

**NORTHERN ARAPAHO BUSINESS COUNCIL
WIND RIVER INDIAN RESERVATION
RIVERTON, WYOMING**

**IN THE MATTER OF FOUNDATIONS FOR NATIONS
Consultation and Request for Authorization Under Resolution No. NABC 2026-2142
FINDINGS OF FACT, CONCLUSIONS OF LAW, AND FINAL
DECISION**

Consultation Date July 31, 2026
Time and Place 1:00 p.m.; Wind River Hotel & Casino Conference Center
Decision Date August 31, 2026

I. INTRODUCTION AND DECISION

This matter came before the Northern Arapaho Business Council ("NABC") under Resolution No. NABC 2026-2142 and the Chairman's Directive dated July 15, 2026. The consultation process concerns whether Foundations For Nations ("FFN"), an outside organization, should receive Northern Arapaho governmental authorization or approval to initiate or expand organized activities on lands within the lawful jurisdiction of the Northern Arapaho Tribe ("Tribe"). For the reasons discussed below, authorization is **DENIED** at this time.

II. AUTHORITY AND JURISDICTION

1. The Northern Arapaho Tribe is a federally recognized sovereign Indian Tribe possessing inherent governmental authority to protect the political integrity, economic security, and health and welfare of the Tribe.
2. The Northern Arapaho General Council is the traditional governing body of the Tribe. On April 23, 1941, the General Council delegated to NABC full authority to act on matters of Tribal business and affairs.
3. NABC adopted Resolution No. NABC 2026-2142 ("the Resolution") to establish a uniform governmental policy for consultation and Tribal authorization when outside organizations seek to initiate or expand organized activities on lands under the jurisdiction of the Tribe.
4. The Resolution does not apply to activities beyond the lawful jurisdiction of the Tribe.

III. PROCEDURAL HISTORY

5. On July 15, 2026, NABC Chairman Keenan Groesbeck issued a Directive requesting FFN to contact the Office of the Chairman within ten days to request consultation with NABC to seek authorization to conduct organized activities on lands under the jurisdiction of the Tribe.
6. FFN responded by letter dated July 23, 2026. FFN confirmed receipt of the July 15 letter, requested a meeting no later than July 31 and proposed a meeting at Riverton City Hall.

7. By letter dated July 28, 2026, NABC accepted FFN's request for consultation and scheduled the consultation for Friday, July 31, 2026, at 1:00 p.m. at the Wind River Casino Conference Center. The letter identified the subjects and information FFN could present and invited advance submission of documents.
8. In a July 29, 2026 letter, FFN confirmed receipt of NABC's meeting notice and requested a different venue. NABC responded in writing, declining to change the time or location of the consultation. The letter advised that, if FFN elected not to attend after notice, NABC could close the consultation process and issue written findings and a final determination based on the administrative record.
9. On July 31, 2026, at approximately 10:30 a.m., FFN emailed the Tribal Secretary a six-page cover letter and a packet of exhibits responsive to NABC's requested categories of information.
10. At approximately 12:45 p.m., fifteen minutes before the scheduled start of the consultation, FFN telephoned the Tribal Secretary and asked to attend by Zoom. FFN did not request a continuance or postponement of the 1:00 p.m. consultation.
11. At 1:00 p.m., NABC convened the scheduled consultation at the Wind River Hotel & Casino Conference Center. Five Council members were present, establishing a quorum of the six-member NABC. No representative of FFN appeared.

IV. FINDINGS OF FACT & CONCLUSIONS OF LAW

12. NABC finds that no prior resolution, agreement, memorandum of understanding, permit, correspondence, or other official Tribal action authorizes FFN to conduct organized activities on lands under the jurisdiction of the Tribe.
13. NABC finds that the procedural requirements of Resolution No. NABC 2026-2142 were satisfied. FFN had actual notice of the Resolution, the July 15 Directive, and the July 31 consultation. NABC conducted a consultation in compliance with the Resolution.
14. NABC finds that FFN did not appear on July 31, 2026, at the noticed location for the consultation. Although FFN submitted documents responsive to NABC's July 28, 2026 letter, the documents could not be authenticated, clarified, or tested through NABC questions due to FFN's failure to appear. NABC thus did not accept FFN's emailed cover letter and exhibits as evidence, but NABC retained these materials in the administrative record as received correspondence and a documentary proffer. The documents included in the administrative record are included in **Exhibit A**.
15. NABC may deny authorization when the record is insufficient to determine whether proposed new or expanded organized activities, Tribal partnerships, program relationships, or access arrangements will comply with Tribal policy and protect Tribal interests within lawful Tribal jurisdiction.
16. NABC retains authority to reconsider, condition, suspend, revoke, or enforce any future authorization consistent with Tribal law and the administrative record.

V. FINAL DECISION AND ORDER

NOW, THEREFORE, the Northern Arapaho Business Council **ORDERS** as follows:

1. **NABC Authorization Denied on Present Record.** FFN is denied NABC authorization to initiate or expand organized activities on lands within the lawful jurisdiction of the Northern Arapaho Tribe. FFN

shall not initiate or expand such activities through Tribal programs, partnerships, referrals, access arrangements, or on Tribal lands unless and until NABC grants written authorization by formal action.

2. **No Representation of Tribal Approval.** If FFN states or implies that its organized activities are authorized by the Northern Arapaho Tribe or NABC that would be a false and fraudulent statement, and FFN is hereby advised that if it states or implies such falsehoods, it is subject to applicable legal recourse.
3. **Notice to Tribal Departments.** Tribal departments, programs, entities, and employees are directed not to represent that FFN possesses NABC authorization and not to enter a new partnership, referral arrangement, sponsorship, use agreement, or other formal relationship with FFN relating to organized activities on lands within the lawful jurisdiction of the Tribe without prior written review and approval through the appropriate Tribal governmental process.
4. **Future Request Permitted.** FFN may submit a new written request for consultation supported by documentation concerning its legal and organizational structure, leadership, funding, insurance, programs, safeguarding policies, locations, prior and proposed activities, and commitments to comply with Tribal law and policy. NABC retains discretion whether and on what terms to reopen consultation. FFN's failure to appear at the July 31, 2026 consultation does not create a default admission as to disputed factual allegations.
5. **Lawful Enforcement Reserved.** If FFN conducts activities contrary to this decision on lands within the Tribe's lawful jurisdiction, NABC may pursue any lawful administrative, civil, judicial, regulatory, or other governmental remedy.
6. **Individual Rights and Jurisdictional Limits Preserved.** This Decision does not purport to, and does not, regulate conduct occurring on FFN's fee land or assert Tribal authority over conduct beyond the Northern Arapaho Tribe's lawful jurisdiction. Nothing in this Decision prohibits an individual, including a Northern Arapaho or Eastern Shoshone Tribal member, from conducting or participating in any otherwise lawful activity on FFN's fee land or otherwise beyond the Tribe's lawful jurisdiction. At this time, NABC does not designate FFN or any person as "bad men" under the 1868 Treaty of Fort Laramie.
7. **Personnel and Enforcement Matters.** No employment, contracting, program, or enforcement action by the Tribe may be based solely on an individual's religious belief, peaceful speech, or lawful association with FFN. Any personnel or enforcement matter must be decided separately under the applicable law and process, upon its own legitimate and documented factual record.
8. **No Finding on Alleged Threats.** This Decision makes no finding as to disputed allegations of threats, obstruction, trespass, property damage, or employment retaliation. NABC condemns threats and violence. Alleged criminal conduct should be reported to the appropriate law-enforcement authority.
9. **Rights and Immunities Reserved.** Nothing in this Decision waives or limits the Tribe's or NABC's sovereignty, jurisdiction, treaty rights, governmental authority, defenses, privileges, remedies, or sovereign immunity.
10. **Effective Date.** This Decision is effective immediately upon adoption by NABC. A copy shall be served on FFN and maintained in the official administrative record.

VI. CERTIFICATION AND ADOPTION

VI. CERTIFICATION AND ADOPTION

The undersigned certify that the foregoing Findings of Fact, Conclusions of Law, and Final Decision were adopted by the Northern Arapaho Business Council at a duly called meeting held on August 31, 2026; that four (4) members were present, constituting a quorum; that the Decision was adopted by a vote of Four (4) FOR, Zero (0) AGAINST, and Zero (0) ABSTAINING; and that the Decision has not been rescinded or amended.

DONE at Riverton, Wyoming, this 31st day of August 2026.



Keenan Groesbeck, Chairman
Northern Arapaho Business Council

Date: 8-31-26

ATTEST:



Secretary
Northern Arapaho Business Council

Date: 8/31/26

EXHIBIT A - ADMINISTRATIVE RECORD INDEX

Exhibit	Document
1	Resolution No. NABC 2026-2142
2	Chairman's Directive dated July 15, 2026
3	FFN letter dated July 23, 2026
4	Liberty Counsel letter dated July 27, 2026
5	NABC letter dated July 28, 2026
6	FFN response dated July 29, 2026
7	NABC confirmation correspondence
8	Northern Arapaho Records Department search result
9	NABC formal press releases and public statements
10	FFN threat examples
11	FFN July 31, 2026 communications
12	July 31, 2026 meeting record
13	FFN cover letter and exhibits dated July 31, 2026

**RESOLUTION OF THE NORTHERN ARAPAHO BUSINESS COUNCIL
WIND RIVER INDIAN RESERVATION
RIVERTON, WYOMING**

RESOLUTION NO. NABC 2026-2142

**A RESOLUTION ESTABLISHING THE POLICY OF THE NORTHERN ARAPAHO
TRIBE REQUIRING CONSULTATION AND TRIBAL AUTHORIZATION FOR
OUTSIDE ORGANIZATIONS CONDUCTING ORGANIZED ACTIVITIES ON LANDS
UNDER THE JURISDICTION OF THE NORTHERN ARAPAHO TRIBE**

WHEREAS, the Northern Arapaho Tribe (the "Tribe") is a federally recognized Indian Tribe possessing inherent sovereign authority over its governmental affairs and lands within its jurisdiction; and

WHEREAS, the Northern Arapaho General Council is the traditional governing body of the Tribe; and

WHEREAS, on April 23, 1941, the General Council delegated to the Northern Arapaho Business Council ("NABC") full authority to act on matters of Tribal business and affairs; and

WHEREAS, the NABC is charged with protecting the governmental, cultural, political, and economic interests of the Northern Arapaho Tribe; and

WHEREAS, the Northern Arapaho Tribe values and protects its language, ways of life, ceremonies, traditional teachings, cultural heritage, and the health and welfare of its citizens; and

WHEREAS, the Northern Arapaho Tribe may regulate non-member conduct on fee lands if it directly impacts the Tribe's political integrity, economic security, health or welfare under *Montana v. U.S.* 450 U.S. 544 (1981); and

WHEREAS, the Northern Arapaho Tribe may regulate non-member activity who enter into "consensual relationships" with the Tribe or its members under *Montana v. U.S.*; and

WHEREAS, the Northern Arapaho may assert its rights to protect its way of life against "bad men" under the 1868 Treaty of Fort Laramie; and

WHEREAS, the Northern Arapaho Tribe recognizes the complex, traumatic, and historical relationship between the Christian Church and Native Nations, which resulted in forced assimilation, colonial trauma, and whose beliefs significantly contributed to the devastating effects of boarding schools; and

WHEREAS, the NABC finds that organizations seeking to conduct recurring programs, outreach, ministries, charitable services, or other organized activities affecting Northern Arapaho citizens should first engage in consultation with the Northern Arapaho Business Council so that

such activities are conducted in a manner respectful of Tribal sovereignty and consistent with Tribal priorities; and

WHEREAS, the NABC requested the Northern Arapaho Tribe's Records Department to search the Tribe's official records concerning authorizations issued to outside organizations to conduct organized activities on lands under the jurisdiction of the Northern Arapaho Tribe; and

WHEREAS, the Records Department reported that it identified no correspondence, resolution, agreement, memorandum of understanding, permit, or other official Tribal action authorizing the specific organization reviewed in that records search to conduct organized activities on behalf of, or pursuant to authorization from, the Northern Arapaho Tribe; and

WHEREAS, the NABC determines that it is in the best interests of the Tribe to establish a uniform governmental policy governing consultation with outside organizations.

NOW, THEREFORE, BE IT RESOLVED, that the Northern Arapaho Business Council hereby adopts the policy that outside organizations seeking to conduct recurring organized activities on lands under the jurisdiction of the Northern Arapaho Tribe should first consult with the Northern Arapaho Business Council before initiating or expanding such activities.

BE IT FURTHER RESOLVED, that Tribal departments are directed to encourage organizations proposing recurring activities to communicate with the Northern Arapaho Business Council so that appropriate governmental consultation may occur.

BE IT FURTHER RESOLVED, that nothing in this Resolution shall be interpreted to limit the constitutional rights of any individual or to restrict activities beyond the lawful jurisdiction of the Northern Arapaho Tribe.

BE IT FURTHER RESOLVED, that the Chairman is authorized to communicate this policy to organizations conducting or proposing to conduct organized activities on lands under the jurisdiction of the Northern Arapaho Tribe and to invite such organizations to meet with the Northern Arapaho Business Council.

BE IT FINALLY RESOLVED, that this Resolution shall become effective immediately upon its adoption.

CERTIFICATION

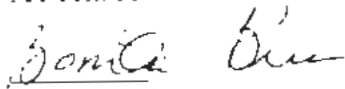
The undersigned, as Chairman of the Northern Arapaho Business Council, hereby certifies that the Northern Arapaho Business Council consists of six (6) members and that four (4) members were present, constituting a quorum, at a regular meeting of the Northern Arapaho Business Council held on July 15, 2026, and that the foregoing Resolution was adopted by a vote of FOUR (4) members FOR and ZERO (0) members AGAINST, the Chairman voting, and that this Resolution has not been rescinded or amended.

Done at Riverton, Wyoming, this 15th day of July, 2026.



Keenan Groesbeck, Chairman
Northern Arapaho Business Council

ATTEST:



Bonita Bell, Secretary
Northern Arapaho Business Council

Northern Arapaho Business Council

P.O. Box 396

Ft. Washakie, Wyoming 82514

Phone: 332-6120 — 332-5006 - 307-856-3461



July 15, 2026

Pastor Jason Lucas
Foundations For Nations Church
20 Mission Rd.
Riverton, WY 82501

RE: Requirement to Obtain Authorization from the Northern Arapaho Tribe Prior to Conducting Organized Ministry and Outreach Activities on Lands Under the Jurisdiction of the Northern Arapaho Tribe

Dear Pastor Lucas:

The Northern Arapaho Business Council ("NABC"), acting under the authority delegated to it by the Northern Arapaho General Council and pursuant to the inherent sovereign authority of the Northern Arapaho Tribe ("Tribe"), has adopted **Resolution No. NABC 2026-2142**, establishing the official policy of the Northern Arapaho Tribe requiring outside organizations seeking to conduct recurring ministries, charitable services, outreach programs, or other organized activities on lands under the jurisdiction of the Northern Arapaho Tribe to obtain authorization from the Northern Arapaho Business Council.

