

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

MOHAMMAD HAMED by His Authorized Agent WALEED HAMED,	)	
	)	
Plaintiff,	)	CIVIL NO. SX-12-CV-370
v.	)	
	)	ACTION FOR DAMAGES
FATHI YUSUF and UNITED CORPORATION,	)	INJUNCTIVE AND
	)	DECLARATORY RELIEF
Defendants.	)	
	)	JURY TRIAL DEMANDED

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**PLAINTIFF'S MOTION TO PARTIALLY RECONSIDER/CLARIFY BOND ORDER**

Plaintiff hereby respectfully requests this Court to reconsider/clarify two aspects of its Bond Order entered on December 5, 2013. The basis for this motion is set forth in the memorandum being filed with this motion. For the reasons set forth therein, it is respectfully submitted that the motion be granted. A proposed order is attached.

**Dated:** December 13, 2013

  
\_\_\_\_\_  
**Joel H. Holt, Esq.**  
*Counsel for Plaintiff*  
Law Offices of Joel H. Holt  
2132 Company Street,  
Christiansted, VI 00820  
Email: holtvi@aol.com  
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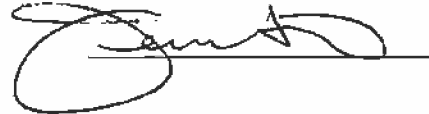
**Carl J. Hartmann III, Esq.**  
*Co-Counsel for Plaintiff*  
5000 Estate Coakley Bay,  
Unit L-6  
Christiansted, VI 00820  
Email: carl@carlhartmann.com  
Tele: (340) 719-8941

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of December, 2013, I served a copy of the foregoing in compliance with the parties consent, pursuant to Fed. R. Civ. P. 5(b)(2)(E), to electronic service of all documents in this action on the following persons:

Nizar A. DeWood  
The DeWood Law Firm  
2006 Eastern Suburb, Suite 101  
Christiansted, VI 00820  
[dewoodlaw@gmail.com](mailto:dewoodlaw@gmail.com)

Gregory H. Hodges  
VI Bar No. 174  
Law House, 10000 Frederiksberg Gade  
P.O. Box 756  
ST. Thomas, VI 00802  
[ghodges@dtflaw.com](mailto:ghodges@dtflaw.com)

A handwritten signature in black ink, appearing to read "Gregory H. Hodges", is written over a horizontal line.

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

<b>MOHAMMAD HAMED by His Authorized</b>	)	
<b>Agent WALEED HAMED,</b>	)	
	)	<b>CIVIL NO. SX-12-CV-370</b>
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>ACTION FOR DAMAGES</b>
	)	<b>INJUNCTIVE AND</b>
<b>FATHI YUSUF and UNITED CORPORATION,</b>	)	<b>DECLARATORY RELIEF</b>
	)	
<b>Defendants.</b>	)	<b>JURY TRIAL DEMANDED</b>
	)	

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**PLAINTIFF’S MEMORANDUM IN SUPPORT OF MOTION TO PARTIALLY  
RECONSIDER/CLARIFY BOND ORDER**

Plaintiff hereby respectfully requests this Court to reconsider/clarify two aspects of its Bond Order entered on December 5, 2013, which the parties all received on December 10, 2013. See **Exhibit 1**.

First, Plaintiff seeks reconsideration of the portion of the Bond Order related to the \$100,000 to cover the entry of a new plea in the criminal case. Second, whether the first request is granted or not, Plaintiff seeks permission to provide the bond in the form of unencumbered cash assets, real property and stock. Each request will be addressed separately for the sake of clarity.

**I. The Criminal Case**

In addressing Defendant’s claim that \$100,000 needs to be posted to protect the expenses to be incurred in the criminal case, this Court stated in part as follows on p. 7 of its Bond Order:

However, Plaintiff does not dispute that such work (“the guilty plea would have to be amended and an indemnity would have to be sought for taxes and fines paid”) eventually needs to be performed by Defendants as a result of this Court’s Injunction.

However, it is respectfully noted that the guilty plea is **not** being amended, as noted in Exhibit 3 of Defendants' November 15<sup>th</sup> Opposition To Motion To Reduce Bond. That pleading, which is a Joint Motion by the Government and the remaining criminal defendant, United Corporation, to proceed with sentencing on the Plea confirms that the Plea as entered is not being changed, requesting that sentencing proceed.

In fact, on page 12 of its November 15<sup>th</sup> Opposition To Motion To Reduce Bond, Defendants admitted that no motion was being filed to amend the plea, arguing instead that the requested amount should still be posted to cover its alleged indemnity claims for "taxes, fines and other penalties."

In short, while Plaintiff should have addressed this point more clearly, the plea entered in the criminal case is not being changed, so expenses will not be incurred in the criminal case to change this plea because of this Court's Injunction.

Likewise, the argument that indemnity has to be sought for fines and taxes paid was addressed by this Court in other parts of its Bond Order, where it noted that the Injunction does not bar Defendants from filing civil claims for damages in which fees incurred can be recovered if successful. Indeed, as noted on p. 8 of Plaintiff's reply re the motion to reduce the bond, there is no viable cause of action for indemnity.<sup>1</sup>

Thus, it is respectfully requested that the Bond Order be amended to reduce the bond amount by \$100,000 as no fees are being incurred to change the plea in the criminal case.

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<sup>1</sup> As noted in footnote 8 of that motion: "If I pay your debts (taxes) with my money, I may have a claim for indemnity, but if I pay our partnership debts (taxes) with our partnership funds, I have no such claim." As for fines and penalties, no law allows a criminal defendant to seek common law indemnity from someone else for those items.

## II. The Security to be Posted

This Court's Bond Order directed on p. 9 that Plaintiff post a bond of \$1,200,000 with the Clerk (less a \$25,000 credit for the current posted bond). Regardless of how this Court addresses the first issue above, it is respectfully requested that this Court reconsider/clarify its Order to allow Plaintiff to post this remaining bond by pledging cash assets and unencumbered real property.<sup>2</sup>

In this regard, Plaintiff does not have \$1,200,000 in cash on hand because of the criminal TRO. See **Exhibit 1**. However, while the plaintiff is trying to assemble some cash, the plaintiff proposes to post the following assets for the bond, which have a value well in excess of the required bond:

- 1) Cash to be deposited this month when annual bonus and accrued vacation is paid to four Hamed sons as Plaza Extra store managers-\$244,000 (approximately \$200,000 after taxes are deducted).<sup>3</sup> See **Exhibit 2**.

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<sup>2</sup> Rule 65(c) uses the word "security" which this Court recognized when it allowed Plaintiff to use the escrowed profits as additional security. While the Supreme Court disallowed the use of these funds because the federal TRO encumbered these assets, it did not hold that the concept was otherwise improper.

<sup>3</sup> The annual bonus of \$50,000 and vacation pay of \$11,000 (totaling \$61,000) were both listed in ¶ 3 of the declaration of John Gaffney attached as Exhibit 1 to the May 9<sup>th</sup> motion to reconsider the bond (calculating total salary at \$347,000). It should be noted that Fathi Yusuf has recently indicated that he will not agree to pay these annual payments. See **Exhibit 2**. That unilateral action violates the Injunction, as these bonuses and annual leave payments have been regularly paid for years, *and were fully approved and paid throughout the time the U.S. Marshall's Office oversaw the accounting of the business*. As this Court's Injunction Order stated:

**ORDERED** that the operations of the three Plaza Extra Supermarket stores shall continue **as they have throughout the years prior to this commencement of this litigation** . . . without unilateral action by either party, or representative(s), affecting the management, employees, methods, procedures and operations.

Moreover, if these payments are not made, then the bond should be reduced accordingly, as these figures were submitted by Defendants as part of the salaries (\$347,000 figure listed in ¶ 3 of Gaffney declaration), which this Court used in calculating the bond for these wages, as noted in the Bond Order at p.4.

