

On April 25, 2007, a transfer application was filed with the VI Economic Development Commission (“VIEDC”) requesting a transfer of incentives to IGY-AYH St. Thomas Holdings, LLC (“IGY”). On May 29, 2007, Mr. Jeffery Epstein acquired 50% interest in IGY as a passive member. The transfer Certificate was agreed upon on December 12, 2010, with a transfer effective date of January 19, 2007. The below chart shows the periods of incentives:

<u>VIEDC Certificate of Incentives</u>	<u>Percentage</u>	<u>Commencement</u>	<u>Termination</u>
Income Taxes	90%	January 19, 2007	March 7, 2010
Gross Receipt Taxes	100%	January 19, 2007	March 7, 2010
Excise Taxes (Raw Materials)	100%	January 19, 2007	October 31, 2012
Excise Taxes (Equipment, Machinery)	100%	January 19, 2007	October 31, 2012
Dividend Withholdings		January 19, 2007	March 7, 2010
Interest Withholdings		January 19, 2007	March 7, 2010
Real Property Tax	100%	January 19, 2007	December 31, 2011
Custom Duties	1%	January 19, 2007	October 31, 2012

On October 22, 2010, IGY submitted an extension application for an extension of its tax incentives. The extension application was accepted as complete by the Chief Executive Officer (“CEO”) of the USVI Economic Development Authority (“USVIEDA”) on November 12, 2010. On November 23, 2010, the public hearing was held, followed by the Commission meeting on February 24, 2011. On June 21, 2011, the Governor of the Virgin Islands approved the tax incentives, the Certificate of Tax Incentives (“Certificate”) was signed by the Chairman of the VIEDC on August 15, 2011, and the VIEDC Compliance orientation was held on January 13, 2013.

IGY was granted an extension of its incentives that commenced and terminated as follows:

<u>VIEDC Certificate of Incentives</u>	<u>Percentage</u>	<u>Commencement</u>	<u>Termination</u>
Income Taxes	81%	March 8, 2010	March 7, 2015
Gross Receipt Taxes	90%	March 8, 2010	March 7, 2015