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GOVERNMENT OF
THE VIRGIN ISLANDS OF THE UNITED STATES

VIRGIN ISLANDS
BUREAU OF INTERNAL REVENUE

9601 Estate Thomas
Charlotte Amalie, St. Thomas, U.S.V.I. 00802

October 2, 2001

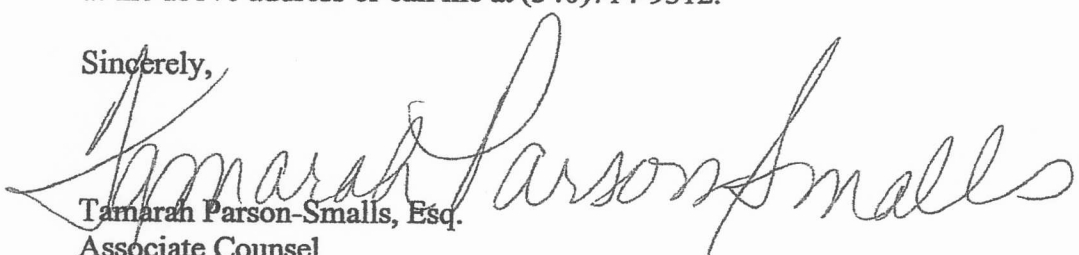
John B. Campbell, Vice President
The St. John Historical Society, Inc.
P. O. Box 1256 – Cruz Bay
St. John, Virgin Islands 00831

Dear Mr. Campbell:

Based on the information that The St. John Historical Society, Inc. ("St. John Historical Inc.") submitted to the Virgin Islands Bureau of Internal Revenue ("BIR"), and the determination made by the Internal Revenue Service ("IRS"), in its letter to you dated June 12, 2001 BIR has determined that St. John Historical Inc. is exempt from Virgin Islands income tax. This exemption is made pursuant to section 501(a) of the Internal Revenue Code, and the corporation will be treated as an organization described in section 501(c)(3). St. John Historical Inc. will also receive benefits granted to Virgin Islands charitable or benevolent organizations under Title 33 of the Virgin Islands Code, including an exemption from excise tax, an exemption from highway user's tax for up to two vehicles imported by St. John Historical Inc. and an exemption from the entertainment tax for charitable events.

This determination is subject to the same limitations and conditions set out in the IRS's letter to St. John Historical Inc. Copies of any correspondence between the IRS and St. John Historical Inc should be forwarded to my attention at BIR. St. John Historical Inc. should file its annual return, Form 990, with the Virgin Islands Bureau of Internal Revenue and the Internal Revenue Service. If you have any questions, please contact me at the above address or call me at (340)714-9312.

Sincerely,


Tamarah Parson-Small, Esq.
Associate Counsel