The Resolution is adopted to protect the Northern Arapaho Tribe's inherent sovereign authority, promote government-to-organization communication, safeguard the cultural, spiritual, and governmental interests of the Northern Arapaho people, and ensure that organizations operating within the Northern Arapaho Tribe's jurisdiction do so in a manner that respects Tribal law and Tribal self-determination.

As part of the Business Council's review of organizations conducting recurring activities within the Wind River Indian Reservation, the Northern Arapaho Tribe requested its Records Department to search the Northern Arapaho Tribe's official governmental records for correspondence, resolutions, memoranda of understanding, permits, agreements, or other official actions concerning Foundations For Nations Church ("Foundations for Nations").

Based upon that records search, the Tribe has not identified any official record reflecting authorization issued by the Northern Arapaho Business Council for Foundations For Nations to conduct recurring organized ministry or outreach activities on lands under the jurisdiction of the Northern Arapaho Tribe.

Accordingly, the Northern Arapaho Business Council hereby directs Foundations For Nations to suspend any expansion of recurring organized ministry activities on lands under the jurisdiction of the Northern Arapaho Tribe until it has completed consultation with the Business Council and any authorization required under Tribal policy has been considered.

The Business Council requests that Foundations For Nations contact the Office of the Chairman within 10 days of receipt of this Directive to request a meeting. At that meeting, Foundations For Nations will have the opportunity to present evidence of authorization or permission to conduct activity including its mission, programs, leadership structure, sources of funding, intended activities on the Reservation, and any other information the Business Council considers relevant in determining whether authorization should be granted.

Nothing in this Directive should be interpreted as prohibiting the lawful exercise of religious rights. Rather, this correspondence reflects the Northern Arapaho Tribe's sovereign authority to establish policies governing organized activities conducted on lands under its jurisdiction and to determine the manner in which outside organizations engage with the Tribe and its citizens. Specifically, the Northern Arapaho Tribe is acting in accordance with statutory law, which provides the Northern Arapaho Tribe to regulate non-member conduct on fee lands if it directly impacts the Tribe's political integrity, economic security, health or welfare. (*See Montana v. U.S.* 450 U.S. 544 (1981)) Furthermore, the Tribe can regulate the activities of non-members who enter into "consensual relationships" with the Tribe or its members, such as through commercial dealings, contracts, leases, or other formal arrangements. *Id.* By this letter, the Northern Arapaho Tribe is asserting its right to protect its way of life against "bad men" under the 1868 Treaty of Fort Laramie and are prepared to legally enforce the removal or punishment of trespassers and non-Indians who commit offenses on Tribal lands.

Given the complex, traumatic and historical relationship between the Christian Church and Native Nations which have resulted in forced assimilation, colonial trauma, and whose beliefs significantly contributed to the devastating effects of boarding schools, the Northern Arapaho Tribe asserts that the conduct of Foundations For Nations directly impacts the Tribe's health and welfare. Because Foundations for Nations has discredited and condemned the Northern Arapaho Tribe's way of life that precedes both Christianity and the Foundations For Nations ministries, the Northern Arapaho Tribe has declared the Foundations for Nations Church a threat to the Northern Arapaho people.

Should Foundations For Nations decline to participate in the consultation process or continue organized activities on lands under the jurisdiction of the Northern Arapaho Tribe without engaging in the consultation required by Resolution No. NABC 2026-2142, the Northern Arapaho Business Council reserves all rights available under Tribal law. Those rights may include seeking appropriate relief through the Northern Arapaho Tribal Court or other lawful

governmental processes to obtain compliance with Tribal law and policy regarding activities conducted on lands under the Tribe's jurisdiction.

Respectfully,

A handwritten signature in black ink, appearing to read 'Keenan Groesbeck', written in a cursive style.

Keenan Groesbeck, Chairman
Northern Arapaho Business Council

cc: Northern Arapaho Business Council
Office of the Attorney General, Northern Arapaho Tribe
Northern Arapaho Records Department

Foundations For Nations

20 Mission Rd.
Riverton, WY 82501

July 23, 2025

Chair Keenan Groesbeck
Northern Arapaho Business Council
P.O. Box 396
Ft. Washakie, Wyoming 82514
nora.willow@northernarapaho.com

RE: Request for meeting

Dear Chairman Groesbeck and Council Members:

We have received your letter of July 15, 2026 requesting that Foundations For Nations (FFN) contact the Office of the Chairman of the Northern Arapaho Business Council (NABC) within 10 days of receipt to request a meeting. We would like to meet with NABC at a mutually agreeable time and location no later than Friday, July 31. We propose Thursday, July 30th at 1:00 PM at the Riverton City Council building, but have scheduling flexibility.

We believe that communication is the best path forward, and in order to provide an environment where we can thoughtfully listen to one another, share information, and seek understanding, we respectfully request that this meeting be held between NABC and FFN leadership without outside involvement. We do not intend to have legal counsel present at the meeting, so that we can all speak freely, but we have requested that our counsel provide you with additional information prior to that meeting.

Our heart has been to serve and be a blessing to the people on the Wind River Reservation as we are led by the Gospel of Jesus Christ. We remain committed to serving with integrity, humility, respect, and a spirit of cooperation. We look forward to the opportunity to meet, listen, and discuss how we can move forward in a manner that honors our shared desire for the well-being of the people we serve.

Thank you for your time, consideration, and willingness to engage in this conversation.

Sincerely,

Jason Lucas
Foundations For Nations



On behalf of the leadership team

LIBERTY COUNSEL



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REPLY TO FLORIDA

July 27, 2026

Via Email Only

Mr. Keenan Groesbeck, Chairman
Northern Arapaho Business Council
P.O. Box 396
Ft. Washakie, Wyoming 82514
Via Email nora.willow@northernarapaho.com

RE: Foundations For Nations Church

Dear Chairman Groesbeck and Council Members:

Liberty Counsel is a national nonprofit litigation, education, and public policy organization with an emphasis on First Amendment religious liberties. See <https://lc.org/cases>.

Liberty Counsel writes regarding Jason and Sarah Lucas; Foundations For Nations Church ("FFN" or "FFN Church"); and FFN Church members, including those FFN members from the Eastern Shoshone Tribe ("EST") and Northern Arapaho Tribe ("NAT"). We have had extensive discussion with concerned Native residents on the Wind River Reservation who object to how the Northern Arapaho Business Council (NABC) has handled this matter.

We understand FFN leadership met with members of the NABC on July 10, 2026, regarding concerns that have been raised over certain religious statements and beliefs. We further understand the NABC has sent a letter (and NABC Resolution No. 2026-2142), both dated July 15, 2026, to FFN requesting a meeting to discuss FFN's work in light of the Resolution. FFN has responded in writing to NABC, stating its willingness to meet again with NABC, per your request, at a mutually agreeable time. Liberty Counsel provides this letter for NABC's consideration, in anticipation of what will hopefully be a good meeting between the NABC and FFN.

BACKGROUND

For over 9 years, Jason and Sarah Lucas and FFN have sought to serve and be a blessing to the people on the Wind River Reservation in a multi-ethnic fellowship of Christian believers that is led by the Gospel of Jesus Christ. FFN's mission has always remained the same: **Love God, Reach People, Impact Community**. FFN is made up of Christians from numerous ethnicities, including Arapaho and Shoshone.

In addition to establishing a Christian church, FFN has faithfully worked to serve the Wind River Reservation community in tangible and meaningful ways. These efforts include operating a food pantry that serves over 2,000 individuals each month; providing after-school programs for children; hosting kids' day camps during the summer; Life Recovery classes helping people overcome addictions; prison ministry; homeless ministry; projects improving Native families' homes, and providing assistance to Native families with utilities and rent when needs arise; along with many other acts of service and outreach.

Through all of these initiatives, FFN's desire has been to build genuine relationships, show the love of Christ through action, and serve the people from both Shoshone and Arapaho backgrounds, while helping meet practical needs within the community.

The current controversy stems from religious teaching and remarks made on July 5, 2026, during a livestreamed 1.5 hour FFN church service, in which the issue of humanity's relationship to the Creator was discussed, including the theology of salvation from sin, reconciliation to the Creator, and new life is possible through faith in Jesus Christ alone. In reference to the recent 250th Anniversary of America, and the recently concluded NAT Sundance activities, the message was titled "Independence in God." At one point in the service, Sarah Lucas (and three Native Christian members of FFN) discussed and contrasted the teachings of the Bible with certain traditional Native religious beliefs and practices. In contrasting religious teachings, Sarah did not intend to be disrespectful toward traditional religious beliefs of the Tribe, nor did she intend to hurt or cause pain to any member of the Tribe. For that matter, neither did the Native Christian church members.

A small clip of Sarah's discussion circulated and attracted attention, but the themes she shared and a full transcript of that segment (as well as the entire worship service) are available. The full transcript contains more than 10,000 words. The worship service continued further from the points in question, discussing other commonly-held Christian religious beliefs and themes. Many people disagree (some strongly) with these themes, or Christianity in general. Many people ridicule and mock these Christian religious beliefs and themes. This is permissible, because in America, we have freedom of belief, free exercise of religion, and freedom of speech. Unfortunately, out of more than 10,000 words, a few of Sarah's words in a handful of sentences discussing deeply-held Christian religious beliefs contrasted with deeply-held traditional Native religious beliefs have been referenced out of context. Sarah and FFN have been unfairly vilified and attacked as a result.

On July 10, 2026, Jason and Sarah met with the NABC. Members of the NABC at that meeting expressed anger over Sarah's religious statements, and indicated that FFN should be barred from Wind River Reservation as a result. On July 15, 2026, the NABC adopted Resolution No. 2026-2142, which contained many recitals ("Whereas") and comparatively few operative provisions ("Resolved"). The Resolution was communicated to FFN via a letter sent that same day, July 15, 2026.

SUMMARY OF LEGAL POSITIONS

Liberty Counsel hopes that through clarity and dialogue, the NABC and FFN leaders can find a way forward in this matter that is respectful of protected rights and various traditions, based upon the following understandings:

- A) FFN's religious beliefs, religious exercise, and church property use (and those of Christian Shoshone and Arapaho FFN members) are protected by:

- i) the First Amendment to the U.S. Constitution;
 - ii) the Religious Freedom Restoration Act, 42 U.S.C. §2000bb-1;
 - iii) the Indian Civil Rights Act, 25 U.S.C. §§ 1301–1341; and
 - iv) the FACE Act, 18 U.S.C. § 248.
 - v) the *Ex parte Young* doctrine, rendering tribal officials amenable to suit in federal court “seeking to enjoin alleged ongoing violations of federal law.”
- B) FFN’s activities pre-date NABC Resolution No. 2026-2142 and FFN does not currently intend to expand recurring organized ministry activities on lands under the jurisdiction claimed by the Northern Arapaho Tribe.
- C) FFN requires no authorization from NABC to conduct religious activities on its own private fee simple property; NABC may not prohibit FFN from conducting religious activities on FFN property; and FFN will not be leaving its property.
- D) FFN’s Shoshone and Arapaho members or attendees require no authorization from NABC to engage in religious free exercise on Wind River Reservation lands and NABC may not violate their rights based on their association with FFN.
- E) Should FFN seek to expand activities in the future, it intends to contact the NABC to inform it of its intentions, pursuant to Resolution No. 2026-2142, as required by law.

These positions are based on applicable law, set forth below, and FFN’s interpretation of operative parts of NABC Resolution No. 2026-2142, with which FFN believes it is currently in compliance. FFN hopes for a positive working relationship with NABC going forward, and hopes to clarify misunderstandings in person. As previously mentioned, based on the plain language of the Resolution,¹ FFN believes it is currently in compliance with the Resolution’s operative parts:

NOW, THEREFORE, BE IT RESOLVED, that the Northern Arapaho Business Council hereby adopts the policy that outside organizations seeking to conduct recurring organized activities on lands under the jurisdiction of the Northern Arapaho Tribe should first consult with the Northern Arapaho Business Council before initiating or expanding such activities. (Emphasis added).

BE IT FURTHER RESOLVED, that Tribal departments are directed to encourage organizations proposing recurring activities to communicate with the Northern Arapaho Business Council so that appropriate governmental consultation may occur. (Emphasis added).

BE IT FURTHER RESOLVED, that nothing in this Resolution shall be interpreted to limit the constitutional rights of any individual or to restrict activities beyond the lawful jurisdiction of the Northern Arapaho Tribe.² (Emphasis added).

BE IT FURTHER RESOLVED, that the Chairman is authorized to communicate this policy to organizations conducting or proposing to conduct organized activities on lands under the jurisdiction of the Northern Arapaho Tribe and to invite such organizations to meet with the Northern Arapaho Business Council.³ (Emphasis added).

¹ “Should,” “encourage,” “may,” “authorized to communicate,” and “invite.”

² FFN respectfully adopts this same interpretation as NABC.

³ FFN appreciates the communication and the invitation.

BE IT FINALLY RESOLVED, that this Resolution shall become effective immediately upon its adoption.

To the extent the NABC characterizes FFN as an “outside organization,” FFN’s Shoshone and Arapaho members would likely assert that characterization is not fully accurate. FFN has been present in and a resource for the Wind River Reservation community for nearly ten years, and is a part of their lives.

While the Resolution and Letter purport to make neutral and secular requirements for further FFN religious activities, recorded statements from the July 10, 2026 meeting indicate NABC may be attempting to retaliate against protected religious speech. If this is the case, the purported facial neutrality of the Resolution is insufficient to overcome its infirmities, should the NABC actually engage in religious discrimination against FFN or its Shoshone or Arapaho members. FFN also respectfully reserves all rights to challenge the Resolution and the assumption of NABC’s claimed jurisdiction, if additional action becomes necessary, including the validity of any Treaty/ies upon which the Resolution purports to stand.

APPLICABLE LAW

U.S. Constitution – First Amendment – Treaties - ICRA

The United States Constitution is the supreme law of the land, including any treaties. The First Amendment to the Constitution protects religious free exercise and freedom of speech, and is binding upon Indian tribes, as are certain other federal laws. While Indian tribes certainly possess the inherent right to exclude non-members from tribal lands as part of their sovereign right of self-government, the right to do so is subject to the limits imposed under federal law. *See National Farmers Union Ins.*, 471 U.S. at 851, 105 (“[F]ederal law defines the outer boundaries of an Indian tribe’s power over non-Indians.”)

