IN THE SUPERIOR COURT
OF THE VIRGIN ISLANDS

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SX-2026-CV-00340
TAMARA CHARLES
CLERK OF THE COURT

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX

PROSPERITY FARM NY LLC and RAISINGCANE NY LLC, Petitioners, v. DEPARTMENT OF LICENSING AND CONSUMER AFFAIRS, and H. NATHALIE HODGE, in her official capacity, Respondents.	:	Case No. SX-2026-CV-00340

AMENDED AND SUPPLEMENTAL PETITION FOR WRIT OF REVIEW AND, IN THE ALTERNATIVE, APPEAL FOR REVIEW UNDER 3 V.I.C. § 272(f)(2)

Petitioners Prosperity Farm NY LLC ("Prosperity Farm") and RaisingCane NY LLC ("RaisingCane") petition under 5 V.I.C. §§ 1421 and 1422 and Rule 91 of the Virgin Islands Rules of Civil Procedure for a writ of review of the letter of the Department of Licensing and Consumer Affairs (the "Department") dated October 26, 2026, signed by Assistant Commissioner Horace W. Graham, Jr., and captioned "NOTICE OF WITHDRAWAL OF INADVERTENT APPROVAL; ALCOHOLIC BEVERAGE BRAND REGISTRATION AND LABEL COMPLIANCE REVIEW - CORRECTIONS AND ADDITIONAL INFORMATION REQUIRED" (the "Withdrawal Notice"). The Withdrawal Notice is Exhibit 1. Petitioners also seek review of the Department's letter of November 23, 2026, signed by Commissioner H. Nathalie Hodge, denying Petitioners' petition for reconsideration of the Withdrawal Notice (the "Denial"), and, in the alternative, appeal from the Denial under 3 V.I.C. § 272(f)(2). The Denial is Exhibit 4.

On November 4, 2026, Petitioners filed with the Department a petition for reconsideration of the Withdrawal Notice under 3 V.I.C. § 272(f)(1). That petition is Exhibit 2.

On November 5, 2026, Petitioners filed their original Petition for Writ of Review in this Court protectively and asked that it be held in abeyance until the Department decided the petition for reconsideration.

On November 23, 2026, the Department denied the petition for reconsideration in a single sentence: "please be advised that the Petition for Reconsideration is hereby denied." Ex. 4 at 1. The condition on which Petitioners asked that the original Petition be held in abeyance has occurred, and Petitioners withdraw that request. This Amended and Supplemental Petition supersedes the original Petition.

THE DECISIONS COMPLAINED OF

By letters on its letterhead dated July 16, 2025, and August 12, 2025, the Department's Alcohol Control Unit, over the signature of its Coordinator, stated that it "hereby approves" the labels of six products that RaisingCane produces on Prosperity Farm, and that the products "are approved for sale in the United States Virgin Islands." Ex. 3 at 1–2.

The Withdrawal Notice states that the Department "hereby withdraws and rescinds in full any purported approval conveyed by the August 12, 2025 communication." Ex. 1 at 1. It states that "[e]ffective immediately, no approval arising from that communication is in effect," and that the August 12, 2025, communication "must not be relied upon as authorization to sell, resell, distribute, offer for sale, or otherwise place the identified products into commerce in the U.S. Virgin Islands." *Id.* It states that the August 12, 2025, statements "were made inadvertently and prematurely." *Id.* It records the status of each product's brand registration as "NO APPROVAL CURRENTLY IN EFFECT." *Id.* at 6. It does not mention the letter of July 16, 2025. No notice preceded the Withdrawal Notice, and no hearing was offered before or after it. Petitioners received the Withdrawal Notice by email on October 26, 2026.

The Denial, signed by the Commissioner, states that "the Petition for Reconsideration is hereby denied." Ex. 4 at 1. It states no reason and no finding of fact or conclusion of law. It does not refer to any of the objections the petition for reconsideration specified, and it identifies no record on which it rests. No hearing was offered on the petition for reconsideration. The Department's General Counsel transmitted the Denial to Petitioners' counsel by email on November 23, 2026.

