

**DECLARATION OF AN ATTORNEY UNDER 28 U.S.C. §1746
JOEL H. HOLT, ESQ.**

I, JOEL H. HOLT, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as follows:

1. I have personal knowledge of the facts set forth herein.
2. I am an attorney licensed to practice law in the U.S. Virgin Islands.
3. I am lead counsel for Mohammad Hamed (now the Mohammad Hamed Estate) in *Hamed v. Yusuf et al.*, SX-12-CV-370.
4. On January 9, 2015, the Court entered an Order that provided that "Hamed's accountant shall be allowed to view all partnership accounting information from January 2012 to present and submit his findings to the Master."

The Liquidating Partner shall promptly confer with the Master and Hamed to inventory all non -Plaza Extra Stores Partnership assets, and to agree to and implement a plan to liquidate such assets, which shall result in the maximum recoverable payment for the Partnership. All previous Partnership accountings are deemed preliminary. **Hamed's accountant shall be allowed to view all partnership accounting information from January 2012 to present and submit his findings to the Master.** The Liquidating Partner is ordered to submit an updated balance sheet to Hamed and to the Master without delay.

5. To accomplish the Court ordered review of "all partnership accounting information from January 2012 to the present", I undertook a number of actions on behalf of my client:
 - a. Retained a Certified Public Accountant who had experience in such matters generally and more specifically in the USVI.

**EXHIBIT
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- b. Retained a more specialized, stateside Certified Public Accountant who had experience in such matters generally and more specifically in the USVI.
 - c. Requested access for those accountants to the partnership records.
- 6. For more than a year both the CPA's and my office attempted to obtain the accounting records set forth by the Court without success.
- 7. By March of 2016, it was clear that the records either did not exist, or would not be supplied. For some accounts, there were no cancelled checks or even vendor invoices. Therefore, we had a meeting with the CPA's and Special Master Ross at which we asked that:
 - a. We be allowed to obtain the accounting information directly from the vendors and banks to recreate what had happened by subpoena, and
 - b. We be allowed to send a set of questions from the CPA's to the partnerships accountant who was being paid, along with an assistant, on a full time basis.
- 8. On the permission of the Special Master in the above-captioned action, I then:
 - a. caused subpoenas to issue to the Bank of Nova Scotia ("Scotiabank") and Banco Popular of Puerto Rico ("Banco"), and
 - b. caused a total of 81 very specific, well documented questions that the CPA's felt were critical to their ability to review the partnership accounting, to be sent to the Master who provided them to the

partnership accountant. **Exhibit D-1.** Additional questions were added to make the total 130 questions. **Exhibit D-2.** As can be seen from the document, references were made to specific checks or entries in the accounting to help simplify the response thereto.

9. The subjects of the subpoenas were only the banking records related to this action of the partnership, the United Accounts from which partnership payments were being made and reimbursed and Plessen accounts where partnership funds had gone.
10. A true copy of the subpoena to Scotiabank was served on May 31, 2016, and is attached as **Exhibit D-3.**
11. A true copy of the subpoena to Banco was served on May 31, 2016, and is attached as **Exhibit D-4.**
12. After communication with counsel for the Yusufs, Gregory Hodges, both banks represented to me that they would not supply much of the requested material until after Yusuf filed a motion to quash.
13. On June 24, 2016, Yusuf, through Hodges, filed a motion to quash. He did not reveal his communications with the banks seeking to stop production
14. That motion was fully briefed by the parties, and was thereafter denied as moot on August 5, 2016.
15. I received documents from both banks, although the banks have both indicated that they are still have more documents to produce. Indeed, a detailed letter was sent to Banco Popular to assist in finalizing compliance

with the subpoena, a copy of which is attached. See **Exhibit D-5**.

16. However, counsel for the the Bank of Nova Scotia stated that they still refused to provide certain documents related to the United Corporation after Gregory Hodges asked that documents not be produced.
17. I was told by counsel for the Bank of Nova Scotia that it would supply the documents to Hodges, but not to me – and that Hodges/Yusuf would then decide what documents I might get, which I agreed to, subject to my client's right to object to this procedure if nothing is ultimately received by me. See **Exhibit D-6**.
18. I have not received all of these United/BNS documents to date. Moreover, last week Banco Popular delivered over 10 Banker's boxes of documents (See **Exhibit D-7**), which no one has had to time to review because of the work being done to finalize all of the claims that are required to be submitted by September 30, 2016.
19. As to the 130 detailed questions from the Hamed CPA's to the partnership accountant, these were drafted by Hamed's CPA's to avoid a lengthy and protracted process of trying to understand the accounting that was submitted. The responses to these questions are essential to understanding the accounting that was provided, which this Court permitted Hamed to review. However, I have been informed by counsel for the Yusufs that he will not answer them, nor has he done so.

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

Dated: September 30, 2016



Joel H. Holt, Esq.

D-1

From: Joel Holt [mailto:holtvi@aol.com]
Sent: Tuesday, February 16, 2016 8:08 AM
To: edgarrossjudge@hotmail.com
Subject: Fwd: Action Please: List of questions & exhibits for Judge Ross by Tuesday, 2/16/16 deadline

Judge Ross—as you directed, attached are 81 specific questions relating ONLY to the financials Mr. Gaffney has supplied. Each has specific references to items from his accounting. There is one inquiry per page.

I will print this out if you prefer a hard copy, but I would recommend giving him the WORD file by forwarding this email, rather than printing out the 81 pages – as it has not only the questions, but also the references to his accounting and a place for him to fill in a response. Each one only requires a short, direct responses.

I cannot emphasize enough that these are not broad, general inquiries. They were composed by the two CPA's you met, who are familiar with these books (the item numbers relate to the CPAs' records and should not be changed).

Additionally, I also have exhibits that go along with a couple of the questions, which are attached and can also be forwarded. Please let me know if you prefer a hard copy of all of these attachments instead of just forwarding this (or you can do both—forward this and get a hard copy—probably best to see what John wants first).

After we see how this process works, we can decide whether there needs to be a partial lift of the discovery stay, as discussed last Friday. Thanks.

Joel H. Holt, Esq.
2132 Company Street
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709



Item No. 3002

Description: Plaza Extra (PE) partnership funds were used to pay for the gross receipt taxes (GRT) for the United Shopping Center.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

East Store GL Acct #14500 – SJE23

West Store, 1/30/15, 9584, BANK OF AMERICA - Invoice: 002194 - VIBIR - GROSS TAX, \$4,346.59

Question/Request for Info:

Is there any reason or basis for using PE partnership funds to pay for the operational GRT of non-PE businesses operated by United Corporation?

Regardless of your answer, for **each** month in the years 2012-2015, please provide the following:

- Monthly Form 720VI stamped by the VIBIR
- Monthly "23100 Accrued GRT" calculation schedule used to prepare Form 720VI
- Supporting documentation (credit card receipts or canceled checks) showing payments of GRT for each month

Response:

List of documents provided:

Item No. 3003

Description: A WAPA deposit was established for each store.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

STT – 12/31/14 – XJE31-02 – ADJUST DEPOSITS TO SCH FR WAPA \$25,592
East store – 12/31/14 – ZJE05 – ADJUST DEPOSITS TO SCH FR WAPA \$30,799
West store – 12/31/14 – XJE31-07 – ADJUST DEPOSITS TO SCH FR WAPA \$52,815

Question/Request for Info:

Please provide detail of all deposit transactions (deposits made and refunds of deposits) with WAPA from 2012-2015 for each store. If the WAPA deposit was credited to the account or refunded, please identify where on the general ledger this credit was recorded and details of the credit/refund.

Response:

List of documents provided: N/A

Item No. 3005

Description: From October 2, 2012-present, John Gaffney was hired by the United Corporation as its Controller. (See 1/25/13 transcript from the TRO hearing, p. 65 in *Hamed v Yusuf*, SX-12-CV-370)

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): None

Question/Request for Info:

By year, please allocate the percentage of your time you devoted to non-PE activities.

Please provide back-up documentation for the following (10/2/12-present):

- Your salary & benefits by year
- Your bonuses by year
- Your allowances by year

Response:

List of documents provided:

Item No. 3006

Description: PE partnership funds were used to pay Mr. Fathi Yusuf's personal legal fees.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

GL Acct #64500

Question/Request for Info: Do you dispute these funds should be recovered by the PE partnership?
Why were the checks written to Mr. Yusuf's attorneys in 2012 not listed on the general ledger?
Why were the checks written to Mr. Yusuf's attorneys in 2013 purged from the general ledger?
Why are the checks written to Mr. Yusuf's attorneys not shown as partnership receivables in the accounting?

Please provide all cancelled checks that were written for legal fees from 2012 to present on PE partnership accounts.

Response:

List of documents provided:

Item No. 3007

Description: There is an imbalance in credit card points between Yusuf Yusuf and Mafi Hamed, NejeH Yusuf and Willie Hamed and Mike Yusuf and Shawn Hamed.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): East, 4/30/13, 29900, V.I.B.I.R - GROSS RECEIPT 3/30/13 PAID W/YUSUF 6073/3791 MIKE C/C 3940 NEJEH C/C5222, \$158,381.20

Question/Request for Info: Are the credit card points reflected in the general ledger and if so, please provide that information. If the credit card points are not reflected on the general ledger, for the years 2012-2015, would you please account for the amounts paid to each of the following individual's credit cards – Fathi Yusuf, Yusuf Yusuf, Mike Yusuf, NejeH Yusuf, Wally Hamed, Willie Hamed, Mafi Hamed and Shawn Hamed.

Please provide the canceled checks showing payment of Fathi Yusuf, Yusuf Yusuf, Mike Yusuf, NejeH Yusuf, Wally Hamed, Willie Hamed, Mafi Hamed and Shawn Hamed credit cards.

Response:

List of documents provided:

Item No. 3008

Description: Need to determine whether United Corporation's franchise taxes and annual fees were paid using PE partnership funds.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): None

Question/Request for Info: Is there any reason or basis for using PE partnership funds to pay for United Corporation's franchise taxes and annual franchise fees?

For the years 2012-present, were PE partnership funds used to pay for the United Corporation's franchise taxes and/or annual fees?

Please provide canceled checks reflecting payment of United Corporation's franchise taxes and annual fees.

Response:

List of documents provided:

Item No. 3009/352

Description: Plaza Extra (PE) partnership funds were used to pay for the property insurance premiums for the United Shopping Center.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

STT – GL Account #13100:

6/30/12 – AJE01 – NET MONTHLY ACTIVITY \$55,435;

12/31/12 – NET MONTHLY ACTIVITY \$40,882;

5/21/13 – INTER OCEAN ISURANCE AGENCY - PROPERTY INSURANCE - STT 2013 \$101,045;

12/12/2013 – INTER OCEAN ISURANCE AGENCY - STORE INSURANCE \$77,887;

5/31/14 – PROPERTY INSURANCE RENEWAL FOR 2014-2015 PAID BY EAST \$91,028;

12/24/14 – INTER OCEAN ISURANCE AGENCY \$125,625

9/30/15, JE30-01, CUSTOMARY GRT/INSUR PAID BY PLAZA FOR SHOP CTR, \$119,529.01

Question/Request for Info: Is there any reason or basis for using PE partnership funds to pay the property insurance premiums of non-PE businesses operated by United Corporation?

Regardless of your answer, for the years 2012-2015, please provide the following:

- Support documentation (invoices) for transactions above
- Any other invoice(s) for property insurance not listed above
- Evidence of property insurance form
- Canceled checks showing payment of property insurance

Response:

List of documents provided:

Item No. 3010

Description: Vendor rebates (e.g., West Indies, Frito Lay/Pepsico, BJs, Associated Grocers, Tropical Shipping, Bellows and Hunter Foods)

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable)
GL Acct #58000

Question/Request for Info:

See attached requested vendor rebates previously emailed to you on 1/21/16 by VZ (see last page for the list). Please provide statements or invoices from vendor for items in list.

Response:

List of documents provided:

Item No. 3011

Description: Travel and Entertainment (T&E)

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable)

GL Acct #68200 Travel & Hotels Expense
GL Acct #64900 Meals & Entertainment

Question/Request for Info: For the years 2012-2015, please provide back-up documentation to support each travel and entertainment expense for every item in excess of \$500. Please include the back-up documentation that is required for tax verification of a business expense: airline ticket, hotel, restaurant, gas station, rental car, train, conference or trade show fees, etc. receipts.

Response:

List of documents provided:

Item No. 218

Description: Entry for Tutu Park Ltd for \$30,359.38

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): STT, 6/1/13, 38149, CDJ, TUTU PARK LTD, \$30,359.38

Question/Request for Info: Please describe what this entry references.

Please provide the canceled check, invoice and any other back up documentation that supports this entry.

Response:

List of documents provided:

Item No. 220

Description: Checks to Daytona Beach Market & Deli.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): STT, 5/25/13, 295456, PJ, DAYTONA BEACH MARKET AND DELI, \$15,000/5/27/13, 37866, CDJ, DAYTONA BEACH MARKET AND DELI - Invoice: 295456

STT, 10/18/2013, 2751, PJ, DAYTONA BEACH MARKET AND DELI, \$4,500/10/19/13, 38691, CDJ, DAYTONA BEACH MARKET AND DELI - Invoice: 2751

Question/Request for Info: Please describe what each of these entries references—this is an unfamiliar vendor.

Please provide the canceled checks, invoices and any other back up documentation that support each of these entries.

Response:

List of documents provided:

Item Nos. 221/223

Description: NejeH Yusuf entries.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): STT, 1/1/13, 01012012-CITI CARDS, PJ, NEJEH YUSUF, \$1,451.46/ 1/11/13, 37060, CDJ, NEJEH YUSUF - Invoice: 01012012-CITI CARDS

STT, 4/14/13, 2013-0419, PJ, NEJEH YUSUF, \$7,000/4/15/13, 37637, CDJ, NEJEH YUSUF - Invoice: 2013-0419

STT, 4/24/13, 04-24-2013, PJ, NEJEH YUSUF, \$5,641/STT, 4/15/13, 37637, CDJ, NEJEH YUSUF - Invoice: 2013-0419

STT, 4/24/13, 04-24-2013, PJ, NEJEH YUSUF - GUN SAFE, \$5,641.00

Question/Request for Info: Please describe what each of these entries references—this is an unfamiliar vendor.

Please provide the canceled checks, invoices and any other back up documentation that support each of these entries.

Response:

List of documents provided:

Item Nos. 246, 255, 260, 318

Description: Inventory sold/transferred to Seaside Market & Deli LLC (Seaside); PE resources used to ship inventory for Seaside; and discounted sales to Seaside.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 12/4/2014, 20141204, SJ, SEASIDE MARKET & DELI LLC, \$10,858.32

STT, 12/21/14, 1061, CRJ, SEASIDE MARKET & DELI LLC - Invoice: 20141204

West, 1/12/15, 1127, CRJ, SEASIDE MARKET & DELI LLC – Invoice: 20141229, \$13,359.40

Question/Request for Info: Please describe how inventory sold/transferred was accounted for between PE and Seaside.

Please describe how PE resources used (i.e. shipping containers, personnel, trucks) for Seaside were accounted.

Please describe how pricing for inventory sold/transferred to Seaside was determined.

Please provide the canceled checks, invoices and any other back up documentation for the following:

–Inventory sold/transferred to Seaside from PE West

–Use of PE resources for Seaside

–Pricing of PE inventory sold to Seaside

Response:

List of documents provided:

Item No. 253

Description: NejeH Yusuf used PE resources, such as shipping containers, for his own personal businesses.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): None

Question/Request for Info: Please describe how PE resources used for NejeH Yusuf's personal businesses were accounted.