The Indian Civil Rights Act of 1968 (ICRA), 25 U.S.C. §§ 1301–1341 governs this situation. In pertinent part, Title I of the ICRA applies many of the individual protections afforded by the Bill of Rights to the application of Indian laws. Like the Constitution, **ICRA forbids any Tribe “prohibiting the free exercise of religion,” or “abridging the freedom of speech,” “depriving anyone of liberty or property without due process of law,” and prohibits “bills of attainder or ex post facto laws.”** *See* 25 U.S.C. § 1302 (1),(8) and (9)(emphasis added). ICRA has been held to apply for the benefit of non-members as well as members of a tribe. *See Bugenig v. Hoopa Valley Tribe*, 266 F.3d 1201, 1223 (9th Cir.2001) (citing *United States v. Mazurie*, 419 U.S. 544, 558 n. 12, (1975)); *White v. Pueblo of San Juan*, 728 F.2d 1307, 1312 n. 1 (10th Cir.1984); *Dodge v. Nakai*, 298 F.Supp. 17, 24 (D.Ariz.1968)(Perceived “scorn,” “contempt” and disrespect are impermissible bases for a Tribe to abridge First Amendment freedom of speech). **ICRA thus prohibits the NABC from discriminating against FFN and its members on the basis of their religion – including religious speech uttered on July 5, 2026.** ICRA’s prohibition on religious discrimination against tribe members and non-members is enforceable in whichever forum an attempted enforcement action by a tribe may be brought. *Santa Ynez Band of Mission Indians v. Torres*, 262 F. Supp. 2d 1038, 1044 (C.D. Cal. 2002).

In addition to the restraints imposed by ICRA’s upon NABC’s powers, its powers cannot go beyond those enumerated by applicable Treaty. Here, the NABC’s suggestion that the Northern

Arapaho Tribe has any cognizable rights against FFN under the 1868 Treaty of Fort Laramie and its “bad men” provision appears misplaced, for several reasons. *First*, it is unclear that a provision of the 1868 Treaty of Fort Laramie signed by the Arapaho can be asserted upon 1863 and 1868 Fort Bridger Shoshone Treaties lands. *Second*, the 1863 and 1868 Shoshone Treaties of Fort Bridger apply to the Shoshone Reservation (now known as Wind River Reservation), and the Northern Arapaho Tribe was not a party to those Treaties.⁴ Only a tribe that is a party (or successor of a party) to a given Treaty may assert rights under that Treaty. “[T]reaty-tribe status ‘is the same gateway question’ any court would face when determining its entitlement to exercise those rights under the Treaty.” *Snoqualmie Indian Tribe v. Washington*, 8 F.4th 853, 865 (9th Cir. 2021). Here,

The Shoshone Tribe and the United States entered into a Treaty on July 2, 1868. 15 State. 673. The treaty established the Wind River Reservation “for the absolute and undisturbed use and occupation of the Shoshonee Indians.” 15 State. 673. The Eastern Shoshonee Tribe (“EST”) settled in the Wind River Reservation. The United States soon reneged on its earlier treaty commitment to the EST when it placed [the Northern Arapaho Tribe] on the Wind River Reservation in 1878.

Each tribe governs itself by vote of its tribal membership at general council meetings or by vote of its elected business council. *N. Arapaho Tribe v. Hodel*, 808 F. 2d 741, 744 (10th Cir. 1987). No member of one tribe may hold office or legislate for the other tribe. The tribes have not entered into a joint constitution to consolidate their respective governments. (Doc. 17-8.) The tribes’ joint occupation of the Wind River Reservation without a confederation agreement makes their situation unique in the nation.

EST and NAT do not operate under a “common sovereignty.” *E. Shoshone Tribe v. N. Arapaho Tribe*, 926 F. Supp. 1024, 1031 (D. Wyo. 1996).

N. Arapaho Tribe v. LaCounte, No. CV-16-11-BLG-BMM, 2017 WL 2728408, at *1 (D. Mont. June 23, 2017). *Third*, even if NABC is a valid successor to the 1863⁵ and 1868⁶ Fort Bridger Shoshone Treaties, a “bad men” designation under those treaties (and similar) does not (and cannot) apply to anyone engaging in peaceful religious speech. “To state a claim for relief under the bad men provision requires the identification of particular ‘bad men,’ **and an allegation that those men committed a wrong within the meaning of the treaty.**” *Jones v. United States*, 846 F.3d 1343, 1352 (Fed. Cir. 2017) (emphasis added). “[O]nly **acts that could be prosecutable as criminal wrongdoing** are cognizable under the bad men provision.” *Id.* at 1355.

⁴ “The [Shoshone] treaty of 1868 charged the government with a duty to see to it that strangers should never be permitted without the consent of the Shoshones to settle upon or reside in the Wind River Reservation. That duty was not fulfilled. Instead, the Arapahoes were brought upon the reservation with a show of military power, and kept there is definance [sic] of the duty to expel them.” *Shoshone Tribe of Indians of Wind River Rsrv. in Wyoming v. United States*, 299 U.S. 476, 494 (1937). However, “recognition of the occupancy of the Arapahoes and their equal interest in the land was ratified by act of Congress. Act of June 7, 1897...” and again by “Act of March 3, 1905.” *Id.* at 490.

⁵ Treaty with the Eastern Shoshoni, art. 1, July 2, 1863, 18 Stat. 685, 685, Oklahoma State University Tribal Treaties Database, <https://treaties.okstate.edu/treaties/treaty-with-the-eastern-shoshoni-1863-0848> (last visited July 22, 2026).

⁶ Treaty with the Eastern Band Shoshoni and Bannack, art. 1, U.S.-Shoshoni & Bannack, July 3, 1868, 15 Stat. 673, 674; <https://www.sbtribes.com/fort-bridger-treaty/>.

Fourth, and arguendo, if the 1868 Treaty of Fort Laramie applies to the NABC on the Shoshone Reservation established by the 1863 and 1868 Treaties of Fort Bridger, the Fort Laramie Treaty also contemplates the existence of “bad men” among the Arapaho,⁷ which illustrates the error of claiming this provision allows anyone (“white, black or Indian”) to designate another a “bad man” for verbal expressions of religious belief. Thus, under no circumstance can a statement of religious belief (whether made by a Tribe during a traditional tribal worship ceremony like Sundance, or by someone else during a Christian worship service in a church) be “prosecutable as criminal wrongdoing” such as to allow invocation of this Treaty provision. Peaceful discussions of, or statements about religion, even if offensive to some, are wholly outside the “bad men” provision of the Treaties and are protected under the First Amendment and under ICRA.⁸

*NABC Has No Authority Over Religious Exercise
On FFN’s Privately-Owned Fee Simple Church Property*

NABC is without authority to interfere with the quiet use and enjoyment of FFN’s privately-owned Church property, because FFN has purchased and holds title to its property in fee simple and because (aside from any consideration of ICRA)⁹ FFN’s use of its private property for Christian religious worship does not fall within the two exceptions within *Montana v. United States*, 450 U.S. 544 (1981), as claimed by NABC.

Again, “Indian tribe power over nonmembers on non-Indian fee land is sharply circumscribed.” *Atkinson Trading Co. v. Shirley*, 532 U.S. 645, 650 (2001)(citing *Montana*). “As to nonmembers...**a tribe’s adjudicative jurisdiction does not exceed its legislative jurisdiction**...Subject to controlling provisions in treaties and statutes, and the two exceptions identified in *Montana v. United States*, **the civil authority of Indian tribes and their courts with respect to non-Indian fee lands generally “do[es] not extend to the activities of nonmembers of the tribe.”** *Strate v. A-1 Contractors*, 520 U.S. 438, 453 (1997)(emphasis added). Tribal sovereignty over non-members does not extend to relationships between tribal and non-tribal members involving the consensual, voluntary, persuasive free exercise of religion.

NABC misreads the two exceptions under *Montana*. The first exception to the *Montana* rule covers “activities of nonmembers who enter **consensual relationships** with the tribe or its members, **through commercial dealing, contracts, leases, or other arrangements.**” See *Montana*, 450 U.S., at 565 (emphasis added). A church leader’s statement of religious belief inside a church building during a worship service simply is not a “consensual relationship” entered through “commercial dealing, a “contract,” a “lease” or an “other arrangement” of a pecuniary nature, as the caselaw makes clear. Nor is a matter of religious freedom, belief, conscience, or association, like Church membership or attendance of Church activities, the type of “consensual relationship” giving the Tribe jurisdiction.

⁷ “If bad men among the Indians shall commit a wrong or depredation upon the person or property of any one, white, black, or Indian, subject to the authority of the United States and at peace therewith, the Indians herein named, solemnly agree that they will... deliver up the wrong doer to the United States...” See Treaty of Fort Laramie, Apr. 29, 1868, 15 Stat. 635, 635; Nat’l Archives, <https://www.archives.gov/milestone-documents/fort-laramie-treaty>.

⁸ “No Indian tribe in exercising powers of self-government shall” “make or enforce any law prohibiting the free exercise of religion, or abridging the freedom of speech, or of the press, or the right of the people peaceably to assemble and to petition for a redress of grievances.” See 25 U.S.C.A. § 1302(a)(1).

⁹ *Id.*

The cases listed in *Montana* indicate the type of activities the Supreme Court had in mind where tribal jurisdiction exists or may be found: *Williams v. Lee*, 358 U.S. 217, 223 (1959) (lawsuit arising out of **on-reservation sales transaction** between nonmember plaintiff and member defendants); *Morris v. Hitchcock*, 194 U.S. 384 (1904) (upholding tribal permit tax on **nonmember-owned livestock** within boundaries of tribe); *Buster v. Wright*, 135 F. 947, 950 (C.A.8 1905) (upholding Tribe's permit **tax on nonmembers conducting business** within Tribe's borders; court characterized as "inherent" the Tribe's "authority ... to prescribe the terms upon which noncitizens may **transact business** within its borders"); *Washington v. Confederated Tribes of Colville Indian Rsrv.*, 447 U.S. 134, 152-54 (1980) (tribal authority to **tax on-reservation cigarette sales** to nonmembers). Measured against these cases, the Church's traditional religious, charitable, and ministry activities – much less any statements made in the course of a worship service within its sanctuary – presents no "consensual relationship" of the qualifying kind to give the NABC any authority under *Montana* like it claims here. See *Strate v. A-1 Contractors*, 520 U.S. 438, 457 (1997).

The second exception to *Montana*'s general rule concerns conduct that "threatens or has some direct effect on the political integrity, the economic security, or the health or welfare of the tribe." 450 U.S., at 566. Matters of religious opinion or discussion do not reach any of these, thus making the church's religious beliefs communicated from its property wholly outside the purview of the NABC. The Court stated: "if *Montana*'s second exception requires no more [than a mere recitation of the above formula], the exception would severely shrink the rule." *Strate v. A-1 Contractors*, 520 U.S. 438, 456–58 (1997). As the Court said:

Read in isolation, the *Montana* rule's second exception can be misperceived. Key to its proper application, however, is the Court's preface: "Indian tribes retain their inherent power [to punish tribal offenders,] to determine tribal membership, to regulate domestic relations among members, and to prescribe rules of inheritance for members.... **But [a tribe's inherent power does not reach] beyond what is necessary to protect tribal self-government or to control internal relations.**" 450 U.S., at 564, 101 S.Ct., at 1257–1258. Neither regulatory nor adjudicatory authority over the [religious statement or beliefs] at issue is needed to preserve "the right of reservation Indians to make their own laws and be ruled by them." *Williams*, 358 U.S., at 220, 79 S.Ct., at 271. The *Montana* rule, therefore, and not its exceptions, applies to this case [involving FFN].

Strate v. A-1 Contractors, 520 U.S. 438, 459 (1997)(emphasis added). The NABC has "read in isolation" and "misperceived" the second exception set forth in *Montana*. The NABC is wholly without authority to declare "the Foundations for Nations Church a threat to the Northern Arapaho people." Just as "inherent sovereignty" was not so broad as to support the application of Resolution No. 74–05 to [hunting and fishing activities on] non-Indian lands" in *Montana v. United States*, 450 U.S. 544, 563 (1981), neither does it support the application of Resolution No. NABC 2026-2142 to religious free exercise activities protected by the First Amendment to the United States Constitution and by RFRA on non-Indian lands here. And for that matter, it is unclear at best whether a non-Treaty Tribe like the Northern Arapaho Tribe has inherent sovereignty to begin with over Eastern Shoshone Tribe treaty lands.

FFN is Protected by the First Amendment, RFRA, and RLUIPA

Even if NABC's claim of power here was within a *Montana* exception (which it is not), it must yield to the First Amendment's protections for religious free exercise and freedom of speech,

and the Religious Freedom Restoration Act (“RFRA”). The Northern Arapaho Code recognizes the applicability of the “First Amendment to the United States Constitution; the Religious Freedom Restoration Act; and other federal law” as set forth in NAC Title 13, Sections 101 and 102 (“The provisions of this Code *do not purport to bind or regulate the Eastern Shoshone Tribe*; nor do they *purport to impede the federal rights of any individual*.”) (Emphasis added). FFN and Christian Shoshone and Arapaho FFN members retain all of their rights under “the free exercise clause of the First Amendment of the United States Constitution, the Religious Freedom Restoration Act [RFRA], or other applicable federal law.” See U.S. Const. Amend. 1, NAC Title 13, Section 102 (a)-(b).¹⁰

RFRA states, “Government shall not substantially burden a person’s exercise of religion even if the burden results from a rule of general applicability.” 42 U.S.C. §2000bb-1. The only exception to that concrete prohibition on burdening religious exercise is if the government demonstrates that its burden is both “in furtherance of a compelling government interest,” and “is the least restrictive means of furthering that compelling government interest.” 42 U.S.C. §2000bb-1(b). That is not the case here, because there is no compelling government interest in the NAT preventing members from being exposed to Christian religious teachings.

RFRA requires a focused inquiry “to the person.” *Id.* See also *Gonzales v. O’Centro Espirita Beneficiente Uniao do Vegetal*, 546 U.S. 418, 430 (2006) (“RFRA requires the Government to demonstrate that the compelling interest test is satisfied through application of the challenged law to the person—the particular claimant whose sincere exercise of religion is being substantially burdened.”). RFRA adopted “the most demanding test known to constitutional law,” *City of Boerne v. Flores*, 521 U.S. 507, 534 (1997), which is rarely passed. See *Burson v. Freeman*, 504 U.S. 191, 200 (1992) (“[W]e readily acknowledge that a law rarely survives such scrutiny . . .”). RFRA likewise applies and may be raised by FFN “as a claim or defense in a judicial proceeding.” 42 U.S.C. §2000bb-1(c).

