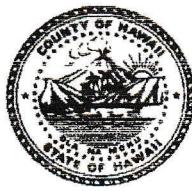


EXHIBIT 11

**COUNTY LETTER
AND
PROPERTY MAP**

William P. Kenoi
Mayor



West Hawai'i Office
74-5044 Ane Keohokalole Hwy
Kailua-Kona, Hawai'i 96740
Phone (808) 323-4770
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Duane Kanuha
Director

Bobby Command
Deputy Director

East Hawai'i Office
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County of Hawai'i PLANNING DEPARTMENT

July 8, 2014

Ken Church (via e-mail dockline3@yahoo.ca)
c/o Hilo Brokers
400 Hualani Street, Suite 296
Hilo, HI 96720

Dear Mr. Church:

Determination of Pre-existing Lots of Record
Wailea, South Hilo, Hawai'i
TMK: 2-9-003:013, 029 & 060

We have received your letter of June 24, 2014, requesting verification that the subject tax map key parcels contain additional pre-existing lots of record.

The total area (parcel and the contiguous railroad right-of-way) consists of:

1. Parcel 13 - 0.662 acre + 0.356 acre = 1.018 acres;
2. Parcel 29 - 2.192 acres + 0.637 acre = 2.829 acres;
3. Parcel 60 - 0.544 acre + 0.219 acre = 0.763 acre; and
4. We do not have any record of these six (6) lots being consolidated with each other or any other lands adjoining them.

In view of the above, we confirm that Parcels 013, 029 and 060 each contain two (2) separate lots of record for a total of six (6) lots of record.

Bear in mind that the railroad right-of-ways were created as nonbuildable lots and can be consolidated with the adjacent land, but may not used to resubdivide into additional buildable lots beyond the three (3) buildable lots that exist.

Ken Church
c/o Hilo Brokers
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July 8, 2014

Should you have any questions, please feel free to contact Jonathan Holmes of this department.

Sincerely,



DUANE KANUHA
Planning Director

JRH:lnm

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xc: Tax Maps and Records Supervisor
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