Please provide the canceled checks, invoices and any other back up documentation for the use of PE resources, such as shipping containers, for NejeH Yusuf's personal businesses.

Response:

List of documents provided:

Item No. 265

Description: Hameds paid over \$300,000 out of pocket in criminal attorney's fees on behalf of PE ref: *US Gov. v United, et. al.*, 1:05-cr-15.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): N/A

Question/Request for Info:

Were expenses paid out of pocket by the Hameds on behalf of PE reimbursed or recorded as a payable to the Hameds in the general ledger? If so, please identify where on the general ledger this is recorded.

Please provide the canceled checks, invoices and any other back up documentation validating this item.

Response:

List of documents provided:

Item No. 272

Description: 2014 and 2015 taxes owed for Tutu Park Mall and the corresponding rent adjustments taken by United and Mr. Fathi Yusuf.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 10/6/15, 255, GENJ, TUTU PARK MALL 2014 R/E TAX RENT ADJUST, \$43,069.36/West, 10/6/15, 256, GENJ, UNITED CORP % RENT ADJ RE TUTU PARK MALL PMT, \$46,990.48

West, 12/17/31, 278, GENJ, TUTU PARK MALL (% RENT THRU 10/31/15), \$41,462.28/West, 12/17/31, 279, GENJ, FATHI YUSUF (TUTU MATCH % RENT), \$41,462.28

Question/Request for Info: Please explain why United Corporation claimed a rent adjustment in response to a 2014 tax payment for the PE Tutu Park Mall.

Please explain why United's rent adjustment taken in response to the 2014 tax payment for PE Tutu Park Mall was \$3,921.12 more than the tax payment.

Please explain why PE paid the full amount of 2015 taxes for the PE Tutu Park Mall when PE only owed 50% (\$20,731.14).

Please explain why Mr. Fathi Yusuf received a payment for the amount of the 2015 taxes for the PE Tutu Park Mall.

Please provide the canceled checks, invoices and any other back up documentation for the 2014 & 2015 tax payments to the Tutu Park Mall.

Please provide the canceled checks, invoices and any other back up documentation justifying the 2014 United rent adjustment and the 2015 rent adjustment taken by Mr. Yusuf.

Response:

List of documents provided:

Item No. 281

Description: NejeH Yusuf has a Bank of America credit card in PE STT's name with a balance of \$49,715.05

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): N/A

Question/Request for Info:

Who is responsible for this liability?

Is this liability recorded in the general ledger of PE?

Who makes the payments on this account?

Has the outstanding balance been paid and/or the account canceled? If so, please identify where it is reflected on the general ledger.

Please provide the canceled checks, bank statements, credit card statements, invoices and any other back up documentation validating this item.

Response:

List of documents provided:

Item No. 297

Description: Retirement bonus paid to Mary Gonzales (PE East) in the amount of \$28,899.28.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): None

Question/Request for Info: Please identify where Mary Gonzales' bonus payment is reflected on the general ledger.

Please provide the last date worked for Mary Gonzales.

Please provide the following:

- the canceled check for Mary Gonzales' bonus payment
- the last payroll canceled check Mary Gonzales' received
- the 2015 W2 for Mary Gonzales

Response:

List of documents provided:

Item No. 299

Description: Workers' compensation for PE East employees

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): N/A

Question/Request for Info: Were workers' compensation payments for PE East paid in full for 2015?

Please provide canceled checks, invoices and any other back up documentation for all 2015 workers compensation payments made for PE East.

Response:

List of documents provided:

Item No. 310

Description: Health permits for PE East employees

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): N/A

Question/Request for Info: Were the health permits for PE East employees paid in full for 2015?

Please provide the following:

- Health permits for all PE East employees in 2015
- Canceled checks for health permit payments for all PE East employees in 2015
- Invoices and any other back up documentation for health permits for PE East employees in 2015

Response:

List of documents provided:

Item No. 314

Description: Business license for PE East

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): None

Question/Request for Info: Was the business license for PE East paid in full for 2015?

Please provide the following:

-Canceled check(s) for the 2015 PE East business license

-Invoices and any other back up documentation for the 2015 PE East business license.

Response:

List of documents provided:

Item No. 331

Description: Car insurance for the car previously owned by PE STT

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): N/A

Question/Request for Info: Was the car insurance for the car previously owned by PE STT paid in full for 2015?

Please provide the following:

- Canceled check(s) for any car insurance for the PE STT car in 2014 and 2015
- Invoices and any other back up documentation for the 2014 and 2015 PE STT car insurance

Response:

List of documents provided:

Item No. 316

Description: Inventory moved from PE West to PE East after the final 2015 inventory was conducted for each store in anticipation of the splitting of the stores.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 1/31/15, SJE05, GENJ, BOOK MTD INVENTORY XFERS TO EAST PER SCHEDULE, \$57,959.92
West, 2/28/15, SJE05, GENJ, BOOK MTD INVENTORY XFERS TO EAST PER SCHEDULE, \$45,819.38
WEST, 3/8/15, SJE05, GENJ, BOOK MTD INVENTORY XFERS TO EAST PER SCHEDULE, \$51,245.11

Question/Request for Info: How was the inventory moved on 2/20/15 from PE West to PE East accounted for on the general ledger?

Explain the general ledger entries listed above for 2015.

Please provide all documents supporting the payment of inventory by PE East to PE West, including, but not limited to:

- Invoices
- Ferrol Trucking invoices for 2015
- Canceled check(s) evidencing payment to PE West for the 2/20/15 inventory

Please provide all documentation supporting the general ledger entries listed above for 2015.

Response:

List of documents provided:

Item No. 319

Description: BJ's wholesale club credit.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

- West, 7/21/15, 15-0701, BJ'S WHOLESAL CLUB - Invoice: 133853DM, \$5,632.57
- West, 15-0701, BJ'S WHOLESAL CLUB - Invoice: 313853, \$5,632.57
- West, 9/30/15, JE30-04, PJ, SCOTIA – MASTERCARD, \$5,632.57
- West, 10/1/15, 15-1001-02, CDJ, SCOTIA - MASTERCARD - Invoice: JE30-04, \$5,632.57
- West, 9/30/15, JE30-04, PJ, SCOTIA - MASTERCARD - CLEAR YUSUF/PSHIP DUE TO/FR ITEM IN TRADE AP, \$5,632.57

Question/Request for Info:

Please explain how credits from BJ's wholesale club work.

Please explain each entry listed above.

Was the \$5,632.57 BJ credit applied back to the PE partnership? If so, please identify where that is reflected on the general ledger.

Please provide the following:

- Bank statements, credit card statements, canceled checks, invoices and any other documentation that supports the general ledger entries listed above.
- Bank statements, credit card statements, canceled checks, invoices and any other documentation that demonstrates the funds were properly credited back to the PE partnership.

Response:

List of documents provided:

Item No. 334

Description: Voided and cancelled Point-of-Sale transactions

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): None

Question/Request for Info: How do you account for voided and cancelled Point-of-Sale transactions in the general ledger?

For the years 2012-2015, please provide documentation for all voided and cancelled Point-of-Sale transactions by store employee for each store and the corresponding journal entries, if any.

Response:

List of documents provided:

Item No. 335

Description: Expired/spoiled items included in the final 2015 inventory count for PE West

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): N/A

Question/Request for Info: Please explain why a credit for spoiled inventory items included in the 2015 final inventory was not given to PE West.

Response:

List of documents provided:

Item No. 242/339

Description: Cash withdrawals from the PE STT safe.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

Question/Request for Info: Please explain how the withdrawals identified in exhibits 242-a-- Expenditures by Nejez from large STT safe and 339-a--Cash withdrawals from STT safes are accounted for in the general ledger.

Please provide any back up documentation for withdrawals of this type reflected in the general ledgers for 2012-2015.

Response:

List of documents provided:

Item No. 340

Description: NejeH Yusuf's collection of rents from Triumphant church.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): N/A

Question/Request for Info: How were the amounts collected, as described in exhibit 340-a--Rent collected by NejeH from Triumphant Church, accounted for on the 2014-2015 general ledgers?

Response:

List of documents provided:

Item No. 352

Description: GRT/Insurance paid by PE for the United Shopping Center

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

East, 9/30/15, JE30-01, GENJ, ADJ CUSTOMARY GRT/INSUR PAID BY PLAZA FOR SHOP CTR,
\$119,529.01

Question/Request for Info: Please explain this entry – what is the basis for the contention that the PE partnership would pay the GRT and insurance for the United Shopping Center?

Please provide the following documentation:

- All documents related to the GRT paid as part of this general ledger entry, including, but not limited to canceled checks, bank and/or credit card statements, stamped VIBIR gross receipt tax forms, all monthly gross receipt amounts for the United Shopping Center covered in this entry
- All documents related to the insurance paid as part of this general ledger entry, including, but not limited to, canceled checks, bank and/or credit card statements, invoices, evidence of insurance forms
- Canceled PE check evidencing payment of the \$119,529.01

Response:

List of documents provided:

Item No. 353

Description: Unexplained payouts to Mr. Fathi Yusuf in 2015.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

STT, 9/30/15, JE30-01, GENJ, CLEAR YUSUF/PSHIP MISC DUE TO/FR ACCOUNTS ON 9/30, \$186,819.33

West, 9/30/15, JE30-03, GENJ, CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS, \$120,167.33

West, 9/30/15, JE03-30, GENJ, CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS, \$900,000

Question/Request for Info: Please describe what the general ledger item listed above is.

Please provide all documents substantiating the general ledger items listed above.

Response:

List of documents provided:

Item No. 355

Description: Withdrawal of \$2,784,706.25 by Mr. Fathi Yusuf from PE partnership funds.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): None

Question/Request for Info:

What account was the \$2,784,706.25 booked re the PE 2012 general ledger?

Please provide all documents substantiating this withdrawal by Mr. Yusuf.

Response:

List of documents provided:

Item No. 356

Description: 2012-2013 STT real estate taxes and rent adjustment for PE East.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 12/8/15, 270, GENJ, TUTU PARK PMT FOR 2012/13 R/E TAXES, \$79,009.87

West, 12/8/15, 271, GENJ, PLAZA EAST RENT ADJUST RE TUTU PARK 2012/13 R/E TAX, \$89,442.92

Question/Request for Info:

Please explain why PE East claimed a rent adjustment in response to 2012/2013 real estate tax payments for the PE Tutu Park Mall.

Please explain why PE East's rent adjustment taken in response to the 2012/2013 real estate tax payments for PE Tutu Park Mall was \$10,433.05 more than the tax payments.

Please provide the canceled checks, invoices and any other back up documentation for the 2012 & 2013 tax payments to the Tutu Park Mall.

Please provide the canceled checks, invoices and any other back up documentation justifying the 2012 & 2013 rent adjustment taken by PE East.

Response:

List of documents provided:

Item No. 357

Description: Payment of the Liquidating Partner's personal attorney for work done ostensibly for the PE partnership

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 12/17/15, 281, GENJ, DUDLEY TOPPER (PSHIP LIQUID LEGAL FEES), \$ 57,605.00

Question/Request for Info: Why did the PE partnership reimburse work done by Mr. Fathi Yusuf's personal attorneys?

Please provide the backup documentation for this entry, including: canceled check, invoices, Dudley Topper billing records, etc.

Response:

List of documents provided:

Item No. 358

Description: STT gift certificates purchased during PE partnership, but redeemed after the stores split.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): None

Question/Request for Info: Where is the reimbursement to KAC357, Inc. from the PE partnership for gift certificates identified in exhibit 358-a--Gift certificates from STT Tutu reflected on the 2015 PE partnership general ledger?

Please provide any documents substantiating payment of this claim.

Response:

List of documents provided:

Item No. 359/362

Description: Employee loans

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 7/17/13, 20130717, PJ, ABDELKRIM BOUCENNA - EMPLOYEE LOAN, \$2,000

West, 10/18/13, 20131018-LOAN, PJ Lissette Lima, \$4,000.00/West, 10/18/13, 6645, CDJ, LISSETTE LIMA - Invoice: 20131018-LOAN, \$4,000.00

West, 9/30/15, XJE30-05, GENJ, W/O EMP LOANS DUE TO POOR ACTG & EMP XFERS AFTER SPLIT, \$26,170.57

Question/Request for Info: Why are employee loans reflected as payables and not receivables?

Please explain the \$26,170.57 entry.

Please provide any documents substantiating payment these claims.

Response:

List of documents provided:

Item No. 360

Description: Approximately \$18 million in purged transactions for 2013.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 4/30/13, Accounts Payable-Trade, Total of purged transactions, \$4,287,321.11

Question/Request for Info: Why are all transactions from January 1, 2013-May 30, 2013 purged from the PE West general ledger?

Although fewer in number, why are there purged transactions after May 30, 2013?

Please provide backup documentation, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices for each voided transaction in 2013.

Response:

List of documents provided:

Item No. 361

Description: Unusually large amounts paid to Caribbean Refrigeration & Mech. - \$51,500, \$22,920.20 and \$21,000.00

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

- West, 6/5/13, 20130605, PJ, CARIBBEAN REFRIGERATION & MECH, \$51,500
- West, 8/5/13, 2135-A, PJ, CARIBBEAN REFRIGERATION & MECH, \$22,920.20
- West, 12/27/13, 3012, PJ, CARIBBEAN REFRIGERATION & MECH, \$21,000.00

Question/Request for Info:

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 363

Description: Miadden 2015 General Ledger entry, cumulatively over \$270,000 for 2012-2015

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 3/27/14, 201403241622916WT, CDJ, MIADDEN PLASTRIC, \$49,565.00

Question/Request for Info:

Please explain what these entries are.

Please provide all documentation supporting these entries (Miadden 2012-2015), including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 364

Description: General Ledger entry - 2013

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 3/31/13, SJ31, GENJ, COLLECTION OF SETALLMENT, \$42,969.98

Question/Request for Info:

Please explain what this entry is.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 365

Description: Foreign Taxes Paid – 2012-2014, multiple entries

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 7/1/12, GL Acct #80400 – Foreign Taxes Paid, \$12,532.17

Question/Request for Info:

Please explain what these entries are.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices.

Please provide all PE Merrill Lynch statements for 2012-2015

Response:

List of documents provided:

Item No. 366

Description: POS In-Store Charges for Seaside Market & Deli – multiple entries

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, GL Acct #13000 – POS In-Store Charges, 7/23/14, 0314, CRJ, SEASIDE MARKET & DELI LLC, \$ 11,659.90

Question/Request for Info:

Please explain what these entries are. What does it mean when it says “POS In-Store Charges”?

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, deposit slips, and invoices.

Response:

List of documents provided:

Item No. 367

Description: Change order, cash requisition listed on general ledger for all three PE stores – East, West and STT for 2012-2015

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): East, 12/31/13, SJ31-1, GENJ, AVISOS DEBITOS (CHANGE ORDER), \$7,010

East, 4/30/13, JE30, GENJ, Cash Requisition, \$14,000

West, 2/26/15, SJE26, GENJ CASH REQ., \$5,500

Question/Request for Info:

Please explain what these entries are for 2012-2015. What does it mean when it says “Change Order” and “Cash Requisition”?

Please provide all documentation supporting all of these entries for 2012-2015, including, but not limited to, canceled checks, bank statements, credit card statements, deposit slips, and invoices.

