



December 17, 2013

VIA HAND DELIVERY and ELECTRONIC MAIL

Ms. Margarita A. Greenidge-Benjamin
Director of Applications
U.S. Virgin Islands Economic Development Authority
8000 Nisky Center, Suite 620
St. Thomas, VI 00802

**Re: Southern Trust Company, Inc.
Capital Investment Requirement – Extension of Time**

Dear Ms. Greenidge-Benjamin:

Please allow this correspondence to serve as a response to your December 6, 2013 letter wherein you requested additional information regarding Southern Trust Company, Inc.'s ("Southern Trust") request for a one (1) year extension of time until February 1, 2015 to meet the its capital investment requirement. Economic benefits were granted with the condition that Southern Trust invest \$400,000.00 in the benefited business upon commencement of benefits and completing one (1) year thereafter.

The primary reason for the extension request is that Southern Trust has yet to secure its office space location. A significant portion of the anticipated capital investment will be directly related to the acquisition, development, and furnishing of the new Southern Trust office. In addition to traditional expenditures associated with the build out of a commercial office space, the Southern Trust location will be equipped with superior information technology and communications capabilities. For example, it is presently anticipated that over \$50,000.00 will be spent to install a state of the art video conferencing system.

In addition to the growth of its office facility, Southern Trust intends to invest a significant portion of its capital investment dollars into the development of its own high speed internet service. This will include the construction of the infrastructure necessary to meet the needs of the Southern Trust ISP network. For example, the construction of a wireless communications tower is planned. This wireless facility will be connected to the Virgin Islands Next Generation Network ("VINGN") system. These planned capital expenditures cannot occur until such time as the agreements for extension of service from the VINGN system are completed. It is presently anticipated that finalization of the necessary agreements will not occur until sometime after the current February 1, 2014 deadline for capital investment.

Southern Trust is confident that its current business plans will result in a capital investment of over \$400,000.00 in the company. However for the reasons detailed above, it is anticipated that those required expenditures may not be completed by February 1, 2014. Therefore, Southern Trust respectfully requests that the Commission extend the period of time to meet its capital investment requirement to February 1, 2015.

Please contact me if you have any questions.

Warm regards,

A handwritten signature in blue ink, appearing to be 'Erika Kellerhals', with a stylized, cursive script.

Erika Kellerhals

cc: Jennifer Nugent-Hill, *Assistant Chief Executive Officer*
Stephanie Berry, *Director of Compliance*
Esther Joseph, *Application Analyst*
LaShanna McBean de Chabert, *Document Specialist*
(via email only)