RFRA applies against all branches of government, including burdens imposed by the judicial branch. 42 U.S.C. §2000bb-2(1) (“the term ‘government’ includes a branch . . . of the United States” (emphasis added)). The explicit purpose of RFRA was to restore strict scrutiny as the governing standard and “to guarantee its application in all cases where free exercise is substantially burdened.” 42 U.S.C. §2000bb(b) (emphasis added). Indeed, **RFRA “operates as a kind of super statute, displacing the normal operation of other federal laws,” and “supersede[s]” other laws “in appropriate cases.”** *Bostock v. Clayton Cnty.*, 590 U.S. 644, 682 (2020) (emphasis added). *Accord*, *Apache Stronghold v. United States*, 101 F.4th 1036, 1058 (9th Cir. 2024), *cert. denied*, 145 S. Ct. 1480 (2025), *reh’g denied*, 146 S. Ct. 285 (2025). As the Second Circuit recognized, “RFRA is unusual in that it amends the entire United States Code,” *Rweyemamu v. Cote*, 520 F.3d 198, 202 (2d Cir. 2008), because “[a]t bottom, the import of RFRA is that, whatever other statutes may (or may not) say, ‘the Federal Government may not, as a statutory matter, substantially burden a person’s exercise of religion.’” *Id.* (quoting *Gonzales*, 546 U.S. at 424) (emphasis original). See also *Rojas v. Roman Catholic Diocese of Rochester*, 557 F. Supp. 2d 387, 396 (W.D.N.Y. 2008) (“RFRA applies to all federal law, and therefore amended federal discrimination statutes such as Title VII.”). RFRA has been recognized as a defense in claims between private parties. See, e.g., *EEOC v. Catholic Univ. of Am.*, 83 F.3d 455 (D.C. Cir. 1996); *Hankins v. Lyght*, 441 F.3d 96 (2d Cir. 2006). RFRA’s successor, the Religious Land Use and Institutionalized Persons Act (“RLUIPA”) provides supplementary protections to religious land use (i.e., the Church’s use of its privately-owned property), where “the substantial burden affects, or removal of that substantial burden would affect,

¹⁰ <https://www.northernarapaho.com/DocumentCenter/View/128/Title-13-Freedom-of-Religion-Type-PDF>

commerce with foreign nations, among the several States, **or with Indian tribes, even if the burden results from a rule of general applicability.**” See RLUIPA, 42 U.S.C.A. § 2000cc(a)(1) and (2)(b)(emphasis added).

The NABC has previously asserted RFRA protections for certain Arapaho religious exercise, notwithstanding that this Arapaho religious exercise (both on- and off-Reservation) was offensive to and unwelcome by the Shoshone, and offended Shoshone religious beliefs. See *N. Arapaho Tribe v. Ashe*, 92 F. Supp. 3d 1160, 1175 (D. Wyo. 2015)(involving Arapaho religiously-motivated killing of eagles). That case noted that “Not allowing [Arapaho] to participate in the sincere religious practice [of killing eagles] on their land constitutes a burden on their free exercise of religion.” *N. Arapaho Tribe v. Ashe*, 92 F. Supp. 3d 1160, 1183 (D. Wyo. 2015). In fact, in *Ashe*, the Arapaho Plaintiffs argued that U.S. Government Defendants **did “not have a compelling interest in protecting the Eastern Shoshone Tribe’s religious beliefs from offense” by Arapaho religious practices.** *N. Arapaho Tribe v. Ashe*, 92 F. Supp. 3d 1160, 1184 (D. Wyo. 2015)(emphasis added). There, the Arapaho argued that offense taken by others is insufficient to allow suppression of their own religious beliefs and religious exercise. Here, the NABC cannot suppress or prohibit First Amendment protected religious beliefs of FFN, which FFN communicated from FFN’s own private fee simple property, simply because NABC members or others of the community at large may be offended. Cf. *Redman v. Birdshead*, No. SC-2006-08, 2007 WL 9193014, at *16 (Cheyenne-Arapaho May 10, 2007)(Cheyenne-Arapaho Supreme Court refusing to enforce Northern Arapaho order because of “Religious Freedom Clause’s proscription against “enforcing any law” that “infringes on religious or cultural beliefs of prohibits the free exercise thereof.”)

Violation of Freedom of Access to Church Entrance Is a Federal Crime

The so-called “Freedom of Access to Clinic Entrances” (FACE) Act also applies to places of worship, including places of worship located on fee simple property within the exterior boundaries of Indian reservations. The inclusion of places of worship is a distinct, parallel provision within the FACE Act (18 U.S.C. § 248): “Whoever...” “by force or threat of force or by physical obstruction, intentionally injures, intimidates or interferes with or attempts to injure, intimidate or interfere with any person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship; ...or intentionally damages or destroys the property of a place of religious worship,” “shall be subject to” penalties including fines and imprisonment. See 18 U.S.C. § 248. Tribal lands have not been excepted from FACE; and private property - like the fee property owned by FFN - is certainly protected by FACE. FACE may be enforced by the Attorney General of the United States. There has already been physical trespass upon FFN property, by persons attempting to physically block entry to the church. Members of FFN have been threatened with death threats and physical force that they should not attend services at FFN. These are *prima facie* violations of FACE.

CONCLUSION

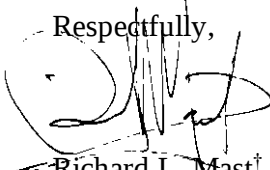
NABC should consider that an overreach of the magnitude upon which has been embarked upon here – complete with heavy media coverage – may be sufficient to capture the attention of the U.S. Attorney General, the FBI, or of Congress. Continued retaliation against FFN (including its Indian members – one of whom the Northern Arapaho Tribe has terminated from her job) **in any way** may very well provide Congress the necessary motivation to subject all Tribes to additional restrictions, including Title VII of the Civil Rights Act of 1964 (making it unlawful for the Tribes to discriminate against their own members in employment on the basis of religion), or take other actions

to prevent harms to the religious liberties of tribe members and non-members, including enhancing religious liberty enforcement mechanisms.

As it now stands, the overreach here is now such as to render NABC members amenable to suit in federal court. “Tribal immunity, like all aspects of tribal sovereignty, is subject to the superior and plenary control of Congress.” *White v. Pueblo of San Juan*, 728 F.2d 1307, 1312 (10th Cir. 1984). Indian tribes are [generally] regarded as sovereign and immune from suit. *See Okla. Tax Comm’n v. Citizen Band Potawatomi Indian Tribe of Okla.*, 498 U.S. 505, 509...(1991). Only a “clear waiver by the tribe or congressional abrogation” limits a tribe’s sovereign immunity. *Id.* A waiver of tribal sovereign immunity “cannot be implied but must be unequivocally expressed.” *Santa Clara Pueblo v. Martinez*, 436 U.S. 49, 58 (1978) (internal quotation marks omitted). But, under *Ex parte Young*, 209 U.S. 123, 159–60 (1908), an exception to state sovereign immunity exists **“for suits against state officials seeking to enjoin alleged ongoing violations of federal law.”** *Crowe & Dunlevy, P.C. v. Stidham*, 640 F.3d 1140, 1154 (10th Cir.2011). This doctrine applies to tribal officials as well. (“[W]e join our sister circuits in expressly recognizing *Ex parte Young* as an exception not just to state sovereign immunity **but also to tribal sovereign immunity.**”) *Crowe & Dunlevy* at 1155 (emphasis added). The *Ex parte Young* doctrine permits a plaintiff to circumvent tribal sovereign immunity by “seeking to enjoin alleged ongoing violations of federal law.” *Norton v. Ute Indian Tribe*, 862 F.3d 1236 at 1251 (10th Cir. 2017) (quoting *Crowe & Dunlevy*, 640 F.3d at 1154) (“[Tribal official] falls squarely within the *Ex parte Young* exception. [Defendant] is a tribal official, sued in his official capacity, in a suit seeking to halt an allegedly unlawful exercise of tribal court jurisdiction.”). *Id.* **“The exception applies to suits against tribal officials.”** *Comanche Nation v. Ware*, 174 F.4th 717, 731 (10th Cir. 2026)(emphasis added). See also *N. Arapaho Tribe v. Harnsberger*, 697 F.3d 1272, 1281–82 (10th Cir. 2012); *Wichita & Affiliated Tribes v. Stitt*, No. 23-6041, 2026 WL 1805130 (10th Cir. June 23, 2026).

NABC should therefore refrain from retaliation or discrimination against FFN Church, or any other Arapaho (or Shoshone) FFN church members, one of whom we understand has been fired from that member’s employment with the Tribe, based on that member’s religious beliefs, speech and association. Should NABC elect to continue violating the rights of FFN (and its Shoshone and Arapaho members), Liberty Counsel stands ready to vigorously defend cherished religious liberties. Neither Liberty Counsel nor Foundations For Nations desires further action beyond this letter.

In light of all of this, Liberty Counsel hopes that discussion between the Northern Arapaho Business Council and FFN Church founders Jason and Sarah Lucas will be productive and will result in restored relationships. Dialogue, not cancel culture, should rule the day here, resulting in an amicable resolution to this matter without the need for intervention by federal authorities or litigation.

Respectfully,

Richard L. Mast[†]

██████████ ██████████

Attachments

[†]Licensed in Virginia

████████████████████

Northern Arapaho Business Council

P.O. Box 396

Ft. Washakie, Wyoming 82514

Phone: 332-6120 — 332-5006 - 307-856-3461



July 28, 2026

Pastor Jason Lucas
Foundations For Nations
20 Mission Road
Riverton, Wyoming 82501

RE: Response to Request for Consultation Meeting

Dear Pastor Lucas:

On behalf of the Northern Arapaho Business Council ("Business Council"), I acknowledge receipt of your July 23, 2026 correspondence responding to the Business Council's July 15, 2026 Directive requesting that Foundations For Nations ("FFN") contact the Office of the Chairman within ten (10) days to request consultation concerning FFN's recurring ministry activities within the jurisdiction of the Northern Arapaho Tribe.

The Business Council appreciates your timely response and your expressed willingness to participate in a respectful dialogue with the Northern Arapaho Tribe.

The Business Council accepts your request for consultation.

Consistent with Resolution No. NABC 2026-2142 and the Chairman's July 15, 2026 Directive, the consultation will be convened by the Northern Arapaho Business Council as an official governmental meeting.

Accordingly, the consultation will be held at the Wind River Casino Conference Center, in Riverton, Wyoming on **Friday, July 31, 2026, at 1:00 p.m.**

The purpose of the consultation remains the same as outlined in the Chairman's July 15 Directive. Specifically, Foundations For Nations will have the opportunity to present any documentation or information relevant to the Business Council's consideration of authorization, including:

- any evidence of prior authorization or permission from the Northern Arapaho Tribe;
- the mission of Foundations For Nations;
- its organizational structure and leadership;
- programs conducted on the Wind River Reservation;

- sources of funding;
- intended future activities within the jurisdiction of the Northern Arapaho Tribe; and
- any additional information the Business Council determines relevant to its review.

**Please feel free to submit any documentation/information beforehand so copies can be made and distributed.*

The Business Council appreciates your request that the meeting remain respectful and constructive. The Northern Arapaho Tribe shares that objective. This consultation is intended to promote communication, mutual understanding, and respectful government-to-organization dialogue consistent with the sovereign authority of the Northern Arapaho Tribe and the consultation policy adopted by the Business Council.

The Business Council will determine the attendance of its elected officials, legal counsel, and appropriate Tribal staff necessary to assist in carrying out its governmental responsibilities. Foundations For Nations is likewise free to determine the composition of its own representatives attending the consultation.

We appreciate your willingness to engage in this process and look forward to a productive discussion.

Respectfully,



Keenan Groesbeck, Chairman
Northern Arapaho Business Council

cc: Northern Arapaho Business Council
Office of the Attorney General
Northern Arapaho Records Department



Foundations For Nations

20 Mission Rd.
Riverton, WY 82501

July 29, 2026

Chair Keenan Groesbeck
Northern Arapaho Business Council
P.O. Box 396
Ft. Washakie, Wyoming 82514
nora.willow@northernarapaho.com

RE: NABC Letter to FFN 7/28/26

Dear Chairman Groesbeck and Council Members:

We have received your letter of July 28, 2026 requesting that Foundations For Nations (FFN) meet with the Northern Arapaho Business Council (NABC) at the Wind River Casino Conference Center on Friday, July 31, 2026 at 1:00 pm.

We were initially encouraged by Chairman Groesbeck's statement during the CNN interview of July 25, 2026, on the *First of All with Victor Blackwell* show, that the NABC is "trying to find a place where it's going to, gonna happen at, gonna find some neutral ground." A secure, neutral location is of utmost importance to FFN leadership as we seek productive discussions with the NABC.

In our letter of July 23, 2026, we proposed the use of a neutral location at Riverton City Hall, in significant part for security reasons. We have received a number of death threats, both in voice messages, and online, and significant personal property damage has already been committed against our members. We have attached some threat examples to this letter.

We therefore renew our request to meet at a neutral location, per Chairman Groesbeck's assurances that neutral ground would be identified. Riverton City Hall is approximately 5 minutes from the Wind River Casino Conference Center, and approximately 10 minutes from FFN. It has adequate police security, and we consider it neutral ground.

As we previously said, FFN church leadership only plans to attend the meeting with the NABC at this time. We requested that this meeting be with the NABC, as its members voted in favor of Resolution No. NABC 2026-2142, and your letter of July 15, 2026 communicated the Resolution's invitation "to meet with the Northern Arapaho Business Council." Of course, we are not opposed to NABC legislative members, legal counsel, and tribal staff attending the meeting.

We request confirmation of whether the NABC intends to allow **only** legislative members, legal counsel, and tribal staff, to attend the meeting, or whether the NABC will allow the meeting to be open to anyone else to attend. If NABC intends to allow people beyond legislative members, legal counsel and tribal staff to attend, and has a list of such other attendees, please provide us with the attendance list. A decision to admit others beyond NABC legislative members, legal counsel and tribal staff may require FFN to reconsider meeting with NABC.

We remain available to meet July 31, 2026 at 1:00 PM, assuming these final two issues - neutral location, and meeting attendees - can be addressed.

Sincerely,

Jason Lucas
Foundations For Nations



On behalf of the leadership team

Threat Examples

VOICE MESSAGE

Hey Sarah, you wanna be martyred? For the cause?

Watch your back you c*nt!

You racist, f*cking c*nt.

