

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

UNITED STATES OF AMERICA,

Plaintiff,

v.

ACE DEVELOPMENT, INC.,

Defendant.

FILED UNDER SEAL

CRIMINAL NO. 2012-0033

SUPPLEMENT TO AGREEMENT

Pursuant to Rule 11 of the Federal Rules of Criminal Procedure and the Plea Agreement, the Government, the Defendant, Defendant's CEO, and Defendant's counsel enter into the following agreement, which is a supplement to the Agreement executed on even date herewith. Any reference to the United States or the Government in this agreement means the Office of the United States Attorney for the District of the Virgin Islands.

1. The Defendant, by and through Alwyn Williams, Sr., CEO for Defendant Ace Development, Inc., agrees to cooperate fully and truthfully with the Government as follows:

a. Defendant agrees to provide truthful, complete and accurate information.

If requested by an attorney for the Government or another party, Defendant agrees to provide truthful, complete and accurate testimony. The Defendant understands that, if defendant testifies untruthfully in any material way, Defendant can be prosecuted for perjury.

b. Defendant agrees to provide all information concerning Defendant's knowledge of and participation in any crimes about which Defendant has knowledge.

c. Defendant agrees not to falsely implicate any person or entity nor will Defendant protect any person or entity through false information or omission. Defendant understands that the obligations under this agreement require that defendant provide accurate information, regardless of whether it hurts or helps the government's legal position, or helps or hurts another person's legal position in a particular case.

d. Defendant agrees to testify as a witness before any grand jury, hearing, trial, or retrial if called upon to do so by the Government or another party.

e. Defendant agrees to be available for any interviews as the Government may require.

f. Defendant agrees to provide all documents or other items under defendant's control, or which may come under Defendant's control which may pertain to any crime.

g. Defendant understands that defendant's cooperation shall be provided to any law enforcement agency as requested by counsel for the Government.

h. Defendant agrees that, if the Government determines that the Defendant has not provided full and truthful cooperation, or has committed any federal, state or local crime between the date of this agreement and sentencing, or has otherwise violated any other provision of this supplemental agreement and the Plea Agreement, the agreements may be voided in whole or part by the government and the Defendant shall be subject to prosecution for any crime of which the Government has knowledge including, but not

limited to, perjury, obstruction of justice, and the substantive offenses arising from this investigation.

i. If the totality of the circumstances convinces the Government that Defendant's statement is not complete and truthful, Defendant will be so informed, and any and all obligations imposed on the Government by the agreement may be rendered null and void. The decision will be in the sole discretion of the United States Attorney.

2. Defendant agrees not to reveal that Defendant is cooperating with the Government to any person other than Defendant's attorney and the law enforcement agents with whom Defendant is then cooperating pursuant to this agreement. Defendant further agrees to never reveal to any person any information defendant has learned from law enforcement agents, such as methods of undercover operations, surveillance techniques, nature and types of official equipment, vehicles, etc.

3. Defendant agrees and understands that, by signing this agreement, Defendant does not become an agent of either the federal, state, local or territorial government. Defendant understands that Defendant will be prosecuted for any unlawful activity in which Defendant engages of which the Government becomes aware, unless it is approved in advance and performed in an undercover capacity under the immediate and direct supervision of a law enforcement officer or agent with whom Defendant is then cooperating.

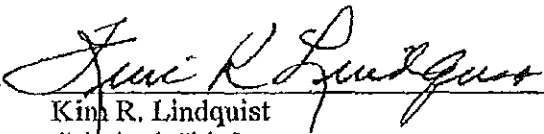
4. The Defendant's rights under this agreement shall in no way be dependent upon or affected by the outcome of any case in which Defendant may testify.

5. It is agreed that no additional promises, agreements or conditions have been entered into other than those set forth in the Plea Agreement and this document, and none will be entered into unless in writing and signed by all parties.

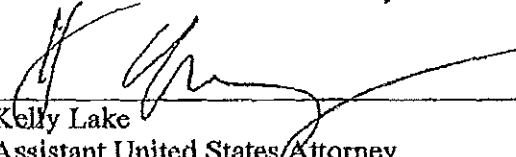
Respectfully submitted,

RONALD W. SHARPE
UNITED STATES ATTORNEY

Dated: 4/3/13

By: 
Kim R. Lindquist
Criminal Chief
Assistant United States Attorney

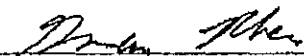
Dated: 4/3/13

By: 
Kelly Lake
Assistant United States Attorney

Dated: 4/4/13


Ace Development, Inc.
Defendant
By Alwyn Williams, Sr.
CEO, Ace Development, Inc.

Dated: 4/18/13


Gordon Rhea
Attorney for Defendant