PARTIES

Prosperity Farm is a New York limited liability company that owns the farm at 180 Mahogany Road, Frederiksted, St. Croix, and holds Department License No. 2-59255-2L. RaisingCane is a New York limited liability company that leases the farm, produces the six products the Withdrawal Notice addresses, and holds Department License No. 2-59253-2L. The Withdrawal Notice is addressed to Prosperity Farm, to the attention of RaisingCane. Ex. 1 at 1. The letter of July 16, 2025, recites labels "submitted by Prosperity Farm," and the letter of August 12, 2025, recites labels "submitted by Prosperity Farm & Restaurant LLC." Ex. 3 at 1, 2. No entity of that name exists. The labels were submitted on behalf of RaisingCane, which the Alcohol Brand Registration Form, Exhibit C to the petition for reconsideration, identifies as the manufacturer of the six products. Rule 91(b) requires that the petition "include all parties before the respondent officer, board, commission, authority, or tribunal from which petitioner seeks a review." V.I. R. Civ. P. 91(b). No person other than Petitioners was a party to the matter before the Department. Rule 91(b) also requires that the petition "designate as a respondent the officer, board, commission, authority, or tribunal appealed from." *Id.* Petitioners designate as Respondents the Department and its Commissioner, H. Nathalie Hodge, in her official capacity.

JURISDICTION AND TIMELINESS

The Superior Court "shall have original jurisdiction in all civil actions regardless of the amount in controversy." 4 V.I.C. § 76(a). The writ of review statute provides that "[a]ny party to any proceeding before or by any officer, board, commission, authority, or tribunal may have the decision or determination thereof reviewed for errors therein as prescribed in this chapter and rules of court." 5 V.I.C. § 1421. The writ "shall be allowed in all cases where there is no appeal or other plain, speedy, and adequate remedy, and where the officer, board, commission, authority, or tribunal in the exercise of his or its functions appears to have exercised such functions erroneously, or to have exceeded his or its jurisdiction, to the injury of some substantial right of the plaintiff." 5 V.I.C. § 1422. Rule 91 provides that a writ of review "may be granted by the court upon the petition of any party to any proceeding before, or aggrieved by, the decision or determination of an officer, board, commission, authority or other tribunal established by statute." V.I. R. Civ. P. 91(a). The Department is a tribunal established by statute, 3 V.I.C. § 270(a), and Petitioners are aggrieved by the Withdrawal Notice and by the Denial.

Section 272(f)(2) of Title 3 refers to an appeal to "the District Court of the Virgin Islands." 3 V.I.C. § 272(f)(2). Review of local administrative action now lies in this Court. The Third Circuit has held that the Legislature's 1990 enactment of 4 V.I.C. § 76 "divested the district court of its jurisdiction to determine writs of review appealing local administrative determinations." *Tamarind Resort Assocs. v. Gov't of the V.I.*, 138 F.3d 107, 114 (3d Cir. 1998).

Rule 91(a) provides that the petition "shall be filed with the Appellate Division within the time provided by statute, or if none is provided, then no later than 30 days after the date of the decision or determination to be reviewed." V.I. R. Civ. P. 91(a). Petitioners do not concede that any statute provides a time for review of the Withdrawal Notice. Section 272(f)(2) provides a

ten-day period that runs from "the date of the notice of such decision," and the decision to which it refers is "the decision of the Department to a request for reconsideration." 3 V.I.C. § 272(f)(2). By its terms, that provision does not reach the act of which reconsideration is sought. Petitioners recognize, however, that this Court has held that a specific statutory period for seeking review of an agency decision controls over the general period, and that the statutory period is jurisdictional. *Jean-Baptiste v. V.I. Taxicab Comm'n*, 64 V.I. 237, 251 (V.I. Super. Ct. 2016). The original Petition was filed within ten days of the Withdrawal Notice and of Petitioners' receipt of it. As to the Withdrawal Notice, this Amended and Supplemental Petition asserts claims that arose out of the conduct set out in the original Petition and relates back to its filing. V.I. R. Civ. P. 15(c)(1)(B). This Amended and Supplemental Petition is filed within ten days following the date of the notice of the Denial, the period Section 272(f)(2) prescribes for an appeal by a person "aggrieved by the decision of the Department to a request for reconsideration." 3 V.I.C. § 272(f)(2). It is therefore timely under Section 272(f)(2), under any ten-day period that Section 272(f) might be thought to supply for review of the Withdrawal Notice itself, and under the thirty-day period of Rule 91(a).