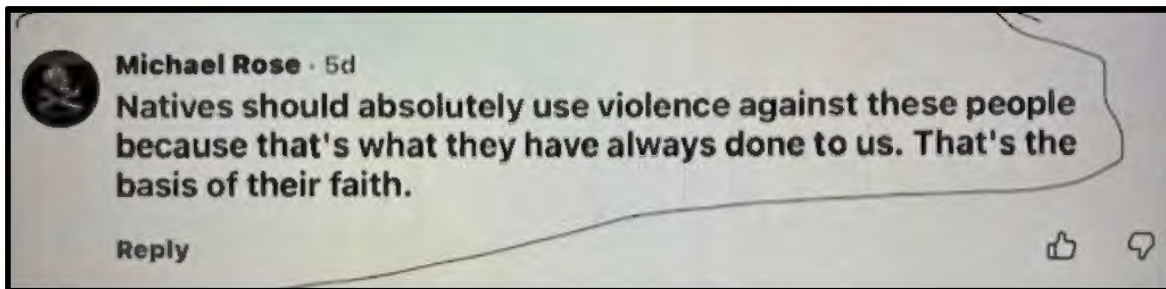
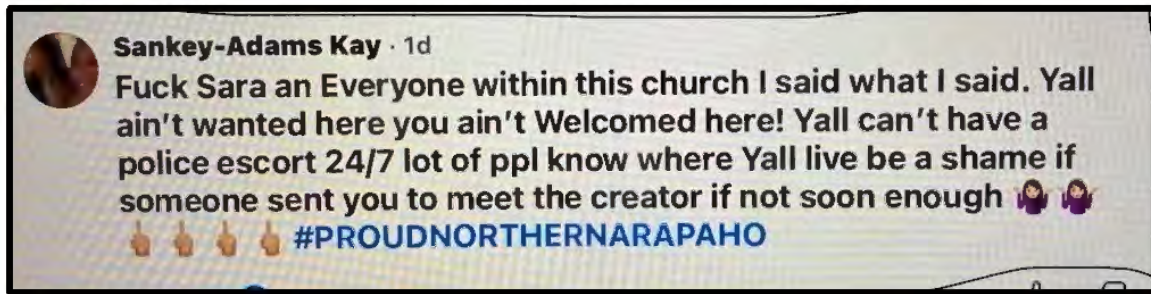
Your family, your friends, your community, your all – is gonna be martyred.

You...c*nt.

SOCIAL MEDIA EXAMPLES



Threat Examples



Threat Examples

**Kel Spoon** · 25m
Remember assault rifles only good for 300 yard
hunting rifles good up to a 1000 lol jus saying for
those that want that info lol

Reply  1  

**ThreeStars Friday** ·  Author · 24m
Kel Spoon green tips and oil that gun diddy
style awwww just some tips and tricks

Reply  1  

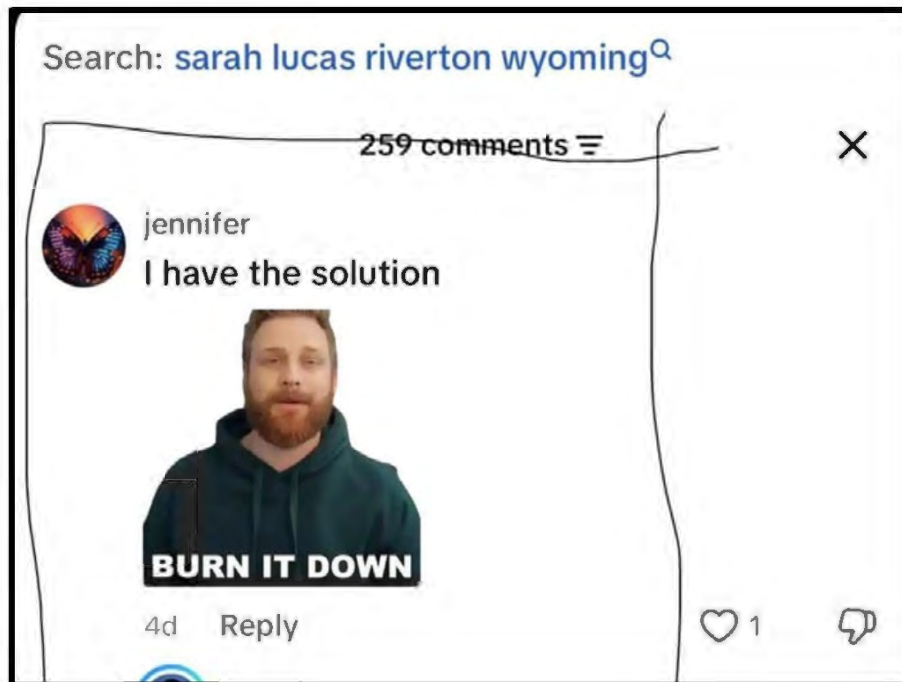
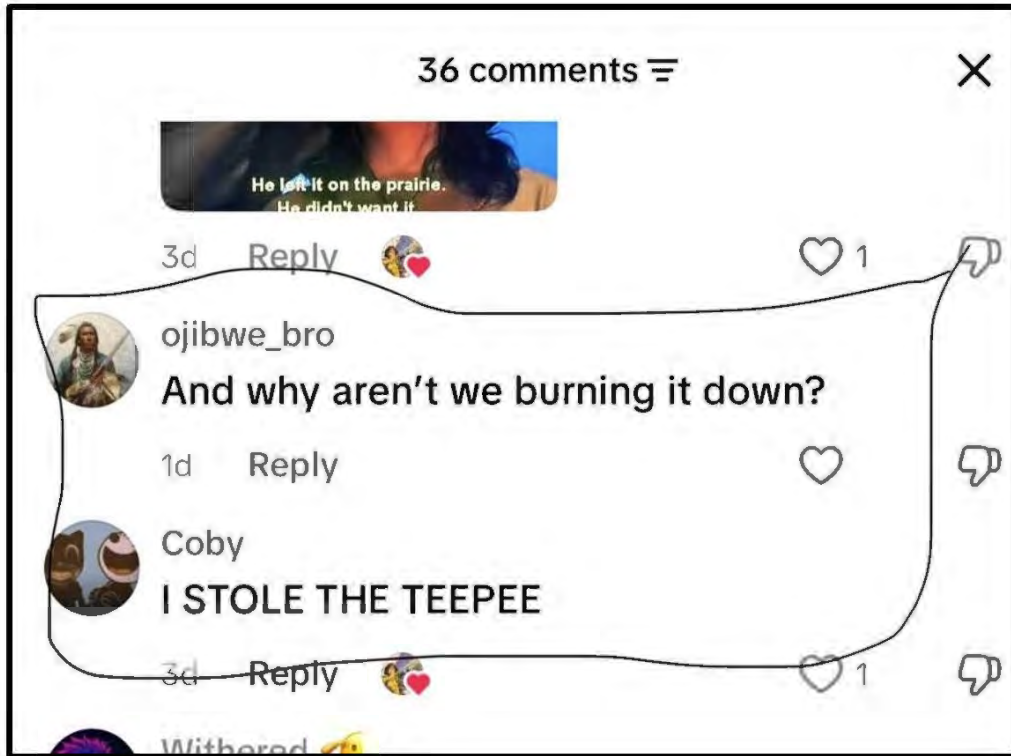
**Kel Spoon** · 22m
ThreeStars Friday green n red tips lol jus
lube it n send it lol

Reply  1  

Most relevant is selected, so some comments may
have been filtered out.

 Comment as Grace Ybarra   

Threat Examples





Foundations For Nations

20 Mission Rd.
Riverton, WY 82501

July 31, 2026

Co-Chairwoman Kim Harjo
Northern Arapaho Business Council
P.O. Box 396
Ft. Washakie, Wyoming 82514
nora.willow@northernarapaho.com

RE: Confirmation of July 31 1:00 PM NABC meeting and FFN attendees list

Dear Co-Chairwoman Harjo and Council Members:

We have received your letter of July 30, 2026 requesting that Foundations For Nations (FFN) meet with the Northern Arapaho Business Council (NABC) at the Wind River Casino Conference Center on Friday, July 31, 2026 at 1:00 pm.

First, thank you for clarifying the meeting will be a closed meeting. We are hopeful this will be conducive of a good result.

Second, thank you for considering our request to meet at a neutral location. The rationales provided by the NABC for the desired meeting location at the Wind River Casino do make sense, under normal circumstances. And under normal circumstances, we would love to meet in person with the NABC, as we have been willing to do in the past, as that is the best way to conduct such discussions.

Given the abnormal circumstances, however, and the strong desire of NABC members to gather at their usual meeting location, we would request for the NABC to provide us with a Zoom Meeting link, due to safety concerns.

After our meeting of July 10, 2026 with the NABC became known to the community, there were protestors on the way in and on the way out. This contributed to a high level of stress and a very stressful meeting. At the first meeting, even though loud protestors were still present, the BIA security officer declined to escort us out, until we pushed very hard for his assistance.

Vehicles followed us from the bridge into Riverton, and we ended up at the Riverton Police Department because of concerns for safety.

Over the last few days, threats have increased. In addition to the online death threats, death threat voice messages, discussion of long-range shooting of our people, and threats to “Charlie Kirk” (i.e. assassinate) Sarah, someone slashed the tires of one of our team who attended the first meeting with the NABC at Wind River Casino. The current atmosphere, threats to personal safety, and instances of property damage require us to respectfully decline an *in-person* meeting at the Wind River Casino at this time.

However, we desire very much to remotely attend the meeting via Zoom, and request that Nora Willow provide us with a Zoom link so that we may be afforded an opportunity to be heard and to discuss any questions the NABC may have, in a way that will ensure our attendees’ personal safety.

Our attendees will be as follows:

1. Jason Lucas
2. Sarah Lucas
3. Josh H
4. Tammie H
5. Caleb E
6. Gary C
7. Janie C
8. Sonja F

We look forward to meeting with the Northern Arapaho Business Council to achieve an amicable solution in this situation. Please advise if the NABC will provide us a Zoom link as it has done in the past, or in the alternative, whether NABC will accept a Zoom link request from us.

Finally, this morning, we will be providing a separate cover letter with documents responding to the NABC’s requests, as we are still compiling that information.

Thank you for your consideration.

Sincerely,

Jason Lucas
Foundations For Nations

On behalf of the FFN leadership team



Foundations For Nations

20 Mission Rd.
Riverton, WY 82501

July 31, 2026

Chairman Keenan Groesbeck
Co-Chairwoman Kim Harjo
Northern Arapaho Business Council
P.O. Box 396
Ft. Washakie, Wyoming 82514
nora.willow@northernarapaho.com

RE: Information requested by NABC Pursuant to Resolution 2026-2142

Dear Chairman Groesbeck, Co-Chairwoman Harjo and Council Members:

Per Northern Arapaho Business Council (NABC) Resolution 2026-2142 and subsequent correspondence to and from Foundations For Nations (FFN), and in anticipation of today's meeting, please find a description below and associated Exhibits regarding the following:

1. Evidence of prior Northern Arapaho Tribe authorization or permission issued to FFN;
2. Organizational mission and objectives of FFN;
3. Organizational and leadership structure of FFN;
4. Programs and recurring activities conducted on the Wind River Indian Reservation by FFN;
5. Sources of funding for FFN;
6. Intended future activities within the jurisdiction of the Northern Arapaho Tribe;
7. Any additional information Foundations For Nations believes relevant to the Business Council's review.

Our Statement of Faith was developed in 2016, and our Statement of Faith has been publicly available on the website since at least 2017, before we moved to our present location. It is publicly available at <https://foundations.com/church-about/> and is also attached.

The following are a numbered, date-order description of attached documentation (each marked as an exhibit corresponding to the outline below) establishing that Foundations For Nations has at all times operated openly with the knowledge and consent of the Northern Arapaho Business Council.

1. Evidence of prior Northern Arapaho Tribe authorization or permission issued to FFN

- A. **January 28, 2020** - Email from FFN to Mr. Spoonhunter, Mrs. Thunder and the rest of the NABC members, thanking NABC for meeting the prior week; expressing thanks for kind words about FFN and the work FFN has done on the Wind River Reservation; expressing excitement "to find more ways to partner together with you to support the Northern Arapaho people;" expressing thanks for leadership and wisdom NABC members share in guiding the systems of the reservation; expressing hope to "find a solution together to build a recreation center that will benefit the community here;" soliciting "any questions or [if they] would like to discuss [FFN's] proposal further."
- B. **April 3, 2020** - Email String of three emails from and to FFN:
 - 1. April 3, 2020 Email from FFN: "Good morning Northern Arapaho and Eastern Shoshone Tribes... We have a partnership with Food Bank of the Rockies and have been giving food out every Monday...in Riverton during this COVID-19 crisis. Food Bank of the Rockies has presented an opportunity to bring a semi full of food to feed 500 families...We know that there is a lot of need for food on the reservation during this time and wanted to let you know in advance so you could inform your tribes."
 - 2. April 3, 2020 Email from Eastern Shoshone Tribe Public Relations Director Silva Robinson: "Sarah, This is an excellent opportunity...is there a possibility of coming to Fort Washakie to distribute food?...Just wanted to make sure so I can relay the message."
 - 3. April 3, 2020 Email from FFN Sarah Lucas to Silva Robinson: "We are going to do [a food drive] in Ethete next week and then we will schedule one for the Fort the following."
- C. **April 24-May 2, 2020** - Email String of four emails to and from FFN Sarah Lucas from Fr. Hugo concluding with discussion of delivery of **"200 food boxes to the elderly across the reservation...in collaboration with the NABC, Wind River Cares, and The Community Foundation in Jackson...If you have any more concerns, please speak with the NABC."**
- D. **June 9, 2020** - Email from Mr. Lee Spoonhunter to FFN/Sarah Lucas, **"in support of your Kid's summer program on behalf of the Northern Arapaho Tribe.** We are aware that you have spoken with Dr. Paul Ebbert and were told of the strict guidelines which your program is to adhere to in opening the summer program to ensure the safety of all involved...**we feel confident in supporting**

your program. Please be safe and have fun!" Signed: Lee Spoonour, Chairman, Northern Arapaho Business Council.