- 2) Assignment of interest in funds escrowed with Carl Beckstedt for investment known as ByOrder Investments LLC, in which the cash value of Plaintiff's interest is currently \$223,200. This figure increases monthly at the rate of \$4,960 per month for the next four years. See **Exhibit 2**.
- 3) Assignment of 50% interest in cash held by Plessen Enterprises, Inc., in which the cash value of Plaintiff's interest is currently \$123,500. This figure increases monthly at the rate of \$18,000. See **Exhibit 2**.
- 4) Assignment of Plaintiff's unencumbered real property at Plots 6F and 6H, Estate Carlton, where the Plaintiff resides, which has a value based on the tax assessment of \$236,300. This value is most likely higher than this assessment, which will be supplied to this Court if an appraisal is requested. See **Exhibit 2**.
- 5) Assignment of Plaintiff's unencumbered real property at Plots 100-E, 100-F and 100-G, Estate Princess, which has a value based on the tax assessment of \$73,500. This value is most likely higher than this assessment, which will be supplied to this Court if an appraisal is requested. See **Exhibit 2**.
- 6) Assignment of Waleed Hamed's unencumbered real property at Plot 6-C, Estate Carlton, consisting of 4 buildings with 8 apartments, which has a value based on the tax assessment of \$326,200. This value is most likely higher than this assessment, which will be supplied to this Court if an appraisal is requested. See **Exhibit 2**.
- 7) Assignment of 50% unencumbered stock in Plessen Enterprises, Inc., which owns three unencumbered parcels of land on St. Croix, including the land where the Plaza West Supermarket is located (Plots 28 & 29 Plessen, 26 Diamond, and 39 & 5-B Diamond), as well as three unencumbered parcels of land in St. Thomas, one of which has a tenant that pays \$36,000 monthly (6 & 9 Estate Thomas, 2 Rem. Charlotte Amalie and Charlotte-Amalie 2-4 New Quarter). Aerial photos of these six parcels are attached as well. This real property owned by Plessen Enterprises, Inc. is valued by the tax assessor as having a value of \$9,701,200, so that the 50% equitable interest in this property is approximately \$4,850,600, although the actual value is most likely higher, which will be supplied to this Court if an appraisal is requested. **Exhibit 2**.
- 8) Assignment of \$802,966 receivable due Hamed from the Dorothea transaction, as discussed at the preliminary injunction hearing. See **Exhibit 2**.<sup>4</sup>

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<sup>4</sup> This matter was addressed by the Court in Finding of Fact #33 as follows:

33. Waleed Hamed testified that Fathi Yusuf utilized Plaza Extra account funds to purchase and subsequently sell property in Estate Dorothea, St. Thomas, to

It should be noted that counsel has requested lien searches for the real property identified above. See **Exhibit 1**. However, counsel will not receive those reports until next week, so a decision was made to file this motion and supplement it with these title reports when received.

Additionally, it should be noted that the Government and United have filed a joint motion in the criminal case to dissolve the TRO that encumbers United's assets. **Exhibit 1**. Should that Joint Motion be granted, then Plaintiff can supplement or even replace this security with an assignment of those funds equal to the bond requirement set by this Court.

The purpose of the bond, as noted in this Court's Order, is to provide financial security for the Injunction in this case. It is respectfully submitted that the above collateral more than amply secures the bond set by this Court, whether reduced or not as requested in Section I of this motion.

### III. Conclusion

For the reasons set forth herein, it is respectfully submitted that the bond be reduced to \$1,100,000 (or further if the annual bonuses and accrued vacation pay will not be paid to the four Hamed managers as due). It also respectfully requested that

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which it was agreed that Hamed was entitled to 50% of net proceeds. Although **Yusuf's handwritten accounting of sale proceeds confirms that Hamed is due \$802,966, representing 50% of net proceeds (Pl. Ex. 18)**, that payment has never been made to Hamed and the disposition of those sale proceeds is not known to Hamed. *Tr.88:8-90:17, Jan. 25, 2013.* (Emphasis added).

Plaintiff be permitted to post a combination of cash assets and unencumbered real property.

As the injunction is to preserve the status quo until the issues in this case can be resolved, it is respectfully requested the relief sought be granted as it provides the security needed to protect the Defendants in the unlikely event they prevail in this case

**Dated:** December 13, 2013



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Fax: (340) 773-8677


**Carl J. Hartmann III, Esq.**  
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Email: carl@carlhartmann.com  
Tele: (340) 719-8941

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Nizar A. DeWood  
The DeWood Law Firm  
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[dewoodlaw@gmail.com](mailto:dewoodlaw@gmail.com)

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P.O. Box 756  
ST. Thomas, VI 00802  
[ghodges@dtflaw.com](mailto:ghodges@dtflaw.com)



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**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

<b>MOHAMMAD HAMED,</b>	)	
	)	<b>CIVIL NO. SX-12-CV-370</b>
Plaintiff,	)	
	)	<b>ACTION FOR DAMAGES,</b>
<b>v.</b>	)	<b>INJUNCTIVE AND</b>
	)	<b>DECLARATORY RELIEF</b>
<b>FATHI YUSUF and UNITED CORPORATION,</b>	)	
	)	<b>JURY TRIAL DEMANDED</b>
Defendants.	)	

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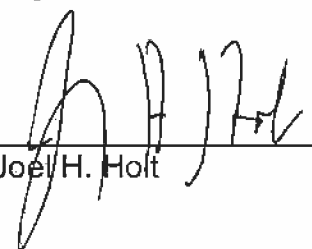
**DECLARATION OF JOEL H. HOLT**

I, Joel H. Holt, declare, pursuant to 28 U.S.C. Section 1746, as follows:

1. I am counsel of record for the Plaintiff and have personal knowledge of the foregoing facts.
2. I received the Court's Bond Order on December 10, 2013, which based on emails exchanged with defense counsel is when they received the Order as well.
3. After being apprised of the Bond Order, my client has indicated that neither he nor his four sons have \$1,200,000 in cash available to post a cash bond since all partnership funds have been frozen by the federal TRO since 2003.
4. After reviewing matters with my client, a decision was made to seek clarification of the Court's Bond Order to see if unencumbered assets would be accepted by the Court as part of the bond.
5. Regarding the real property being offered as security, I have ordered lien searches, but I have been told I will not receive those reports until next week.
6. I should also note that the Government and United Corporation have filed a joint motion to release the federal TRO. If that motion is granted, then my client can supplement or even replace this security with an assignment of those funds equal to the bond requirement set by this Court

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 12, 2103

  
\_\_\_\_\_  
Joel H. Holt



**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

<b>MOHAMMAD HAMED,</b>	)	
	)	<b>CIVIL NO. SX-12-CV-370</b>
Plaintiff,	)	
	)	<b>ACTION FOR DAMAGES,</b>
v.	)	<b>INJUNCTIVE AND</b>
	)	<b>DECLARATORY RELIEF</b>
<b>FATHI YUSUF and UNITED CORPORATION,</b>	)	
	)	
Defendants.	)	<b>JURY TRIAL DEMANDED</b>
	)	

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**DECLARATION OF WALEED HAMED**

I, Waleed Hamed, declare, pursuant to 28 U.S.C. Section 1746, that I am over 18 years of age and have personal knowledge of the foregoing facts:

1. My three brothers (Willie, Mafi and Shawn) and I have all agreed that we will allow our annual bonus and accrued vacation of \$61,000 (totaling \$244,000 in gross pay) due to us this month as Plaza Extra store managers, to be deposited with the Court as part of the bond required to be posted in this case. We will all sign whatever documents are needed to ensure that this payment is deposited to the Clerk. These payments can be paid now as the Plaza Extra bank account has in excess of \$4,000,000 in reserve to pay these bonuses and accrued vacation payments. While Fathi Yusuf has indicated that he will not agree to these payments (see **Exhibit A**), these payments have been regularly made for many years, including the time period when the U.S. Marshall oversaw the operations of the businesses, so he has been told it would be a violation of the "status quo" provisions of the Injunction for him not to approve payments that have been routinely paid in the normal course of business for years before the Injunction was entered.
  
2. My father, my brothers and I have agreed to assign our interest in funds escrowed with Carl Beckstedt regarding our interest in ByOrder Investments LLC. This account was created to hold the monthly mortgage payments due from Bubiyan Enterprises, LLC who purchased the east end gas station at Tide Village from the Hamed and Yusuf families. The total in escrow after the December payment will be \$720,000. See **Exhibit B** (current accounting before the \$16,000 December payment that is being paid this week). The Hamed's interest in this account is 31% by agreement with the Yusufs, for a total of \$223,200. That account increases monthly at the rate of \$16,000 per month, of which \$4,960 per month represents the Hameds' 31% interest. These payments will continue for the next four years. We will all sign whatever documents are needed to insure that the escrow agent, Carl Beckstedt, knows it cannot be released until further Order of this Court, or that it can be deposited to the Court now.




3. My father, my brothers and I own 50% of the outstanding stock in Plessen Enterprises, Inc. We have agreed to assign our 50% interest in the cash currently in the account of Plessen Enterprises, Inc., which is \$247,002.12. See **Exhibit C** (which does not reflect the December rent payment of \$36,000 being deposited this week). The Hamed interest is \$123,500. This amount increases monthly at the rate of \$36,000 per month, as rent is paid monthly, of which \$18,000 represents the Hamed portion. We will all sign whatever documents are needed to ensure that this sum is secured by the Court's Order. While annual real property taxes in the amount of \$69,000 have to be paid from this account, taxes are current. By the time taxes are due next year, the rent received in the interim (at the rate of \$36,000 per month) will more than cover these taxes, so the sum of \$123,500 will not be decreased and will in fact increase.
4. My father owns unencumbered real property at Plots 6F and 6H, Estate Carlton, where he resides, which has a value based on the current tax assessment of \$236,300 (**Exhibit D**). He will sign whatever documents are needed to use this property as part of the bond.
5. My father owns unencumbered real property at Plots 100-E, 100-F and 100-G, Estate Princess, which has a value based on the current tax assessment of \$73,500 (**Exhibit E**). He will sign whatever documents are needed to use this property as part of the bond.
6. I own unencumbered real property at Plot 6-C, Estate Carlton, which has a value based on the tax assessment of \$326,200 (**Exhibit F**), and which has 4 buildings with 8 rental units. I will sign whatever documents are needed to use this property as part of the bond.
7. My father, my brothers and I own 50% of the outstanding stock in Plessen Enterprises, Inc. We have all agreed to assign our interest in this unencumbered stock in Plessen Enterprises, Inc. as part of the bond. This corporation owns three unencumbered parcels of land on St. Croix, including the land where the Plaza West Supermarket is located (Plots 28 & 29 Plessen, 26 Diamond, and 39 & 5-B Diamond), as well as three unencumbered parcels of land in St. Thomas, one of which has a tenant that pays \$36,000 monthly (6 & 9 Estate Thomas, 2 Rem. Charlotte Amalie and Charlotte-Amalie 2-4 New Quarter). Aerial photos of these six parcels are attached as **Exhibit G**. This real property owned by Plessen Enterprises, Inc. is valued by the tax assessor as having a value of \$9,701,200. See **Exhibit H**. Thus, the 50% equitable interest in this property is worth approximately \$4,850,600, although the actual value is most likely higher that will be supplied to this Court if an appraisal is requested.
8. My father is also owed \$802,966.00 by Fathi Yusuf related to the Dorothea property in St. Thomas. See **Exhibit I** (handwritten note signed by Yusuf, marked as an Exhibit at the Preliminary Injunction Hearing). He is willing to sign whatever documents are needed to ensure that the injunction is secured by this receivable.