THE WRIT SHOULD BE ALLOWED OR THE APPEAL HEARD

Section 272(f)(2) provides that "[a]ny person aggrieved by the decision of the Department to a request for reconsideration may within ten (10) days following the date of the notice of such decision file an appeal for review with the District Court of the Virgin Islands," review that now lies in this Court. 3 V.I.C. § 272(f)(2). Petitioners filed their petition for reconsideration under Section 272(f)(1), Ex. 2 at 1, and the Department decided it without questioning that the section applies. Ex. 4 at 1. To the extent Section 272(f) governs, Petitioners appeal from the Denial under Section 272(f)(2), and this filing states "the fundamentals on which

the petition for review is based." 3 V.I.C. § 272(f)(3). Section 272(f)(1), however, reaches "acts, orders or resolutions issued by the Department in accordance with the powers granted by this chapter," *id.* § 272(f)(1), and the Withdrawal Notice relies principally on provisions of Title 8 of the Virgin Islands Code and of the regulations under it, Ex. 1 at 2–6. If the Department contends that Section 272(f) does not reach the Withdrawal Notice, no statutory appeal is available, and the writ of review is Petitioners' only remedy. 5 V.I.C. § 1422. Petitioners ask the Court to treat this filing as an appeal for review under Section 272(f)(2) or as a petition for writ of review, as the law requires. The decisions to be reviewed, the record, and the errors alleged are the same either way.

Petitioners have also exhausted the only administrative remedy the statute provides, although they were not required to. This Court has held: "Given that both statutes speak in permissive language, the Court finds that a request for rehearing is not a prerequisite to appealing a decision of the DLCA." *Metro Motors, V.I., Inc. v. Dep't of Licensing & Consumer Affairs*, 2012 WL 13219652, at *3 (V.I. Super. Ct. Apr. 20, 2012). Petitioners nonetheless sought reconsideration to give the Department the opportunity to correct the Withdrawal Notice. The Department declined to do so. Ex. 4.

The withdrawal is final in the sense that matters. This Court has stated that its "power to review administrative action has traditionally been limited to those instances in which a final decision or order has been rendered below." *Metro Motors*, 2012 WL 13219652, at *2. That limitation is satisfied here. The Withdrawal Notice describes itself as "not a final denial of the pending submissions," Ex. 1 at 1, but the withdrawal it announces is complete: "[e]ffective immediately, no approval arising from that communication is in effect." *Id.* In evaluating finality, "courts employ a practical approach." *Metro Motors*, 2012 WL 13219652, at *2. The

Withdrawal Notice injures a substantial right of each Petitioner. It directs that the approval "must not be relied upon as authorization to sell, resell, distribute, offer for sale, or otherwise place the identified products into commerce," *id.*, and it reaches every retailer, restaurant, and bar that buys RaisingCane's products for resale. Any remaining question of finality is resolved by the Denial: the Department has declined to reconsider, and the withdrawal remains in effect.

ERRORS ALLEGED

The Department, in issuing the Withdrawal Notice and the Denial, exercised its functions erroneously and exceeded its jurisdiction in each of the following respects. Petitioners also rely on each objection stated in their petition for reconsideration. Ex. 2. Under Rule 91(i), "factual determinations are to be reviewed for clear error while legal findings, statements of law, and the application thereof shall be afforded plenary review." V.I. R. Civ. P. 91(i). Each error below turns on a question of law, or on the application of law to documents whose content is not in dispute. If this filing proceeds as an appeal for review under Section 272(f)(2), the statute provides that "[t]he court shall review on their merits the issue of facts and questions of law which caused the review of the decision of the Department," 3 V.I.C. § 272(f)(4), and Rule 91(i) applies only "[u]nless otherwise provided by statute," V.I. R. Civ. P. 91(i).