- E. **January 13, 2021** - Email string from FFN to Lee Spoonhunter with attached flyers for upcoming free gas event on Saturday, January 16, 2021 and upcoming clothing drive; response email from Lee Spoonhunter to FFN/Sarah Lucas stating "Thank you so much. It really means a lot for all you do for our community. Thanks."
- F. **May 18, 2021** - Email from FFN to Lee Spoonhunter, describing attached "letter for the Northern Arapaho Business Council explaining our plans for Kids Club this summer. **Please present it to the proper person/group so that we can gain approval for Kids Club.** More of the details are in the letter that is attached." **Letter attached to May 18, 2021 email, from FFN to NABC** regarding "Kids Club this summer as we do every summer," describing how children will "get picked up with our bus or other vehicles," beginning and ending dates, stating "We wanted to reach out and **let you know our plans** for Kids Club **and to ultimately get your approval for this program.**"
- G. **March 14-15, 2022** - Emails **requesting and setting meeting date/time with the NABC to discuss** FFN's building of "**recreation center/church in Aarapahoe**" and intent to "**start a Domestic Violence**" shelter "**on the reservation.**" FFN has "a team from Colorado helping...develop this and **we were wanting to present to the [NAB] Council our plan to get their permission and involvement.**" Follow-on email from La Nessa Morgan confirms meeting at 533 Ethete Road.
- H. **January 25, 2024** - Emails with FFN/Sarah Lucas requesting a meeting with the Business Counsel regarding Recreation Center; response from Nora Willow with attached blank NABC Meeting Request Form.
- I. **January 29, 2024 - NABC Meeting Request** - discussing
 1. "After school programming @ our Rec Center"
 2. "Wind River Refuge...Domestic Violence Shelter"
 3. "Funding"
- J. **February 2 and 6, 2024** - Email from Nora Willow offering Tuesday, February 13, 2024 at 1:00 PM **as meeting date with NABC**; response from FFN/Sarah Lucas confirming time.
- K. **February 7, 2024** - Email of Zoom Meeting Invitation from NABC Nora Willow listing "NABC, Foundation of Nation (Sarah & Jason Lucas) @ Tue Feb 13, 2024 1pm-2pm (MST)"

RE: Information requested by NABC Pursuant to Resolution 2026-2142
July 31, 2026

- L. **February 19, 2024** - Email from FFN/Jason Lucas to Nora Willow regarding attached "letter that the Northern Arapaho Business Council requested us to write as options for potential funding are discussed by the Council. **Please share it with the whole NABC.** If there are any comments or questions please let me know."
- M. **February 19, 2024** - Letter - from FFN to NABC per NABC's request, listing "all [FFN] is doing on the Wind River Reservation."
 - 1. FFN Church and Recreation Center: Constructed our 22,000 square foot building to use as a community recreation center at 20 Mission Rd. in Arapahoe. This was done with \$2.2 million debt free through our partners. Our desire is to hire Native leaders to run the after school programs we have planned. We are reaching out to St. Stephens School as well as Arapahoe School...
 - 2. Foundations For Nations Food Pantry and Clothing Closet...
 - 3. Wind River Refuge Women's Shelter...
- N. **March 13, 2024** - Email from FFN/Sarah Lucas to Nora Willow, requesting "to **schedule a meeting with the [NABC] in person,**" requesting dates that work.
- O. **May 31, 2025** - Email from Lee Spoonhunter requesting meeting to discuss partnership between FFN and Northern Arapaho 477 Program, indicating "We might be serving some of the same tribal members."
- P. **August 28, 2025** - Email from FFN and Lee Spoonhunter advising of:
 - 1. Growth of FFN children's and youth programs;
 - 2. Intent of FFN to build new gym facility "where children and youth can enjoy after-school programming, tutoring, youth group, healthy food distribution, sports camps, mentorship" and more.
 - 3. Participation of over 100 children in FFN summer programs.
 - 4. Participation of 50 elementary students active in after-school programs.
 - 5. Employment of four Native American youth over the summer in FFN programs.
 - 6. Goal of continuing to meet needs by expanding ("we must expand") and raising \$135,000 by September 22 to fund new facility.
- Q. **September 2, 2025** - Email from Lee Spoonhunter in response to August 28 email from FFN: "Hi Sarah, How awesome! Your such a blessing to your people and community!"
- R. Permission Slip - KIDS CLUB After School Program
- S. FFN Statement of Faith - Printed Format

2. Organizational mission and objectives of FFN

FFN's mission has always remained the same: Love God, Reach People, Impact Community. FFN is made up of Christians from numerous ethnicities, including Arapaho and Shoshone. FFN seeks to build genuine relationships, show the love of Christ through action, and serve the people from both Shoshone and Arapaho backgrounds, while helping meet practical needs within the community. FFN seeks to serve and be a blessing to the people on the Wind River Reservation in a multi-ethnic fellowship of Christian believers that is led by the Gospel of Jesus Christ.

3. Organizational and leadership structure of FFN

FFN is led by Pastors Jason and Sarah Lucas. Pastor Jason and Pastor Sarah are accountable to a five-member Board of Directors. They are also accountable to their sending church, Church For All Nations. They lead a team of both paid pastoral staff (1. Lead Pastor, 2. Associate Pastor, 3. Business Manager, 4. Youth Pastor, 5. Children's Pastor, 6. Food Pantry Director, 7. Worship Leader), who serve the church body that meets at FFN, along with over twenty volunteers (1. Hospitality, 2. Children's Classroom Teachers, 3. Sound and Media, 4. Security Team, 5. After-school program helpers, 6. Youth Group, etc.). All of our staff and volunteers have passed a background check administered by Safe Hiring Solutions as part of our child protection policy. See Exhibit 3.A, Organizational Chart.

4. Programs and recurring activities conducted on the Wind River Indian Reservation by FFN:

FFN programs and activities in or around the Wind River Reservation include operating the Food Pantry (which serves over 2,000 individuals each month, 40% of whom are Native American); prison ministry; homeless ministry; FFN's Christian church, which meets Sundays and Wednesdays on fee simple property owned by FFN; and at that location providing after-school programs for children; hosting kids' day camps during the summer; bussing children to-and-from FFN after-school programs and day camps and services; Life Recovery classes; helping people overcome addictions; projects improving Native families' homes, hosting mission teams, and providing assistance to Native families with utilities and rent when needs arise; and other acts of service and outreach.

5. Sources of funding for FFN:

FFN is funded through a handful of sources. From 2017 to 2026, Jason Lucas aided in funding FFN's work by working as a High School Business Teacher at St. Stephen's Indian School (5 years); a UPS preload supervisor (1 year); and as FFN's Business Manager while working as a Bus Driver at St. Stephens (2 years). After additional donors began providing additional support to FFN's work, the FFN Board voted to provide Jason a salary so that he could devote his full-time efforts to the various ministries of FFN.

In addition to being funded in large part by Jason Lucas' outside employment for 9 years, FFN has been and continues to be funded by the contributions of individual donors who

live in the City of Riverton, upon the Wind River Reservation, around the country; and through tithes and offerings of FFN Church members and attendees. Other aspects of our operations, like the Food Pantry, are funded in part through United States Department of Agriculture funding sources.

See Exhibit 5A, Statement detailing breakdown of mission team costs and Exhibit 5B, detailing costs involved in the \$30/month child sponsorship, as these were questioned in the previous NABC meeting of July 10, 2026.

6. Intended future activities within the jurisdiction of the Northern Arapaho Tribe:

While we are uncertain as to which of our activities the Northern Arapaho Tribe considers within its jurisdiction, FFN programs and activities in or around the Wind River Reservation include operating the Food Pantry (which serves over 2,000 individuals each month, 40% of whom are Native American); prison ministry; homeless ministry; FFN's Christian church, which meets Sundays and Wednesdays on fee simple property owned by FFN; and at that location providing after-school programs for children; hosting kids' day camps during the summer; bussing children to-and-from FFN after-school programs, day camps and services; Life Recovery classes; helping people overcome addictions; projects improving Native families' homes, hosting mission teams, and providing assistance to Native families with utilities and rent when needs arise; and other acts of service and outreach.

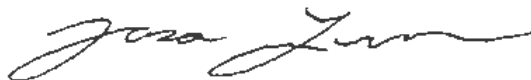
If NABC desires, FFN is willing to consult with the NABC if a future activity idea is outside the above current activities. FFN believes in collaboration, as our documentary evidence attached hereto and our community reputation and relationships show.

7. Any additional information Foundations For Nations believes relevant to the Business Council's review.

We appreciate the attention of the Northern Arapaho Business Counsel to the information set forth above and attached hereto as Exhibits. As can be seen, FFN has had a close working relationship with the NABC over the years, and has kept the NABC informed of our activities. We hope that these explanations and this documentation is satisfactory to show that Foundations For Nations loves and cares deeply for the people of the Wind River Reservation, both Shoshone and Aarapaho, and we hope to continue our work with the continued blessing of the NABC in a spirit of mutual respect.

Sincerely,

Jason Lucas
Foundations For Nations



On behalf of the FFN leadership team

Subject: Foundations For Nations: Thank you for the meeting!



Jason Lucas <jlucas@foundnations.com>
to lee.spoonhunter, clarinda.thunder, Sarah Lucas ▾

Tue, Jan 28, 2020, 11:08 AM

Mr. Spoonhunter, Mrs. Thunder, and the rest of the NABC,
Sarah and I greatly appreciate your time in the meeting the other week. The kindness you said about our ministry, and the work we have done on the Wind River Reservation meant a lot to us. We are excited to find more ways to partner together with you to support the Northern Arapaho people. Thank you for your leadership and wisdom you share in guiding the systems of the reservation.

We are hopeful that we can find a solution together to build a recreation center that will benefit the community here. Please let us know if you have any questions or would like to discuss our proposal further.

Hohou!

Ecclesiastes 4:9 Two are better than one, because they have a good reward for their toil.

—
Jason Lucas
(307) 840-0623
Foundations For Nations

FoundNations.com
Isaiah 58:12
Revive > Raise Up > Restore

EXHIBIT 1.A

Subject: Re: Food Distribution - Fremont County

Sarah Lucas <slucas@foundnations.com>
to Alejandra Silva ▾

Sat, Apr 4, 2020, 12:41 AM

Hello Silvia,

There is opportunity to do a food drive in Fort Washakie. We are going to do one in Ethete next week and then we will schedule one for Fort the following.

We do ask that people stay in the car. They pull up and we put the food in their trunks or pass it through their window. All of our volunteers will wear face masks and gloves. We as volunteers stick to the 6ft distancing as well. We care about the health of all those involved. We are happy to help the best way we can.

Thank you and God Bless

On Fri, Apr 3, 2020 at 4:32 PM Alejandra Silva <asilva@easternshoshone.org> wrote:

Sarah,

This is an excellent opportunity to receive food. Is there a possibility of coming to Fort Washakie to distribute food? Also, how are you handling crowds? Are people told to stay in their vehicles? Just wanted to make sure so I can relay the message.

Alejandra (Silva) Robinson

Eastern Shoshone Tribe

Public Relations Director

E. Shoshone Archives

307-332-3532

asilva@easternshoshone.org

[Facebook](#)

[Instagram](#)

[Website](#)

On Fri, Apr 3, 2020 at 10:31 AM Sarah Lucas <slucas@foundnations.com> wrote:

Good morning Northern Arapaho and Eastern Shoshone Tribes. This is Jason and Sarah Lucas from Foundations For Nations Ministries in Riverton. We have a partnership with Food Bank of the Rockies and have been giving food out every Monday at [620 East Monroe Ave.](#) in Riverton during this COVID-19 crisis. Food Bank of the Rockies has presented an opportunity to bring a semi full of food to feed 500 families on Saturday April 11th at 1pm. We know that there is a lot of need for food on the reservation during this time and wanted to let you know in advance so you could inform your tribes.

The food distribution will be at Foundations For Nations Christian Church on Saturday April 11th, starting at 1pm at [620 E. Monroe Ave. Riverton, WY 82501](#).

God Bless you!

from St. Stephen's Mission External Inbox x



FrHugo Blotsky <frhugo4365@gmail.com>

Fri, Apr 24, 2020, 7:47 PM



to me ▾

Hello, Sarah:

This is Fr. Hugo from St. Stephen's Mission and I received your contact information from Pastor Marshall Whitaker because of my involvement with the food distribution that is taking place in Fremont County. I was at United Baptist Church yesterday while they were doing curbside loading of food boxes into vehicles. Today, I visited at the food distribution at the administration building of Arapahoe Charter School. I am writing up a report on the purchase and food distribution in Fremont County for the staff at St. Stephen's Mission, and for the Chancery Office of the Catholic Diocese of Cheyenne. The purpose of the report is to assess what needs are being met in Fremont County and what needs still need to be met. Marshall mentioned that you and Jason organize the purchase and distribution of food at the Foundation for Nations church in Riverton. On what day and times does this food distribution take place? I would like to visit the site while the distribution is going on.

God bless.

Fr. Hugo

 Image result for Picture of medal of St. Benedict

Modernized Smoke Signals coming from where I am in residence:

Father Hugo L. Blotsky, O.S.B.

St. Stephens Indian Mission

33 St. Stephens Rd./ P.O. Box 250

St. Stephens, WY 82524

Phone: (307) 856-7806

Email: frhugo4365@gmail.com

EXHIBIT 1.C.1



Sarah Lucas <slucas@foundnations.com>
to FrHugo ▾

Fri, Apr 24, 2020, 11:34 PM ☆ 😊 ↶ ⋮

Hello FR Hugo,

We run the TEFAP emergency food program for Fremont County. All of our food comes from Food Bank of the Rockies. Since the stay at orders have been put in place, we have done 6 food drives. We have given a total of 4900 people food. We will do another food drive next Thursday in FT. Washakie. This food drive is in collaboration with with a foundation out of Jackson.

We run a food pantry year round on Tuesdays and Thursdays and average 800 people a month. We aren't open during the Covid. We are just doing a mobile food pantry every week with the food drives until May.

God Bless

—

Sarah Lucas
(219) 307-1457
Foundations For Nations

FoundNations.com
Isaiah 58:12
Revive > Raise Up > Restore



FrHugo Blotsky <frhugo4365@gmail.com>
to me ▾

Sat, May 2, 2020, 6:49 PM ☆ 😊 ↶ ⋮

Hello, Sarah:

Thanks for your response to my email. What do the initials TEFAP stand for? Good to hear that you are receiving food

EXHIBIT 1.C.2



FrHugo Blotsky <frhugo4365@gmail.com>
to me ▾

May 2, 2020, 6:49 PM ☆ 😊 ↩ ⋮

Hello, Sarah:

Thanks for your response to my email. What do the initials TEFAP stand for? Good to hear that you are receiving food from the Food Bank of the Rockies. You mentioned that you would be doing a food drive Thursday of this week at Fort Washakie. In Riverton at the food distribution in the parking lot at United Southern Baptist Church, mention was made that your food distribution would be made at the administration building of the Arapahoe School District. On Thursday afternoon, someone should me an announcement on County 10 News that your food distribution was to be held at the site for the future church building for Foundations for Nations on Mission Road. I hope that all went well. Rev. Roxanne Friday was telling me last week that a truck load of food was being delivered to the community center at Crow Heart this week.

I'm wondering whether too much food was being delivered to the Rez in one week. My hope is that none of the food was left to spoil. Seems that there is no collaborated effort being made to space the food distribution days to monitor the flow of food. The homebound definitely need to have food delivered to them in their homes. Those who have a vehicle are able to come to the distribution site to pick up food. The families without a vehicle and/or gas need to have food delivered to their homes.



Sarah Lucas <slucas@foundnations.com>
to FrHugo ▾

May 2, 2020, 8:22 PM ☆ 😊 ↩ ⋮

EXHIBIT 1.C.3

vehicle are able to come to the distribution site to pick up food. The families without a vehicle and/or gas need to have food delivered to their homes.



Sarah Lucas <slucas@foundnations.com>

to FrHugo ▾

May 2, 2020, 8:22 PM



Thank you for your concerns. We delivered 200 food boxes to the elderly across the reservation on Wednesday and disbursed the rest of the food at our food drive at our property.

We do a weekly food drive in Fremont County. It isn't only on the reservation. We have plenty of commodities left over for our food drive in two weeks. The reservation has had a lot of food distributed in the past two weeks but it is because they are in great need!

TEFAP is commodities for the poor of the poor in Fremont County. It is a government program.