Response:

List of documents provided:

Item No. 368

Description: Ayman K. Al Khaled salary and benefits

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 1/19/13, DD-20205, PRJ, AYMAN K. AL KHALED, \$1,465.04 – multiple entries

Question/Request for Info: Why was Ayman K. Al Khaled paid salary, benefits and bonus out of PE partnership funds when he was working on the case against the Hameds and was a United Corporation employee? (See, Transcript of PI hearing, January 31, 2013, pp. 51-55)

Response:

List of documents provided:

Item No. 369

Description: "Credit card paid" entries – multiple entries for 2012-2015

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

Question/Request for Info:

For the years 2012-2015-

--For each credit card that was paid, but the owner of the card was not identified, please identify the owner.

-- Provide all documentation supporting all of these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices.

Response:

List of documents provided:

Item No. 370

Description: RDC Frozen Account – multiple entries 2012-2014

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): East, 9/10/13, JE-9-17, GENJ, to record RDC Frozen Account, \$350,000.00

Question/Request for Info: Please explain what is meant by “RDC Frozen Account.”

For the years 2012-2014, please provide all documentation supporting all of these RDC Frozen Account entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices.

Response:

List of documents provided:

Item No. 371

Description: Transfers from Scotiabank Telecheck accounts

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

Various

Question/Request for Info:

For 2012 – 2015, please provide backup for transfers and checks from the Telecheck accounts that were not paid to or deposited into to a PE bank account.

Response:

List of documents provided:

Item No. 372/379

Description: Misc. adjustments to employee loans per analysis and restore employee loans

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):
West, 7/31/13, XJE31-2, GENJ, RECORD MISC ADJ'S TO EMP LNS PER ANALYSIS, \$ 48,968.00
West, 2/28/13, JE32-02, GENJ, Restore Emp Loans to GL per Analysis, \$36,975.26
West, 2/28/13, JE32-02, GENJ, Restore Emp Loans to GL per Analysis, \$36,961.40

Question/Request for Info:

Please explain what the record "misc adj's to empl lns per analysis" means. Please explain what analysis was conducted.

Please explain what the records "restore emp loans to GL per analysis" means. Please explain what analysis was conducted.

Please provide all documentation supporting these three entries, including, but not limited to, the analysis, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 373

Description: 2015 General Ledger entries – “return check mutilated”

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 1/12/15, JE12, GENJ, RETURN CK MUTILATED, \$11,000
West, 1/15/15, JE 15, RETURN CHECK MUTILATED, \$7,000
West, 2/19/15, SJE 19, GENJ, RETURN CK MUTILATED, \$15,800
East, 1/15/15, JE15, GENJ, RET MUTILATED CK, \$20,000
East, 2/5/15, JE05, GENJ, RET CK MUTILATED

Question/Request for Info:

--What do these entries mean?

--What is the reference to Cash-Safe under account description for each of these entries mean?

--Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 374

Description: Cash – Transfer Clearing, Banco Proc Error Re Xfer

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 11/25/14, JE24, GENJ, BANCO PROC ERROR RE XFER, \$360,000

Question/Request for Info: Please explain what this entry is in detail.

–Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, deposit slips, transfer slips, and invoices

Response:

List of documents provided:

Item No. 375

Description: US Customs Exp Per Schedule

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 1/31/13, JE32-8, GENJ, RECL 50% OF 2013 US CUSTOMS EXP PER SCHEDULE, \$9,916.18 – 12 entries

Question/Request for Info: Please describe what these entries are.

--Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 376

Description: Merrill Lynch general ledger entries

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 12/31/13, SJE31-6, GENJ, Post Y/E Merrill Lynch Activity, \$1,812,990.41
West, 12/31/13, SJE31-6, GENJ, Post Y/E Merrill Lynch Activity, \$1,611,901.72
West, 12/31/13, SJE31-6, GENJ, Post Y/E Merrill Lynch Activity, \$338,145.63
West, 12/31/13, SJE31-6, GENJ, Post Y/E Merrill Lynch Activity, \$135,084.71
West, 8/17/15, JE17, GENJ, MERRILL LYNCH ACCOUNT CLOSURE, \$336,378.45

Question/Request for Info:

Please explain these entries.

Please provide all documentation supporting these entries, including, but not limited to, investment statements for 2012-2015 for these accounts, canceled checks, bank statements and invoices.

Response:

List of documents provided:

Item No. 377

Description: Daas Corp. loan

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

STT, 3/8/13, SJ8-1, GENJ, DAAS CORP LOAN REPAYMENT, \$327,500.00

STT, 3/8/13, SJ8-2, GENJ, RECLASS DAAS PMT TO INTRACO WEST ACCT, \$327,500.00

West, 3/31/13, JE31-5, GENJ, ADJ DAAS N/R PMT REC'D IN STT FOR WEST, \$327,500.00

Question/Request for Info:

Please explain these entries in detail, including why the payment was moved from STT to West.

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 378

Description: Due from Yusuf \$639,242

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

GL Acct #13500

West store – 12/31/12 NET MONTHLY ACTIVITY \$581,475

West store – 12/31/12 NET MONTHLY ACTIVITY \$111,767

Question/Request for Info:

Please explain what these entries means.

Please provide all documentation supporting this entry, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 380

Description: Reclassification of partnership income in 2013 and 2014

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West store – 12/31/14 – XJE31-10 – RECORD 2013 PROFIT XFER TO NEW PLAZA PSHIP ENTITY
\$5,354,159

West store – 12/31/14 – XJE31-11 – RECORD XFER OF DIV DISTRIB'S BY EAST AND POST
AGAINST WEST PSHIP LIAB \$8,751,671

West store – 12/31/14 – XJE31-14 – RECLASS 2014 PLAZA PSHIP NET INCOME TO PSHIP LIAB
\$7,603,885

Question/Request for Info:

Please explain this general ledger notation.

Why was the partnership income for 2013 and 2014 reclassified?

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 381

Description: Transactions on the general ledger without descriptions.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 1/12/14, 7195, CDJ, no description, \$19,861.00

West, 6/9/14, 8061, CDJ, ~~no~~ description, \$ 6,142.33

Question/Request for Info: For all general ledger entries in 2012-2015 that don't have a description, please provide a description and an explanation of what each item is.

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 382

Description: Check no. 1406 on PE West credit card account – the check is missing

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

Question/Request for Info: Why is check 1406 missing – it appears that it did not clear the general ledger.

Response:

List of documents provided:

Item No. 383

Description: Nominal cash recon adjustment entries on the general ledger for 2012-2014

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): East, 1/1/13, JE01-2, GENJ, Nominal 2012 Cash Recon Adjustment, \$4,151.27

Question/Request for Info: Please provide an explanation of what this and other similar entries mean.

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 384

Description: Accrue 2012 rent as directed by legal listed on the 2013 general ledger

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): East, SJE105B, GENJ, ACCRUE 2012 RENT AS DIRECTED BY LEGAL, \$678,549.00

Question/Request for Info:

Please explain this entry – what does it mean?
Why was the accrual for the 2012 rent done in 2013?
How was the amount determined?

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 385

Description: Law offices of KG Cameron

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

East, 9/16/13, 20297, PJ, LAW OFFICES OF K.G. CAMERON, \$14,995.26

East, 2/21/14, 20306 12/20/2013, LAW OFFICES OF K.G. CAMERON - PMT. ON INVOICE# 20306,
12/20/2013 FOR SERVICES THROUGH 11/30/2013

Question/Request for Info:

Why was counsel for Yusufs in lawsuit against Hameds shown on the general ledger as being paid with PE partnership funds?

Were any PE partnership funds actually used to pay the Law Offices of K.G. Cameron at any time during 2012-2015?

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts, billing records and invoices.

Response:

List of documents provided:

Item No. 386

Description: Temp GL Acct #10300 Deposit Adjustment

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

East, 1/3/13, TR03, GENJ, TEMP 10300 DEPOSIT ADJUSTMENT, \$300,000
East, 1/9/13, TR09, GENJ, TEMP 10300 DEPOSIT ADJUSTMENT, \$150,000
East, 1/11/13, TR11, GENJ, TEMP 10300 DEPOSIT ADJUSTMENT, \$400,000
East, 1/23/13, TR23, GENJ, TEMP 10300 DEPOSIT ADJUSTMENT, \$360,000
East, 1/25/13, TR24, GENJ, TEMP 10300 DEPOSIT ADJUSTMENT, \$200,000
East, 1/31/13, TR31, GENJ, TEMP 10300 DEPOSIT ADJUSTMENT, \$300,000

Question/Request for Info:

Please explain these entries.

Why are these adjustments so large?

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 388

Description: Due to/from Shopping Center \$900,000

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

GL Acct #33000 Dividends distribution

GL Acct #14000 Due to Yusuf

GL Acct #14500 Due to Shopping center

West Store -12/31/14 - XJE31-13 RECORD XFER OF 62% OF BYORDER INVEST FR SHOPPING CTR TO PLAZA \$543,210

West Store - 12/31/14 - XJE31-12 BYORDER 2014 DISTRIB'S TO M HAMED BY SHOP CTR AND MATCH LIAB FR PLAZA TO F YUSUF \$282,720

Question/Request for Info:

Response:

List of documents provided:

Item No. 390

Description: Alamnai Co. 2014 general ledger entries

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 3/17/14, NYAA9878, PJ, ALAMNAI CO, \$37,629.00

West, 3/17/14, 7661, CDJ, ALAMNAI CO - Invoice: NYAA9878, \$37,629.00

Question/Request for Info:

Please explain these entries.

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 391

Description: Adjust Due To/From Accounts per Schedule 2013 & 2015 general ledger entries

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 2/28/13, JE32-03, GENJ, Adjust Due To/From Accounts per Schedule, \$33,476.14

West, 9/30/15, JE30-05, GENJ, Clear MISC HAMED/PSHIP DUE TO/FR ACCOUNTS, \$183,381.91

West, 3/31/15, JE30-05, GENJ, CLEAR MISC HAMED/PSHIP DUE TO/FR ACCOUNTS, \$24,700.00

Question/Request for Info: Please explain what entries are.

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 392

Description: Carol's Newspaper Distribution

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): Multiple 2015 entries on the general ledger

Question/Request for Info:

Why was Carol's Newspaper distribution being paid when the business is suspected of stealing from the PE partnership?

Response:

List of documents provided:

Item No. 393

Description: Cash Reques 2015 general ledger entry

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West. 3/9/15, SJE09, GENJ, CASH REQUES, \$1,000

West, 2/26/15, SJE26, GENJ, CASH REQ., \$5,500.00

Question/Request for Info:

Please explain what these entries are.

Please provide all documentation supporting these entries, including, but not limited to canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 394

Description: 2015 General Ledger entry

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): East, 3/30/15, 100745, CDJ, AT&T MOBILITY - Invoice: 287004749208X0321201, \$387.34

Question/Request for Info:

Please explain what this entry is.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 395

Description: 2015 General Ledger entry – cash on hand

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 3/31/15, XJE31-01, GENJ, HAMED DISTRIB FOR CASH ON HAND, \$10,000.00

West, 3/31/15, XJE31-01, GENJ, HAMED DISTRIB FOR CASH ON HAND, \$11,450.00

Question/Request for Info: Please explain these entries—what are they? What does they cover?

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 396

Description: JKC Communication 2015 general ledger entries

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 1/13/15, 9455, CDJ, JKC COMMUNICATION, \$13,500.00

West, 1/14/15, 9458 CDJ, JKC COMMUNICATION, \$13,500.00

Question/Request for Info:

Please explain what these entries are – what did these cover?

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 397

Description: House of Printing 2015 general ledger entry

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 1/13/15, 9458, CDJ, House of Printing, \$860.00

Question/Request for Info:

Please explain what this entry covers.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 398

Description: Foampack 2015 general ledger entry

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 2/27/15, 9813, CDJ, FOAMPACK, \$1,257.05

Question/Request for Info:

Please explain what this entry covers.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 399

Description: Scotia Account Closures on 2015 general ledger

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 7/9/15, JE09, GENJ, ALL SCOTIA ACCOUNTS CLOSURES (ADJ West 2918), \$28,029.86

West, 7/9/15, JE09, GENJ, ALL SCOTIA ACCOUNTS CLOSURES, \$587,142.31

Question/Request for Info:

Please explain what these entries cover.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 400

Description: Fathi Yusuf Matching Draw on 2015 general ledger

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 7/10/15, 209, GENJ, FATHI YUSUF MATCHING DRAW, \$644,301.32

Question/Request for Info:

Please explain what this entry covers—what items does the \$644,301.32 cover?

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 401

Description: United Corporation 2015 general ledger entries.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West, 263, GENJ, UNITED CORPORATION, \$86,604.00

West, 12/17/15 UNITED CORP (NOV AP AGING TOTAL), \$37,827.00

Question/Request for Info:

Please explain what these entries cover

--what items does the \$86,604.00 cover?

--what is the \$37,827 for?

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 402

Description: Mr. Fathi Yusuf refund of overpayment on 2015 general ledger

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):
West, 7/14/15, JE14, GENJ, YUSUF REFUND OF OVERPMT, \$77,335.62

Question/Request for Info:

Please explain what this entry covers—what items does the \$77,335.62 cover?

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 403

Description: By Order entry on 2015 general ledger

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable): West, 9/30/15, JE31, GENJ, ADJ BYORDER 2015 FULL SETTLE BY SHOP CRT AS DIV, \$260,490.72

Question/Request for Info:

Please explain what this entry is.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No.404

Description: PAYMENT UNITED CORPORATION

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):
East Store GL Acct #28600 11/5/2015 CRA CK 263 PAYMENT UNITED CORPORATION \$89,604
East Store GL Acct #28600 12/17/2015 – UNITED CORP (NOV AP AGING TOTAL) \$30,827

Question/Request for Info:

Please explain why these payments were made?

Please provide all documentation supporting this entry, including, but not limited to, canceled checks and invoices

Response:

List of documents provided:

Item No.405

Description: Misc. adjustments

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West store – GL Acct #25800 – 9/30/2015 – JE30-05 – CLEAR MISC HAMED/PSHIP DUE TO/FR ACCOUNTS \$39,788.4

West store – GL Acct #33000 – 3/31/2015 – XJE31-02 – HAMED DISTRIB FOR TRADE AR \$11,272.96

Question/Request for Info:

Please explain what these entries cover.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices

Response:

List of documents provided:

Item No. 406

Description: There were several transactions recorded from the Cash – Safe to Hamed

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):
West store – 3/31/2015 – XJE31-01/Hamed Distribution for Cash on Hand/ \$10,000 and \$11,500.

Question/Request for Info:
Please explain and provide support for this entry in order for us to confirm its validity.

Response:

List of documents provided:

Item No. 407

Description: There several accounts payable recognized to United Corporation which aggregate to approximately to \$215,734.61 from the period from 4/29/15 to 7/31/15.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West/ 4/29/15 -7/31/15/ 2015-0429-01;2015-0429-02;2015-0429-03;2015-0514-01;2015-0525-01;2015-0527-01;2015-0527-02;2015-0527-03;2015-0624-01;20150624-02;2015-0624-03;2015-0625-01;2015-0701-01;2015-0701-02;2015-0701-03;2015-0701-04;2015-0701-05;2015-0701-06;2015-0724-01;2015-0731-01;2015-0731-02;2015-0731-03 / Accounts Payable/ United Corporation

Question/Request for Info:

Please explain and provide support for this entry in order for us to confirm its validity.

Response:

List of documents provided:

Item No. 408

Description: There was an entry for \$176,353.61 with vague or general description which we would need support for and/or explanation.

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

WEST / 9/30/2015 / JE30-02 / GENJ / Cash – Bank Telch 9/30

Question/Request for Info:

Please explain and provide support for this entry in order for us to confirm its validity.