I. THE WITHDRAWAL WAS MADE WITHOUT NOTICE OR A HEARING.

The Department may impose administrative fines only "upon previous notice and an opportunity for a fair hearing," 3 V.I.C. § 272(b)(5), and may issue an order to cease and desist only "[a]fter a hearing and determination that an accused party has violated this chapter or any administrative order, resolution or regulation issued pursuant to this chapter," *id.* § 272(d)(1). The Commissioner may revoke or suspend a license issued under Chapter 1 of Title 8 only "upon finding, after public notice and adequate hearing, that such revocation or suspension is in the

public interest," 8 V.I.C. § 17(a), and may suspend, cancel, or revoke a license for a violation of Chapter 3 only "after public notice and adequate hearing," 8 V.I.C. § 160. To the extent the Withdrawal Notice prohibits or restricts the sale of the six products, it operates as an order to cease and desist issued with no hearing and no determination of any violation. This Court has held that the Department's request for a cease-and-desist order without notice and a hearing was contrary to Act No. 5265, the act that enacted Section 272. *Pate v. Gov't of the V.I.*, 62 V.I. 271, 297–98 & n.100 (V.I. Super. Ct. 2015). No hearing was offered on the petition for reconsideration either; the Department denied it without one. Ex. 4 at 1.

II. THE LABELING REGULATIONS PROVIDE FOR NO APPROVAL, NO WITHDRAWAL, AND NO PROHIBITION ON SALE PENDING REVIEW.

The regulation on which the Withdrawal Notice relies requires a distiller, blender, maker, or importer to "file with the Board not less than 10 days prior to the initial sale or use thereof 6 specimens of all labels," and provides that "[n]o labels, wrappers, individual containers, or devices so filed will be expressly approved by the Board, and delay in objecting thereto shall not be construed as an approval thereof." 8 V.I. R. & Regs. § 2-18. The remedies the regulations provide for a noncompliant label are a fine, forfeiture, and seizure subject to a petition to court. *Id.* § 2-19(a), (b), (e). None is an administrative stop-sale directive. When the Department's predecessor confiscated spirits whose labels did not comply, the District Court restrained the confiscation because the Secretary "ha[d] uniformly allowed the wholesaler or retailer to correct the deficiency." *Norman's on the Waterfront, Inc. v. V.I. Bd. of Control of Alcoholic Beverages*, 292 F. Supp. 391, 393–94 (D.V.I. 1968).

III. 8 V.I.C. § 152 DOES NOT APPLY TO PRODUCTS PRODUCED AND DISTILLED IN THE VIRGIN ISLANDS.

The Withdrawal Notice relies on 8 V.I.C. § 152 and records that no brand registration is in effect. Ex. 1 at 2, 6. For purposes of the chapter that contains Section 152, "Alcoholic Beverage" "shall not include beer wherever produced or alcoholic beverages produced or distilled in the United States Virgin Islands." 8 V.I.C. § 151. The District Court so read the statute: "all alcoholic beverages subject to the statute are imported, 8 V.I.C. § 151." *Norman's on the Waterfront, Inc. v. Wheatley*, 317 F. Supp. 247, 253 (D.V.I. 1970), *aff'd*, 444 F.2d 1011 (3d Cir. 1971). The six products are produced and distilled in the Virgin Islands.

IV. THE WITHDRAWAL NOTICE IDENTIFIES NO AUTHORITY FOR THE ASSISTANT COMMISSIONER TO WITHDRAW THE APPROVAL.

The provisions on which the Withdrawal Notice relies assign their functions to "the Board," the Virgin Islands Board of Control of Alcoholic Beverages. 8 V.I.C. § 1; 8 V.I. R. & Regs. §§ 2-18, 2-19. The statute that continued the Board within the Department, 3 V.I.C. § 275, was repealed in 2003. Act No. 6634, § 32. The duties of the Assistant Commissioner "shall be prescribed by the Commissioner consistent with the provisions of this chapter." 3 V.I.C. § 270(c). The Withdrawal Notice identifies no statute, regulation, delegation, or prescription by the Commissioner authorizing the Assistant Commissioner to withdraw an approval issued by the Alcohol Control Unit. The Denial, signed by the Commissioner, likewise identifies no such authority, and it does not purport to adopt the withdrawal as the Commissioner's own act or to ratify it. Ex. 4 at 1.

