



White Earth Nation - Moorhead Satellite Shooting Star - Off-Reservation Fee-to-Trust Application

Why is this meeting happening?

- To educate and inform WE members on the Fee to Trust Application process for our Moorhead property.
- Discuss why the Tribe is evaluating a Moorhead casino.
- To provide an opportunity for members to ask questions.

Why is a Moorhead casino being evaluated?

- Shooting Star and Tribal leadership are always considering how to strengthen gaming as a long-term source of economic benefit to the White Earth Nation.
- The Fargo/Moorhead market is a critical customer base. Building a casino here captures and secures this market and can ultimately further strengthen the Mahnomen and Bagley sites.
- Studies conducted thus far indicate a casino in Moorhead would be a very smart business decision.

Off Reservation Fee To Trust Process – 2 Part Secretarial Determination

- 25 U.S.C. 2719(b)(1)(A) – IGRA – This is for Gaming Off Reservation for lands not held in trust prior to Oct. 17, 1988, as an Exception
- 25 CFR 292.13 is what we are requesting, this is a process where both the Secretary of the Interior along with the MN Governor approve the project
- Office of Indian Gaming (OIG) – Will sign off on the site as part of the 25 U.S.C. 2719
- Local governments (Clay County, Moorhead) need to support this, or at least not oppose.



Off-Reservation Gaming Fee-to-Trust Process

Two-Part Secretarial Determination Overview



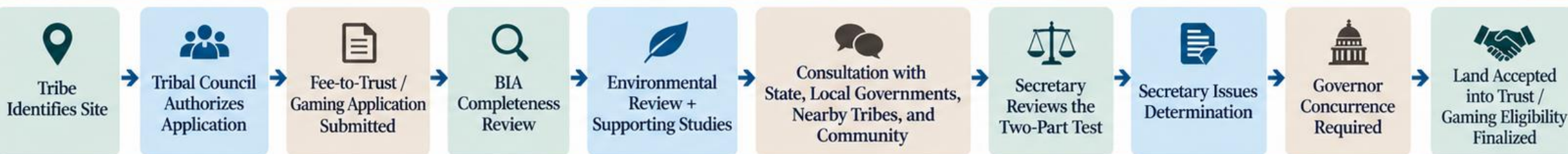
PEOPLE
LAND
OPPORTUNITY
STRONGER
TOGETHER



Submitting an application begins a federal review process. It does not by itself approve construction or gaming.

PLANNING • PARTNERSHIP • A STRONGER TOMORROW

1 Overall Process Flow



2 The Two-Part Test

BALANCED REVIEW
BRIGHTER FUTURES



Part 1: Best Interest of the Tribe

- Jobs and revenue
- Government services
- Tribal self-sufficiency
- Benefits to tribal members



Part 2: Not Detrimental to the Surrounding Community

- Traffic and access
- Public safety
- Utilities and infrastructure
- Effects on nearby tribes and local communities



The Secretary weighs the full record before issuing a decision.

3 Who Is Consulted

LISTEN • COLLABORATE
BUILD TOGETHER



4 What the Application Typically Includes

- ✓ Property location and legal description
- ✓ Ownership / title information
- ✓ Distance from reservation and tribal headquarters
- ✓ Tribal benefits analysis
- ✓ Community impact analysis
- ✓ Tribal authorizing resolution
- ✓ Gaming ordinance / NIGC materials
- ✓ Environmental and infrastructure information

General overview for public information purposes.

OUR HERITAGE • OUR PEOPLE



THRIVING TODAY • FOR GENERATIONS

Submitting the Application Starts the Federal Review — It Does Not Approve Construction.

