

EXHIBIT X

**Letter dated October 19, 2019 from Paulus Subrata of Maui Land &
Pineapple Company, Inc.**



Maui Land & Pineapple Company, Inc.

October 19, 2019

Mr. Paul Cheng
Maui Ocean View – Pulelehua Project
USAI Investments
16610 N. Dallas Parkway, Suite 1600
Dallas, Texas 75248

Re: Non Disturbance & No Activity Letter – Pulelehua Project in West Maui

Dear Mr. Cheng:

As requested, we are providing this letter to confirm that Maui Land & Pineapple Company, Inc. (“MLP”) is not aware of any activity, or discovery of cultural or archaeological finds since the completion of the EIS in 2005 until the date of this letter.

Should you have any questions or requests for additional information, please feel free to contact me at 808-757-2666 or psubrata@mlpmaui.com.

Sincerely,

Paulus Subrata
Vice President