

Section 3: No part of the net earnings of the Corporation shall inure to the benefit of or be distributable to its members, directors or trustees, officers or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes of the Corporation. No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of or in opposition to any candidate for public office.

Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from Federal income tax under Section 501(c)(3) of the Internal Revenue Code or (b) by a corporation, contribution which are deductible under section 170(c)(2) of the Internal Revenue Code (or corresponding section of any future Federal tax code.)

Section 4: In accordance with Section 508(e) of the Internal Revenue Code, it is the intention that the Corporation should be exempt from taxation under section 501(a). In furtherance of such intent, the Corporation shall be required to distribute all income for each taxable year to be distributed in such a manner as to not subject the Corporation to tax under the provisions of Section 4942 of the Internal Revenue Code. In addition, the Corporation is prohibited from engaging in any act of self-dealing (as defined in Section 4941 (d) of the Internal Revenue Code), from retaining any excess business holdings (as defined in Section 4943 (c) of the Internal Revenue Code), from making any investments in such manner as to subject the foundation to tax under Section 4944 of the Internal Revenue Code, and from making any taxable expenditures (as defined in section 4945 (d) of the Internal Revenue Code).

Section 5: Upon the dissolution of the Corporation, its assets remaining after payment, or provision for payment of all debts and liabilities of the Corporation, shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Code (or corresponding section of any future Federal tax code) or shall be distributed to the federal government, or to a state or local government, for a public purpose. Such distribution shall be made in accordance with all applicable provisions of the laws of the U.S. Virgin Islands.

Section 6: However, if the named recipient is not then in existence or no longer a qualified distributee, or unwilling or unable to accept the distribution, then the assets of this corporation shall be distributed to a fund, foundation or corporation organized and operated exclusively for the purposes specified in Section 501(c)(3) of the Internal Revenue Code, (or corresponding section of any future Federal tax code.)

ARTICLE IV DURATION

The Corporation shall commence upon filing of these Articles. The duration of the Corporation shall be perpetual.

ARTICLE V