Response:

List of documents provided:

Item No. 409

Description: There were several adjusting entries reducing the bank accounts

General Ledger-Store, Date, Entry No. & Description [as an example] (if applicable):

West store – 9/30/2015/JE09/Cash Bank CC/ Close East Banco 3307 Into West Banco 9091 CRA
\$186,820.63

West store – 1/5/2015/ Cash – Bank Op'g 8830/Plaza Extra (St. Thomas) \$140,823.53.

West store – 7/09/2015/JE09 GENJ/ Close Banco 6269 into Banco 9091\$509,910.07

Question/Request for Info:

Support and documentation would be necessary in order to determine that cash was actually transferred to the proper cash account and that the transaction was authorized by all parties and valid.

Response:

List of documents provided:

Please provide the following previously requested documents:

Missing monthly bank statements

Store	Bank	Acct #	Acct Type	GL	Months Missing
2012					
St.Thomas	Scotiabank	N/A	Operating	10300	Jan - Dec 2012
West	Banco Popular	191-256269	Operating	10300	Jan - Nov 2012
East	Banco Popular	191-148830	Operating	10300	Jan - Nov 2012
St.Thomas	Banco Popular	192-026143	Credit Card	10400	Jan - Nov 2012
West	Banco Popular	191-063789	Credit Card	10400	Jan - Nov 2012
East	Banco Popular	191-013307	Credit Card	10400	Jan - Nov 2012
West	Scotiabank	058-60092918	Telecheck	10500	Jan - Dec 2012
East	Scotiabank	058-60086413	Telecheck	10500	Jan - Dec 2012
St.Thomas	Scotiabank	044-55356719	Telecheck	10500	Jan - Dec 2012
2013					
St.Thomas	Scotiabank	N/A	Operating	10300	Jan - Dec 2013
West	Scotiabank	058-60092918	Telecheck	10500	Jan - Apr 2013, July - Dec 2013
East	Scotiabank	058-60086413	Telecheck	10500	July - Dec 2013
St.Thomas	Scotiabank	044-55356719	Telecheck	10500	Jan - Dec 2013
2014					
St.Thomas	Scotiabank	N/A	Operating	10300	Jan - Dec 2014
East	Scotiabank	058-60086413	Telecheck	10500	Feb 2014
2015					
St.Thomas	Scotiabank	N/A	Operating	10300	Jan - Dec 2015
West	Banco Popular	191-256269	Operating	10300	Aug - Dec 2015
East	Banco Popular	191-148830	Operating	10300	Aug - Dec 2015
St.Thomas	Banco Popular	192-026143	Credit Card	10400	Aug - Dec 2015
West	Banco Popular	191-063789	Credit Card	10400	Sept - Dec 2015
East	Banco Popular	191-013307	Credit Card	10400	Aug - Dec 2015
West	Scotiabank	058-60092918	Telecheck	10500	Aug - Dec 2015
East	Scotiabank	058-60086413	Telecheck	10500	April 2015, July - Dec 2015
St.Thomas	Scotiabank	044-55356719	Telecheck	10500	Jan - Mar 2015, May 2015, Aug - Dec 2015

The following bank statements were missing the attached copies of cancelled checks:

Store	Bank	Acct #	Acct Type	GL	Months Missing
2012					
St.Thomas	Scotiabank	N/A	Operating	10300	Jan - Dec 2012
West	Banco Popular	191-256269	Operating	10300	Jan - Nov 2012
East	Banco Popular	191-148830	Operating	10300	Jan - Nov 2012
Store	Bank	Acct #	Acct Type	GL	Months Missing
2013					
St.Thomas	Scotiabank	N/A	Operating	10300	Jan - Dec 2013
West	Banco Popular	191-256269	Operating	10300	Aug - Dec 2013
East	Banco Popular	191-148830	Operating	10300	Aug - Dec 2013
2014					
St.Thomas	Scotiabank	N/A	Operating	10300	Jan - Dec 2014
West	Banco Popular	191-256269	Operating	10300	Jan - Dec 2014
East	Banco Popular	191-148830	Operating	10300	Jan - Dec 2014
2015					
St.Thomas	Scotiabank	N/A	Operating	10300	Jan - Dec 2015
West	Banco Popular	191-256269	Operating	10300	Jan - Dec 2015
East	Banco Popular	191-148830	Operating	10300	Jan - Dec 2015

Requested vendor rebates

Date	Store	Vendor	GL	Amount
3/13/2013	West	Tropical Shipping	58000	\$ 163,172.88
10/27/2015	West	Tropical Shipping	58000	293,614.74
4/6/2015	West	Associated Grocers	58000	35,238.65
4/6/2015	West	Associated Grocers	58000	35,238.65
12/29/2014	West	Associated Grocers	58000	35,238.65
7/8/2014	West	Food Warehouse	58000	30,663.76
3/6/2013	St.Thomas	Tropical Shipping	58000	153,803.70
3/27/2014	St.Thomas	Tropical Shipping	58000	166,553.64
3/31/2013	East	Tropical Shipping	58000	163,172.88
3/20/2013	East	Associated Grocers	58000	35,319.51
3/7/2013	West	DAILY POS ENTRY	58000	79,982.38
2/2/2014	West	DAILY POS ENTRY	58000	34,456.56
4/7/2014	West	DAILY POS ENTRY	58000	36,368.16
4/15/2014	West	DAILY POS ENTRY	58000	329,423.79
7/10/2014	East	DAILY POS ENTRY	58000	22,754.00
10/23/2014	East	DAILY POS ENTRY	58000	18,000.00
5/9/2013	St.Thomas	DAILY POS ENTRY	58000	26,902.00

D-2

Item No. 359/362

Description: Employee Loans

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
60700	Bad Debts Expense	9/30/15	XJE30-05	GENJ	W/O EMP LNS DUE TO FAULTY ACTG COMPLICATED BY EMP XFERS AFTER SPLIT	6,950.49		East
13400	Due from Employees - Loans	9/30/15	XJE30-05	GENJ	W/O EMP LNS DUE TO FAULTY ACTG COMPLICATED BY EMP XFERS AFTER SPLIT		6,950.49	East

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices

Response:

List of documents provided:



Item No. 376

Description: Merrill Lynch general ledger entries

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	2/11/15	314974	PJ	MERRILL LYNCH		27,438.12	STT
29900	Suspense	2/11/15	314974	PJ	MERRILL LYNCH - PAID BJ'S WHOLESALE CLUB	27,438.12		STT
10300	Cash - Bank Op'g 2010	2/16/15	41263	CDJ	MERRILL LYNCH		27,438.12	STT
20000	Accounts Payable - Trade	2/16/15	41263	CDJ	MERRILL LYNCH - Invoice: 314974	27,438.12		STT

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 410

Description: 50/50 distribution for cash on hand for STR auction and 50/50 distribution for land

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10000	Cash - Petty	4/30/15	XJE30-01	GENJ	50/50 DISTRIB FOR CASH ON HAND DUE TO STR AUCTION		10,000.00	STT
10100	Cash - Registers	4/30/15	XJE30-01	GENJ	50/50 DISTRIB FOR CASH ON HAND DUE TO STR AUCTION		5,000.00	STT
10200	Cash - Safe	4/30/15	XJE30-01	GENJ	50/50 DISTRIB FOR CASH ON HAND DUE TO STR AUCTION		35,000.00	STT
33000	Dividend Distributions	4/30/15	XJE30-01	GENJ	50/50 DISTRIB FOR CASH ON HAND DUE TO STR AUCTION	25,000.00		STT
33000	Dividend Distributions	4/30/15	XJE30-07	GENJ	50/50 DISTRIB OF LAND DUE TO O/S AGRMT / DISPUTED	165,000.00		STT
17000	Land	4/30/15	XJE30-07	GENJ	50/50 DISTRIB OF LAND DUE TO O/S AGRMT / DISPUTED		330,000.00	STT

Question/Request for Info:

- Please explain what the entry "50/50 DISTRIB FOR CASH ON HAND DUE TO STR AUCTION" means.
- Please explain what the entry "50/50 DISTRIB OF LAND DUE TO O/S AGRMT / DISPUTED" means.
- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts, and invoices.

Response:

List of documents provided:

Item No. 411

Description: Accrued accounting fees to complete 2015 year-end taxes

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
60000	Accounting Fees	9/30/15	XJE30-10	GENJ	ACCRUE EST'D ACTG FEES TO COMPLETE 2015 Y/E TAX	5,438.33		East
23000	Accrued Expenses	9/30/15	XJE30-10	GENJ	ACCRUE EST'D ACTG FEES TO COMPLETE 2015 Y/E TAX		5,438.33	East
60000	Accounting Fees	9/30/15	XJE30-10	GENJ	ACCRUE EST'D ACTG FEES TO COMPLETE 2015 Y/E TAX PER JUDGE ROSS	5,438.33		STT
23000	Accrued Expenses	9/30/15	XJE30-10	GENJ	ACCRUE EST'D ACTG FEES TO COMPLETE 2015 Y/E TAX PER JUDGE ROSS		5,438.33	STT
60000	Accounting Fees	9/30/15	XJE30-10	GENJ	ACCRUE EST'D ACTG FEES TO COMPLETE Y/E TAX FILINGS PER JUDGE ROSS	5,438.34		West
23000	Accrued Expenses	9/30/15	XJE30-10	GENJ	ACCRUE EST'D ACTG FEES TO COMPLETE Y/E TAX FILINGS PER JUDGE ROSS		5,438.34	West

Question/Request for Info:

- Please explain what these entries mean.
- Please identify the accounting firm who will or has billed for the 2015 partnership taxes.

Please provide the 2015 year-end partnership taxes stamped by the VIRB.
 Please provide all accounting invoices, if received, supporting these entries.
 Please provide all documents supporting these entries.

Response:

List of documents provided:

Item No. 412

Description: Accounting error for Tropical Shipping invoices

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
28600	Pship Claims Reserve Clearing	9/30/15	JE30-02	GENJ	ACTG ERROR RE TROP SHIPG DISPUTED INVOICES PAID FOR KAC357 BY PSHIP		10,242.00	STT
29900	Suspense	9/30/15	JE30-02	GENJ	ACTG ERROR RE TROP SHIPG DISPUTED INVOICES PAID FOR KAC357 BY PSHIP	10,242.00		STT
51000	COS - Freight Expense	9/30/15	JE30-02	GENJ	CORRECT TROP SHIPG INV'S CHARGED TO PSHIP THAT BELONG TO KAC357		10,242.00	STT
29900	Suspense	9/30/15	JE30-02	GENJ	CORRECT TROP SHIPG INV'S CHARGED TO PSHIP THAT BELONG TO KAC357	10,242.00		STT

Question/Request for Info:

- Please explain the accounting error in the entry above.
- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documents that support this entry, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts, and invoices.

Response:

List of documents provided:

Item No. 413

Description: ByOrder adjustment for 2015

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
33000	Dividend Distributions Due from (to) Shopping	3/31/15	JE31	GENJ	ADJ BYORDER 2015 FULL SETTLE BY SHOP CTR AS DIV	130,245.36		West
14500	Ctr	3/31/15	JE31	GENJ	ADJ BYORDER 2015 FULL SETTLE BY SHOP CTR AS DIV		260,490.72	West

Question/Request for Info:

- Please explain what these entries mean.
- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 414

Description: Adjust cash on hand to count on 3/11/15

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10200	Cash - Safe	3/31/15	JE31	GENJ	ADJUST CASH ON HAND TO COUNT ON 3/11/15	24,934.18		East
	Other							
80000	Income (Expense)	3/31/15	JE31	GENJ	ADJUST CASH ON HAND TO COUNT ON 3/11/15		24,934.18	East

Question/Request for Info:

- Please explain what the entry "ADJUST CASH ON HAND TO COUNT ON 3/11/15" means.
- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 415

Description: Clearing Banco irregularities

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10900	Cash - Transfer	6/30/15	JE30	GENJ	CLEAR ALL BANCO IRREGULARITIES DUE TO TIME CONSTRAINTS		8,481.58	West
80000	Other Income (Expense)	6/30/15	JE30	GENJ	CLEAR ALL BANCO IRREGULARITIES DUE TO TIME CONSTRAINTS	8,481.58		West

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks and bank statements.

Response:

List of documents provided:

Item No. 416

Description: Balance sheet balances closed for insurance items to expedite close

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
21700	AFLAC W/H & Payable	6/30/15	JE30	GENJ	CLEAR BAL SHEET PR INSUR ITEMS TO EXPEDITE CLOSE		2,399.51	East
21800	CIGNA W/H & Payable	6/30/15	JE30	GENJ	CLEAR BAL SHEET PR INSUR ITEMS TO EXPEDITE CLOSE		49,179.82	East
63000	Insurance - Emp Health	6/30/15	JE30	GENJ	CLEAR BAL SHEET PR INSUR ITEMS TO EXPEDITE CLOSE	51,569.11		East

Question/Request for Info:

- For each entry, please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 417

Description: Accounting entries to "clear misc Yusuf/Pship Due to/fr accounts"

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10400	Cash - Bank CC 3307	9/30/15	JE30-02	GENJ	CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS ON 9/30		176,353.61	East
28600	Pship Claims Reserve Clearing	9/30/15	JE30-02	GENJ	CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS ON 9/30	176,353.61		East
28600	Pship Claims Reserve Clearing	9/30/15	JE30-03	GENJ	CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS	197,061.33		West
28600	Pship Claims Reserve Clearing	9/30/15	JE30-03	GENJ	CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS	343,314.01		West
29900	Suspense Deposit Error	9/30/15	JE30-03	GENJ	CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS	239,457.33		West
25800	Suspense	9/30/15	JE30-04	GENJ	CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS ON 9/30	193,649.63		East
28600	Pship Claims Reserve Clearing	9/30/15	JE30-04	GENJ	CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS ON 9/30		193,649.63	East

Question/Request for Info:

- For each entry, please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 418

Description: United reimbursement to Hamed of 7/13 overpayment.

