7 security human security presence.

For example, in Vinita there exist the following facilities:

- Buffington Heights, HACN low-income apartments.
- Cherokee Nation Vinita Health Center
- CNB's Anna Mitchell Cultural Center
- Cherokee Nation Archery Range
- Cherokee Nation Food Distribution / Career Services offices.

- Cherokee Nation Outpatient Substance Misuse Recovery Center (future clinic)
- CNB's Buffington Home (future staff publicly accessible historic site)
- Buffington – Barrett Building (future HACN elder apartments)

It very likely makes little fiscal sense for each entity to staff each asset with a individual dedicated security guard (beyond the current status of the Vinita Health Center, which has security during operating hours). For that reason, none of these assets have dedicated human security other than the Vinita Health Center during its normal operating hours or during special events.

Yet, collectively these assets represent hundreds of millions of dollars of Cherokee Nation Capital investment, hundreds of employees and tens of thousands of visits by the public on an annualized basis. Some exterior parts of these facilities are either public accessible or are attractive to visits by the public during prohibit hours. HACN's Buffington Heights in particular houses a large number of people in a residential setting where the perception of security is as important to the quality of life there as actual security, and just as fragile.

Vinita, though periodically patrolled by CNMS, is more than an hour away from the nearest CNMS substation. Even the ambitious growth plan for CNMS cannot achieve the optimal level of human security at Vinita if that growth is to be equitable across our large reservation. To be sure, cross deputization affords a blanket of protection across the reservation. But, cross deputization also depends on often under resourced local law enforcement agencies.

Vinita is simply an example. There exist a number of similarly situated "outlaying" communities where assets are numerous and growing, our CNMS coverage will increase but across a medium to long term time horizon, and where it makes little sense for each site to have dedicated human security resources. These may best be categorized for present purposes as "Security Vulnerable Outlying Communities."

Shared security services for Security Vulnerable Outlying Communities could include a small staff of qualified and credentialed security guards operating 24 / 7 responsible for the assets of multiple entities across the community in question. These security guards would necessarily be mobile, patrolling properties on assigned schedule and otherwise as needed. These employees would necessarily have a single "employer" and chain of command (presumably, Cherokee Nation) but the cost associated with this staff would be borne proportionally by the entities in the subject community. It is worth underscoring that this suggestion assumes this staff to be security guards largely in an observe and report role, not commissioned law enforcement officers.

B. Report on Security Vulnerable Outlying Communities

According, the Senior Advisor of Public Safety should issue a report addressing the following:

1. Using the Vinita example set forth above to develop a definition or set of objective factors, identify a list of Security Vulnerable Outlying Communities.
2. Analyze the *actual* security vulnerability present in these communities, identifying specific assets, public access, employment figures, etc
3. Offer observations relating to *perceived* security vulnerabilities, specifically as it relates to 24/7 residential HACN sites.
4. Address the fundamental question as to whether a shared services approach to addressing real or perceived security vulnerabilities is warranted.
5. Consider whether security services on a contract basis is more feasible.
6. Irrespective of the recommendation inherent in the response to question No. 4, above, analysis the cost associated with staffing each identified community to meet the suggested shared services approach. This part of the analysis will require engaging our various entities on the subject, including CNB and HACN.

III. Public Safety Restrictions on Access to Reports

The reports prescribed herein, once provided to the Principal Chief, will be made available for inspection by members of the Council of the Cherokee Nation. However, insofar as the reports reveal security methods, vulnerabilities and strategize to protect Cherokee Nation access and the general public, only an “public summary” of these reports shall be made accessible to the general public for inspection, unless otherwise required by law.

IV. Conclusion

The Senior Advisor for Public Safety should undertake the reviews and issue the reports prescribed in this memorandum. The Chief of Staff, Attorney General, Marshal and Senior Advisor of Housing Programs should provide all appropriate support, including staff resources, as is necessary to support the Senior Advisor’s work prescribed herein.



Chuck Hoskin, Jr
Principal Chief