

FOURTH

GOVERNING LAW; CLAIMS OR CHARGES AGAINST GRANTOR OR HIS ESTATE

A. This Trust Agreement and the Trust created by it shall in all respects and for all purposes be governed and regulated by the laws of the Territory of the U.S. Virgin Islands as they now exist and may from time to time be enacted, amended, or repealed. All questions regarding the validity, construction, and administration of this trust instrument, or any of its provisions, and of this Trust shall be determined solely by the laws of that territory. The courts of the State of Delaware and the U.S. Virgin Islands shall have primary supervision over the administration of the Trust. It is intended that the Trust shall be a U.S. domestic trust as defined in Title 26 section 7701(a)(30) of the Code by virtue of meeting the court and control test. As provided in Treas. Reg. section 301.7701-7(c)(4)(D), if both a United States court and a foreign court are able to exercise primary supervision over the administration of the Trust, the Trust meets the court test.

B. No portion of the income or principal of the Trust shall be liable for the payment of any taxes, liabilities, debts or any other claims or charges against the Grantor or the estate of the Grantor, except as otherwise expressly provided herein.