We are in collaboration with the **NABC**, Wind River Cares, and The community Foundation in Jackson to meet these needs and listening to them on the best time of the month to deliver.

There is no food drive this week! We are down for the week.

If you have any more concerns please speak with the **NABC**.

God bless you

↩ Reply

➡ Forward



💬 Share in chat

Subject: summer events



Lee Spoonhunter <lee.spoonhunter@northernarapaho.com>
to slucas ▾

Tue, Jun 9, 2020, 1:13 PM

Hello,

I am writing in support of your Kid's summer program on behalf of the Northern Arapaho Tribe. We are aware that you have spoken with Dr. Paul Ebbert and were told of the strict guidelines which your program is to adhere to in opening the summer program to ensure the safety of all involved. As long as you are wearing a mask, practicing social distancing, and continuing to wash hands, we feel confident in supporting your program. Please be safe and have fun!

Respectfully,

Lee

Lee Spoonhunter, Chairman
Northern Arapaho Business Council
PO Box 396
Fort Washakie, WY 82514
(Phone) 307-332-6120 (Fax) 307-332-7543

EXHIBIT 1.D

Subject: Flyers



Sarah Lucas <slucas@foundnations.com>
to lee.spoonhunter ▾

Wed, Jan 13, 2021, 2:21PM

Mr. Spoonhunter,

Thank you again for allowing us to bless your community. Attached are two flyers for our upcoming events. One is our free gas this upcoming Saturday, and the other is our clothing coat drive.

God bless you,

Sarah Lucas
(219) 307-1457
Foundations For Nations

FoundNations.com
Isaiah 58:12
Revive > Raise Up > Restore

2 Attachments • Scanned by Gmail



Add all to Drive

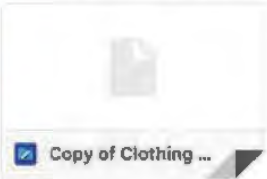


EXHIBIT 1.E

FOUNDATIONS FOR NATIONS HOSTS

FREE GAS

For those in Need



**150 CAR
LIMIT**



**COVID
SAFE**



**FOOD &
DRINKS**

JANUARY 16TH @ 1:30PM



**789 Smokeshop and Gas
180 Red Wolf Creek Dr.
Riverton**



**CONTACT SARAH
FOR ANY
QUESTIONS**

(219)307-1457

Subject: Re: Error



Lee Spoonhunter <lee.spoonhunter@northernarapaho.com>
to Sarah Lucas ▾

Jan 13, 2021, 2:29 PM

Hi Sarah

Thank you so much. It really means a lot for all you do for our community. Thanks

lee

Lee Spoonhunter, Co-Chairman
Northern Arapaho Business Council
PO Box 396
Fort Washakie, WY 82514
(Phone) 307-332-6120 (Fax) 307-332-7543

On Wed, Jan 13, 2021 at 2:27 PM Sarah Lucas <slucas@foundnations.com> wrote:

I'm sorry Lee, only one of those attachments worked. Attached is the other flyer.

Thank you

--

Sarah Lucas
(219) 307-1457
Foundations For Nations

FoundNations.com
Isaiah 58:12
Revive > Raise Up > Restore

EXHIBIT 1.E.2

Subject: Foundations For Nations: Summer Kids Club



Jason Lucas <jlucas@foundnations.com>
to lee.spoonhunter, Sarah Lucas ▾

Tue, May 18, 2021, 2:07 PM

Lee, Sarah and I have put together a letter for the Northern Arapaho Business Council explaining our plans for Kids Club this summer. Please present it to the proper person/group so that we can gain approval for Kids Club. More of the details are in the letter that is attached.

Please let me know if you have any questions.

Hohou,
Jason Lucas

—
Jason Lucas
(307) 840-0623
Foundations For Nations

FoundNations.com
Isaiah 58:12
Revive > Raise Up > Restore

One attachment • Scanned by Gmail ⓘ Add to Drive



EXHIBIT 1.F.1



Northern Arapaho Business Council
533 Ethete Rd. Ethete, WY 82520

5/18/2021

Dear Northern Arapaho Business Council,

Foundations For Nations is planning to have our Kids Club this summer as we do every summer. We believe that Kids Club is a great program for the Native children ages 5 through 12. When the children get picked up with our bus or other vehicles, we will make sure all have masks on and will provide hand sanitizer at several stations all through our property. Kids Club will begin in the middle of June and will go to the end of July (Mondays, Tuesdays, and Wednesdays). We wanted to reach out and let you know our plans for Kids Club and to ultimately get your approval for this program.

If you have any questions or comments, please either respond by calling Sarah Lucas at (219) 307-1457 or simply respond through email at slucas@foundnations.com

Houhou,

Jason and Sarah Lucas

Foundations For Nations

(219) 307-1457

slucas@foundnations.com

jlucas@foundnations.com

Subject: Re: connectiong



La Nessa Morgan <lanessa.morgan@northernarapaho.com>
to Sarah Lucas ▾

Tue, Mar 15, 2022, 4:27 PM

Ok, We are at 533 Ethete road. I will send you a calendar invite. Don't mind the zoom link, I send that out for any council members that might not be able to attend in person.

On Tue, Mar 15, 2022 at 4:21 PM Sarah Lucas <slucas@foundnations.com> wrote:

Yes, will do!

On Tue, Mar 15, 2022 at 3:27 PM La Nessa Morgan <lanessa.morgan@northernarapaho.com> wrote:
Can you do 3-4pm? At our Ethete office?

On Tue, Mar 15, 2022 at 3:13 PM Sarah Lucas <slucas@foundnations.com> wrote:

Thank you. We can we meet on the 25th in person. Will that work for you all? Also, what time?

On Tue, Mar 15, 2022 at 1:34 PM La Nessa Morgan <lanessa.morgan@northernarapaho.com> wrote:

Good morning Sarah. Nice to meet you! Most of our tribal leaders will be out of town this week 17th-19th for work & again 21st-24th. I checked to make sure if some council members will be in the area for you to meet with however the majority of them are going to be on travel. Can we set up a zoom meeting for Friday the 25th? or maybe the following week?

On Tue, Mar 15, 2022 at 8:14 AM Sarah Lucas <slucas@foundnations.com> wrote:

Good morning La Nessa.

My husband and I are the founders of Foundations For Nations. We are currently building a recreation center/church in Arapahoe. We are also looking to start a Domestic Violence on the reservation. I have a team from Colorado helping me develop this and we were wanting to present to the Council our plan to get their permission and involvement. My team will be here this Thursday and was wanting to know if we can schedule an appointment on Friday the 18th or Monday the 21st? Can we make this happen?

Thank you,
Sarah Lucas

On Mon, Mar 14, 2022 at 3:33 PM Lee Spoonhunter <lee.spoonhunter@northernarapaho.com> wrote:

Hi

I wanted to connect you all so Foundations for Nations can be scheduled with the Council for a meeting. Thanks

Lee

Lee Spoonhunter, Councilman
Northern Arapaho Business Council
PO Box 396
Fort Washakie, WY 82514

EXHIBIT 1.G

Request External Inbox x



Sarah Lucas

Thu, Jan 25, 2024, 3:22 PM ☆

Hello Nora, This is Sarah Lucas with Foundations for Nations INC. I would like to request a meeting with the Business Counsel regarding our Recreation center th



Nora Willow <nora.willow@northernarapaho.com>

Thu, Jan 25, 2024, 3:33 PM ☆ 😊 ↩ ⋮

to me ▾

Hello,

The form is attached.

Thank you,

Nora Willow

One attachment • Scanned by Gmail ⓘ Add to Drive



↩ Reply ↪ Forward 😊 □ Share in chat

Northern Arapaho Business Council Meeting Request

Please contact nora.willow@northernarapaho.com or by phone 307-332-6120 ext 210

Name: Sarah Lucas Date submitted: 1/29/24 Program
Name: Foundations For Nature Message #: (219) 307-1457

Agenda Item

I am requesting to meet with the Northern Arapaho Business Council at their earliest convenience in regard to
the following items:

1. After school programming @ our Rec Center
2. Wind River Refuge - Opening in a month - Domestic Violence Shelter
3. Funding

Please attach all relevant documents to be reviewed by NABC or email to

nora.willow@northernarapaho.com

I will need approximately 40min (amount of time) to discuss these items. I am aware that any items not listed on my agenda item will NOT be discussed & that I will need to reschedule to address other issues at a later date.

Is this meeting request urgent? (Y) (N)

Number of participants for this meeting: 2

Equipment needed: ☐ Zoom Link

Will this need to be on record? (Y) (N) / Will any action need to be taken by the Business Council? (Y) (N)

All administrative routes should be exhausted before this item is considered by the Business Council, such as Program Director, Human Resources, Finance, CEO, etc.

RECOMMENDATION BY

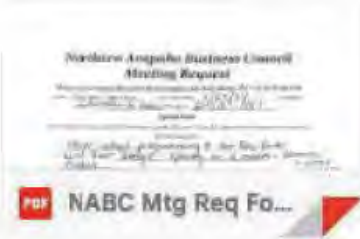
1. Program Director: _____

2. Finance Office: _____

3. Human Resources: _____

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N

Nora Willow <nora.willow@northernarapaho.com>

Fri, Feb 2, 2024, 1:23 PM ☆ 😊 ↩️ ⋮

to me, Jason ▾

Hello,

Tuesday, February 13, 2024 at 1pm. Please let me know if the date will work for you.

Thank you,

Nora Willow

S

Sarah Lucas <slucas@foundnations.com>

Tue, Feb 6, 2024, 9:36 PM ☆ 😊 ↩️ ⋮

to Nora, Jason ▾

Yes, that time works for me.

EXHIBIT 1.J

Invitation: NABC, Foundation of Nation (Sarah & Jason Lucas) @ Tue Feb 13, 2024 1pm - 2pm (MST) (slucas@foundnations.com) External Inbox x [print] [share]

Feb 13, 2024 • 1:00 PM – 2:00 PM
NABC, Foundation of Nation (Sarah & Jason Lucas)

[location pin] <https://us06web.zoom.us/j/5611427467?omn=81871017844>

[person icon] nora.willow@northernarapaho.com - Organizer
Jason Lucas & NABC

[calendar icon] On your Google Calendar
No other events on this day

Yes ▾ Directions Propose a new time Add note

Based on this email

Correc:? [thumbs up] [comment]

N

Nora Willow <nora.willow@northernarapaho.com>
to me, jlucas, NABC ▾

[envelope icon] Wed, Feb 7, 2024, 9:05 AM [star icon] [smiley icon] [reply icon] [menu icon]

NABC Ethete is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting
<https://us06web.zoom.us/j/5611427467?omn=81871017844>

Meeting ID: 561 142 7467

EXHIBIT 1.K

Foundations For Nations Letter requested by NABC

External Inbox x



Jason Lucas <jlucas@foundnations.com>
to nora.willow, me ▾

Mon, Feb 19, 2024, 2:13PM ☆ 😊 ↶ ⋮

Nora,
Attached is a letter that the Northern Arapaho Business Council requested us to write as options for potential funding are discussed by the Council. Please share it with the whole NABC.

If there are any comments or questions please let me know.
Ho'Hou'

Blessings,
Jason Lucas
—
Jason Lucas
(307) 840-0623
Foundations For Nations

FoundNations.com
Isaiah 58:12
Revive > Raise Up > Restore

One attachment • Scanned by Gmail [info] [add to drive icon] Add to Drive



EXHIBIT 1.L

EXHIBIT 1.M



Foundations For Nations

[REDACTED]
20 Mission Road
Riverton, WY 82501

Web: www.FoundNations.com
Email: [REDACTED]

Northern Arapaho Business Council,

We are honored to be serving the Northern Arapaho Tribe and the Wind River Reservation.

As we stated in the Zoom meeting, we have been working on the reservation for almost seven years now. All of the funding for our summer kids day camps, food giveaways, clothing giveaways, youth group camps, and the construction of our church/recreation center has been through our church and outside financial support. For us to continue in reaching the community with our after school programming and women's safe shelter, we need your help and support. Foundations For Nations has proven that our heart and "fruit" is not in building our Non-Profit, but rather in building up the native community around us, your community that we love so much. FFN is here as a resource, a partner in reaching the goals the NABC wants to reach as well.

Here is a list of all our Non-Profit is doing on the Wind River Reservation:

1. FFN Church and Recreation Center: Constructed our 22,000 square foot building to use as a community recreation center at 20 Mission Rd. in Arapahoe. This was done with \$2.2 million debt free through our partners. Our desire is to hire Native leaders to run the after school programs we have planned. We are reaching out to the St. Stephens School as well as Arapahoe

EXHIBIT 1.M

School to see if there are any funds designated for after school programs that we could be awarded. We believe that the after school programming will help the community in many ways. It will be a safe place where children and youth can come and get help with mentorship, school work, exercise, play games, and do crafts. We will open up the recreation center for Elementary students from 3:30pm-5:30pm, and Middle School-High School from 6:30pm-8:30pm. With the help of our partners and funds that can be given from the schools, this program can be more than sustained.

2. Foundations For Nations Food Pantry and Clothing Closet has been in operation for five years. This location is at [REDACTED] in Riverton. We now feed over 1,050 people per month in Fremont County. The clothes are free to those who come in. Our food pantry manager is Adria Posey, her assistant is Virginia Posey-Felter, as well as many volunteers from the community.
3. Wind River Refuge Women's Shelter opens in March of 2024. Wind River Refuge is the only women's safe home in Fremont County and on the Wind River Reservation. The house is at an undisclosed location and we desire to keep it that way for the safety of the women and children that will be part of the women's shelter. We can hold up to 16 women, or a mix of women and their children, in the home. The Wind River Refuge partners help to sustain the operations costs, but we could use funding for the food, supplies, toiletries, transportation, as well as supplemental operations money. Three of our staff members for the Wind River Refuge are Native American women who have overcome domestic violence here on the reservation. See our website at www.windriverrefuge.com

The Wind River Refuge is its own Non-Profit organization.

We look forward to hearing back from you and the possibility of partnership with you. God bless you.

Sincerely,



Jason and Sarah Lucas

Foundations For Nations Inc.

Subject: Meeting



Sarah Lucas <slucas@foundnations.com>
to Nora Willow, Lee Spoonhunter ▾

Wed, Mar 13, 2024, 10:46 AM

Good morning Nora, This is Sarah Lucas with Foundations for Nations. My husband and I were wanting to schedule a meeting with Tribal Counsel in person. Please let me know what dates work for them to meet.

Thank you

—

Sarah Lucas
(219) 307-1457
Foundations For Nations

FoundNations.com
Isaiah 58:12
Revive > Raise Up > Restore

EXHIBIT 1.N

Subject: Re: possible meeting



Sarah Lucas <slucas@foundnations.com>
to Lee Spoonhunter ▾

May 31, 2025, 12:18 PM

We would be willing to meet. What day works best for you?

