



Smith Tabata
A T T O R N E Y S

Pure Africa, LLC
c/o Brian R. Dinning
208 E. Plume Street
Suite 208
Norfolk, VA 23510

Our ref: Mr R Linde/gf
Email: ginaf@smithtabata.co.za
Your ref:
Date: 1 September 2008

Dear Sirs

Re: The Reserve at Hole in the Wall Development

We act on behalf of the aforesaid Pure Africa, LLC as majority shareholder of Incopho Wild Coast Development Projects (Pty) Ltd. Incopho, in turn, is the majority shareholder of the project company, The Reserve at Hole in the Wall (Pty) Ltd. Our firm has represented The Reserve at Hole in the Wall project on behalf of Pure Africa since 2007. We also assisted in the referral of the project to auditors, Charteris & Barnes.

We have reviewed the documentation relating to this Development and confirm that The Reserve at Hole in the Wall is an oceanfront and oceanview real estate development consisting of 50 stands and a small hotel. The Reserve at Hole in the Wall is being marketed by Lofty Nel of Sotheby's International Realty in East London, South Africa.

The original documentation for this project dates back to September, 2004. For this letter, I have reviewed the following:

1. The Final Scoping Report dated September, 2004;
2. The Review of Documents relating to proposed Coffee Bay and Hole in the Wall developments by East Cape Development Corporation and the Development Bank of South Africa;
3. The Ground Lease by and between the Kwa Tshezi Community and Earth Conservancy dated February 6, 2006;

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4. The Lease Agreement between The Government of the Republic of South Africa through the Department of Land Affairs, the Kwa Tshezi Community and Incopho dated February 2, 2006;
5. The Record of Decision from the Department of Environmental Affairs and Tourism dated August 10, 2005 authorizing Incopho "to construct 50 single storey chalets, a central restaurant, a curio shop and amenities and association infrastructure at Hole in the Wall, KSD Municipal Area."
6. The Lease Agreement between The Government of the Republic of South Africa through the Department of Land Affairs, the Kwa Tshezi Community and Incopho dated June 21, 2008 which is a 30 year renewable lease at the option of Incopho for up to 90 years and continuing thereafter.

It is also my understanding that Title Deed, freehold ownership, to the land comprising the Hole in the Wall development may well be forthcoming to the Community in the next 6 months or longer from the Government of South Africa and the Department of Land Affairs. We trust you will appreciate that the time factor is difficult to anticipate given that we are dependant on the Government for this to materialise.

Based upon a review of this documentation, Incopho has a valid lease with the Government of South Africa and the Kwa Tshezi Community for up to 90 years or more. Under South African law, Incopho through The Reserve at Hole in the Wall (Pty) Ltd, can sublease the 50 stands to interested sublessees for rental payments over the term of the lease or the rent and lease may be prepaid. It is our view that sublessees can "purchase" or sublease one or more of the 50 stands for an up-front payment of rent or with 10% downpayment of rent and the balance of the rent payments over 10 years at 12% interest.

It is our understanding that Sotheby's International Realty will be acting as estate agent in the "sale" of the 50 subleased stands to the general public. A separate company, Villager Homes, will be constructing homes on the 50 subleased stands under separate written agreement between Villager Homes and the stand "purchasers" or sublessees.

Finally, when Title Deed is ultimately vested with the Kwa Tshezi Community, it is planned that the 50 stand sublessees may have the opportunity to convert their lease to Title Deed ownership of their stand.

Yours faithfully


RUSSELL LINDE
SMITH TABATA INC

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