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
33000	Dividend Distributions	7/14/15	JE14	GENJ	UNITED CK 1815 TO M HAMED TO REIMB 7/13 OVERPMT		38,667.81	West

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 419

Description: Combined services inv dtd 2/24/15 paid on behalf of East

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10600	Cash - Bank Claims 9091	4/2/15	101	GENJ	COMBINED SERVICES INV DTD 2/24/15 PAID ON BEHALF OF EAST DUE TO MAFI REFUSAL		4,010.00	West
10600	Cash - Bank Claims 9091	4/2/15	102	GENJ	MARCO STX INV DTD 2/24/15 PAID ON BEHALF OF EAST DUE TO MAFI REFUSAL		925.00	West
28600	Pship Claims Reserve Clearing	4/2/15	102	GENJ	MARCO STX INV DTD 2/24/15 PAID ON BEHALF OF EAST DUE TO MAFI REFUSAL	925.00		West

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amounts.
- Please explain what these entries mean.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 420

Description: CRA check 215 to reimburse KAC357 for STT deposit errors

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
25800	Deposit Error Suspense	7/14/15	215	GENJ	CRA CK 215 REIMB TO KAC357 FOR STT DEP ERR'S	181,355.40		STT
28600	Pship Claims Reserve Clearing	7/14/15	215	GENJ	CRA CK 215 REIMB TO KAC357 FOR STT DEP ERR'S		181,355.40	STT

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 421

Description: Daily (United C. CK)

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
80000	Other Income (Expense)	2/25/15	SJ25	GENJ	DAILY (UNITED C. CK)		9,592.44	East

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.
- Please describe what this entry means.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 422

Description: Excess cash over \$50k per court order

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10300	Cash - Bank Op'g 8830	3/18/15	JE18	GENJ	EXCESS CASH OVER \$50K PER COURT ORDER	44,399.63		East
10200	Cash - Safe	3/18/15	JE18	GENJ	EXCESS CASH OVER \$50K PER COURT ORDER		44,399.63	East

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.
- Please describe what this entry means.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 423

Description: Prepayment of insurance

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
63200	Insurance - Gen Liability	9/30/15	XJE30-04	GENJ	EXP PREPAID INSUR & TREAT ANY REFUND AS PSHIP INC	15,990.39		East
63200	Insurance - Gen Liability	9/30/15	XJE30-04	GENJ	EXPENSE PREPAID INSUR & TREAT ANY REFUND AS PSHIP INCOME	15,990.40		West
63200	Insurance - Gen Liability	9/30/15	XJE30-04	GENJ	EXPENSE PREPAID INSUR & TREAT ANY REFUND AS PSHIP INCOME	73,281.25		STT
63400	Insurance - Property	9/30/15	XJE30-04	GENJ	EXP PREPAID INSUR & TREAT ANY REFUND AS PSHIP INC	15,338.78		East
63400	Insurance - Property	9/30/15	XJE30-04	GENJ	EXPENSE PREPAID INSUR & TREAT ANY REFUND AS PSHIP INCOME	18,629.71		West
13100	Prepaid Insurance	9/30/15	XJE30-04	GENJ	EXP PREPAID INSUR & TREAT ANY REFUND AS PSHIP INC		31,329.17	East
13100	Prepaid Insurance	9/30/15	XJE30-04	GENJ	EXPENSE PREPAID INSUR & TREAT ANY REFUND AS PSHIP INCOME		34,620.11	West
13100	Prepaid Insurance	9/30/15	XJE30-04	GENJ	EXPENSE PREPAID INSUR & TREAT ANY REFUND AS PSHIP INCOME		73,281.25	STT

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.
- Please identify any refunds that were given as a result of the prepayment of the insurance.
- If refunds were given, please show how the refund was distributed between the partners and provide documentation of that distribution.

Please provide all documentation supporting these entries and any refunds, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 424

Description: 2015 General Ledger entry – cash on hand

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10200	Cash - Safe	3/31/15	XJE31-01	GENJ	HAMED DISTRIB FOR CASH ON HAND		28,550.00	West
33000	Dividend Distributions	3/31/15	XJE31-01	GENJ	HAMED DISTRIB FOR CASH ON HAND	50,000.00		West

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 425

Description: 2015 Accounts Payable-Trade to John Gaffney

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	1/1/15	0001027	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	1/21/15	9499	CDJ	JOHN GAFFNEY - Invoice: 102914-1285-25	5.75		West
20000	Accounts Payable - Trade	1/21/15	102914-1285-25	PJ	JOHN GAFFNEY		5.75	West
20000	Accounts Payable - Trade	1/21/15	9499	CDJ	JOHN GAFFNEY - Invoice: 3155	20.00		West
20000	Accounts Payable - Trade	1/21/15	3155	PJ	JOHN GAFFNEY		20.00	West
20000	Accounts Payable - Trade	1/21/15	9499	CDJ	JOHN GAFFNEY - Invoice: 0001027	1,000.00		West
20000	Accounts Payable - Trade	1/21/15	9499	CDJ	JOHN GAFFNEY - Invoice: 001026A	351.33		West
20000	Accounts Payable - Trade	1/29/15	42846360820-0096	PJ	JOHN GAFFNEY		17.25	West
20000	Accounts Payable - Trade	2/3/15	9594	CDJ	JOHN GAFFNEY - Invoice: 42846360820-0096	17.25		West
20000	Accounts Payable - Trade	2/1/15	001028	PJ	JOHN GAFFNEY		1,150.00	West
20000	Accounts Payable - Trade	2/9/15	9616	CDJ	JOHN GAFFNEY - Invoice: 001028	1,150.00		West
20000	Accounts Payable - Trade	3/1/15	0001029	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	3/2/15	9816	CDJ	JOHN GAFFNEY - Invoice: 0001029	1,000.00		West

Question/Request for Info:

- Please describe the purpose of the routine \$1,000 payments.

Please provide all documentation supporting *each* of these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 426

Description: 2014 Accounts Payable-Trade to John Gaffney

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	1/1/14	0001015	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	1/2/14	7186	CDJ	JOHN GAFFNEY - Invoice: 0001015	1,000.00		West
20000	Accounts Payable - Trade	2/1/14	0001016	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	2/11/14	7416	CDJ	JOHN GAFFNEY - Invoice: 0001016	1,000.00		West
20000	Accounts Payable - Trade	3/1/14	0001017	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	3/10/14	7552	CDJ	JOHN GAFFNEY - Invoice: 0001017	1,000.00		West
20000	Accounts Payable - Trade	4/1/14	0001018	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	4/2/14	7675	CDJ	JOHN GAFFNEY - Invoice: 0001018	1,000.00		West
20000	Accounts Payable - Trade	5/1/14	0001019	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	5/9/14	7895	CDJ	JOHN GAFFNEY - Invoice: 0001019	1,000.00		West
20000	Accounts Payable - Trade	6/1/14	0001020	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	6/5/14	8032	CDJ	JOHN GAFFNEY - Invoice: 0001020	1,000.00		West
20000	Accounts Payable - Trade	7/1/14	0001021	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	7/8/14	8175	CDJ	JOHN GAFFNEY - Invoice: 0001021	1,000.00		West

20000	Accounts Payable - Trade	8/1/14	8410	CDJ	JOHN GAFFNEY - Invoice: 0001022	1,000.00	West
20000	Accounts Payable - Trade	8/1/14	0001022	PJ	JOHN GAFFNEY	1,000.00	West
20000	Accounts Payable - Trade	9/1/14	0001023	PJ	JOHN GAFFNEY	1,000.00	West
20000	Accounts Payable - Trade	9/2/14	8576	CDJ	JOHN GAFFNEY - Invoice: 0001023	1,000.00	West
20000	Accounts Payable - Trade	10/1/14	0001024	PJ	JOHN GAFFNEY	1,000.00	West
20000	Accounts Payable - Trade	10/6/14	8797	CDJ	JOHN GAFFNEY - Invoice: 0001024	1,000.00	West
20000	Accounts Payable - Trade	11/1/14	0001025	PJ	JOHN GAFFNEY	1,000.00	West
20000	Accounts Payable - Trade	11/3/14	8932	CDJ	JOHN GAFFNEY - Invoice: 0001025	1,000.00	West
20000	Accounts Payable - Trade	12/1/14	0001026	PJ	JOHN GAFFNEY	1,000.00	West
20000	Accounts Payable - Trade	12/9/14	9204	CDJ	JOHN GAFFNEY - Invoice: 0001026	1,000.00	West

Question/Request for Info:

- Please describe the purpose of the routine \$1,000 payments.

Please provide all documentation supporting each of these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 427

Description: 2013 Accounts Payable-Trade to John Gaffney

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	7/1/13	0001009	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	7/19/13	5947	CDJ	JOHN GAFFNEY - Invoice: 0001009	1,000.00		West
20000	Accounts Payable - Trade	8/5/13	6070	CDJ	JOHN GAFFNEY - Invoice: 1010	1,000.00		West
20000	Accounts Payable - Trade	8/5/13	1010	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	8/7/13	2000006216429CM	PJ	JOHN GAFFNEY	1,214.10		West
20000	Accounts Payable - Trade	8/7/13	2000006216429	PJ	JOHN GAFFNEY		1,214.10	West
20000	Accounts Payable - Trade	9/1/13	0001011	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	9/27/13	6495	CDJ	JOHN GAFFNEY - Invoice: 0001011	1,000.00		West
20000	Accounts Payable - Trade	10/1/13	0001012	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	11/1/13	001013	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	11/4/13	6753	CDJ	JOHN GAFFNEY - Invoice: 0001012	1,000.00		West
20000	Accounts Payable - Trade	11/22/13	6949	CDJ	JOHN GAFFNEY - Invoice: 001013	1,000.00		West
20000	Accounts Payable - Trade	12/1/13	0001014	PJ	JOHN GAFFNEY		1,000.00	West
20000	Accounts Payable - Trade	12/4/13	7031	CDJ	JOHN GAFFNEY - Invoice: 0001014	1,000.00		West

Question/Request for Info:

- Please describe the purpose of the routine \$1,000 payments.

Please provide all documentation supporting each of these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 428

Description: 2015 Accounts Payable – Maher Yusuf

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	1/1/15	2015-0101-06	CDJ	MAHER YUSUF - Invoice: 0803010000037	46.00		West
20000	Accounts Payable - Trade	1/1/15	2015-0101-06	CDJ	MAHER YUSUF - Invoice: 067793	58.00		West
20000	Accounts Payable - Trade	1/1/15	2015-0101-06	CDJ	MAHER YUSUF - Invoice: 00009357948	81.29		West
20000	Accounts Payable - Trade	1/1/15	2015-0101-06	CDJ	MAHER YUSUF - Invoice: Q2F8334	82.41		West
20000	Accounts Payable - Trade	1/1/15	2015-0101-06	CDJ	MAHER YUSUF - Invoice: 727709329	152.25		West
20000	Accounts Payable - Trade	1/1/15	2015-0101-06	CDJ	MAHER YUSUF - Invoice: 097489	232.50		West
20000	Accounts Payable - Trade	1/1/15	2015-0101-06	CDJ	MAHER YUSUF - Invoice: 011457	400.00		West
20000	Accounts Payable - Trade	1/1/15	2015-0101-06	CDJ	MAHER YUSUF - Invoice: 20130820		1,052.45	West
20000	Accounts Payable - Trade	3/16/15	080914	CDJ	MAHER F YUSUF - Invoice: AG SHOW - GAS	58.50		West
20000	Accounts Payable - Trade	3/16/15	080914	CDJ	MAHER F YUSUF - Invoice: 828	111.87		West
20000	Accounts Payable - Trade	3/16/15	080914	CDJ	MAHER F YUSUF - Invoice: 008210	125.00		West
20000	Accounts Payable - Trade	3/16/15	080914	CDJ	MAHER F YUSUF - Invoice: CVICHE 105	140.00		West
20000	Accounts Payable - Trade	3/16/15	080914	CDJ	MAHER F YUSUF - Invoice: 391375095	378.57		West
20000	Accounts Payable - Trade	3/16/15	080914	CDJ	MAHER F YUSUF - Invoice: TRAVEL - 08/09/14CM		813.94	West

Question/Request for Info:

Please provide all documentation supporting each of these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 429

Description: Mike's Trading Co.

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
50000	COS - Purchases	1/1/15	CM11050	PJ	MIKE'S TRADING CO - CLEAR OLD OPEN ITEM		801.00	West
50000	COS - Purchases	1/1/15	CM11428	PJ	MIKE'S TRADING CO - CLEAR OLD OPEN ITEM		282.00	West
50000	COS - Purchases	1/1/15	CM11395	PJ	MIKE'S TRADING CO - CLEAR OLD OPEN ITEM		1,165.00	West
50000	COS - Purchases	1/1/15	CM11471	PJ	MIKE'S TRADING CO - CLEAR OLD OPEN ITEM		260.00	West

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 430

Description: NejeH Yusuf GRT payments

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10300	Cash - Bank Op'g 8830	2/26/15	100589	CDJ	NEJEH F. YUSUF NEJEH F. YUSUF - Invoice: JAN 2015 GRT RECEIPT - JAN 2015 GRT RECEIPT		2,031.84	East
20000	Accounts Payable - Trade	2/26/15	100589	CDJ	PMT	2,031.84		East
20000	Accounts Payable - Trade	2/26/15	JAN 2015 GRT RECEIPT	PJ	NEJEH F. YUSUF		2,031.84	East
29900	Suspense	2/26/15	JAN 2015 GRT RECEIPT	PJ	NEJEH F. YUSUF - JAN 2015 GRT RECEIPT PMT	2,031.84		East

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 431

Description: Non-cash distribution to Yusuf

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
33000	Dividend Distributions	9/30/15	JE30-01	GENJ	NON-CASH DISTRIB TO YUSUF TO SETTLE MISC DUE TO/FR ACCOUNTS AT 9/30	245,089.90		West
29900	Suspense	9/30/15	JE30-01	GENJ	NON-CASH DISTRIB TO YUSUF TO SETTLE MISC DUE TO/FR ACCOUNTS AT 9/30		245,089.90	West

Question/Request for Info:

- Please describe the detail underlying the transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 432

Description: North Western Selectra Inc. – Clear Old Open Item

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
50000	COS - Purchases	1/1/15	CM1593532	PJ	NORTH WESTERN SELECTA INC - CLEAR OLD OPEN ITEM		4,524.24	West

Question/Request for Info:

- Please describe the detail underlying the transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 433

Description: Offset J Ortiz

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
13300	Due from Cashiers - Shortages	3/8/15	JE08-02	GENJ	OFFSET J ORTIZ PR DEDUCTS TO OTHER RENT	1,250.00		East
66400	Rent Expense - Other	3/8/15	JE08-02	GENJ	OFFSET J ORTIZ PR DEDUCTS TO OTHER RENT		1,250.00	East

Question/Request for Info:

- Please describe the detail underlying the transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 434

Description: St. Thomas Petty Cash

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	1/1/15	2015-0101-3	CDJ	PETTY CASH - STT - Invoice: 2013-1022-1 - CLEAR OLD UNPAID DISPUTED VOUCHERS	235.00		STT
20000	Accounts Payable - Trade	1/1/15	2015-0101-3	CDJ	PETTY CASH - STT - Invoice: 2013-0909-1 - CLEAR OLD UNPAID DISPUTED VOUCHERS	728.74		STT
20000	Accounts Payable - Trade	1/1/15	2015-0101-3	PJ	PETTY CASH - STT	963.74		STT
20000	Accounts Payable - Trade	1/1/15	2015-0101-3	CDJ	PETTY CASH - STT - Invoice: 2015-0101-3 - CLEAR OLD UNPAID DISPUTED VOUCHERS		963.74	STT
61000	Cash Short (Over)	1/1/15	2015-0101-3	PJ	PETTY CASH - STT - W/O UNPAID DISPUTED VOUCHERS		963.74	STT
20000	Accounts Payable - Trade	1/19/15	41212	CDJ	PETTY CASH - STT - Invoice: 2014-0119-1	1,366.13		STT
10300	Cash - Bank Op'g 2010	1/19/15	41212	CDJ	PETTY CASH - STT		1,366.13	STT
68200	Travel & Hotels Expense	1/19/15	2014-0119-1	PJ	PETTY CASH - STT - PARKING FEE'S	1.00		STT
65500	Office Supplies & Expense	1/19/15	2014-0119-1	PJ	PETTY CASH - STT - OFFICEMAX	228.44		STT
60500	Auto Expenses	1/19/15	2014-0119-1	PJ	PETTY CASH - STT - ADVANCE AUTO PARTS AND CAR REPAIRS	308.92		STT
66700	Repairs & Maintenance Expense	1/19/15	2014-0119-1	PJ	PETTY CASH - STT - HOME DEPOT	407.83		STT
65700	Postage & Overnight Delivery	1/19/15	2014-0119-1	PJ	PETTY CASH - STT - USPS	419.94		STT
20000	Accounts Payable - Trade	1/19/15	2014-0119-1	PJ	PETTY CASH - STT		1,366.13	STT
20000	Accounts Payable - Trade	2/10/15	41300	CDJ	PETTY CASH - STT - Invoice: 2015-0210-1	1,873.94		STT