Sarah Lucas
(219) 307-1457
Foundations For Nations

FoundNations.com
Isaiah 58:12
Revive > Raise Up > Restore

On Sat, May 31, 2025 at 11:21 AM Lee Spoonhunter <lee.spoonhunter@northernarapaho.com> wrote:
Good Morning Pastor Jason and Sarah,

I hope all is well. I would like to meet with you all possibly next week if you are available. I would love to partner with your ministry and the Northern Arapaho 477 Program. We might be serving some of the same tribal members. Thank you.

Lee

Lee Spoonhunter, Director
Northern Arapaho 477 Program
230 West Main
Riverton, WY 82501
(Phone) 307-857-2436 (Fax) 307-856-9569

Subject: Re: Expanding on the Wind River Reservation

Lee Spoonhunter <lee.spoonhunter@northernarapaho.com>

to Sarah Lucas ▾

Tue, Sep 2, 2025, 10:12 AM

Hi Sarah,

How awesome! Your such a blessing to your people and community!

Lee

Lee Spoonhunter, Director
Northern Arapaho 477 Program
230 West Main
Riverton, WY 82501
(Phone) 307-857-2436 (Fax) 307-856-9569

On Thu, Aug 28, 2025 at 1:20 PM Sarah Lucas <slucas@foundations.com> wrote:

Dear Mr. Spoonhunter

Our children's and youth programs on the Wind River Reservation are growing—and with that growth comes an exciting new opportunity. We are stepping forward to build a **new gym facility**, a safe place where children and youth can enjoy after-school programming, tutoring, youth group, healthy food distribution, sports camps, mentorship, and so much more.

This past summer alone, over **100 children** participated in our programs, and **50 elementary students** are now active in our after-school program. We are seeing encouraging results—improved grades, stronger reading skills, and greater confidence in the lives of the children we serve. We also focus on healthy eating and sports camps to help get their little bodies moving.

This summer, we employed **four Native American youth**, furthering our mission to raise up and mentor the next generation of leaders.

To continue meeting these needs, we must expand. That's why we are building—and why we need your help. Our goal is to raise **\$135,000 by September 22nd** to make this new facility a reality.

Click the Video Link below to see a short video from our Project Manager and Sarah.

Video Link: <https://youtu.be/fdy4HXQHBbU>

Together, we can build more than a building—we can build brighter futures.

Would you prayerfully consider joining us in this effort to provide hope, opportunity, and a safe place for the children and youth of the Wind River Reservation?

Link to our Giving Site: <https://pushpay.com/g/foundations>

With gratitude,

STUDENT NAME: _____

KIDS CLUB After School Program
At Foundations For Nations

STUDENT INFORMATION:

Student First & Last Name _____

Home Address / Drop-off Address _____

Gender Male _____ Female _____ Date of Birth _____

Age _____ Grade Level _____

School Name and District _____

PARENT INFORMATION:

Parent/Legal Guardian _____

Phone (Day) _____ (Cell) _____

(Eve) _____ Email _____

Parent/Legal Guardian _____

Phone (Day) _____ (Cell) _____

(Eve) _____ Email _____

SIGN OUT INFORMATION

Safety is a top priority at Foundations For Nations; therefore no child enrolled may be picked up from the program without a parent/guardian signature or that of one of the individuals listed below. (Note: The names that appear below must be someone 16 years or older.)

ADDITIONAL INDIVIDUALS ALLOWED TO PICK UP STUDENT:

Name: _____

Phone _____ Relationship _____

Name: _____

Phone _____ Relationship _____

Name: _____

Phone _____ Relationship _____

STUDENT NAME: _____

PHYSICIAN TO BE CALLED IN AN EMERGENCY

Name: _____

Address: _____ Phone: _____

Medical Insurance Carrier: _____

ID# _____

Are there any medical, family circumstances or cultural requirements of which the leader should be aware of (Any known Allergies)?

Current Medications: _____

Please read the following and sign at the bottom:

I, the undersigned parent or legal guardian of the above named child, do hereby give my permission for the child named above to participate in the activities identified above planned by FOUNDATIONS FOR NATIONS and its affiliated entities.

I am aware of and consent to the scope of the activity to be engaged in and mode of transportation being employed.

I understand that participation in KIDS CLUB After School program activities requires an acceptance of risk. I am aware of and accept the risks associated with the activity to be engaged in and the mode of transportation being used.

I certify that the indicated participant(s) is/are in good physical and mental health and has/have never been declared medically ineligible for athletic competition. I further certify that the above mentioned participant(s) has/have had no previous pre-existing medical condition or injury, listed as, but not limited to exercise induced asthma, cardio or pulmonary (lung) disease, abnormal organ deficiencies, and head or neck injuries which may limit playing abilities.

I understand that participation in KIDS CLUB After School program activities requires an acceptance of risk. With my signature, on behalf of myself and the above named child I hereby waive, release and hold harmless the sponsors, promoter and all other persons and entities associated with FOUNDATIONS FOR NATIONS programs and events from any and all claims, demands, actions, causes of action, obligations, debts, damages, losses, liens, liabilities, costs, attorneys fees, debts and expenses of every kind and nature whatsoever, in law or in equity, known or unknown, fixed or contingent, including any and all rights to subrogation therefore which arise out of, result from or are related to the above-named child's participation in the activities set forth herein.

If I cannot be reached in case of an emergency, I hereby and authorize FOUNDATIONS FOR NATIONS program director or its affiliates to contact 911 or a medical facility or physician of



EXHIBIT 1.R

STUDENT NAME: _____

their choice to provide proper treatment and that I will be responsible for all expenses arising out of or related to such treatment. I hereby authorize and consent to any x-ray examination, anesthetic, medical and/or surgical diagnosis or treatment and hospital care which is deemed necessary and is rendered under the general or special supervision of any licensed physician or surgeon or the medical staff of an emergency medical service provider or a licensed hospital, whether such examination, diagnosis, or treatment is rendered at the office of the physician or surgeon or at the hospital.

I understand that this medical authorization and consent is given (1) in advance of any specific examination, diagnosis, treatment, or hospital care being required and (2) to authorize FOUNDATIONS FOR NATIONS staff to consent to examinations, diagnosis, treatment, or hospital care which is deemed advisable by a licensed physician or surgeon or the medical staff of an emergency medical service provider or a licensed hospital. This authorization shall remain effective until revoked in writing.

Furthermore, I hereby grant full permission for all the foregoing to transport the above participant as need for medical treatment. I hereby represent that I have authority to bind and sign on behalf of all parent/guardians of the above participant(s).

Please Print Name of Parent/Guardian _____

Parent/Guardian Signature _____ Date _____

STUDENT NAME: _____

Basic Information Rules and State Requirements

1. Enrollment: Enrollment is limited. Our hope is to have enough room for all children wishing to participate in our After School Program; however, we cannot always accommodate everyone. After receiving your completed forms, the FFN Staff will call to let you know if your child will be participating in the program and the date that they may begin.

2. Attendance: Regular attendance is necessary. Children are expected to stay for the entire duration of the After School Program. If a student is absent, written or verbal notification must be submitted or communicated to the FFN Staff by the next program day. If a student is absence from the program for 3 or more days without parent communication or written notification the student's spot will be given to another child.

3. Student Pick-Up & Drop-Off: Children being pick-up from the KIDS CLUB After School Program must be signed out by you or someone designated on the registration form (designated person must be 16 years of age and on registration forms). Your child must be picked up promptly at the end of the program. Students being driven home will only be dropped off at the address listed on enrollment forms. Written permission must be given for the child to dropped off at a different location.

4. Discipline: Participation in the KIDS CLUB After School Program is a privilege. A child must follow the rules of the program. Disruptive or disrespectful behavior towards other students or staff is cause for dismissal. We encourage you to discuss concerns about your child's behavior with the FFN Staff.

5. Parental Support: While KIDS CLUB After School Program Staff are committed and qualified, your help is needed to make the program the very best it can be. You are an important partner in our program's success, and we welcome your help with events and activities, tutoring, field trips and other projects.

Release Form for Statements and Photographs: FOUNDATIONS FOR NATIONS uses photographs of program participants for local, regional, state and national publicity. By my signature, I acknowledge receipt of this document and give permission for FOUNDATIONS FOR NATIONS use of statements, written and verbal, made by me, and/or photographs of my child in any and all brochures, flyers, non-profit fundraising, or publicity documents published by FOUNDATIONS FOR NATIONS and its affiliates.

Transportation, Please check one of the following:

_____ My child has permission to walk home from KIDS CLUB After School Program; furthermore, I give permission for my child to sign themself out of the program.

_____ My child will be picked-up by a parent, guardian or other designated individual.

_____ My child will be transported home by FFN Transportation.

I have read and understand all of the information above on this KIDS CLUB After School Program Parent agreement and I give permission for my child to attend the after school program. All of the information in my child's after school registration form and the after school emergency card is complete. I agree to follow the rules of the program and to help my child understand and follow the rules.

Please Print Name of Parent/Guardian _____

Parent/Guardian Signature _____ Date _____

STUDENT NAME: _____

Behavior and Discipline Policies

The KIDS CLUB After-School Program at Foundations For Nations strives to provide a warm and welcoming environment for students and families. Our expectation is that everyone in our community will behave in a respectful, responsible and caring manner toward one another. The following behavior and discipline guidelines have therefore been established.

Any form of lewd behavior, bullying, aggression, violence, disrespect or foul language will not be tolerated. Clothing, toys, books or any other objects depicting, displaying or supporting any of the aforementioned will not be allowed.

Infractions will be dealt with as follows:

***First Infraction: Student will receive a verbal warning.**

***Second and Third Infractions: Student will be relocated to the “island” to complete a “Student Reflection,” parents will be notified and an Incident Report will be completed.**

***Fourth Infraction: Student will be suspended from the program for a period of at least one week, depending on the severity of incident. Parents will be notified and an Incident Report will be completed.**

***If unacceptable behavior continues after the period of suspension, the student will be dismissed from the KIDS CLUB After School Program.**

Please Print Name of Parent/Guardian_____

Parent/Guardian Signature_____

Date_____

Student Signature_____

STUDENT NAME: _____

KIDS CLUB Program Funding:

The KIDS CLUB Program is **free** of charge to all participants.

By allowing your child to participate in the KIDS CLUB After School Program at Foundations For Nations you agree to allow your child's first name and photo to be used for fundraising to cover the cost of the KIDS CLUB After School Programing.

Please Print Name of Parent/Guardian _____

Parent/Guardian Signature _____

Date _____



Foundations For Nations: What We Believe/Statements Of Our Christian Faith

TRINITY

We believe that God is the eternal Father and Creator of all things. He has always existed in three persons - Father, Son, Holy Spirit (Gen 1:1-3).

SALVATION

We believe that Jesus Christ was fully God and fully man, born of a virgin, died for our sins, and resurrected from the dead on the third day to freely offer salvation to all who call on and put faith in Him (Rom. 10:13). He is the only way to heaven and the only name that can be called upon to gain eternal life (Acts 4:12).

THE HOLY SPIRIT

We believe that God sent the Holy Spirit to empower us to go out and be witnesses (Acts 1:8). Just as the Father sent His Son into the world, now Jesus sends us to be His ambassadors to a lost and hurting world (Jn. 20:21). The Holy Spirit gives us gifts and causes us to bear fruit in order to carry out God's will (1 Cor. 12:11,12).

OUR MISSION

We believe that love sums up the law. We need to love God with all that we are and love our neighbors as ourselves (Mt. 22:37-39). By our love will they know that we are His disciples (John 13:35).

THE FALL

We believe that God created man in His image (Gen. 1:27), but man rebelled against God, introducing sin into this world (Rom. 5:12). Ever since then, all men have sinned and fallen short of the glory of God (Rom. 3:23).

Foundations For Nations: What We Believe/Statements Of Our Christian Faith

THE SON

We believe that Jesus Christ was the Messiah and came to usher in the kingdom of God which is already here, but not yet revealed in its fullness (Mt. 4:17). He deserves to be the Savior and Lord of our lives (Rom. 10:9). As a result, we need to die to ourselves, forsake all, take up our crosses, and follow Him (Luke 14:27).

THE BIBLE

We believe that the Bible is the inspired, infallible Word of God and the final authority and standard by which we should live (1 Tim. 3:16).

THE CHURCH

We believe that it is the responsibility of the Church to take the Gospel into the entire world as a testimony to all nations (Mt. 24:14). Every member in the body of Christ must play a role in building the kingdom of God, and taking the Good News to all creation, making disciples, baptizing them, and teaching them to obey everything that Jesus taught (Mt. 28:18-20).

Foundations For Nations

EXHIBIT 3

ORGANIZATIONAL STRUCTURE CHART



EXHIBIT 5A

Mission Trip cost breakdown= **\$550 per missionary for one week:**

Mission Trip Expense	Per Person
Lodging	\$125
Food & Meals	\$100
Outreach Costs	\$60
Fuel for Vehicles / Transportation	\$50
Mission Trip Shirt	\$25
Crafts & Kids Ministry Supplies	\$40
Construction Materials & Projects	\$150
Total	\$550

This provides a straightforward explanation of how the **\$550 mission trip fee** is used to cover both the missionary's basic needs and the costs of ministry and service projects during the week.

EXHIBIT 5B

Child Sponsorship Program

\$30 Per Child — Authorized by Parent or Guardian Signature

The **Child Sponsorship Program** was introduced by Foundations For Nations to help offset a portion of the costs associated with operating our After-School Program and to help us continue making the program available to more children in our community.

The **\$30 per child contribution** is authorized by the child's parent or legal guardian through their signature and helps cover a portion of the many expenses involved in providing a safe, welcoming, and enriching environment for the children.

What the \$30 Helps Support:

- **Hired Cook & Meal Preparation** — Helping cover the cost of hiring a cook to prepare and serve meals for the children.
- **Food & Snacks** — Providing nutritious meals, snacks, and drinks during the program.
- **Crafts & Activities** — Purchasing art supplies, craft materials, educational activities, and other supplies used throughout the year.
- **Christmas Gifts** — Helping provide Christmas gifts and special holiday blessings for children participating in the program.
- **Shoes & Clothing Needs** — Assisting with shoes and other basic needs for children when resources are available.
- **Additional Program Expenses** — Helping with supplies, special activities, events, and other costs necessary to operate and expand the After-School Program.

Why the Program Was Introduced

The Child Sponsorship Program was created to help make the After-School Program more sustainable while allowing **more children to attend and benefit from the services provided**.

The \$30 does not represent the full cost of caring for and serving each child. Rather, it helps cover **a portion of the overall expenses** while Foundations For Nations and its supporters continue to provide additional financial resources needed to operate the program.

Our goal is to provide children with a positive place where they can receive **food, encouragement, educational support, activities, and practical assistance** while being cared for by people who are invested in their lives.

Child Sponsorship Program Contribution: \$30 per child

Authorization: Parent or Guardian Signature Required