

Virgin Islands Economic Development Commission
Decision Meeting of Thursday, April 13, 2023
Summary Report Out

During the Virgin Islands Economic Development Commission (“VIEDC”) Decision Meeting on Thursday, April 13, 2023, the Governing Board heard recommendations from VIEDC Team regarding three (3) application matters in Regular Session and voted as follows:

Regular Session:

Action Items:

Application:

1. Amalie Global, Inc. – Addition of New Member

Amalie Global, Inc. (“Amalie Global”) was granted Virgin Islands Economic Development Commission (“VIEDC”) tax incentive benefits as a Category IV designated service business, providing family office and financial and investment advisory and consulting services, business management services, including human resources and executive training, and back office and related services to its clients located outside the U.S. Virgin Islands. Amalie Global established seven (7) wholly-owned disregarded subsidiaries, Amalie Holding I, LLC; Amalie Holding II, LLLP, HoneyWater I, LLC; HoneyWater II, LLLP; HoneyWater III, LLLP; HoneyWater IV, LLLP; and HoneyWater V, LLLP. At the time of application, Amalie Global stated it may establish additional wholly-owned disregarded subsidiaries through which it shall carry out the above-mentioned activities. All clients will be located outside the USVI. Amalie is located on the island of St. Thomas.

On January 27, 2023, Amalie Global submitted a petition to the VIEDC on February 27, 2023, requesting a change in its ownership.

The Governing Board voted (6 – 0) to:

1. Acknowledge and approve the change in ownership structure of Amalie Global, Inc. pursuant to 29 V.I.C. § 714(b) with the admission of new entities The Moreno Business Trust and The CG Asset Trust.
2. Require the admission of The Moreno Business Trust shall be effective January 1, 2023.
3. Require the CG Asset Trust to be effective retroactive to February 2, 2017 primarily because it is owned by the beneficiary on the current Amalie Global, Inc. certificate of tax incentives, who has now created a trust for himself.
4. Require the Certificate of tax incentives to be amended to reflect the admission of new entities, The Moreno Business Trust and The CG Asset Trust.
5. Require Amalie Global, Inc. to report to the VIEDC within 10 business days of any amendments, restatement or revocation of the trust documents and provide a copy of amended, reinstated trusts or revocation documentation.
6. Require Amalie Global, Inc. to provide notice to the VIEDC within 10 business days upon any owner severing its U.S. Virgin Islands residency.

7. Require all other terms and provisions of the Certificate to remain in full force and effect.

2. Lovango Island Holdings, LLP – Admission of Disregarded Entities

Lovango Island Holdings, LLP (“Lovango Island”) was granted Virgin Islands Economic Development Commission (“VIEDC”) tax incentive benefits as a Category III – Hotel/Guesthouse to own and operate a full-service resort with ancillary activities normally associated with a resort, to include a restaurant, beach club, pool, fitness club, vacation rentals, ferry and concierge services.. Lovango Island also stated it will establish one or more wholly-owned, disregarded subsidiaries through which it will hold title to the real property for the resort, and to carry out the above activities. Lovango Island is located on Lovango Cay, St. John.

On January 19, 2023, Lovango Island notified VIEDC of several disregarded entities in response to VIEDC correspondence of January 13, 2023 requesting information to facilitate the drafting of a certificate of tax incentives.

The Governing Board voted (6 – 0) to:

1. Acknowledge and approve the establishment of Lovango Island Holdings I, LLP and Lovango Islands Holdings II, LLP as a wholly-owned disregarded entities of Lovango Island Holdings, LLP pursuant to V.I. CODE ANN. tit. 29 § 714(c);
2. Require the admission of the disregarded entities to be effective January 1, 2023;
3. Require the Certificate of tax incentives to reflect the admission of wholly-owned disregarded entities, Lovango Island Holdings I, LLP and Lovango Island Holdings II, LLP; and
4. Require all other terms and provisions of the initial Grant of Incentives approved on October 8, 2019 and amended on November 19, 2019 to remain in full force and effect.

3. Royalton USVI, LLC. – Extension of Time to Commence Tax Incentive Benefits

Yusuf Drinking Water, Inc. (“Yusuf”) was granted Virgin Islands Economic Development Commission (“VIEDC”) tax incentive benefits as a Category III – Manufacturer to manufacture and produce plastic bottles, especially the 16.9 oz. bottle, to serve the emergency needs throughout the Caribbean and beyond. Yusuf is located on the island of St. Croix. Yusuf has been granted two (2) extensions to activate its benefits.

On January 5, 2023 Yusuf submitted a petition requesting a third extension of time to activate its benefits.

The Governing Board voted (6 – 0) to:

1. Find Royalton USVI, LLC has shown good cause for a grant of additional time to commence its tax incentives after restructuring of its business activities due to pandemic-related disruptions to the global economy;
2. Grant Royalton USVI, LLC an extension of time to commence its tax incentive to July 1, 2023;
3. Require Royalton USVI, LLC’s existing tax incentives to be null and void and require Royalton USVI, LLC to file a new application for incentives if Royalton USVI, LLC does not commence its tax incentives by July 1, 2023; and

4. Require all other terms and provisions of the July 22, 2021 grant of incentives to remain in full force and effect.

Compliance

(As a result of the Governing Board approval of the resolution granting approval authority to the CEO during the April 13, 2023 Public Hearing, the beneficiary requests listed below will be handled administratively).

1. **183 Media, LLC - Extension of Waiver of Full-time Employment Requirement**
2. **Altisource Asset Management Corporation - Extension of Waiver of Full-Time Employment Requirement**
3. **International Capital Management Company, LLC - Suspension of Certificate of Tax Incentives**
4. **Real Impact Corporation - Waiver of Full-Time Employment Requirement**
5. **St. Croix Renaissance Group, LLLP - Waiver of Full-Time Employment Requirement**
6. **Sunset Cove Holdings, LL - Extension of Time to Meet Full-Time Employment Requirement**
7. **Sunset Cove Holdings, LLC - Suspension of Certificate of Tax Incentives**
8. **Tree Limin' Extreme, LLC - Extension of Waiver of Full- Time Employment Requirement**
9. **Tropico Management, LP - Waiver of Full-time Employment Requirement**