10300	Cash - Bank Op'g 2010	2/10/15	41300	CDJ	PETTY CASH - STT		1,873.94	STT
68200	Travel & Hotels Expense	2/10/15	2015-0210-1	PJ	PETTY CASH - STT - SEABORNE FLIGHT FOR ACCOUNTANT TO ST CROIX	112.00		STT
66700	Repairs & Maintenance Expense	2/10/15	2015-0210-1	PJ	PETTY CASH - STT - KEYS MADE AND LAUNDRY AND RODRIEGUEZ AUTO	154.25		STT
65700	Postage & Overnight Delivery	2/10/15	2015-0210-1	PJ	PETTY CASH - STT - USPS POSTAGE	186.96		STT
65500	Office Supplies & Expense	2/10/15	2015-0210-1	PJ	PETTY CASH - STT - OFFICE MAX	441.46		STT
68200	Travel & Hotels Expense	2/10/15	2015-0210-1	PJ	PETTY CASH - STT - GAS RECEIPTS	445.97		STT
64900	Meals & Entertainment Expense	2/10/15	2015-0210-1	PJ	PETTY CASH - STT - MEALS	533.30		STT
20000	Accounts Payable - Trade	2/10/15	2015-0210-1	PJ	PETTY CASH - STT		1,873.94	STT
20000	Accounts Payable - Trade	3/10/15	41402	CDJ	PETTY CASH - STT - Invoice: 2015-0315-1	3,652.77		STT
10300	Cash - Bank Op'g 2010	3/10/15	41402	CDJ	PETTY CASH - STT		3,652.77	STT
54000	COS - Supplies	3/10/15	2015-0315-1	PJ	PETTY CASH - STT - SUPPLIES	40.76		STT
60500	Auto Expenses	3/10/15	2015-0315-1	PJ	PETTY CASH - STT - AUTO	136.34		STT
65500	Office Supplies & Expense	3/10/15	2015-0315-1	PJ	PETTY CASH - STT - OFFICEMAX	177.66		STT
68200	Travel & Hotels Expense	3/10/15	2015-0315-1	PJ	PETTY CASH - STT - TRAVEL	267.00		STT
65700	Postage & Overnight Delivery	3/10/15	2015-0315-1	PJ	PETTY CASH - STT - USPS	288.57		STT
68200	Travel & Hotels Expense	3/10/15	2015-0315-1	PJ	PETTY CASH - STT - GAS RECEIPTS	412.94		STT
66700	Repairs & Maintenance Expense	3/10/15	2015-0315-1	PJ	PETTY CASH - STT - REPAIRS	841.00		STT
64900	Meals & Entertainment Expense	3/10/15	2015-0315-1	PJ	PETTY CASH - STT - MEALS	1,488.50		STT
20000	Accounts Payable - Trade	3/10/15	2015-0315-1	PJ	PETTY CASH - STT		3,652.77	STT

20000	Accounts Payable - Trade	4/30/15	41562	CDJ	PETTY CASH - STT - Invoice: 2015-0430-1	2,482.54	STT
10300	Cash - Bank Op'g 2010	4/30/15	41562	CDJ	PETTY CASH - STT	2,482.54	STT
60500	Auto Expenses	4/30/15	2015-0430-1	PJ	PETTY CASH - STT - AUTO CARE	23.02	STT
61200	Computer Supplies & Expense	4/30/15	2015-0430-1	PJ	PETTY CASH - STT - COMPUTER EXPENSES	85.60	STT
68200	Travel & Hotels Expense	4/30/15	2015-0430-1	PJ	PETTY CASH - STT - GAS	287.01	STT
66700	Repairs & Maintenance Expense	4/30/15	2015-0430-1	PJ	PETTY CASH - STT - REPAIR AND MAIN.	306.17	STT
64900	Meals & Entertainment Expense	4/30/15	2015-0430-1	PJ	PETTY CASH - STT - MEALS	385.23	STT
65500	Office Supplies & Expense	4/30/15	2015-0430-1	PJ	PETTY CASH - STT - OFFICE EXPENSES	648.30	STT
65700	Postage & Overnight Delivery	4/30/15	2015-0430-1	PJ	PETTY CASH - STT - USPS AND SEA PLANE	747.21	STT
20000	Accounts Payable - Trade	4/30/15	2015-0430-1	PJ	PETTY CASH - STT	2,482.54	STT

Question/Request for Info:

For each entry, please provide all documentation supporting the entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 435

Description: Plaza Extra St. Thomas Cash for Safe

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10300	Cash - Bank Op'g 2010	4/30/15	41564	CDJ	PLAZA EXTRA PLAZA EXTRA - REPLENISHMENT OF PLAZA EXTRA STHOMAS SAFE FOR BIDDING		21,225.41	STT
10200	Cash - Safe	4/30/15	41564	CDJ	CLOSURE	21,225.41		STT

Question/Request for Info:

- Please describe the detail underlying the transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 436

Description: United Shopping Center paid accounting fees for Plaza Extra

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
60000	Accounting Fees	9/30/15	JE30-01	GENJ	REV ACTG FEES PAID BY SHOP CTR FOR PLAZA		4,500.00	East

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 437

Description: United Shopping Center paid legal fees for Plaza Extra

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
64500	Legal Fees Expense	9/30/15	JE30-01	GENJ	REV LEGAL FEE PAID BY SHOP CTR FOR PLAZA		4,946.31	East

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, attorney billings, receipts and invoices.

Response:

List of documents provided:

Item No. 438

Description: Source accounting

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
60000	Accounting Fees	6/10/15	179	GENJ	SOURCE ACCOUNTING	3,500.00		West
10600	Cash - Bank Claims 9091	6/10/15	179	GENJ	SOURCE ACCOUNTING		3,500.00	West

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.
- Please identify who Source Accounting is and what work they performed for the partnership.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 439

Description: St. Thomas 1.5% CR Reduction paid by West to United

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
21200	FUTA Accrued & Payable	12/31/15	15-1231-01	GENJ	STT 1.5% CR REDUCTION PAID BY WEST TO UNITED	12,346.17		STT
28600	Pship Claims Reserve Clearing	12/31/15	15-1231-01	GENJ	STT 1.5% CR REDUCTION PAID BY WEST TO UNITED		12,346.17	STT

Question/Request for Info:

- Please explain what this entry is.
- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 440

Description: Temporary adjustment for unreimbursed cash expenses during 2014/15

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10200	Cash - Safe	4/30/15	JE30	GENJ	TEMP ADJ FOR UNREIMB'D CASH EXP'S DURING 2014/15		46,725.41	STT
61000	Cash Short (Over)	4/30/15	JE30	GENJ	TEMP ADJ FOR UNREIMB'D CASH EXP'S DURING 2014/15	46,725.41		STT

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 441

Description: Tropical Shipping Rebate check

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10600	Cash - Bank Claims 9091	10/27/15	JE27	GENJ	TROPICAL SHIPPING 2014 REBATE CK 64312	293,614.74		West

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.
- Please show how this amount was distributed between the partners and provide documentation of that distribution.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 442

Description: Accounts Payable – United Corporation

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	3/6/15	2015-0306-01	PJ	UNITED CORPORATION	500.00		East
20000	Accounts Payable - Trade	3/9/15	2015-0309-01	PJ	UNITED CORPORATION		9,558.60	East
20000	Accounts Payable - Trade	3/11/15	2015-0311-01	PJ	UNITED CORPORATION		21.33	East
20000	Accounts Payable - Trade	3/18/15	2015-0318-CM01	PJ	UNITED CORPORATION	1,074.10		East
20000	Accounts Payable - Trade	3/18/15	2015-0318-01	PJ	UNITED CORPORATION		924.18	East
20000	Accounts Payable - Trade	3/24/15	2015-0324-CM01	PJ	UNITED CORPORATION	10,196.62		East
20000	Accounts Payable - Trade	3/25/15	2015-0325-03	PJ	UNITED CORPORATION		1,609.60	East
20000	Accounts Payable - Trade	3/25/15	2015-0325-03	PJ	UNITED CORPORATION		1,609.60	East
20000	Accounts Payable - Trade	3/25/15	2015-0325-04	PJ	UNITED CORPORATION		1,677.86	East
20000	Accounts Payable - Trade	3/25/15	2015-0325-04	PJ	UNITED CORPORATION		1,677.86	East
20000	Accounts Payable - Trade	3/25/15	2015-0325-02	PJ	UNITED CORPORATION		4,390.00	East
20000	Accounts Payable - Trade	3/25/15	2015-0325-02	PJ	UNITED CORPORATION		4,390.00	East
20000	Accounts Payable - Trade	3/25/15	2015-0325-01	PJ	UNITED CORPORATION		11,841.50	East
20000	Accounts Payable - Trade	3/25/15	2015-0325-01	PJ	UNITED CORPORATION		11,841.50	East

20000	Accounts Payable - Trade	3/26/15	2015-0326-01	PJ	UNITED CORPORATION	409.62	East
20000	Accounts Payable - Trade	3/26/15	2015-0326-01	PJ	UNITED CORPORATION	409.62	East
20000	Accounts Payable - Trade	3/30/15	2015-0930-02	PJ	UNITED CORPORATION	13,117.00	East
20000	Accounts Payable - Trade	3/30/15	2015-0930-02	PJ	UNITED CORPORATION	13,117.00	East
20000	Accounts Payable - Trade	3/30/15	2015-0930-01	PJ	UNITED CORPORATION	59,867.02	East
20000	Accounts Payable - Trade	3/30/15	2015-0930-01	PJ	UNITED CORPORATION	59,867.02	East
20000	Accounts Payable - Trade	3/31/15	2015-0331-CM02	PJ	UNITED CORPORATION	13,117.00	East
20000	Accounts Payable - Trade	3/31/15	2015-0331-CM02	PJ	UNITED CORPORATION	13,117.00	East
20000	Accounts Payable - Trade	3/31/15	2015-0331-CM01	PJ	UNITED CORPORATION	59,867.02	East
20000	Accounts Payable - Trade	3/31/15	2015-0331-CM01	PJ	UNITED CORPORATION	59,867.02	East
20000	Accounts Payable - Trade	3/31/15	2015-0331-01	PJ	UNITED CORPORATION	327.00	East
20000	Accounts Payable - Trade	3/31/15	2015-0331-01	PJ	UNITED CORPORATION	327.00	East
20000	Accounts Payable - Trade	4/1/15	2015-0401-02	PJ	UNITED CORPORATION	376.14	East
20000	Accounts Payable - Trade	4/1/15	2015-0401-02	PJ	UNITED CORPORATION	376.14	East
20000	Accounts Payable - Trade	4/1/15	2015-0401-01	PJ	UNITED CORPORATION	28,899.28	East
20000	Accounts Payable - Trade	4/1/15	2015-0401-01	PJ	UNITED CORPORATION	28,899.28	East
20000	Accounts Payable - Trade	4/6/15	2015-0406-CM01	PJ	UNITED CORPORATION	767.06	East
20000	Accounts Payable - Trade	4/6/15	2015-0406-CM01	PJ	UNITED CORPORATION	767.06	East

20000	Accounts Payable - Trade	4/8/15	2015-0408-CM01	PJ	UNITED CORPORATION	1,221.22	East
20000	Accounts Payable - Trade	4/8/15	2015-0408-CM01	PJ	UNITED CORPORATION	1,221.22	East
20000	Accounts Payable - Trade	4/15/15	2015-0415-01	PJ	UNITED CORPORATION	98.03	East
20000	Accounts Payable - Trade	4/29/15	2015-0429-02	PJ	UNITED CORPORATION	4,537.58	East
20000	Accounts Payable - Trade	4/29/15	2015-0429-01	PJ	UNITED CORPORATION	10,933.00	East
20000	Accounts Payable - Trade	4/29/15	2015-0429-03	PJ	UNITED CORPORATION	29,603.75	East
20000	Accounts Payable - Trade	5/8/15	2015-0508-01	PJ	UNITED CORPORATION	59.99	East
20000	Accounts Payable - Trade	5/14/15	2015-0514-01	PJ	UNITED CORPORATION	544.00	East
20000	Accounts Payable - Trade	5/25/15	2015-0525-01	PJ	UNITED CORPORATION	1,750.00	East
20000	Accounts Payable - Trade	5/27/15	2015-0527-01	PJ	UNITED CORPORATION	3,292.50	East
20000	Accounts Payable - Trade	5/27/15	2015-0527-02	PJ	UNITED CORPORATION	8,732.00	East
20000	Accounts Payable - Trade	5/27/15	2015-0527-03	PJ	UNITED CORPORATION	23,683.00	East
20000	Accounts Payable - Trade	6/3/15	2015-0603-01	PJ	UNITED CORPORATION	653.50	East
20000	Accounts Payable - Trade	6/24/15	2015-0624-02	PJ	UNITED CORPORATION	4,390.00	East
20000	Accounts Payable - Trade	6/24/15	2015-0624-01	PJ	UNITED CORPORATION	8,625.50	East
20000	Accounts Payable - Trade	6/24/15	2015-0624-03	PJ	UNITED CORPORATION	22,505.00	East
20000	Accounts Payable - Trade	6/25/15	2015-0625-01	PJ	UNITED CORPORATION	349.00	East
20000	Accounts Payable - Trade	7/1/15	2015-0701-04	PJ	UNITED CORPORATION	270.00	East

20000	Accounts Payable - Trade	7/1/15	2015-0701-02	PJ	UNITED CORPORATION	445.88	East
20000	Accounts Payable - Trade	7/1/15	2015-0701-03	PJ	UNITED CORPORATION	2,255.00	East
20000	Accounts Payable - Trade	7/1/15	2015-0701-05	PJ	UNITED CORPORATION	2,869.32	East
20000	Accounts Payable - Trade	7/1/15	2015-0701-06	PJ	UNITED CORPORATION	8,210.39	East
20000	Accounts Payable - Trade	7/1/15	2015-0701-01	PJ	UNITED CORPORATION	62,082.94	East
20000	Accounts Payable - Trade	7/24/15	2015-0724-01	PJ	UNITED CORPORATION	4,433.25	East
20000	Accounts Payable - Trade	7/31/15	2015-0731-01	PJ	UNITED CORPORATION	5,457.50	East
20000	Accounts Payable - Trade	7/31/15	2015-0731-02	PJ	UNITED CORPORATION	10,765.00	East
20000	Accounts Payable - Trade	7/31/15	2015-0731-03	PJ	UNITED CORPORATION	27,898.75	East
20000	Accounts Payable - Trade	8/20/15	15-0820-01	PJ	UNITED CORPORATION	174.00	East
20000	Accounts Payable - Trade	8/31/15	2015-0831-01	PJ	UNITED CORPORATION	4,366.00	East
20000	Accounts Payable - Trade	8/31/15	2015-0831-02	PJ	UNITED CORPORATION	8,612.00	East
20000	Accounts Payable - Trade	8/31/15	2015-0831-03	PJ	UNITED CORPORATION	22,319.00	East
20000	Accounts Payable - Trade	9/1/15	15-0901-03	PJ	UNITED CORPORATION	707.23	East
20000	Accounts Payable - Trade	9/1/15	15-0901-01	PJ	UNITED CORPORATION	1,922.00	East
20000	Accounts Payable - Trade	9/1/15	15-0901-02	PJ	UNITED CORPORATION	3,518.28	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0311-01	21.33	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0508-01	59.99	East