V. THE WITHDRAWAL NOTICE STATES ITS GROUNDS BY REFERENCE TO LABELS THE AUGUST 12, 2025, LETTER DID NOT APPROVE.

The letter of July 16, 2025, approved the labels Petitioners filed on July 1, 2025. The letter of August 12, 2025, approved amended labels Petitioners filed on August 1, 2025. The

labels the Withdrawal Notice describes are the July 1, 2025, labels. It quotes the maker's statement "RaisingCane NY LLC, St. Croix, USVI," Ex. 1 at 2; identifies the liqueurs by the designation "Sugar Cane Liqueur," *id.* at 1, 4–5, and the gins as "Distilled from Cane Spirit," *id.* at 5; quotes "Origin: St. Croix," *id.* at 3; and states the proof of Sorrel Gin as 90 and of Tropical Gin as 96, *id.* at 5. None of those statements appears on the labels approved on August 12, 2025, which state the proof of the two gins as 94 and 90. The labels filed on July 1 and August 1, 2025, are part of Exhibit B to the petition for reconsideration. Ex. 2. The Withdrawal Notice thus withdraws the approval of August 12, 2025, on grounds stated by reference to the text of labels that the letter of July 16, 2025, approved, and it leaves the approval of July 16, 2025, standing. To the extent any ground also bears on the labels approved on August 12, 2025, the Withdrawal Notice does not say so, and it reflects no review of those labels.

VI. THE STATED BASIS FOR THE WITHDRAWAL IS UNSUPPORTED.

The Withdrawal Notice does not state when, how, or by whom it was determined that the August 12, 2025, statements were made "inadvertently and prematurely." Ex. 1 at 1. The approvals stood for more than fourteen months. The Third Circuit has held that "[a]n attempt to change a SIP thirteen years after its creation . . . cannot be exempted from procedural requirements on the grounds that it is the correction of a mistake." *Concerned Citizens of Bridesburg v. U.S. EPA*, 836 F.2d 777, 780 (3d Cir. 1987). It was not "persuaded by the EPA's reference to the revisions as 'corrections' and its reference to the original approvals as 'inadvertent,'" because "[w]e are not dealing here with typographical errors." *Id.* at 786. In a Virgin Islands case, the Third Circuit declined to revisit irregularities once "the time for review of errors or irregularities which do not go to the jurisdiction of the Board has long since passed." *In re Hooper's Estate*, 359 F.2d 569, 574, 5 V.I. 518, 527 (3d Cir. 1966).

VII. THE DEPARTMENT DENIED RECONSIDERATION WITHOUT STATING ANY REASON.

Section 272(f)(1) requires a petition for reconsideration to specify the petitioner's objections. 3 V.I.C. § 272(f)(1). Petitioners specified theirs and supported them with documents, and they asked the Department to suspend the Withdrawal Notice while the petition was pending. Ex. 2 at 1. The Denial addresses none of their objections and does not address the request for suspension. It states no finding of fact, no conclusion of law, and no reason, and it identifies no record on which it rests. Ex. 4 at 1. Section 272(f)(4) directs this Court to "review on their merits the issue of facts and questions of law which caused the review of the decision of the Department." 3 V.I.C. § 272(f)(4). A decision that states no ground leaves the Court nothing to review beyond the Withdrawal Notice itself. The Supreme Court has explained that "the orderly functioning of the process of review requires that the grounds upon which the administrative agency acted be clearly disclosed and adequately sustained." *SEC v. Chenery Corp.*, 318 U.S. 80, 94 (1943). The Denial should be vacated together with the Withdrawal Notice.

RESERVATION OF FEDERAL CLAIMS

Petitioners are the plaintiffs in *Prosperity Farm NY LLC, et al. v. Hodge, et al.*, Case No. 3:26-cv-57 (D.V.I.), and *Prosperity Farm NY LLC, et al. v. Graham*, Case No. 3:26-cv-66 (D.V.I.), which assert claims under 42 U.S.C. § 1983. Petitioners present to this Court only questions of territorial law. They do not submit to this Court any claim or question arising under the Constitution or laws of the United States, and they reserve every such claim and question for determination by the District Court. The Supreme Court has held that a litigant who makes that reservation preserves the right to return to federal court: "When the reservation has been made,

however, his right to return will in all events be preserved." *England v. La. State Bd. of Med. Exam'rs*, 375 U.S. 411, 421–22 (1964).

