



Memorandum

To: File

From: Forrest Tahdooahnippah

Date: October 10, 2025

Re: Comanche Nation Sovereign Immunity Cap - \$15,297,713.67

Comanche Nation Resolution No. TC 06-2024, effective January 25, 2025, authorizes the Comanche Business Committee to approve contracts containing a limited waiver of sovereign immunity under certain enumerated conditions. One such condition is that a limited waiver of sovereign immunity approved by the Comanche Business Committee cannot exceed a cap. At the time of the resolution, the cap was set by the Tribal Council at \$15 million. However, the resolution called for the cap to be indexed to inflation, and for the Chairman to calculate an inflation-adjusted cap using the Consumer Price Index ("CPI") published by the U.S. Bureau of Labor Statistics. Under the resolution, the Chairman is required announce the new cap at the beginning of each fiscal year. The Comanche Nation's fiscal year runs from October 1 to September 30.

I have visited the CPI inflation calculator on the U.S. Bureau of Labor Statistics website, available at https://www.bls.gov/data/inflation_calculator.htm. The most recent month for which data was available was August 2025. Moreover, the calculator had a limit of \$10 million. The inflation adjusted value of \$10,000,000.00 in January 2025 dollars using the calculator was \$10,198,475.78 in August 2025 dollars. Dividing this number by two and multiplying by three gives an inflation adjusted value for \$15,000,000.00 of \$15,297,713.67. Therefore, as of October 1, 2025, the cap on limited waivers of sovereign immunity referenced in Comanche Nation Resolution No. TC 06-2024 is **\$15,297,713.67**.

Forrest Tahdooahnippah
Chairman of the Comanche Nation