20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0415-01	98.03	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0701-04	270.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0331-01	327.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0625-01	349.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0401-02	376.14	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0326-01	409.62	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0701-02	445.88	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0514-01	544.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0603-01	653.50	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0318-01	924.18	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0325-03	1,609.60	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0325-04	1,677.86	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0525-01	1,750.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0701-03	2,255.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0701-05	2,869.32	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0527-01	3,292.50	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0831-01	4,366.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0325-02	4,390.00	East

20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0624-02	4,390.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0724-01	4,433.25	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0429-02	4,537.58	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0731-01	5,457.50	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0701-06	8,210.39	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0831-02	8,612.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0624-01	8,625.50	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0527-02	8,732.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0309-01	9,558.60	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0731-02	10,765.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0429-01	10,933.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0325-01	11,841.50	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0930-02	13,117.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0831-03	22,319.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0624-03	22,505.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0527-03	23,683.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0731-03	27,898.75	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0401-01	28,899.28	East

20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0429-03	29,603.75	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0930-01	59,867.02	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0701-01	62,082.94	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	PJ	UNITED CORPORATION	326,017.99	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0306-01	500.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0406-CM01	767.06	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0318-CM01	1,074.10	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0408-CM01	1,221.22	East
20000	Accounts Payable - Trade	9/30/15	15-0930-03	PJ	UNITED CORPORATION	4,366.00	East
20000	Accounts Payable - Trade	9/30/15	15-0930-02	PJ	UNITED CORPORATION	8,612.00	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0324-CM01	10,196.62	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0331-CM02	13,117.00	East
20000	Accounts Payable - Trade	9/30/15	15-0930-01	PJ	UNITED CORPORATION	27,898.72	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: 2015-0331-CM01	59,867.02	East
20000	Accounts Payable - Trade	9/30/15	JE30-03	CDJ	UNITED CORPORATION - Invoice: JE30-03	326,017.99	East
20000	Accounts Payable - Trade	10/1/15	15-1001-02	PJ	UNITED CORPORATION	1,062.00	East
20000	Accounts Payable - Trade	10/1/15	15-1001-03	PJ	UNITED CORPORATION	1,290.00	East
20000	Accounts Payable - Trade	10/1/15	15-1001-01	PJ	UNITED CORPORATION	7,143.77	East

20000	Accounts Payable - Trade	10/28/15	15-1028-03	PJ	UNITED CORPORATION	2,153.00	East
20000	Accounts Payable - Trade	10/28/15	15-1028-02	PJ	UNITED CORPORATION	8,612.00	East
20000	Accounts Payable - Trade	10/28/15	15-1028-01	PJ	UNITED CORPORATION	22,319.00	East
20000	Accounts Payable - Trade	10/31/15	15-1031-01	PJ	UNITED CORPORATION	375.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-0901-03	707.23	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-1001-02	1,062.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-1001-03	1,290.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-0901-01	1,922.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-1028-03	2,153.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-0901-02	3,518.28	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-0930-03	4,366.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-1001-01	7,143.77	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-0930-02	8,612.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-1028-02	8,612.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-1028-01	22,319.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: 15-0930-01	27,898.72	East
20000	Accounts Payable - Trade	11/5/15	CRA263	PJ	UNITED CORPORATION	89,604.00	East
20000	Accounts Payable - Trade	11/5/15	CRA263	CDJ	UNITED CORPORATION - Invoice: CRA263	89,604.00	East

20000	Accounts Payable - Trade	11/30/15	15-1130-02	PJ	UNITED CORPORATION	6,459.00	East
20000	Accounts Payable - Trade	11/30/15	15-1130-01	PJ	UNITED CORPORATION	22,319.00	East
20000	Accounts Payable - Trade	12/17/15	CRA282	PJ	UNITED CORPORATION	30,827.00	East
20000	Accounts Payable - Trade	12/18/15	15-1218-01	PJ	UNITED CORPORATION	54.89	East
20000	Accounts Payable - Trade	12/29/15	15-1229-01	PJ	UNITED CORPORATION	5.75	East
20000	Accounts Payable - Trade	12/31/15	15-1231-03	PJ	UNITED CORPORATION	12,686.15	East
20000	Accounts Payable - Trade	12/31/15	15-1231-01	PJ	UNITED CORPORATION	26,149.07	East
20000	Accounts Payable - Trade	12/31/15	15-1231-02	PJ	UNITED CORPORATION	27,898.75	East

Question/Request for Info:

Please provide all documentation supporting each of these entries, including, but not limited to, canceled checks, bank statements, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 443

Description: Price gun deposits

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
60700	Bad Debts Expense	9/30/15	XJE30-13	GENJ	W/O EMP PRICE GUN DEP'S DUE TO NO OR COMPLICATED ACTG IN OTHER STORES		1,780.00	West
25200	Price Gun Deposits Held	9/30/15	XJE30-13	GENJ	W/O EMP PRICE GUN DEP'S DUE TO NO OR COMPLICATED ACTG IN OTHER STORES	1,780.00		West

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices

Response:

List of documents provided:

Item No. 444

Description: 2013 Q3 VIESA deficiency

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10600	Cash - Bank Claims 9091	10/17/15	258	GENJ	VIESA 2013 Q3 DEFICIENCY PLUS PENALTY & INTEREST		9,166.84	West
10600	Cash - Bank Claims 9091	11/25/15	265	GENJ	VIESA 2013 Q3 DEFICIENCY RE EAST PMT NOT CLEARED		7,314.60	West
10600	Cash - Bank Claims 9091	11/25/15	266	GENJ	VIESA INT/PEN RE Q3 2013 TAX PMT NOT CLR'D		2,071.35	West

Question/Request for Info:

- Please describe the detail underlying this transaction and how you arrived at the amount.
- Please explain why a penalty and interest was assessed against Plaza Extra.

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices

Response:

List of documents provided:

Item No. 445

Description: US Custom payments

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
52200	COS - US Customs Expense	3/26/15	2015-0326-01	PJ	UNITED CORPORATION - WEST US CUSTOMS PAID BY EAST CK 1022	409.62		East
52200	COS - US Customs Expense	4/1/15	2015-0401-02	PJ	UNITED CORPORATION - US CUSTOMS PD BY NEW EAST CK 1069 FOR PSHIP WEST	376.14		East
52000	COS - Excise Tax Expense	9/1/15	15-0901-03	PJ	UNITED CORPORATION - VIBIR EXCISE TAX PAID BY EAST FOR PSHIP	707.23		East
50000	COS - Purchases	9/1/15	15-0901-02	PJ	UNITED CORPORATION - ALIMENTAIRA INVOICE PAID BY EAST FOR PSHIP	3,518.28		East
50000	COS - Purchases	9/1/15	15-0901-01	PJ	UNITED CORPORATION - ASSOC GROCERS INVOICE PAID BY EAST FOR PSHIP	1,922.00		East

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices

Response:

List of documents provided:

Item No. 446

Description: United Corporation paid FUTA

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
21200	FUTA Accrued & Payable	7/1/15	2015-0701- 05	PJ	UNITED CORPORATION - EAST PSHIP FUTA PAID BY UNITED EAST ON 6/25 INCL'D IN TOTAL PMT OF \$3,510.90	2,869.32		East
21200	FUTA Accrued & Payable	12/31/15	15-1231-01	PJ	UNITED CORPORATION - FUTA 1.5% CR REDUCTION EAST PSHIP ALLOCATION	7,177.82		East

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices

Response:

List of documents provided:

Item No. 447

Description: Gift Certificates – United Corporation

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
48000	Revenue - Sales Discounts	7/1/15	2015-0701-03	PJ	UNITED CORPORATION - PSHIP GIFT CERTS REDEEMED AT EAST	2,255.00		East
48000	Revenue - Sales Discounts	10/31/15	15-1031-01	PJ	UNITED CORPORATION - P'SHIP GIFT CERTS REDEEMED BY NEW EAST	375.00		East

Question/Request for Info:

Please provide all documentation supporting these entries, including, but not limited to, gift certificates, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices

Response:

List of documents provided:

Item No. 448

Description: Yusuf distribution for cash on hand

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
10000	Cash - Petty	3/31/15	XJE31-01	GENJ	YUSUF DISTRIB FOR CASH ON HAND		6,800.00	East
10100	Cash - Registers	3/31/15	XJE31-01	GENJ	YUSUF DISTRIB FOR CASH ON HAND		24,310.00	East

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 449

Description: Yusuf Yusuf invoices

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	1/28/15	100428	CDJ	YUSUF YUSUF - Invoice: INDUSTRIAL V.1/20/14 - INDUSTRIAL VIDEO SUPPLY PMT (INV. DATE 1/20/15)	7,680.00		East
20000	Accounts Payable - Trade	1/19/15	100107	CDJ	YUSUF YUSUF - Invoice: LUXOR GOOD1/16/15 - LUXOR GOODS, INC. PMT (INV. DATE 1/16 &1/17/14)	2,123.00		East

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 450

Description: Hector Torres invoice

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	1/22/15	20150122	PJ	HECTOR TORRES		2,000.00	West
20000	Accounts Payable - Trade	1/22/15	9501	CDJ	HECTOR TORRES - Invoice: 20150122	2,000.00		West

Question/Request for Info:

Please provide all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 451

Description: Ramone Reid Felix

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	1/2/15	01-02-2015	PJ	RAMONE REID - FELIX		84.00	West
50000	COS - Purchases	1/2/15	01-02-2015	PJ	RAMONE REID - FELIX	84.00		West
10300	Cash - Bank Op'g 6269	1/7/15	9404	CDJ	RAMONE REID - FELIX		84.00	West
20000	Accounts Payable - Trade	1/7/15	9404	CDJ	RAMONE REID - FELIX - Invoice: 01-02-2015	84.00		West
10300	Cash - Bank Op'g 8830	2/4/15	100468	CDJ	RAMONE REID FELIX		1,008.00	East
20000	Accounts Payable - Trade	2/4/15	100468	CDJ	RAMONE REID FELIX - Invoice: 1/21/2015	1,008.00		East

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 452

Description: Tasty Alternatives invoice

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	1/26/15	100194	CDJ	TASTY ALTERNATIVES - Invoice: 0014402	15,431.00		East
20000	Accounts Payable - Trade	4/1/15	0014403	PJ	TASTY ALTERNATIVES		15,290.00	STT
20000	Accounts Payable - Trade	5/13/15	CRA113	CDJ	TASTY ALTERNATIVES - Invoice: 0014403	15,290.00		STT

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 453

Description: Scotia invoices for St. Thomas

General Ledger-Store, Date, Entry No. & Description

Acct ID	Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Store
20000	Accounts Payable - Trade	2/20/15	41275	CDJ	SCOTIA - Invoice: 6217-46785-49633	5,287.00		STT
20000	Accounts Payable - Trade	2/17/15	6217-46785-49633	PJ	SCOTIA		5,287.00	STT
20000	Accounts Payable - Trade	2/20/15	41276	CDJ	SCOTIA - Invoice: 6217-46786-49703	6,124.17		STT
20000	Accounts Payable - Trade	2/17/15	6217-46786-49703	PJ	SCOTIA		6,124.17	STT

Question/Request for Info:

- Please describe the detail underlying each transaction and how you arrived at the amount.

Please provide all documentation supporting these entries, including, but not limited to, canceled checks, bank statements, deposit slips, transfer slips, credit card statements, receipts and invoices.

Response:

List of documents provided:

Item No. 454

Description: Lissette Colon's salary, benefits, bonuses and incidental expenses

General Ledger-Store, Date, Entry No. & Description None

Question/Request for Info:

From March 9, 2015 to present, please identify the percentage of Ms. Colon's time devoted to non-Plaza Extra partnership activities.

Please provide back-up documentation (invoices, cancelled checks and any other back up documentation) for the following (3/9/15-present):

- Ms. Colon's salary & benefits
- Ms. Colon's bonuses
- Ms. Colon's allowances
- Ms. Colon's travel, entertainment or incidental expenses, if any

Response:

List of documents provided:

Item No. 455

Description: Myra Senhouse's salary, benefits, bonuses and incidental expenses

General Ledger-Store, Date, Entry No. & Description None

Question/Request for Info:

From March 9, 2015 to present, please identify the percentage of Ms. Senhouse's time devoted to non-Plaza Extra partnership activities.

Please provide back-up documentation (invoices, cancelled checks and any other back up documentation) for the following (3/9/15-present):

- Ms. Senhouse's salary & benefits
- Ms. Senhouse's bonuses
- Ms. Senhouse's allowances
- Ms. Senhouse's travel, entertainment or incidental expenses, if any

Response:

List of documents provided:

Item No. 456

Description: Humphrey Caswell salary, benefits, bonuses and T&E

General Ledger-Store, Date, Entry No. & Description None

Question/Request for Info:

From May 1, 2015 to present, please identify the percentage of Mr. Caswell's time devoted to non-Plaza Extra partnership activities.

Please provide back-up documentation (invoices, cancelled checks and any other back up documentation) for the following (5/1/15-present):

- Mr. Caswell's salary & benefits
- Mr. Caswell's bonuses
- Mr. Caswell's allowances
- Mr. Caswell's travel and entertainment expenditures

Response:

List of documents provided:

D-3

SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

MOHAMMAD HAMED by his
authorized agent WALEED HAMED)
FATHI YUSUF AND UNITED CORPORATION)
v.)
WALEED HAMED, ET AL.)

CASE NO: SK. 2012. CV. 370

ACTION FOR: DAMAGES, INJUNCTIVE RELIEF
DECLARATORY RELIEF

TERRITORY OF THE VIRGIN ISLANDS)
DISTRICT OF ST. CROIX) SS:

I, FELIPE TORRES, JR., being duly sworn according t law upon my oath depose and state:

1. That I am a citizen of the United States and a resident of St. Croix, Virgin Islands and I am a process ser
duly appointed by the Courts of the Virgin Islands.

2. That I received copies of () summons and complaint, () subpoena, () citation, () lette
() order, () request for admission, () request for production, () other

RECEIVED: 5.31.16 in the above matter and served the same as follow
SERVED: 6.1.16
PERSON SERVED: DERICK MARTIN PLACE SERVED: BNS 4500 ESTATE DIAMOND

3. That such service was personally made by delivering to and leaving with the person, who was proper
identified to be the person mentioned and described in said process or authorized according to law to receive suc
process true copies of the above-mentioned document(s).

4. That I made diligent search and inquiry in St. Croix for the person to be served but have been unable :
find or learn of the whereabouts of the person and thus have been unable to serve process on the said person
Locations endeavors are: _____

[Signature]
FELIPE TORRES, JR.

SUBSCRIBED AND SWORN to before me
this 1 day of June 2016

[Signature]
Notary Public
Name: JUDITH M. WARD HALL
Notary No: HA10632845
Commission Expires: Exp. Officer



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

SUPERIOR COURT OF THE VI
OFFICE OF THE CLERK
DISTRICT OF ST. CROIX

MOHAMMAD HAMED, by his
authorized agent **WALEED HAMED**,

Plaintiff/Counterclaim Defendant,
vs.

FATHI YUSUF and UNITED CORPORATION,

Defendants and Counterclaimants.

vs.

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

Counterclaim Defendants.

