



February 24, 2011

By facsimile and regular mail

Mr. Aaron Loomis  
Tribal Attorney  
St. Croix Chippewa Indians of Wisconsin  
24663 Angeline Avenue  
Webster, WI 54893  
Fax: (715) 349-2975

Dear Mr. Loomis:

This letter responds to your request for comments on documents related to the St. Croix Band of Chippewa Indians' financing agreement with Heartland Business Bank that was forwarded by the Regional Office of the Bureau of Indian Affairs on August 26, 2010. Those documents are the (1) Master Lease Agreement, (2) Sublease Agreement, and (3) Leasehold Mortgage and Security Agreement.

Based on our initial review, these documents appear to be nearly identical to those reviewed and included in the OGC opinion issued on February 22, 2010 (attached). In the absence of material changes, there is no need for additional review. Please let us know if material changes have been made to the documents since the February 22, 2010 opinion. If so, we would be happy to review those changes.

If you have any questions, please feel free to contact Staff Attorney Jennifer Ward at 202-632-7003.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lawrence S. Roberts".

Lawrence S. Roberts  
General Counsel

cc: Mr. Jay Daniels  
Realty Specialist  
Midwest Regional Office  
One Federal Drive, Room 550  
Fort Snelling, MN 55111

Paula Hart, Director  
Office of Indian Gaming