

*Samuels Richardson & Co*  
*Barristers and Solicitors*  
*Notaries Public, Commissioners for Oaths, Trade Mark Agents*

Benedicta P.T. Samuels, LLM (Legislative Drafting), LLB (Hons), LEC (UWI)  
Asha L. Johnson, LLB (Hons), LEC  
Gail Carrington, LLB (Hons), LEC

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12<sup>th</sup> March, 2009

To whom it may concern

Dear Sirs,

**Re: FINCIB LTD**  
**BVIBC No. 1468085**

We are lawyers qualified to practice and practicing in the Territory of the British Virgin Islands and are competent to give the opinion set forth herein.

We have been instructed that Fincib Ltd (the Company”) has submitted the Application to any bank or other authority (“Application”). We have been asked to render an opinion to confirm the Company’s existence under the laws of the British Virgin Islands.

For the purpose of issuing this confirmation we have examined:

- (i) a copy of the business plan of the Company;
- (ii) a copy of the Application;
- (iii) a copy of the Certificate of Incorporation of the Company;
- (iv) a copy of the Memorandum and Articles of Association of the Company;
- (v) a Certificate of Incumbency (the “Certificate of Incumbency”) issued in respect of the Company on 3<sup>rd</sup> March, 2009, by Icaza, Gonzalez-Ruiz & Aleman (BVI) Trust Limited, the Registered Agent of the Company;

and such other documents and have made such enquiries as to questions of law as we have deemed necessary in order to render the opinion set forth below.

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**Re: FINCIB LTD**  
**BVIBC No. 1468085**  
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On this basis of the foregoing, we are of the opinion:

1. The Company is duly incorporated as a company with limited liability under the BVI Business Companies Act, 2004 (as amended) (the "Act") on 5<sup>th</sup> March, 2008 with registration number 1468085. The Company is validly existing under the laws of the British Virgin Islands and is capable of suing and being sued in its own name.
2. That Company conducts business under the assumed name *FINCIB LTD*.
3. We have determined that according to the information provided, no regulatory body within its jurisdiction exists.
4. We confirm that the business activities of *FINCIB LTD* does not infringe or contradict any local law of the country of incorporation, according to the information presented to us.
5. The registered office of the Company is at Vanterpool Plaza, Wichkhams Cay 1, 2<sup>nd</sup> Floor, Road Town, Tortola, British Virgin Islands.

We have made no investigation of and express no opinion in relation to the laws of any jurisdiction other than the British Virgin Islands. This opinion is to be governed by and construed in accordance with the laws of the British Virgin Islands and is limited to and is given on the basis of the current law and practice in the British Virgin Islands. This opinion is issued solely for your benefit and is not to be relied upon by any other person, firm, or entity or in respect of any other matter, without our prior written consent.

Yours faithfully,

SAMUELS RICHARDSON & CO

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