

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

<b>UNITED CORPORATION,</b>	)	<b>Case No. SX-13-CV-03</b>
	)	
<i>Plaintiff,</i>	)	ACTION FOR DAMAGES INJUNCTIVE
	)	RELIEF AND DECLARATORY RELIEF
	)	
v..	)	
	)	
<b>WALEED HAMED,</b>	)	
	)	
<i>Defendant.</i>	)	
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**RESPONSE OF WALEED HAMED TO  
REQUEST FOR ADMISSIONS BY DEFENDANT WALEED HAMED**

Waleed Hamed (“Mr. Hamed”) responds and objects to the Request for Admissions (each, individually, a “Request” and, collectively, the “Requests”) propounded upon Mr. Hamed by the above-captioned plaintiff (“Plaintiff”) as follows:

1. Admit that you are an employee of United Corporation, and have managed the Plaza Extra East Store from 1986 through present. **Deny.**
2. Admit that you owe a duty of loyalty and care to United Corporation as its employee. **Deny.**
3. Admit that you received only a salary as a form of compensation from United Corporation for the years of 1986 through 1994. **Deny.**
4. Admit that you received only a salary as a form of compensation from United Corporation for the years of 1995 through 1998. **Deny.**
5. Admit that you received only a salary as a form of compensation from United Corporation for the years of 1999 through 2003. **Deny.**
6. Admit that you received only a salary as a form of compensation from United Corporation for the years of 2004 through 2012. **Deny.**
7. Admit that you have opened brokerage accounts to trade securities with one or more brokerage firms since 1986. **Admit.**

8. Admit that you have opened and maintained at least one bank account on the island of St. Maarten. **Admit that Mr. Hamed, together with Fathi Yusuf, opened an account in St. Maarten and further admit that, although the account is titled in the name of Mr. Hamed, that Fathi Yusuf has signatory authority over the account and has, since the inception of the account, enjoyed and exercised equal control over the account.**

9. Admit that you opened at least one bank account in your name in the country of Jordan. **Admit to the existence of the account and admit that, since the inception of the account, Fathi Yusuf has enjoyed and exercised equal control over the account and, further admit that Fathi Yusuf executed almost all of the transactions that were ever executed to and from such account.**

10. Admit that you have opened at least one bank account in the country of Jordan for which you have control. **Admit to the existence of such an account and further admit that, since the inception of the account, Fathi Yusuf has enjoyed and exercised equal control over the account and, further admit that, Fathi Yusuf executed almost all of the transactions that were ever executed to and from the account.**

11. Admit that you signed and filed (or instructed a third party to file) your 1992 and 1993 tax returns with the Virgin Islands Bureau of Internal Revenue. **Admit.**

12. Admit that the schedules listing securities in the amount of \$5.4 million dollars was attached to your tax return. (See Exhibit A). **Admit.**

13. Admit that you have declared \$394,328 in short-term losses from the sale of securities as reported in your 1993 tax return. (See Exhibit B). **Admit.**

14. Admit that you only received a salary as an employee of United Corporation during 1992 and 1993. **Deny.**

15. Admit that you issued six checks as shown in Exhibit C made payable to you personally. **Admit. The same as Fathi Yusuf.**

16. Admit that you have made personal loans to various third parties totaling \$430,500. **Deny.**

17. Admit that you have expended at least \$400,000 dollars to renovate your personal residence. **Admit. The same as Fathi Yusuf.**

18. Admit that you have opened gambling accounts at various casinos throughout the United States, and online gambling accounts. **Object to this Request as calling for information that is entirely irrelevant to this Action. Subject to this, Admit. The same as Fathi Yusuf.**

19. Admit that you have sustained gambling losses at various casinos, and online. **Admit. The same as Fathi Yusuf.**

20. Admit that you have sustained losses in securities trading (including stock options trading).  
**Admit. The same as Fathi Yusuf.**

Respectfully submitted,

**ECKARD, PC**

Dated: March 14, 2014

By: /s/ Mark W. Eckard  
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Counsel to Waleed Hamed

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail by parties' stipulation on this the 14<sup>th</sup> day of March, 2014 to the following:

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/s/ Mark W. Eckard