**Declaration**  
**Page 3**

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 12-12-2013

  
\_\_\_\_\_  
Waleed Hamed

# Plaza Extra

ST. CROIX ST. THOMAS  
4605 Tutu Park Mall Ste. 200  
4 CD Estate Sion Farm  
# 14 Estate Plessen

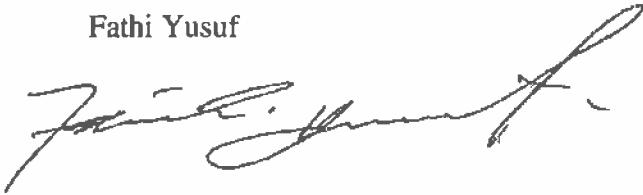
Date: December 04, 2013

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To: Hamed & Yusuf Families

Due to the present circumstances and so you can plan accordingly, this will provide notice that there will be no vacation pay or bonus checks this year for any of the Hamed and Yusuf family store managers because the Yusuf's will not agree to any such payments. Thank you.

Fathi Yusuf



Corp No. 578046

**GOVERNMENT OF  
THE VIRGIN ISLANDS OF THE UNITED STATES  
— O —  
CHARLOTTE AMALIE, ST. THOMAS, VI 00802**

**CERTIFICATE OF EXISTENCE**

*To All To Whom These Presents Shall Come:*

I, GREGORY R. FRANCIS, Lieutenant Governor of the Virgin Islands do hereby certify that I am, by virtue of the laws of the Virgin Islands, the custodian of the corporate records and the proper officer to execute this certificate.

I further certify that the records of this office disclose that


**BYORDER INVESTMENTS, LLC**

**Limited Liability Company**

was duly registered to conduct business in the Territory on **September 9, 2009** and has a legal existence as a Limited Liability Company so far as the records of this office show.



Witness my hand and the seal of the Government of the Virgin Islands of the United States, at Charlotte Amalie, St. Thomas, this 24th day of September, 2009.

  
GREGORY R. FRANCIS  
Lieutenant Governor of the Virgin Islands

Blumberg No. 5208

EXHIBIT

B

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Matter Date	Description Received From/Paid To	Lawyer Che#/Rec#	Bank Acct#	Deposit Type	Receipt	Disbs	Last Entry Acct Bal
United Corporation		CAB					Nov/ 5/2013
6000-8553	U/Rahhal Loan						16000.00
Jan/13/2012	Bubiyan Enterprises	00002	1	Check	16000.00		16000.00
	214 Receipt of Loan Payment for Client, Byorder Investme						
Jan/30/2012	Bryant, Barnes & Blair	00003	1	Check	336000.00		352000.00
	433 Bubiyan Rahhal Escrow Funds Transfer						
Feb/ 5/2012	Bubiyan Enterprises, LLC	00004	1	Check	16000.00		368000.00
	1348 To be updated February 2012 payment						
Mar/13/2012	Bubiyan Enterprises, LLC	00007	1	Check	16000.00		384000.00
	1647 March, 2012 payment						
Apr/13/2012	Bubiyan Enterprises, LLC	00011	1	Check	16000.00		400000.00
	2430 April, 2012 loan payment						
May/21/2012	Bubiyan Enterprises	00015	1	Check	16000.00		416000.00
	3818 May 1, 2012 payment						
Jun/14/2012	Bubiyan Enterprises	00016	1	Check	16000.00		432000.00
	4258 Check dated June 1, 2012						
Jul/12/2012	Bubiyan Enterprises	00019	1	Check	16000.00		448000.00
	5186 Check dated 7/1/2012						
Aug/31/2012	Bubiyan Enterprises, LLC	00020	1	Check	16000.00		464000.00
	6280 Check dated August 1, 2012 (August 2012 payment)						
Sep/12/2012	Bubiyan Enterprises, LLC	00023	1	Check	16000.00		480000.00
	6586 Check dated September 1, 2012						
Oct/16/2012	Bubiyan Enterprises, LLC	00025	1	Check	16000.00		496000.00
	7311 Check dated 10/1/12						
Nov/13/2012	Bubiyan Enterprises, LLC	00029	1	Check	16000.00		512000.00
	8833 November, 2012 payment						
Dec/13/2012	Bubiyan Enterprises, LLC	00031	1	Check	16000.00		528000.00
	10842 Check dated 12/1/12						
Jan/ 3/2013	Bubiyan Enterprises, LLC	00035	1	Check	16000.00		544000.00
	11907 Check dated January 1, 2013						
Feb/28/2013	Bubiyan Enterprises, LLC	00042	1	Check	16000.00		560000.00
	15225 February, 2013 payment						
Mar/ 6/2013	Bubiyan Enterprises, LLC	00043	1	Check	16000.00		576000.00
	15439 March, 2013 payment						
Apr/ 8/2013	Bubiyan Enterprises LLC	00046	1	Check	16000.00		592000.00
	17460 April, 2013 payment						
May/10/2013	Bubiyan Enterprises, LLC	00049	1	Check	16000.00		608000.00
	19976 Check dated May 1, 2013						
Jun/11/2013	Bubiyan Enterprises, LLC	00052	1	Check	16000.00		624000.00
	21571 June, 2013 payment						
Jul/11/2013	Bubiyan Enterprises, LLC	00055	1	Check	16000.00		640000.00
	23028 July, 2013 payment						
Aug/12/2013	Bubiyan Enterprises, LLC	00058	1	Check	16000.00		656000.00
	23858 August, 2013 payment						
Sep/ 9/2013	Bubiyan Enterprises, LLC	00061	1	Check	16000.00		672000.00
	25213 September, 2013 payment						
Oct/ 4/2013	Bubiyan Enterprises, LLC	00063	1	Check	16000.00		688000.00
	26170 October, 2013 payment						
Nov/ 5/2013	Bubiyan Enterprises, LLC	00065	1	Check	16000.00		704000.00
	27386 November, 2013 payment						
<b>er Total:</b>			<b>1</b>		<b>704000.00</b>		<b>704000.00</b>
<b>nt Total:</b>			<b>1</b>		<b>704000.00</b>		<b>704000.00</b>
<b>Totals:</b>	<b>1 - Trust Account</b>				<b>704000.00</b>		<b>704000.00</b>

RT SELECTIONS - Client Trust Ledger

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 Totals for All Matters with Trust Balances Yes  
 er with No Trust Activity on or After No  
 lls Begin Date Jan/ 1/1982

Client Trust Ledger

To Dec/12/2013

nt

Matter	Description	Resp	Bank	Deposit Type	Receipt	Disbs	Last Entry
Date	Received From/Paid To	Lawyer	Acct#				Acct Bal
Entry #	Explanation	Che#/Rec#					
ers with Balances Greater Than or Equal to		No					
ude Checks		Yes					
ude Receipts		Yes					
ude Details for		Cheque,Cash,Credit Card,Bank Chk,Dir Dpst,Money Order,Other,Wire,Crtfd Chk					
unt		All					
Entries which result in a neg. balance		No					
Matters with Activity		Yes					
Totals Only		No					
ls Only		No					
tive Balances Only		No					
by		Date					



# PLESSEN ENTERPRISES, INC.

## TRANSACTIONS WITHDRAWALS & DEPOSITS 2013

Date	Check #	Deposit (Check)	Description	(Overdraft) Balance
16-Sep-13	Dep	36,000.00	Rent (September 2013)	103,641.12
5-Sep-13	381	204.50	Peter's Farm (Franchise Tax 2012)	139,641.12
5-Sep-13	382	204.50	Sixteen Plus (Franchise Tax 2012)	139,436.62
5-Sep-13	383	204.50	Plessen Enterprises (Franchise Tax 2012)	139,232.12
30-Sep-13	Charge	8.50	Service Charge( Sept 2013)	139,027.62
17-Oct-13	Dep	36,000.00	Rent (October 2013)	139,019.12
31-Oct-13	Charge	8.50	Service Charge( October 2013)	175,019.12
7-Nov-13	Dep	36,000.00	Rent (November 2013)	175,010.62
30-Nov-13	Charge	8.50	Service Charge( November 2013)	211,010.62
				211,002.12
				211,002.12





GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
100 Lagoon Complex, Suite #5

Frederiksted, St. Croix, Virgin Islands 00840-3912

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**

Dear Property Owner,

Your 2011 Notice of Change of Assessment and Real Property Tax Bill has been prepared in a two-part format. If you had an overpayment from your 2010 tax bill, this bill reflects a prepayment. Please pay Balance Due listed below. If there is still an overpayment the additional credit will be applied towards the 2012 tax bill. If you have outstanding Property taxes they are listed on the reverse side of this bill.