Application Timeline - workflow

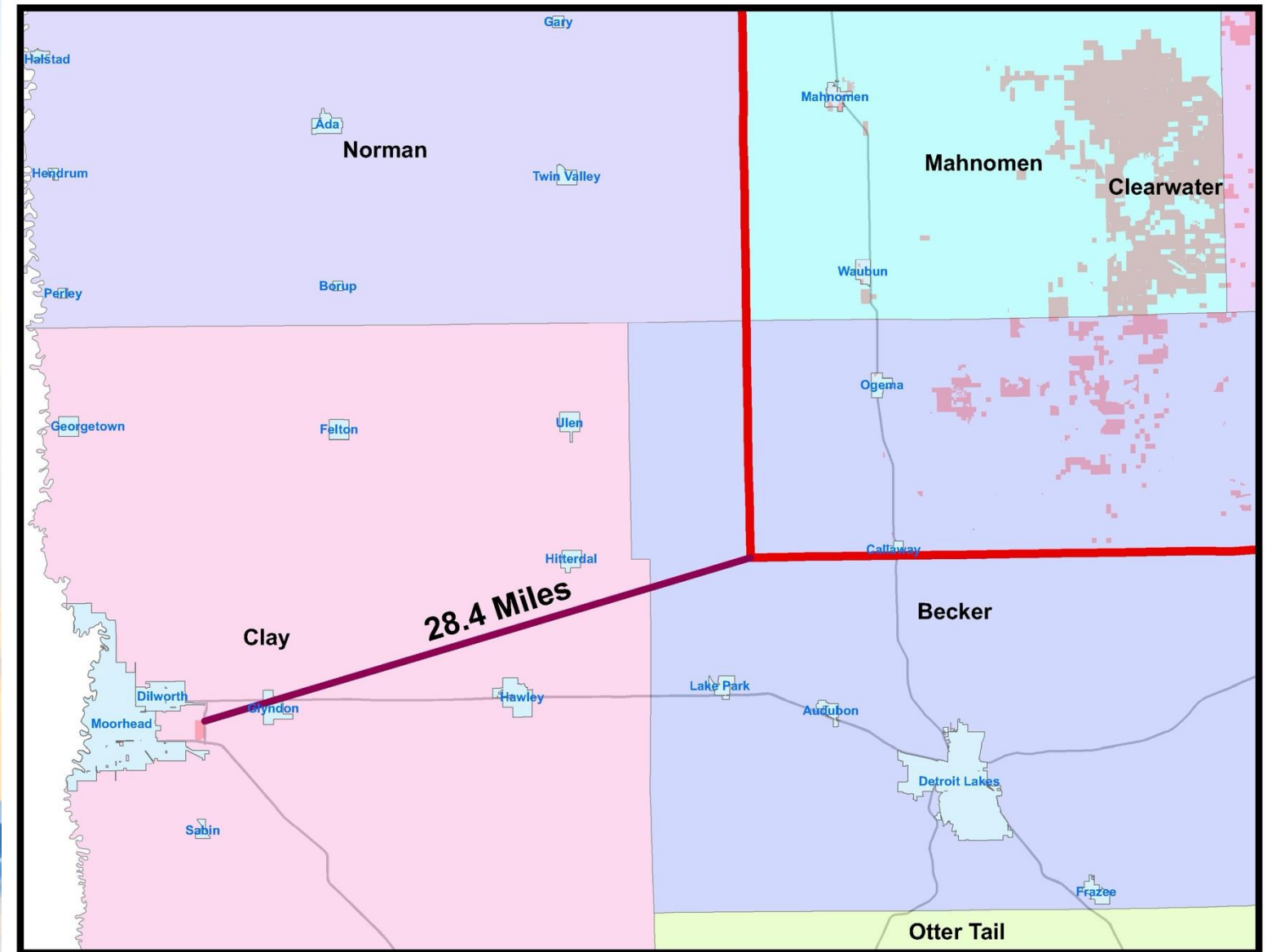
- Tribe Identifies Site – (Moorhead former Feder Farms Property)
- Tribal Council Authorizes Application – This is Current Step
- Fee-to-Trust /Gaming Application Submitted
- BIA completeness Review of Application – 120 days to determine completeness
- Environmental Review + Studies – This is where the Draft EA for the NEPA process gives us a head start so to speak
- Consultation with State/Local govts and Community
- Secretary Reviews “Two-Part” Test
- Secretary issues Determination – Approves or Denies
- Governor Concurrence Required – Must approve
- Land Accepted into Trust for Gaming Eligibility Finalized

What work has already been completed?

- Phase 1 & 2 Gaming Feasibility Study
- Socio-economic Impact study
- Alta Survey – elevation and boundary
- Phase 1 Environmental Survey
- Geotechnical soil borings completed spring 2026 – wells in place for monitoring ground water
- Preliminary concept site layouts by Full Circle Indigenous Planning
- Preliminary Civil engineering/site work analysis and planning; Draft Environmental Assessment (EA) for our application by Moore Engineering
- Introductory project concept conversations with local government leaders in Moorhead area.

How close is it to the Rez?

- 28 miles from border to this parcel.
- Near high population
- Adjacent to high volume roadways.



Mahnomen and Moorhead

- Mahnomen

- Main concert venue
- Continued conventions
- More Hotel Rooms
- Longer guest stays
- Executive offices remain
- Be the Flagship asset moving forward

- Moorhead

- Tailored towards tourists in the FM area
- New convention space
- Housing opportunities from private individuals/companies
- Modern for the younger generation and eager job seekers
- Opportunity for economic development initiatives on the property
- 700 new jobs (estimate)

Once we submit, will we have to build the Casino and how will we finance this?

- No. The Fee to Trust application is a starting point. Even if it gets approved, we do not HAVE to build it. It provides an option for future generations.
- Financing – There has been no construction financing secured, as this is still theoretical. A concept financing plan will be submitted to the BIA/OIG. Less than 10% of investment will come from tribal funds.
- Remember this is a first step in a multi year project, could take up to 5 years before any shovel is in the ground.
- Purely administrative work at this time.

FAQ's

- Why this site in the Moorhead area?
 - Location, Location, Location. Intersection of Interstate 94 and Highway 336.
- Why is there no official rendering?
 - We only need a conceptual Site Layout at this time for the fee to trust application
- Why should we do this, there is nothing wrong with Mahnomen?
 - Correct, but there is limited growth potential at Mahnomen. New gaming investments secure additional revenue, new customer exposure, and new jobs, for generations to come. A Moorhead presence will result in more visits/revenue.
- How can we afford this?
 - We are not at this point yet. Detailed financing analysis and discussions will be required to help inform a Tribal Council decision. Cash flow projections are sufficient to project a payoff of funds invested in 10 years.

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Questions?

