

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

MOHAMMAD HAMED, by his)
authorized agent **WALEED HAMED**,)
)
Plaintiff/Counterclaim Defendant,)

vs.)

CIVIL NO. SX-12-CV-370

FATHI YUSUF and)
UNITED CORPORATION,)
)
Defendants/Counterclaimants,)

vs.)

**ACTION FOR DAMAGES
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF**

WALEED HAMED, WAHEED)
HAMED, MUFEED HAMED,)
HISHAM HAMED,)
and **PLESSEN ENTERPRISES, INC.**,)
)
Counterclaim Defendants.)

JURY TRIAL DEMANDED

**COUNTERCLAIM DEFENDANT WAHEED HAMED'S INTERROGATORIES TO
UNITED CORPORATION**

Each of the following requests is to be answered subject to the following two provisions:

A. Plaintiff asserts the existence of a stipulation with regard to acts of money laundering, tax evasion and related criminal matters entered into on March 31, 2014. If you agree that this stipulation exists, you need not respond to a request, but can simply indicate: "Not Answered Pursuant to the March 31, 2014 Stipulation."

B. Plaintiff asserts a Statute of Limitation bar to acts prior to 2006. If you agree that this bar exists, you need not respond to a request, but can simply indicate: "Not Answered Pursuant to the SOL Bar."

DEFINITIONS

Unless otherwise specified, or the context of the Request requires otherwise, answers to these Requests shall be governed by the following definitions:

"United" or "United Corp" or "you" shall mean the defendant United Corporation.

"Yusuf" shall mean defendant Fathi Yusuf.

"Hamed" shall mean the Counterclaim Defendant herein Willie Hamed.

INTERROGATORIES

1. Describe all accounting records presently in existence that reflect the gross amount of sales of the Plaza Extra supermarkets from 1986 to 2011, and for each such record, state the amount of sales for that year.

2. Describe generally how, from 1986 to 2002, cash was removed from Plaza Extra Supermarkets sales reporting by the Hameds and Yusufs. For each method or technique used, provide specificity about: A. Methods used to remove ("skim") the cash; B. Where cash first went after being skimmed; C. Which individual Hameds or Yusuf were involved; D. What intermediate accounts or transfer instruments and methods were used (i.e. that the cash was used to purchase or create); E. What final destinations the cash (or instruments into which the cash had been converted) were placed, deposited or otherwise used to purchase assets; F. What funds exist in foreign bank accounts now, obtained with such funds; G. What property or assets exist in the U.S. Virgin Islands now, obtained with such funds; and, H. What property or assets exist in foreign countries now, obtained with such funds.

3. Describe all accounting records presently in existence that reflect the gross amount of sales of the Plaza Extra supermarkets removed as cash prior to accounting and reporting ("skimmed") from 1986 to 2011, and for each such record, state the amount of sales skimmed for that year.

4. With regard to the skimmed cash set forth in your response to #3, describe all accounting records presently in existence that reflect the gross amount of sales of the Plaza Extra supermarkets skimmed from 1986 to 2011 that went to Fathi Yusuf, Mohammad Hamed, Willie Hamed, Wally Hamed and Mike Yusuf; and for each such record, state the amount of skimmed sales directed to each for that year.

5. Describe United's board's and management's understanding of why cash was removed or "skimmed" from the sales of Plaza Extra Supermarkets. Give their understanding of the purpose and goals of those acts and what results were achieved or sought to be achieved, and state:

A. Whose idea was the skimming

B. Who was "in charge" of the skimming

C. Who kept the records of the skimming and what records were kept

6. State whether United falsified tax documents to hide evidence of such removal or cash and skimming, who within the corporation directed or was involved with this and how they did so.

7. For each of the years from 1986 to 2002, state the approximate amount United believes was skimmed from the sales of Plaza Extra Supermarkets.

8. Describe in detail whether the amount reflected in the plea agreement in the criminal case (where tax evasion by underreporting of sales in 2002 was part of the allocution) for the actual and reported sales is correct, and for the amount that was not reported, state what United understands was done with those funds.

9. Describe all bank accounts and property which United directly or indirectly owns presently as a result of the 1985-2002 skimming transactions set forth above.

10. Describe all bank accounts and property known to United which Waleed Hamed directly or indirectly owns presently as a result of the transactions set forth above.

11. Describe all funds which Fathi Yusuf, Wally Hamed or Willie Hamed used for gambling -- and provide the amount gambled, won and lost by year for the years 1990-2008.

12. Describe in detail the net worth, assets and liabilities of United Corporation and Mattress Pal as of the date of your responses hereto.

13. Describe all funds obtained by removing cash and otherwise skimming from Plaza Extra sales used by United or Plaza Extra Supermarkets for investing in stock options -- and provide the amount invested, gains and losses by year for the years 1990-2008.

14. State how any monies skimmed were provided to United; and state what amount United should correctly have received of these funds.

15. With regard to your response to Interrogatory #14, state how monies skimmed by the United should have properly received in the splitting of those amounts and what amounts United obtained beyond what he should correctly have received of these funds.

16. State how monies skimmed by the Hameds and Yusufs were divided among Yusuf family members and United; and state what amounts United, Fathi and Mike Yusuf should correctly have received of these funds.

17. Describe when and how the Associated Grocers (AG) membership and stock were obtained, what funds were used to obtain them and who Fathi Yusuf presently believes is the rightful owner of them.

18. Describe in detail the relationship between Seaside Market and AG, and whether the AG membership or stock are involved and how.

19. Describe the sale or transfer of any goods, assets, inventory or other thing of value to Seaside Market from January 1, 2014 to August 1, 2014; and for each such sale or transfer state:

- A. The date and item(s) or amount(s)
- B. Whether the sale or transfer went through the cashiers in the front of the store.
- C. How the sale or transfer was paid for, if it was.
- D. Which Hamed family member agree to the process or the individual sale or transfer.
- E. Whether any Hamed family member objected to such sales and transfers.

19. Describe the time spent by any employee of United working at Seaside Market from January 1, 2014 to August 1, 2014; and for each such occasion state:

- A. The date and amount of time
- B. Whether the person was paid their regular salary at Plaza Extra Supermarkets.
- C. Which Hamed family member agree to the process or use of that time
- D. Whether any Hamed family member objected to such a use of that time..

Dated: August 22, 2014



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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of August, 2014, I served a copy of the foregoing Motion by email, as agreed by the parties, on:

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