

Virgin Islands Economic Development Commission
Pole Vote Meeting of Tuesday, January 13, 2026
Summary Report

During the Virgin Islands Economic Development Commission (“VIEDC”) Pole Vote Meeting on Tuesday, January 13, 2026, the Governing Board heard a legal opinion from the VIEDC Board Counsel regarding one (1) application matter previously discussed and recommended by the VIEDC team that was tabled during the VIEDC Decision Meeting on December 18, 2025, and voted as follows:

Regular Session:

➤ **Action Items:**

❖ **Compliance:**

▪ **Historic Area Revitalization Project Joint Venture (HARP JV) – Qualification of Charitable Contributions**

Historic Area Revitalization Project Joint Venture (“HARP JV”) was granted Virgin Islands Economic Development Commission (“VIEDC”) tax incentive benefits on April 15, 2025 to engage in the revitalization and restoration of over 185,000 square feet of commercial and residential space in downtown Charlotte Amalie. HARP JV applied for a grant of tax incentives pursuant to 29 VIC 708(a)(1) which allows the Commission to approve other such industries or businesses as may be considered appropriate by the Commission and which the Commission has determined will advance the economic well-being of the Virgin Islands and its people. HARP JV is located on the island of St. Thomas.

On October 31, 2025, HARP JV’s counsel requested confirmation that: 1) contributions made to fund the New Classrooms Innovation Partners, Inc. and Vanderbilt Peabody School Program for Talented Youth, which solely benefit local U.S. Virgin Islands students, will be deemed contributions made to local charities as required by the language of HARP’s Certificate; and 2) Thirteen Thousand Seven Hundred Fifty Dollars (\$13,750.00) of the total contributions made by HARP to St. Croix Educational Complex to fund student travel and accommodations for the Vanderbilt PTY program satisfies the requirement that fifty-five percent (55%) of HARP’s total contribution for educational initiatives be made to the Department of Education pursuant to V.I. CODE ANN. tit. 29, § 708(m).

By email dated December 3, 2025, the Commissioner of the Department of Education (“DOE”) stated, in pertinent part, that HARP JV’s request to deem its aforementioned contribution as made to the DOE is approved insofar “as it’s tied to an existing program.”

On December 18, 2025, the VIEDC Governing Board voted unanimously (6 - 0) to table the matter before it pending receipt of a legal opinion from its Legal Counsel. On December 29, 2025, VIEDC Governing Board Legal Counsel rendered an opinion.

The Governing Board voted (4 – 2) to:

1. Acknowledge the approval by the Virgin Islands Department of Education (“DOE”) to allow Historic Area Revitalization Project Joint Venture to make funds to the St. Croix Educational Complex in support of New Classrooms Innovation Partners, Inc. and Vanderbilt Peabody School Program for Talented Youth for the 2025 reporting year, which shall qualify as an indirect contribution to the DOE. This recognition is contingent upon the current approval by DOE and shall not imply endorsement for future years.

2. Find that New Classrooms Innovation Partners, Inc. and Vanderbilt Peabody School Program for Talented Youth are not U.S. Virgin Islands (“local”) charities.
3. Require written confirmation from the Virgin Islands Department of Education certifying that New Classrooms Innovation Partners, Inc. and Vanderbilt Peabody School Program for Talented Youth, are public school programs and/or initiatives and require that Historic Area Revitalization Project Joint Venture provide information on the public school students that benefit from these programs.