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**PAY BY DUE DATE OF APRIL 8, 2013 AND RECEIVE A TWO AND A HALF (2 1/2) PERCENT DISCOUNT AND BY MARCH 25, 2013 FOR FIVE (5) PERCENT EARLY PAYMENT DISCOUNT. PAY BEFORE JUNE 8, 2013 TO AVOID BECOMING DELINQUENT AND INCURRING LATE PAYMENT CHARGES OF ONE PERCENT PER MONTH.**

If you are dissatisfied with the assessment, you may file an informal appeal with the Tax Assessor's office; if not satisfied, a formal appeal may be filed to the Board of Tax Review no later than June 24, 2013. (See Below). Call (340) 772-3115 or visit us at [www.ltg.gov.vi](http://www.ltg.gov.vi)

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Mailing Address: It is the responsibility of the property owner to notify the Tax Assessor's Office of any change in their mailing address.

**2011**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**  
**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Frederiksted

**2011**

DESCRIPTION OF PROPERTY							PARCEL NUMBER		
<b>6-F &amp; H CARLTON</b>							<b>4-07700-0213-00</b>		
ASSESSED LAND	ASSESSED IMPROVEMENT	ASSESSED TOTAL	TAX RATE	AMOUNT OF TAX	LESS EXEMPTIONS	SEWER USER'S FEE	AMOUNT DUE	LESS CREDITS	BALANCE DUE
32,200	204,100	<b>236,300</b>	0.0125	1,772.25	0.00	0.00	<b>1772.25</b>	0.00	<b>1772.25</b>

THE TAX HEREON IS DUE AND PAYABLE ON APRIL 8, 2013 TO THE GOVERNMENT OF THE VIRGIN ISLANDS AND BECOMES DELINQUENT IF NOT PAID WITHIN 60 DAYS THEREAFTER.

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ATTACH FEE	INTEREST	AMOUNT PAID
EXEMPTIONS AND CREDITS APPLIED ABOVE		

HAMED, MOHAMMED  
PO Box 763  
Christiansted, VI 00821

**2011**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**  
**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Frederiksted

**2011**

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EXEMPTIONS AND CREDITS APPLIED ABOVE		
<div style="border: 1px solid black; padding: 5px; display: inline-block;">           EXHIBIT 0         </div>		

HAMED, MOHAMMED  
PO Box 763  
Christiansted, VI 00821

Remittance Copy

34417  
7046.7  
A.H. 10 19

May 25, 1988

WARRANTY DEED

No. 3460 /1988

INDENTURE made this 18<sup>th</sup> day of APRIL, 1988, by and between LUZ DELIA SALEME DE SOUSS a/k/a LUZ DELIA SALEME GONZALEZ of Padre Las Casas 116, El Vedado, Hato Rey, Puerto Rico 00918, hereinafter referred to as "Grantor" and MOHAMMAD HAMED, P.O. Box 2926, Frederiksted, St. Croix, USVI 00840, hereinafter referred to as "Grantee";

WITNESSETH that in consideration of the sum of Ten Dollars (\$10.00), and other good and valuable consideration to her in hand paid, receipt of which is hereby acknowledged, Grantor does hereby grant, sell and convey unto Grantee, his heirs and assigns, the following described real property, situate in St. Croix, Virgin Islands of the United States, to-wit:

Plot 6F (consisting of 0.560 U.S. acre) and Plot 6H (consisting of 0.566 U.S. acre) of Estate Carlton, West End Quarter, as more fully described on Public Works Drawing No. 1775, dated May 6, 1965, revised March 7, 1972;

TOGETHER WITH all the tenements, hereditaments and appurtenances thereunto belonging.

ALSO TOGETHER WITH a condition that Grantee maintain one-half of the right of way along western boundary of Plot 6H as set forth in deed from Santana Bermudez and Felicita Mercado Bermudez to Pablo Tanaus Saleme and Estaquia G. de Saleme dated February 4, 1966, recorded February 7, 1966 in Photocopy 40, page 242, Document No. 373 and a condition that Grantee maintain one-half of right of way along western boundary of Plot 6F as set forth in deed from Santana Bermudez and Felicita Mercado Bermudez to Pablo Tanaus and Estaquia G. de Saleme dated February 4, 1966, recorded February 7, 1966 in Photocopy 40, page 242, Document No. 374.

TO HAVE AND TO HOLD the said described premises unto the said MOHAMMAD HAMED, his heirs and assigns, in fee simple forever.

Grantor covenants and warrants that she is lawfully seized of said premises and has good right to convey the same, that said premises are free from encumbrances, except as herein stated, that Grantee shall quietly enjoy said premises, and Grantor further covenants that she will warrant and defend the title to said premises against the lawful claims of any and all persons whomsoever.

IN WITNESS WHEREOF, this instrument has been duly executed as of the day and year first above written.

*Luz Delia Saleme De Souss*  
Luz Delia Saleme De Souss  
a/k/a Luz Delia Saleme Gonzalez

IN WITNESS:  
*James A. Isherwood*  
*Maibry Torres*

no. Hamed0007

MAY 18 1988  
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MAY 18 1988

LAW OFFICES  
ISHERWOOD & ISHERWOOD  
46 KING STREET  
CHRISTIANSTED ST. CROIX  
U.S. VIRGIN ISLANDS 00820  
(800) 773-3900

2001R00389  
S2-007760

MAY 18 1988  
MAY 18 1988  
MAY 18 1988

99.1



COMMONWEALTH OF PUERTO RICO  
 DEPARTMENT OF STATE  
 SAN JUAN, PUERTO RICO 00904

I, LOURDES I. DE PIERLUISI, Assistant Secretary of State of the Commonwealth of Puerto Rico, DO HEREBY CERTIFY: That according to evidence in file in this Department, \_\_\_\_\_

\_\_\_\_\_RAFAEL BAELLA SILVA\_\_\_\_\_

whose signature appears to the annexed instrument, was on the day of the same, and is at present, a Notary Public in and for the Commonwealth of Puerto Rico, his authority as such being filed and registered in this Department. AND I FURTHER CERTIFY, That his signature affixed in the above-mentioned instrument is genuine.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Great Seal of the Commonwealth of Puerto Rico, at the City of San Juan, this \_\_\_\_\_twenty-second\_\_\_\_\_ day of \_\_\_\_\_April\_\_\_\_\_, A. D., one thousand nine hundred and eighty-eight.-

*Lourdes I. de Pierluisi*

Assistant Secretary of State of Puerto Rico

*Vimas O. Medina Lopez*

Vimas O. Medina Lopez, Director  
 Certifications Division



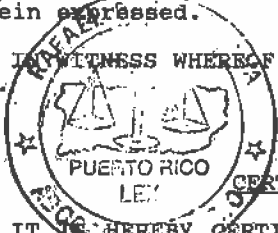
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 S2- 007761

**ACKNOWLEDGMENT**

COMMONWEALTH OF PUERTO RICO )  
 ) SS;

On this the 18<sup>th</sup> day of April, 1988, before me personally came and appeared LUZ DELIA SALEME DE SOUSS a/k/a Luz Delia Saleme Gonzalez to me known and known to me to be the person described in and who signed the foregoing instrument, and she acknowledged to me that she executed the same freely and voluntarily for the uses and purposes therein expressed.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.



*[Signature]*  
Notary Public

**CERTIFICATE OF VALUE**

*affidavit no. 1940*

IT IS HEREBY CERTIFIED that the value of the property described in the foregoing instrument, for recording and stamp purposes does not exceed \$95,000.00

ISHERWOOD HUNTER AND COLIANNI  
Attorney for Grantor

by *[Signature]*

**CERTIFICATE OF THE PUBLIC SURVEYOR**

IT IS HEREBY CERTIFIED that according to the records in the Office of the Public Surveyor, the property described in the foregoing instrument has not undergone any change in regard to boundary and area.

