



Mille Lacs Band of Ojibwe Indians

*Executive Branch of Tribal Government
Office of the Chief Executive*

Via E-mail

October 9, 2025

Sheldon Boyd, Speaker of the Assembly
Carolyn Beaulieu, District I Representative
Wendy Merrill, District II Representative
Harry Davis, District III Representative

Re: Comments on the Draft TERO Bill

Dear Honorable Members of the Band Assembly:

It is with great appreciation that we offer our comments on your Draft TERO Bill. We are grateful for the opportunity to contribute to this significant legislative process, which has far-reaching implications for tribal employment.

Section No.	Section Name	Comment/Question
1004(j)	Definitions	Corporate Ventures is defined as Mille Lacs Corporate Ventures. Throughout the Title, the term "MLCV" is used without being defined. I therefore recommend replacing "MLCV" with "Corporate Ventures."
1004(k)	Definitions	Mille Lacs Corporate Ventures is "considered a covered employer under this chapter unless otherwise designated." Before signing this type of provision into law, I prefer to see a report from Mille Lacs Corporate Ventures showing the likely financial impact on business operations. It is important that we have a full understanding of the new statute's implications.
1004(q)	Definitions	I agree with defining nepotism with respect to immediate family members, but the definition should further clarify that extended family members are not to be precluded from job opportunities on the basis of perceived nepotism.
1011(a)(1)(i), (ii), (iii)	TERO Commission and Recusal of Commission Members	I recommend changing "10 calendar days" to "15 business days."

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1011(a)(1)(i), (iii)	TERO Commission and Recusal of Commission Members	I recommend clarifying the language to say “. . . Members of the Board” so it is clear that two people will be ratified.
1014(p)	Powers and Duties of TERO Director	This amendment would “permit nepotism . . . when doing so would provide a substantial benefit to the Band or MLCV, subject to ratification by the TERO Commission.” I don’t support the Band’s TERO Code being designed to “permit nepotism.” Nepotism does not (and should) not apply if the relationship is free of any conflicts of interest under Title 6 and when the individual being hired qualifies based on their own merit and skills.
1022	Covered Employer’s Responsibilities	This section would impose a duty on Mille Lacs Corporate Ventures to assist “Band member employees in reaching their career development goals” without specifically defining or expanding upon what would constitute an appropriate level of assistance.
1024(b)	Anishinaabe or Indigenous Preference in Contracting	The paragraph added the word “percent” prior to “(10%)” but does not delete the word “percent” after “(10%).”
1024(d)	Anishinaabe or Indigenous Preference in Contracting	I recommend adding “calendar” after “30.”
1032	Exempt Employers and Entities	This section is not included in the bill. Is this to remove the section in its entirety or because there are no amendments to this section? This comment applies to any other sections of the existing TERO statute that have been omitted from this bill.
1033	Fee Collection and Expenditure	This section removes the TERO Director’s authority to collect fees and imposes an obligation on OMB to automatically withhold the fees. I prefer additional clarification on how this process would work.
1061	Minimum Wage	I support increasing the minimum wage to 20% beyond the minimum wage for the state of Minnesota. For MLCV to best prepare for this change, I recommend the implementation date be fiscal year 2026. I further request to see a report from Mille Lacs Corporate Ventures showing the likely financial impact on business operations.

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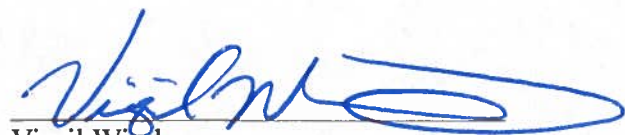
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In addition to my comment above, I am also monitoring Mille Lacs Corporate Ventures and the TERO Commission's perspectives on how this bill might affect their operations.

Thank you again for taking my comments into consideration. Also, please feel free to contact me at Virgil.Wind@millelacsband.com if you have any questions.

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Virgil Wind
Chief Executive

CC:

Reen Reinhardt, Revisor of Statutes
Jared Miller, Legislative Counsel