

**Exhibit 4 - Documents in the Criminal Case (*United States et. al., v Fathi Yusuf, et. al.*, criminal no. 2005-15F/B) Obtained by the FBI During the FBI Raid (as Supplied to Plaintiff by Defendants on August 1, 2013)**

**Note:** the 881 page index and documents of the discovery items and description from Defendants' Initial Rule 26 Disclosures are incorporated herein, but are not attached as a part of this exhibit

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

MOHAMMAD HAMED, by his	)	
authorized agent, WALEED HAMED,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	<b>CIVIL NO. SX-12-CV-370</b>
	)	
FATHI YUSUF and UNITED CORPORATION,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS' INITIAL RULE 26 DISCLOSURES**

Defendants FATHI YUSUF and UNITED CORPORATION, through undersigned counsel, pursuant to Fed. R. Civ. P. 26(a)(1)(A), provides the following:

- (i) Defendants' witnesses:
- 1. Plaintiff;
- 2. Plaintiff's agents;
- 3. Wally Hamed;
- 4. Willy Hamed;
- 5. Mafi Hamed;
- 6. Shawn Hamed;
- 7. Plaintiff's accountant/tax return preparer;
- 8. Fathi Yusuf;
- 9. Mike Yusuf;
- 10. Nejeh Yusuf;
- 11. Yusuf Yusuf;
- 12. Zeyad Yusuf;
- 13. Syaid Yusuf;

*Hameds v. Yusuf, CIVIL NO. SX-12-CV-370*  
*Defendants' Initial Rule 26 Disclosures*

14. Pablo O'Neil;
15. John Gaffney;
16. Ayman al Khalid;
17. Wadda Charriez;
18. Kareema Dorsette;
19. Corporate representative for Tutu Park Limited;
20. Ron Soluri, CPA;
21. Howard Epstein, CPA;
22. Randy Andreozzi, Esq.;
23. Gordon Rhea, Esq.;
24. Pam Colon, Esq.;
25. Corporate Representative for Banco Popular;
26. Corporate Representative for 5H;
27. Corporate Representative for Marina Market;
28. All of the witnesses identified by the Plaintiff.

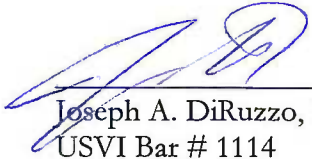
(ii) All exhibits attached to Complaint, Amended Complaint, attached to the various filings in this case (including before the District Court of the Virgin Islands), all exhibits admitted into evidence at the TRO/Preliminary Injunction hearing. Other exhibits obtained during the pendency of the Defendants' investigation of this case.

Additionally, please find the following: one (1) CD containing the discovery produced by the Government to the criminal defendants in the case of *United States, et al., v. United Corporation, et al.*, case no. 1:05-cr-15 (D.V.I.). Attached herewith is the coversheet from the Government (881 pages) detailing the file name, date, and description.

(iii) Computation of Damages: Professionals' fees and costs in this case. Additional damages based on counter-claims, if any. Possible punitive damages, if applicable based on counter-claims. Investigation continues.

(iv) N/A

Respectfully submitted,

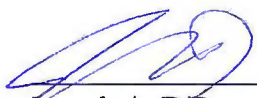


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*Co-counsel for Defendants Fathi Yusuf and United Corporation*

Dated August 1, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2013, a true and accurate copy of the foregoing was forwarded via email to the following: *Joel H. Holt, Esq.*, 2132 Company St., St. Croix, VI 00820, [holtvi@aol.com](mailto:holtvi@aol.com); *Carl J. Hartmann III, Esq.*, 5000 Estate Coakley Bay, L-6, Christiansted, VI 00820, [carl@carlhartmann.com](mailto:carl@carlhartmann.com).



Joseph A. DiRuzzo, III