Office of the Public Surveyor, Christiansted, St. Croix

by *[Signature]*  
O'NEAL ABEL

*DATE: MAY 16 1988*  
*Fee: \$300*

Subscribed and sworn to on the 25<sup>th</sup> day of July, 1988 at 4:30 o'clock P. M. and recorded and entered in Recorder's Book for the District of St. Croix, Virgin Islands of the U.S.A. as Photo-copy Page 30 No. 544 and noted in Real Property Register Page 61 & 63

*Beatrice Pemberton*



2001R00389  
S2- 007762



GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
1131 King Street, Suite 101

Christiansted, St. Croix, Virgin Islands 00820-4974

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**

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**2011**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**  
**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Christiansted

**2011**

DESCRIPTION OF PROPERTY							PARCEL NUMBER		
<b>100-E LA GR PRINCESS</b>							<b>2-02610-0102-00</b>		
ASSESSED LAND	ASSESSED IMPROVEMENT	ASSESSED TOTAL	TAX RATE	AMOUNT OF TAX	LESS EXEMPTIONS	SEWER USER'S FEE	AMOUNT DUE	LESS CREDITS	BALANCE DUE
24,700	27,000	<b>51,700</b>	0.0125	387.75	0.00	0.00	<b>387.75</b>	0.00	<b>387.75</b>

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ATTACH FEE	INTEREST	AMOUNT PAID
EXEMPTIONS AND CREDITS APPLIED ABOVE		

MOHAMAD, HAMED  
PO Box 763  
Christiansted, VI 00821

**2011**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**  
**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Christiansted

**2011**

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<div style="border: 2px solid black; padding: 5px; display: inline-block;">           EXHIBIT E         </div>		

MOHAMAD, HAMED  
PO Box 763  
Christiansted, VI 00821

Reprintance Copy



GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
1131 King Street, Suite 101

Christiansted, St. Croix, Virgin Islands 00820-4974

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**2011**

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**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Christiansted

**2011**

DESCRIPTION OF PROPERTY							PARCEL NUMBER		
<b>100F LA GRANDE PRINCE</b>							<b>2-02610-0104-00</b>		
ASSESSED LAND	ASSESSED IMPROVEMENT	ASSESSED TOTAL	TAX RATE	AMOUNT OF TAX	LESS EXEMPTIONS	SEWER USER'S FEE	AMOUNT DUE	LESS CREDITS	BALANCE DUE
14,200	0	14,200	0.0125	106.50	0.00	0.00	106.50	0.00	106.50

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ATTACH FEE	INTEREST	AMOUNT PAID
EXEMPTIONS AND CREDITS APPLIED ABOVE		

MOHAMAD, HAMED  
PO Box 763  
Christiansted, VI 00821

**2011**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**  
**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Christiansted

**2011**

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MOHAMAD, HAMED  
PO Box 763  
Christiansted, VI 00821

Remittance Copy



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OFFICE OF THE LIEUTENANT GOVERNOR  
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**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Christiansted

**2011**

DESCRIPTION OF PROPERTY							PARCEL NUMBER		
<b>100G LA GRANDE PRIN</b>							<b>2-02610-0135-00</b>		
ASSESSED LAND	ASSESSED IMPROVEMENT	ASSESSED TOTAL	TAX RATE	AMOUNT OF TAX	LESS EXEMPTIONS	SEWER USER'S FEE	AMOUNT DUE	LESS CREDITS	BALANCE DUE
7,600	0	7,600	0.0125	57.00	0.00	0.00	57.00	0.00	57.00

THE TAX HEREON IS DUE AND PAYABLE ON APRIL 8, 2013 TO THE GOVERNMENT OF THE VIRGIN ISLANDS AND BECOMES DELINQUENT IF NOT PAID WITHIN 90 DAYS THEREAFTER.

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EXEMPTIONS AND CREDITS APPLIED ABOVE		

MOHAMAD, HAMED  
PO Box 763  
Christiansted, VI 00821

**2011**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**  
**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Christiansted

**2011**

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ATTACH FEE	INTEREST	AMOUNT PAID
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MOHAMAD, HAMED  
PO Box 763  
Christiansted, VI 00821

Remittance Copy



May 2, 1990

WARRANTY DEED

No. 2855/1990

*m. Hamed*  
3772

INDENTURE made this 19<sup>th</sup> day of April, 1990, by and between Thomas C. Hill and Bessie R. Hill of 7059 W. Country Club Drive N., Sarasota, Florida 34243 hereinafter referred to as GRANTOR, and Mohamad Hamed of P.O. Box 2926, Frederiksted, St. Croix 00841-2926 hereinafter referred to as GRANTEE.

WITNESSETH:

THAT, in consideration of the sum of One (\$1.00) Dollar and other good and valuable consideration to GRANTORS in hand paid, receipt whereof is hereby acknowledged, GRANTORS do hereby GRANT, SELL and CONVEY unto the GRANTEE, his heirs and assigns, the following real property situated in Christiansted, St. Croix, U.S.V.I., to wit:

Plot No. 100-E of Estate La Grande Princesse, Company Quarter, consisting of 1.199 U.S. Acre, as more fully shown and described on Department of Public Works Drawing No. 2570 dated February 5, 1969;

Plot No. 100-F of Estate La Grande Princesse, Company Quarter, consisting of 0.558 U.S. Acre, as more fully shown and described on Department of Public Works Drawing No. 2570 dated February 5, 1969;

Road Plot No. 100-G of Estate La Grande Princesse, Company Quarter, consisting of 0.237 U.S. Acre, as more fully shown and described on Department of Public Works Drawing No. 2570 dated February 5, 1969;

TOGETHER WITH all the tenements, hereditaments and appurtenances thereunto belonging;

TO HAVE AND TO HOLD the premises hereby granted unto the GRANTEE, Mohamad Hamed, his heirs and assigns, in fee simple forever.

SUBJECT, HOWEVER, to covenants, easements and restrictions of record and all applicable laws and regulations.

AND, GRANTORS do hereby COVENANT that they are seized of said premises in fee simple and have good right to convey same; that GRANTEE shall quietly enjoy said premises; that the premises are free from encumbrances except as herein provided; that GRANTORS will execute or procure any further necessary assurances of title to said premises; and that GRANTORS will forever warrant and defend the title to said premises.

IN WITNESS WHEREOF, GRANTORS have caused these presents to be signed the day and year first above written.

Witness:

[Signature]

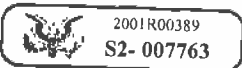
Thomas C. Hill  
Thomas C. Hill

[Signature]

Bessie R. Hill  
Bessie R. Hill



St. Croix



no. Hamed0008

Warranty Deed  
 Hill to Hamed  
 Page Two

ACKNOWLEDGMENT

STATE OF FLORIDA )  
 ) ss:  
 COUNTY OF Manatee )

ON THIS 13<sup>th</sup> day of April, 1990, before me personally came and appeared **Thomas C. Hill and Bessie R. Hill** to me known and known to me to be the individuals described in and who executed the foregoing instrument and they acknowledged that they executed same freely and voluntarily for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and seal.

*Cheris Ames*  
 Notary Public  
 My commission expires:

Notary Public  
 State of Florida at Large  
 My Commission Expires:  
 November 14, 1993

CERTIFICATE OF VALUE

IT IS HEREBY CERTIFIED that the value of the property conveyed herein for recording and and stamp tax purposes, does not exceed \$100,000.00.

*Thomas C. Hill*  
 Thomas C. Hill  
*Bessie R. Hill*  
 Bessie R. Hill



CERTIFICATE OF PUBLIC SURVEYOR

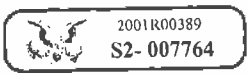
IT IS HEREBY CERTIFIED that the property described in the foregoing instrument, Plot No. 110-E (1.199 U.S. Acre); Plot No. 100-F (0.558 U.S. Acre) and Road Plot No. 100-G (0.237 U.S. Acre) of Estate La Grande Princesse, have not undergone any change in respect to boundary and area.

Office of the Public Surveyor  
 St. Croix, U.S.V.I.

By: *[Signature]*  
*Sandra J. Christensen R.R.*

DATED: APR 20 1990  
 FEE: 5.58

Received for recording on the 2nd day of May  
 1990 at 11:27 o'clock A.M. and  
 Recorded and Entered in Recorder's Book for the  
 District of St. Croix, Virgin Islands of the U.S.A. at  
 Photo-copy 353 Page 13  
 No. 25549 and filed in Real Property Register  
28 Page 10, 764 77  
*Sandra J. Christensen*  
 FEE: 103.00





GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
100 Lagoon Complex, Suite #5

Frederiksted, St. Croix, Virgin Islands 00840-3912

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**

Dear Property Owner,

Your 2011 Notice of Change of Assessment and Real Property Tax Bill has been prepared in a two-part format. If you had an overpayment from your 2010 tax bill, this bill reflects a prepayment. Please pay Balance Due listed below. If there is still an overpayment the additional credit will be applied towards the 2012 tax bill. If you have outstanding Property taxes they are listed on the reverse side of this bill.

A return envelope is enclosed for your convenience. If you choose to pay your bill by mail, tear off the lower portion of the tax bill and return it in the enclosed return envelope with your check or money order made payable to the GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS. **DO NOT SEND CASH.**

If you prefer to pay your Real Property Tax Bill in person, bring the entire bill to the Tax Collector's office. You may pay in person by cash, check, money order, or credit card (MasterCard or Visa). The Tax Collector's office will retain the lower section of your bill.