WITHDRAWAL OF THE REQUEST FOR ABEYANCE

The original Petition asked the Court to defer ruling until the Department decided the petition for reconsideration, and Petitioners undertook to file a status report within ten days after that decision. The Department decided the petition for reconsideration on November 23, 2026. Ex. 4. This Amended and Supplemental Petition serves as that status report. Petitioners withdraw the request for abeyance and ask the Court to proceed. If this filing proceeds as an appeal for review under Section 272(f)(2), the Department must "take to the court a certified copy of the documents appearing in the record, within ten (10) days from and after the date in which it was notified of the filing of the appeal for review," and "the court shall indicate the hearing of the appeal to take place within 120 days from the date said documents were received." 3 V.I.C. § 272(f)(4). If it proceeds as a petition for writ of review, the writ issues "[i]f the court grants the petition," and the Department must return it with a certified copy of the record within twenty days. V.I. R. Civ. P. 91(d). Petitioners do not now apply under Rule 91(e) for a clause requiring the Department "to desist from further proceedings in the matter under review," V.I. R. Civ. P. 91(e). They reserve the right to apply for such a clause, limited to enforcement of the Withdrawal Notice, and to move for a stay of the Withdrawal Notice.

Rule 91(c) permits the Court to require a bond "to ensure that the petitioner will obey the determination or decision sought to be reviewed." V.I. R. Civ. P. 91(c). Petitioners ask that no bond be required. They seek review of the Withdrawal Notice through the procedure the law provides, and the Department retains the means Titles 3 and 8 give it to enforce any obligation the Withdrawal Notice may be found to impose.

NOTICE TO THE DEPARTMENT

Section 272(f)(3) provides that "[o]n the filing of the petition, the petitioner shall notify same to the Department within five (5) days from and after its filing." 3 V.I.C. § 272(f)(3). Rule 91 provides that "[s]ummons shall not issue upon the filing of a petition for writ of review," V.I. R. Civ. P. 91(d), and it does not otherwise prescribe how the petition is to be served. To the extent Section 272(f) governs, Petitioners are giving that notice. Petitioners are serving this Amended and Supplemental Petition, on the day it is filed, on the Department through its Commissioner and its General Counsel, and on the Attorney General.

RELIEF REQUESTED

Petitioners respectfully request that the Court:

(1) treat this filing as an appeal for review under 3 V.I.C. § 272(f)(2), direct the Department to file a certified copy of the record within ten days as 3 V.I.C. § 272(f)(4) requires, and set the hearing of the appeal within the period that section prescribes; or, in the alternative,

(2) grant the Petition without requiring a bond, and issue a writ of review directing the Department to return the writ with a certified copy of the record of the proceedings, V.I. R. Civ. P. 91(d), including the labels Petitioners filed on July 1, 2025; the amended labels Petitioners filed on August 1, 2025; the Department's correspondence with Petitioners from July 1 through August 12, 2025; the letters of July 16 and August 12, 2025; the petition for reconsideration and every document the Department considered in deciding it; and every document on which the Department relied in determining that the August 12, 2025, statements were made "inadvertently and prematurely";

(3) vacate the Withdrawal Notice and the Denial;

(4) direct that the Department take no further action withdrawing, rescinding, or qualifying the approvals of July 16, 2025, and August 12, 2025, except after written notice of the grounds and an opportunity to be heard;

(5) award Petitioners their costs; and

(6) grant such other relief as is just.

Respectfully submitted,

November 25, 2026

/s/ Joseph A. DiRuzzo, III
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CERTIFICATE OF COUNSEL UNDER RULE 91(b)

I certify under V.I. R. Civ. P. 91(b) that I have examined the process or proceeding and the decisions or determinations sought to be reviewed, the Withdrawal Notice and the Denial, and that I am not filing this Petition for delay.

/s/ Joseph A. DiRuzzo, III
Joseph A. DiRuzzo, III

CERTIFICATE OF SERVICE

I certify that on November 25, 2026, I served this Amended and Supplemental Petition and its exhibits by email and by mail upon The Honorable H. Nathalie Hodge, Commissioner, Virgin Islands Department of Licensing and Consumer Affairs, 3000 Estate Golden Rock, Suite 9, Christiansted, St. Croix, U.S. Virgin Islands 00820, nathalie.hodge@dlca.vi.gov; Geraldine P. Vaval, Esq., General Counsel, Virgin Islands Department of Licensing and Consumer Affairs, geraldine.vaval@dlca.vi.gov; and Gordon C. Rhea, Esq., Attorney General of the Virgin Islands, Virgin Islands Department of Justice, 3438 Kronprindsens Gade, GERS Complex, 2nd Floor, St. Thomas, U.S. Virgin Islands 00802, gordon.rhea@doj.vi.gov.

/s/ Kevin A. Rames, Esq.
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