



GABRIEL
Rosja Montana
IN PARTNERSHIP

GABRIEL RESOURCES LTD.
110 Yonge Street, Suite 1501
Toronto, Ontario M5C 1T4
Phone: (416) 955-9200
Fax: (416) 955-4661
Email: info@gabrielresources.com

PFIC Annual Information Statement

1. This Information Statement applies to the taxable year of **Gabriel Resources Ltd.** beginning on **January 1, 2010** and ending on **December 31, 2010**.
2. Ordinary earnings and net capital gain of **Gabriel Resources Ltd.** for the taxable year ended **December 31, 2010** and number of outstanding shares as at **December 31, 2010** are as following:

Ordinary Earnings: **Zero**
Net Capital Gain: **Zero**
Total outstanding shares: **348,183,362**

Based on the information provided above please determine the pro-rata share of ordinary earnings and net capital gains, as defined in Treasury Regulation Section 1.1293-1 (a)(2), attributable to **Paulson Advantage Master Ltd, Paulson Advantage Plus Master Ltd and Paulson Gold Master Fund Ltd's** shareholding in **Gabriel Resources Ltd.**

3. The amount of cash and fair market value of other property distributed or deemed distributed by **Gabriel Resources Ltd.** to **Electrum Strategic Holdings LLC** during the taxable year specified in paragraph (1) is as follows:

Cash: **Zero**
Fair Market Value of Property: **Zero**

4. **Gabriel Resources Ltd.** will permit **Paulson Advantage Master Ltd, Paulson Advantage Plus Master Ltd and Paulson Gold Master Fund Ltd** to inspect and copy **Gabriel Resources Ltd's** permanent books of account, records, and such other documents as may be maintained by **Gabriel Resources Ltd.** that are necessary to establish that PFIC ordinary earnings and net capital gain, as provided in section 1293(e) of the Code, are computed in accordance with U.S. income tax principles.

Gabriel Resources Ltd.

Date: **March 2, 2011**

By: **Jonathan Henry**
Title: **Chief Executive Officer**