**PAY BY DUE DATE OF APRIL 8, 2013 AND RECEIVE A TWO AND A HALF (2 1/2) PERCENT DISCOUNT AND BY MARCH 25, 2013 FOR FIVE (5) PERCENT EARLY PAYMENT DISCOUNT. PAY BEFORE JUNE 8, 2013 TO AVOID BECOMING DELINQUENT AND INCURRING LATE PAYMENT CHARGES OF ONE PERCENT PER MONTH.**

If you are dissatisfied with the assessment, you may file an informal appeal with the Tax Assessor's office; if not satisfied, a formal appeal may be filed to the Board of Tax Review no later than June 24, 2013. (See Below). Call (340) 772-3115 or visit us at [www.ltg.gov.vi](http://www.ltg.gov.vi)

**PROPERTY SOLD:** 2011 Real property tax bills are sent to the owner as of January 1, 2012. If you have sold this property since January 1, 2012, you may need to forward this bill to the new owner.

Mailing Address: It is the responsibility of the property owner to notify the Tax Assessor's Office of any change in their mailing address.

**2011**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**  
**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Frederiksted

**2011**

DESCRIPTION OF PROPERTY							PARCEL NUMBER		
<b>6-C CARLTON</b>							<b>4-07700-0403-00</b>		
ASSESSED LAND	ASSESSED IMPROVEMENT	ASSESSED TOTAL	TAX RATE	AMOUNT OF TAX	LESS EXEMPTIONS	SEWER USER'S FEE	AMOUNT DUE	LESS CREDITS	BALANCE DUE
20,100	306,100	<b>326,200</b>	0.0125	2,446.50	0.00	0.00	<b>2446.50</b>	0.00	2446.50

THE TAX HEREON IS DUE AND PAYABLE ON APRIL 8, 2013 TO THE GOVERNMENT OF THE VIRGIN ISLANDS AND BECOMES DELINQUENT IF NOT PAID WITHIN 60 DAYS THEREAFTER.

According to Title 33, Virgin Islands Code, Section 2451, if dissatisfied with this assessment, you have until June 24, 2013 to appeal to the Board of Tax Review; no claim will be considered after this period. If you file such an appeal, you are invited to visit the Tax Assessor's Office in your district where you will be shown the details of the assessment and the method of arriving at the valuation. If errors are found they will be corrected.

ATTACH FEE	INTEREST	AMOUNT PAID
EXEMPTIONS AND CREDITS APPLIED ABOVE		

HAMED, WALEED  
PO Box 763  
Christiansted, VI 00821

**2011**


**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**  
**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**  
Frederiksted

**2011**

DESCRIPTION OF PROPERTY							PARCEL NUMBER		
<b>6-C CARLTON</b>							<b>4-07700-0403-00</b>		
ASSESSED LAND	ASSESSED IMPROVEMENT	ASSESSED TOTAL	TAX RATE	AMOUNT OF TAX	LESS EXEMPTIONS	SEWER USER'S FEE	AMOUNT DUE	LESS CREDITS	BALANCE DUE
20,100	306,100	<b>326,200</b>	0.0125	2,446.50	0.00	0.00	<b>2446.50</b>	0.00	2446.50

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ATTACH FEE	INTEREST	AMOUNT PAID
EXEMPTIONS AND CREDITS APPLIED ABOVE		
		

HAMED, WALEED  
PO Box 763  
Christiansted, VI 00821

June 5, 1987

between JOSE ORTIZ CUENCAS of Reparto San Rafael #23, Trujillo Alto, Puerto Rico 00760, hereinafter referred to as "GRANTOR", and WALRED HAMED, of P.O. Box 2926, Frederiksted, V.I. hereinafter referred to as "GRANTEE".

WITNESSETH:

That in consideration of the sum of Ten Dollars (\$10.00) and other good and valuable consideration to his in hand paid, the receipt of which is hereby acknowledged, GRANTOR by these presents hereby grants, sells, and convey unto GRANTEE, his heirs and assigns forever, the following described real property more fully described as follows:

Plot No. 6C, consisting of 1.002 U.S. Acres, more or less, of Estate Carlton, West End Quarter, Frederiksted, St. Croix, as more fully shown in P.W.D. Drawing No. 1775 dated May 6, 1965 as revised May 10, 1966.

TOGETHER WITH ALL improvements, tenements, hereditaments, and appurtenances thereunto belonging.

SUBJECT to the condition that GRANTEE faithfully pays all mortgage installments for Purchase Money Mortgage issued concurrently herewith for \$84,800.00.

TO HAVE AND TO HOLD the said described real property unto GRANTEE, his heirs, successors and assigns, in fee simple forever.

GRANTOR covenants and warrants that he is lawfully seized of said premises and has good right to convey the same; that said property is free from encumbrances except as herein stated; that GRANTEE shall have quiet enjoyment of same and GRANTOR will forever warrant and defend title to said premises against the unlawful claims of any and all persons whomsoever.

IN WITNESS WHEREOF, the undersigned have duly executed this instrument as of the day and year first above written.

WITNESSES:

*Patricia Frederick*  
*Gloria Lewis*

*Jose Ortiz Cuencas*  
JOSE ORTIZ CUENCAS

U.S. GOVERNMENT PRINTING OFFICE: 1975 O-281-811

1987 JUN -5 PM 2:42

20 DOLLAR STAMP OF THE VIRGIN ISLANDS

1000 DOLLARS STAMP OF THE U.S. VIRGIN ISLANDS INTERNAL REVENUE



**Property Info**  
 Address 26 DIAMOND, St Croix

<b>Property</b>	ID 4-07900-0141-00
<b>Ownership</b>	Name PLESSEN ENTERPRISES INC Address PO Box 763 Christianssted VI 821
<b>Miscellaneous</b>	

Property and Procurement Central Warehouse

Bloomberg No 2206  
EXHIBIT  
G



**Property Info**

Address MATR 39 & S-B DIAMOND, St Croix

Property ID 4-07900-0140-00

**Ownership**

Name PLESSEN ENTERPRISES INC  
Address PO Box 763  
Christianssted VI 821

**Miscellaneous**





**Property Info**

**Address** MTR 28 & 29 PLESSEN, St Croix

**Ownership**

**Name** PLESSEN ENTERPRISES INC  
**Address** PO Box 763  
 Christianssted, VI 821

**Miscellaneous**

**DPNR Zoning** R-3  
**Parcel Name**  
**Map Number**  
**Parcel Acreage**

358 ft

1-05603-0199-00  
26 REM ESTATE CHARLOTTE AMALIE NEW QTR  
HARTHMAN LEASING I, LLLP  
Parcel: Select Add

**Property Info**

Address 2 REM CHARLOTTE AMALIE No.3 NEW QTR., St Thomas

**Property**

ID 1-05604-0318-00

**Ownership**

Name PLESSEN ENTERPRISES INC  
Address PO Box 503358  
St Thomas, VI 805

**Miscellaneous**







**Property Info**

Address 6 & 9 EST. THOMAS NEW CTR, St Thomas

Property ID 1-05404-1505-00

Ownership Name PLESSEN ENTERPRISES INC  
Address P.O. Box 8707  
St Croix, VI 823

Miscellaneous



GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
100 Lagoon Complex, Suite #5

Frederiksted, St. Croix, Virgin Islands 00840-3912

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**

Dear Property Owner,

Your 2012 Notice of Assessment and Real Property Tax Bill has been prepared in a two-part format. If you had an overpayment from your 2011 tax bill, this bill reflects a prepayment. Please pay Balance Due listed below. If there is still an overpayment the additional credit will be applied towards the 2013 tax bill. If you have outstanding property taxes they are listed on the reverse side of this bill.

A return envelope is enclosed for your convenience. If you choose to pay your bill by mail, tear off the lower portion of the tax bill and return it in the enclosed return envelope with your check or money order made payable to the GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS. **DO NOT SEND CASH** or credit card (MasterCard or Visa). The Tax Collector's Office will retain the lower section of your bill.

**PAY BY DUE DATE OF AUGUST 30, 2013 AND RECEIVE A TWO AND A HALF (2 1/2) PERCENT DISCOUNT AND BY AUGUST 15, 2013 FOR FIVE (5) PERCENT EARLY PAYMENT DISCOUNT. PAY BEFORE OCTOBER 30, 2013 TO AVOID BECOMING DELINQUENT AND INCURRING LATE PAYMENT CHARGES OF ONE PERCENT PER MONTH.**

If you are dissatisfied with the assessment, you may file an informal appeal with the Tax Assessor's Office; if not satisfied, a formal appeal may be filed to the Board of Tax Review no later than NOVEMBER 15, 2013. (See Below). Call (340) 772-3115 or visit us at [www.ltg.gov.vi](http://www.ltg.gov.vi)

**PROPERTY SOLD:** 2012 Real Property Tax Bills are sent to the owner as of January 1, 2013. If you have sold this property since January 1, 2013, you may need to forward this bill to the new owner.

Mailing Address: It is the responsibility of the property owner to notify the Tax Assessor's Office of any change in their mailing address.

**2012**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**  
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS

**2012**

Frederiksted

DESCRIPTION OF PROPERTY						PARCEL NUMBER	
<b>MTR 28 &amp; 29 PLESSEN</b>						4-06200-0408-00	
ASSESSED LAND IMPROVEMENT	ASSESSED TOTAL	TAX RATE	AMOUNT OF TAX	LESS EXEMPTIONS	SEWER USER'S FEE	AMOUNT DUE	BALANCE DUE
727,700	3,870,400	0.0125	34,485.75	0.00	1,250.00	35735.75	35735.75
<small>THE TAX HEREON IS DUE AND PAYABLE ON AUGUST 30, 2013 TO THE GOVERNMENT OF THE VIRGIN ISLANDS AND BECOMES DELINQUENT IF NOT PAID WITHIN 30 DAYS THEREAFTER.</small>							
<small>According to Title 33, Virgin Islands Code, Section 2451, if dissatisfied with this assessment, you have until NOV 15, 2013 to appeal to the Board of Tax Review; no claim will be considered after this period. If you file such an appeal, you are advised to visit the Tax Assessor's Office in your district where you will be shown the details of the assessment and the method of appeal. If errors are found, they will be corrected.</small>						<b>ATTACH INTEREST AMOUNT PAID</b> 33,948.90	
COLLECTORS IN ISLANDS						EXEMPTIONS AND CREDITS APPLIED ABOVE 510	

PLESSEN ENTERPRISES INC  
PO Box 763  
Christiansted, VI 00821

PA AUG 22 2013 ID

CASH  OTHER  ASH  
CHECK OR M.O.

*Receipt # 5637*  
*96*





GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
100 Lagoon Complex, Suite #5  
Frederiksted, St. Croix, Virgin Islands 00840-3912  
NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL

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Your 2012 Notice of Change of Assessment and Real Property Tax Bill has been prepared in a two-part format. If you had an overpayment from your 2011 tax bill, this bill reflects a prepayment. Please pay Balance Due listed below. If there is still an overpayment the additional credit will be applied towards the 2013 tax bill. If you have outstanding property taxes they are listed on the reverse side of this bill.

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If you prefer to pay your Real Property Tax Bill in person, bring the entire bill to the Tax Collector's Office. You may pay in person by cash, check, money order, or credit card (MasterCard or Visa). The Tax Collector's Office will retain the lower section of your bill.

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Mailing Address: It is the responsibility of the property owner to notify the Tax Assessor's Office of any change in their mailing address.

2012  
NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL

Frederiksted

DESCRIPTION OF PROPERTY		26 DIAMOND		4-07900-0141-00		PARCEL NUMBER	
ASSESSED	ASSESSED	ASSESSED	AMOUNT	SEWER	AMOUNT	LESS	BALANCE
LAND	IMPROVEMENT	TOTAL	TAX	LESS	EXEMPTIONS	USERS FEE	DUE
703,800	0	703,800	0.0125	5,278.50	2686.15	0.00	2592.35
THE TAX MUST BE PAID BY AUGUST 30, 2013 TO THE GOVERNMENT OF THE VIRGIN ISLANDS AND BECOMES DELINQUENT IF NOT PAID WITHIN 30 DAYS THEREAFTER.		ATTACH INTEREST AMOUNT PAID					
According to Title 33, Virgin Islands Code, Section 2451, if dissatisfied with this assessment, you have until NOV 15, 2013 to appeal to the Board of Tax Review; no claim will be considered after this period. If you file such an appeal, you are invited to visit the Tax Assessor's Office in your district where you will be shown the details of the assessment and the method of arriving at the valuation. If errors are found they will be corrected.		EXEMPTIONS AND CREDITS APPLIED ABOVE					
Farm Partial Exempt \$2,686.16		Prepayment Amount \$3506.29					
Remaining Credit for 2012 \$-913.94							

2012  
NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL

Frederiksted

DESCRIPTION OF PROPERTY		26 DIAMOND		4-07900-0141-00		PARCEL NUMBER	
ASSESSED	ASSESSED	ASSESSED	AMOUNT	SEWER	AMOUNT	LESS	BALANCE
LAND	IMPROVEMENT	TOTAL	TAX	LESS	EXEMPTIONS	USERS FEE	DUE
703,800	0	703,800	0.0125	5,278.50	2686.15	0.00	2592.35
THE TAX MUST BE PAID BY AUGUST 30, 2013 TO THE GOVERNMENT OF THE VIRGIN ISLANDS AND BECOMES DELINQUENT IF NOT PAID WITHIN 30 DAYS THEREAFTER.		ATTACH INTEREST AMOUNT PAID					
According to Title 33, Virgin Islands Code, Section 2451, if dissatisfied with this assessment, you have until NOV 15, 2013 to appeal to the Board of Tax Review; no claim will be considered after this period. If you file such an appeal, you are invited to visit the Tax Assessor's Office in your district where you will be shown the details of the assessment and the method of arriving at the valuation. If errors are found they will be corrected.		EXEMPTIONS AND CREDITS APPLIED ABOVE					
Farm Partial Exempt \$2,686.16		Prepayment Amount \$3506.29					
Remaining Credit for 2012 \$-913.94							

PLESSEN ENTERPRISES INC  
PO Box 763  
Christiansted, VI 00821

PLESSEN ENTERPRISES INC  
PO Box 763  
Christiansted, VI 00821

Remittance Copy



GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
No. 5049 Kongens Gade

St. Thomas, Virgin Islands 00802-6487

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**

Dear Property Owner,

Your 2012 Notice of Change of Assessment and Real Property Tax Bill has been prepared in a two-part format. If you had an overpayment from your 2011 tax bill, this bill reflects a prepayment. Please pay Balance Due listed below. If there is still an overpayment the additional credit will be applied towards the 2013 tax bill. If you have outstanding property taxes they are listed on the reverse side of this bill.

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Mailing Address: It is the responsibility of the property owner to notify the Tax Assessor's Office of any change in their mailing address.

**2012**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL  
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**

St. Thomas

DESCRIPTION OF PROPERTY						PARCEL NUMBER	
<b>6 &amp; 9 EST. THOMAS NEW QTR</b>						<b>1-05404-1505-00</b>	
ASSESSED LAND	ASSESSED IMPROVEMENT	ASSESSED TOTAL	TAX RATE	AMOUNT OF TAX	LESS EXEMPTIONS	SEWER USER'S FEE	AMOUNT DUE
2,643,600	81,800	<b>2,725,400</b>	0.0125	20,440.50	0.00	0.00	<b>20440.50</b>
<small>THE TAX REVISIONS DUE AND PAYABLE ON AUGUST 30, 2013 TO THE GOVERNMENT OF THE VIRGIN ISLANDS AND BECOMES DELINQUENT IF NOT PAID WITHIN 60 DAYS THEREAFTER.</small>						LESS CREDITS	BALANCE DUE
						0.00	20440.50
<small>According to Title 32, Virgin Islands Code, Section 2451. If dissatisfied with this bill, you have until NOVEMBER 15, 2013 to appeal to the Board of Tax Review; no claim will be considered after this period. If you file such an appeal, you must submit a copy of this bill to the Tax Assessor's Office in your district where you will be shown the details of the assessment and the method of corrections available. If corrections are made, they will be corrected.</small>						ATTACH FEE	INTEREST
						EXEMPTIONS AND CREDITS APPLIED/ABOVE	AMOUNT PAID
							19,418.74
						510	

PA AUG 22 2013 **PA ID**

CASH  OTHER  CHECK OR M.O. *HSW*

PLESSEN ENTERPRISES, INC.  
P.O. BOX 763  
P.O. Box 8707  
St Croix, VI 00823

*Noted # 96942*



GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
100 Lagoon Complex, Suite #5

Frederiksted, St. Croix, Virgin Islands 00840-3912

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**

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**2012**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL  
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**

**2012**

Frederiksted

DESCRIPTION OF PROPERTY				PARCEL NUMBER	
<b>MATR 39 &amp; 5-B DIAMOND</b>				<b>4-07900-0140-00</b>	
ASSESSED LAND	ASSESSED IMPROVEMENT	TAX RATE	TAX AMOUNT	LESS EXEMPTIONS	SEWER USER'S FEE
770,900	0	0.0125	5,781.75	2574.68	
TOTAL				AMOUNT DUE	BALANCE DUE
770,900				3207.07	3207.07
				LESS CREDITS	
				0.00	
				ATTACH FEE	AMOUNT PAID
					3,046.28
				EXEMPTIONS AND CREDITS APPLIED ABOVE	
				Farm Partial Exempt \$2,574.68	

According to Title 33, Virgin Islands Code, Section 2451, if dissatisfied with this assessment you have until Nov. 15, 2013 to appeal to the Board of Tax Review; no claim will be considered after this period. If you file such an appeal, you must pay the amount assessed to the Assessor's Office in your distinct where you will be shown the details of the assessment and the method of payment if the valuation is found to be incorrect.

PA AUG 22 2013 ID

PLESSEN ENTERPRISES INC  
PO Box 763  
Christiansted, VI 00821

CASH  OTHER  VISA  
CHECK OR M/O \_\_\_\_\_

*Received # 9639*



GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
No. 5049 Kongens Gade  
St. Thomas, Virgin Islands 00802-6487

*Receipt # 965641*

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**

Dear Property Owner,

Your 2012 Notice of Assessment and Real Property Tax Bill has been prepared in a two-part format. If you had an overpayment from your 2011 tax bill, this bill reflects a prepayment. Please pay Balance Due listed below. If there is still an overpayment the additional credit will be applied towards the 2013 tax bill. If you have outstanding property taxes they are listed on the reverse side of this bill.

A return envelope is enclosed for your convenience. If you choose to pay your bill by mail, tear off the lower portion of the tax bill and return it in the enclosed return envelope with your check or money order made payable to the GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS. **DO NOT SEND CASH.**

If you prefer to pay your Real Property Tax Bill in person, bring the entire bill to the Tax Collector's Office. You may pay in person by cash, check, money order, or credit card (MasterCard or Visa). The Tax Collector's Office will retain the lower section of your bill.

**PAY BY DUE DATE OF AUGUST 30, 2013 AND RECEIVE A TWO AND A HALF (2 1/2) PERCENT DISCOUNT AND BY AUGUST 15, 2013 FOR FIVE (5) PERCENT EARLY PAYMENT DISCOUNT. PAY BEFORE OCTOBER 30, 2013 TO AVOID BECOMING DELINQUENT AND INCURRING LATE PAYMENT CHARGES OF ONE PERCENT PER MONTH.**

If you are dissatisfied with the assessment, you may file an informal appeal with the Tax Assessor's Office; if not satisfied, a formal appeal may be filed to the Board of Tax Review no later than NOVEMBER 15, 2013. (See Below). Call (340) 776-8505 or visit us at [www.tg.gov.vi](http://www.tg.gov.vi)

**PROPERTY SOLD:** 2012 Real Property Tax Bills are sent to the owner as of January 1, 2013. If you have sold this property since January 1, 2013, you may need to forward this bill to the new owner.

**Mailing Address:** It is the responsibility of the property owner to notify the Tax Assessor's Office of any change in their mailing address.

**2012**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL  
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**

St. Thomas

**2012**

DESCRIPTION OF PROPERTY						PARCEL NUMBER	
<b>2 REM. CHARLOTTE AMALIE No.3 NEW QTR.</b>						1-05604-0318-00	
ASSESSED LAND	ASSESSED IMPROVEMENT	ASSESSED TOTAL	TAX RATE	TAX AMOUNT	LESS EXEMPTIONS	SEWER USER'S FEE	AMOUNT DUE
644,100	178,900	823,000	0.0125	6,172.50	0.00	0.00	6172.50
						0.00	0.00
							6172.50

THE TAX HEREON IS DUE AND PAYABLE ON AUGUST 30, 2013 TO THE GOVERNMENT OF THE VIRGIN ISLANDS AND BECOMES DELINQUENT IF NOT PAID WITHIN 10 DAYS THEREAFTER.

According to Title 33, Virgin Islands Code, Section 2451, if dissatisfied with the assessment, you may file an informal appeal with the Tax Assessor's Office until NOV 15, 2013 to appeal to the Board of Tax Review, no claim will be considered after this period. If you file such an appeal, you must visit the Tax Assessor's Office in your district where you will be shown the details of the assessment and the method of making a valuation. If an appeal is filed, the bill will be corrected.

ATTACH FEE	INTEREST	AMOUNT PAID
		5,810.38
EXEMPTIONS AND CREDITS APPLIED ABOVE		

**PA** AUG 22 2013 **ID**

CASH  OTHER  VISA  
CHECK OR M/C

PLESSEN ENTERPRISES INC  
PO Box 503358  
St Thomas, VI 00805

570



GOVERNMENT OF  
THE UNITED STATES VIRGIN ISLANDS  
OFFICE OF THE LIEUTENANT GOVERNOR  
TAX ASSESSOR'S OFFICE  
No. 5049 Kongens Gade

*Receipt  
96 5134*

St. Thomas, Virgin Islands 00802-6487

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL**

Dear Property Owner,

Your 2012 Notice of Change of Assessment and Real Property Tax Bill has been prepared in a two-part format. If you had an overpayment from your 2011 tax bill, this bill reflects a prepayment. Please pay Balance Due listed below. If there is still an overpayment the additional credit will be applied towards the 2013 tax bill. If you have outstanding property taxes they are listed on the reverse side of this bill.

A return envelope is enclosed for your convenience. If you choose to pay your bill by mail, tear off the lower portion of the tax bill and return it in the enclosed return envelope with your check or money order made payable to the GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS. DO NOT SEND CASH. If you prefer to pay your Real Property Tax Bill in person, bring the entire bill to the Tax Collector's Office. You may pay in person by cash, check, money order, or credit card (MasterCard or Visa). The Tax Collector's Office will retain the lower section of your bill.

**PAY BY DUE DATE OF AUGUST 30, 2013 AND RECEIVE A TWO AND A HALF (2 1/2) PERCENT DISCOUNT AND BY AUGUST 15, 2013 FOR FIVE (5) PERCENT EARLY PAYMENT DISCOUNT. PAY BEFORE OCTOBER 30, 2013 TO AVOID BECOMING DELINQUENT AND INCURRING LATE PAYMENT CHARGES OF ONE PERCENT PER MONTH.**

If you are dissatisfied with the assessment, you may file an informal appeal with the Tax Assessor's Office; if not satisfied, a formal appeal may be filed to the Board of Tax Review no later than NOVEMBER 15, 2013. (See Below). Call (340) 776-8505 or visit us at [www.itg.gov.vi](http://www.itg.gov.vi)

**PROPERTY SOLD:** 2012 Real Property Tax Bills are sent to the owner as of January 1, 2013. If you have sold this property since January 1, 2013, you may need to forward this bill to the new owner.

**Mailing Address:** It is the responsibility of the property owner to notify the Tax Assessor's Office of any change in their mailing address.

**2012**

**NOTICE OF CHANGE OF ASSESSMENT AND REAL PROPERTY TAX BILL  
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**

St. Thomas

DESCRIPTION OF PROPERTY						PARCEL NUMBER	
CHARLOTTE AMALIE 2-4 NEW QTR.						1-056603-0214-00	
ASSESSED LAND IMPROVEMENT	34,700	ASSESSED TOTAL	80,000	TAX RATE	0.0125	AMOUNT OF TAX	600.00
				EXEMPTIONS	0.00	LESS	0.00
				SEWER USER'S FEE		AMOUNT DUE	600.00
						LESS CREDITS	
						AMOUNT DUE	600.00
<small>THE TAX HEREON IS DUE AND PAYABLE ON AUGUST 30, 2013 TO THE GOVERNMENT OF THE VIRGIN ISLANDS AND BECOMES DELINQUENT IF NOT PAID BY NOVEMBER 15, 2013. HERE-FOR-          According to Title 33, Virgin Islands Code, Section 2451, if dissatisfied with this assessment, you have until NOV 15, 2013 to appeal to the Board of Tax Review; no claim will be considered after this period. If you file such an appeal, you are invited to visit the Tax Assessor's Office in your district where you will be shown the details of the assessment and the method of appeal. If interest on late payments will be corrected.</small>						ATTACH FEE	
						INTEREST	
						AMOUNT PAID	1570.00
						EXEMPTIONS AND CREDITS APPLIED ABOVE	

PA AUG 22 2013  
 CASH  OTHER  VISA  
 CHECK OR M/C

UNITED CORPORATION  
 PO Box 763  
 Christiansted, VI 00821

*570*

Dorothia  
Jordan Fund 75,000 Dinar

1,500,000.00  
105,932.00

Fathi YUSUF  
From Jordan " " "  
Balance for Fathi YUSUF

1,605,932.00  
← 617,000.00  
← 105,932.00  
80,034.00

802,966.00

2

1,605,932.00

802,966.00





**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

<b>MOHAMMAD HAMED by His Authorized</b>	)	
<b>Agent WALEED HAMED,</b>	)	
	)	<b>CIVIL NO. SX-12-CV-370</b>
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>ACTION FOR DAMAGES</b>
	)	<b>INJUNCTIVE AND</b>
<b>FATHI YUSUF and UNITED CORPORATION,</b>	)	<b>DECLARATORY RELIEF</b>
	)	
<b>Defendants.</b>	)	<b>JURY TRIAL DEMANDED</b>
_____	)	

**ORDER**

Plaintiff has filed a motion to reconsider/clarify this Court's December 5, 2013, Bond Order. Upon consideration of the matters before the Court, it is hereby Ordered that the motion is granted. The bond is reduced to \$1,100,000. Further, Plaintiff can secure the bond by the pledging of unencumbered assets, including cash accounts, real property, stock and the receivable due Plaintiff by Defendant Yusuf.

Dated:

\_\_\_\_\_  
Douglas A. Brady  
Judge, Superior Court

ATTEST:  
VENETIA H. VALESQUEZ  
Clerk of Court

By: \_\_\_\_\_  
Deputy Clerk