Case No.: SX-2012-cv-370

2016 MAY 31 P 3: 08

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

JURY TRIAL DEMANDED

TO:

THE HONORABLE TAMARA BERMUDEZ

Chief Deputy Clerk
R. H. Amphlett Leader
Justice Complex
RR1 9000
1st Floor, Room 101
Kingshill, VI 00850

Hon. Edgar Ross

Special Master
% edgarrossjudge@hotmail.com

Nizar A. DeWood

The DeWood Law Firm
2006 Eastern Suburb, Suite 101
Christiansted, VI 00820
dewoodlaw@gmail.com

HAMD632844

Gregory H. Hodges

Law House, 10000 Frederiksberg Gade
P.O. Box 756
ST. Thomas, VI00802
ghodges@dtflaw.com

Mark W. Eckard

Ham & Eckard, P.C.
5030 Anchor Way
Christiansted, VI 00820
Telephone: (340) 773-6955 meckard @hammeckard. Com

Jeffrey B. C. Moorhead

CRT Brow Building
1132 King Street, Suite 3
Christiansted, VI 00820
email : jeffreymlaw @yahoo.com

PLEASE TAKE NOTICE that on May 31, 2016, or as soon thereafter as service may be effectuated, and pursuant to Federal Rule of Civil Procedure 45 as adopted by this Court, the undersigned will issue and serve the Subpoena Duces Tecum attached hereto as "Exhibit A", upon **Bank of Nova Scotia**, a non-party to the above-captioned litigation, for a deposition and the production of the items listed in said Subpoena at the time and place specified therein.

Dated: May 31, 2016



Joel H. Holt, Esq.
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820
(340) 773-8709 / holtvi@aol.com

Carl J. Hartmann III, Esq.
Co-Counsel for Plaintiff
5000 Estate Coakley Bay, L-6
Christiansted, VI 00820
(340) 719-8941
carl@carlhartmann.com

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of May, 2016, I served a copy of the foregoing Notice by email, as agreed by the parties, on:

Hon. Edgar Ross
Special Master
% edgarrossjudge@hotmail.com

Nizar A. DeWood
The DeWood Law Firm
2006 Eastern Suburb, Suite 101
Christiansted, VI 00820
dewoodlaw@gmail.com

Gregory H. Hodges
Law House, 10000 Frederiksberg Gade
P.O. Box 756
ST. Thomas, VI 00802
ghodges@dtflaw.com

Mark W. Eckard
Ham & Eckard, P.C.
5030 Anchor Way
Christiansted, VI 00820
Telephone: (340) 773-6955 [meckard @hammeckard. Com](mailto:meckard@hammeckard.com)

Jeffrey B. C. Moorhead
CRT Brow Building
1132 King Street, Suite 3
Christiansted, VI 00820
email : [jeffreymlaw @yahoo.com](mailto:jeffreymlaw@yahoo.com)



Issued by the
SUPERIOR COURT OF THE VIRGIN ISLANDS

OFFICE OF THE CLERK
DISTRICT OF ST. CROIX

DIVISION OF

St. Croix

2016 MAY 31 P 3: 08

SUBPOENA IN A CIVIL CASE

Mohammad Hamed,
Plaintiff,

v.

Fathi Yusuf,
Defendant.

Case No: 2012-SX-CV-370

**ACTION FOR DEBT AND
CONVERSION**

JURY TRIAL DEMANDED

SUBPOENA DUCES TECUM

TO: Bank of Nova Scotia operating as ScotiaBank

ADDRESS: 4500 Estate Diamond, St. Croix, USVI 00820

YOU ARE HEREBY COMMANDED to appear in the Superior Court of the Virgin Islands in the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE HEREBY COMMANDED to appear in the Superior Court of the Virgin Islands in the place, date, and time specified at the taking of a Deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

***Note: In lieu of appearing for the deposition at the time and place specified, you may comply with this subpoena duces tecum by producing the documents referenced in Exhibit A on or before the stated date.

YOU ARE HEREBY COMMANDED to produce and permit inspection and copying of the following documents or object at the place, date and times specified below (list documents or objects):

Produce any and all documents listed in Exhibit A attached hereto.

PLACE: Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820
(340) 773-8709

DATE AND TIME:
June 30, 2016
at 1:00 p.m.

YOU ARE HEREBY COMMANDED to permit inspection of the following premises at the date and time specified below:

PREMISES

DATE AND TIME:

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE

ESTRELLA H. GEORGE
ACTING CLERK OF THE SUPERIOR COURT:

By:

[Handwritten Signature]

DATE

5/31/16

ISSUING ATTORNEY'S ADDRESS AND TELEPHONE NUMBER:

Joel H. Holt, Esq.
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820
(340) 773-8709

RETURN OF SERVICE

I personally served the within subpoena duces tecum by delivering a copy to

[Handwritten Signature]
DERZUC MAZES

Dated:

JUNE 1 2016

By:

[Handwritten Signature]

RETURN OF SERVICE

This is to certify that _____ cannot be found in this jurisdiction.

Dated: _____

By: _____

RETURN OF SERVICE

I hereby certify that I served the within subpoena duces tecum by leaving a copy at _____, the usual place of abode, with _____, a member of his/her family over the age of 14 years, then residing with him/her.

Dated: _____

By: _____

**Rules Governing the
Superior Court of the Virgin Islands**

Rule 11. Subpoena

(a) **Form and issuance.** A subpoena shall be issued by the judge or clerk or deputy clerk under the seal of the court. It shall state the name of the court and the title, if any, of the proceeding, and if the witness is to testify on behalf of the Government, it shall so note, and shall command each person to whom it is directed to attend and give testimony at the time and place specified therein. The clerk shall issue a subpoena, signed and sealed, to a party requesting it, who shall fill in the blanks before it is served.

(b) **Indigent defendants.** A judge may order, at any time, that a subpoena be issued on motion or request of an indigent defendant in a criminal case.

(c) **For production of documentary evidence and of objects.** A subpoena may also command the person, to whom it is directed, to produce books, papers, documents, or other objects designated therein. The judge, on motion made promptly, may quash or modify the subpoena if compliance would be unreasonable or oppressive. The judge may direct that books, papers, documents, or other objects designated in the subpoena be produced before the court at a time prior to the trial or prior to the time when they are to be offered in evidence, and may upon their production permit the books, papers, documents, or other objects or portions thereof, to be inspected and copied by the parties and their attorneys, or by a probation officer.

(d) **Service.** A subpoena may be served by any person who is not a party and who is not less than 18 years of age. Service of a subpoena may be made by delivering a copy thereof to the person named. A subpoena requiring the attendance of a witness at a hearing or trial may be served at any place within the territory.

(e) **Contempt.** Failure by any person without adequate excuse to obey a subpoena served upon him may be deemed a contempt of the court from which the subpoena issued.

Exhibit A to Scotiabank Subpoena

1. All bank non-payroll canceled checks or wire transfer receipts (or photocopies or other copies of them in a digital medium that reflect both the front and back sides of the documents) for the period of July 1, 2012 through June 30, 2013 -- for all accounts of Plaza Extra Supermarkets, United Corporation d/b/a Plaza Extra Supermarkets, United Corporation and Plessen Enterprises. For non-check or wire accounts (i.e. credit or other card transactions) supply all representative transaction documents.

Those accounts will include, but not be limited to:

- United Corporation dba Plaza Extra - Operating Account (30445) 55312010
- United Corporation dba Plaza Extra Supermarket- Telecheck Account (30445) 55356719
- United Corporation dba Plaza Extra Supermarket- Telecheck (30585) 60092918
- United Corporation dba Plaza Extra Supermarket- Telecheck 058-60086413
- United Corporation dba Plaza Extra (30445) 96001238
- United Corporation (30585) 65811
- United Corporation dba United Corporation -Tenants Account (30585) 92031923
- Plessen Enterprises Inc (30585) 45012

If there are other Scotiabank Plaza Extra Supermarkets, United Corporation d/b/a Plaza Extra, United Corporation or Plessen Enterprises accounts that are not listed above, please provide the information requested in this exhibit for all of those accounts as well.

2. All documents reflecting the application for, opening, maintenance, signature identification, and modification of all accounts of Plaza Extra Supermarkets, United Corporation d/b/a Plaza Extra Supermarkets, United Corporation and Plessen Enterprises -- as well as all external or external emails, correspondence, notes and any other documents that appear in your business records or computer systems regarding these accounts.

3. All bank statements and deposit slips for the years 1998-2015.

4. Documents reflecting what accounts (both those listed and any others) have been open and closed and the dates of such opening and closing.

D-4

SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

MOHAMMAD HAMED, by his
authorized agent WALEED HAMED

CASE NO: SX 2012 CV 370

FATHI YUSUF AND UNITED CORPORATION

ACTION FOR: DAMAGES, INJUNCTIVE RELIEF
AND DECLARATORY RELIEF

WALEED HAMED, ET AL.

TERRITORY OF THE VIRGIN ISLANDS)
DISTRICT OF ST. CROIX) SS:

I, FELIPE TORRES, JR., being duly sworn according t law upon my oath depose and state:

1. That I am a citizen of the United States and a resident of St. Croix, Virgin Islands and I am a process ser
duly appointed by the Courts of the Virgin Islands.

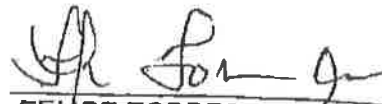
2. That I received copies of () summons and complaint, () subpoena, () citation, () lette
() order, () request for admission, () request for production, () other


_____ in the above matter and served the same as follow
RECEIVED: 5-31-16 SERVED: 6 1 2016
PERSON SERVED: JOANN CARA PLACE SERVED: BPPR, ORANGE GROVE

3. That such service was personally made by delivering to and leaving with the person, who was prope
identified to be the person mentioned and described in said process or authorized according to law to receive su
process true copies of the above-mentioned document(s)

4. That I made diligent search and inquiry in St. Croix for the person to be served but have been unable
find or learn of the whereabouts of the person and thus have been unable to serve process on the said person
Locations endeavors are: _____

SUBSCRIBED AND SWORN to before me
this 1st day of June 2016


FELIPE TORRES, JR.


Notary Public
Name: DUSTIN M. WARD-HALL
Notary No: 114116
Commission Expires: 07/01/2018

Blumberg No. 5208
EXHIBIT
D-4

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

SUPERIOR COURT OF THE VI
OFFICE OF THE CLERK
DISTRICT OF ST. CROIX

MOHAMMAD HAMED, by his
authorized agent **WALEED HAMED**,

Plaintiff/Counterclaim Defendant,
vs.

FATHI YUSUF and UNITED CORPORATION,

Defendants and Counterclaimants.

vs.

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

Counterclaim Defendants.

Case No.: SX-2012-cv-370

2016 MAY 31 P 3:12

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

JURY TRIAL DEMANDED

TO:

THE HONORABLE TAMARA BERMUDEZ

Chief Deputy Clerk
R. H. Amphlett Leader
Justice Complex
RR1 9000
1st Floor, Room 101
Kingshill, VI 00850

Hon. Edgar Ross

Special Master
% edgarrossjudge@hotmail.com

Nizar A. DeWood

The DeWood Law Firm
2006 Eastern Suburb, Suite 101
Christiansted, VI 00820
dewoodlaw@gmail.com

HAMD632837

Gregory H. Hodges
Law House, 10000 Frederiksberg Gade
P.O. Box 756
ST.Thomas,VI00802
ghodges@dtflaw.com

SUPERIOR COURT OF THE VI
OFFICE OF THE CLERK
DISTRICT OF ST. CROIX

2016 MAY 31 P 3: 12

Mark W. Eckard
Ham & Eckard, P.C.
5030 Anchor Way
Christiansted, VI 00820
Telephone: (340) 773-6955 meckard @hammeckard. Com

Jeffrey B. C. Moorhead
CRT Brow Building
1132 King Street, Suite 3
Christiansted, VI 00820
email : jeffreymlaw @yahoo.com

PLEASE TAKE NOTICE that on May 31, 2016, or as soon thereafter as service may be effectuated, and pursuant to Federal Rule of Civil Procedure 45 as adopted by this Court, the undersigned will issue and serve the Subpoena Duces Tecum attached hereto as "Exhibit A", upon **Banco Popular**, a non-party to the above-captioned litigation, for a deposition and the production of the items listed in said Subpoena at the time and place specified therein.

Dated: May 31, 2016



Joel H. Holt, Esq.
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820
(340) 773-8709 / holtvi@aol.com

Carl J. Hartmann III, Esq.
Co-Counsel for Plaintiff
5000 Estate Coakley Bay, L-6
Christiansted, VI 00820
(340) 719-8941
carl@carlhartmann.com

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of May, 2016, I served a copy of the foregoing Notice by ~~email~~, as agreed by the parties, on:

Hon. Edgar Ross
Special Master
% edgarrossjudge@hotmail.com

Nizar A. DeWood
The DeWood Law Firm
2006 Eastern Suburb, Suite 101
Christiansted, VI 00820
dewoodlaw@gmail.com

Gregory H. Hodges
Law House, 10000 Frederiksberg Gade
P.O. Box 756
ST.Thomas,VI00802
ghodges@dtflaw.com

Mark W. Eckard
Ham & Eckard, P.C.
5030 Anchor Way
Christiansted, VI 00820
Telephone: (340) 773-6955 meckard @hammeckard. Com

Jeffrey B. C. Moorhead
CRT Brow Building
1132 King Street, Suite 3
Christiansted, VI 00820
email : jeffreymlaw @yahoo.com



Issued by the
SUPERIOR COURT OF THE VIRGIN ISLANDS

DEPT. OF THE VI
OFFICE OF THE CLERK
DISTRICT OF ST. CROIX

DIVISION OF

St. Croix

2016 MAY 31 P 3: 12

SUBPOENA IN A CIVIL CASE

Mohammad Hamed,
Plaintiff,

v.

Fathi Yusuf,
Defendant.

Case No: 2012-SX-CV-370

**ACTION FOR DEBT AND
CONVERSION**

JURY TRIAL DEMANDED

SUBPOENA DUCES TECUM

TO: Banco Popular De Puerto Rico
ADDRESS: 3009 Orange Grove, St. Croix, USVI 00820

YOU ARE HEREBY COMMANDED to appear in the Superior Court of the Virgin Islands in the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE HEREBY COMMANDED to appear in the Superior Court of the Virgin Islands in the place, date, and time specified at the taking of a Deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

***Note: In lieu of appearing for the deposition at the time and place specified, you may comply with this subpoena duces tecum by producing the documents referenced in Exhibit A on or before the stated date.

YOU ARE HEREBY COMMANDED to produce and permit inspection and copying of the following documents or object at the place, date and times specified below (list documents or objects):

Produce any and all documents listed in Exhibit A attached hereto.

PLACE: Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820
(340) 773-8709

SUPERIOR COURT OF THE VI
OFFICE OF THE CLERK
DISTRICT OF ST. CROIX

2016 MAY 31 P 3:12

DATE AND TIME:
June 30, 2016
at 2:00 p.m.

YOU ARE HEREBY COMMANDED to permit inspection of the following premises at the date and time specified below:

PREMISES

DATE AND TIME:

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE

ESTRELLA H. GEORGE
ACTING CLERK OF THE SUPERIOR COURT:

By:

E. Hernandez

DATE

5/31/16

ISSUING ATTORNEY'S ADDRESS AND TELEPHONE NUMBER:

Joel H. Holt, Esq.
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820
(340) 773-8709

RETURN OF SERVICE

I personally served the within subpoena duces tecum by delivering a copy to

JOANN CARL

Dated:

JUNE 1, 2016

By:

A. Som Jr

RETURN OF SERVICE

This is to certify that _____ cannot be found in this jurisdiction.

Dated: _____

By: _____

RETURN OF SERVICE

I hereby certify that I served the within subpoena duces tecum by leaving a copy at _____, the usual place of abode, with _____, a member of his/her family over the age of 14 years, then residing with him/her.

Dated: _____

By: _____

HAMD632841

Rules Governing the
Superior Court of the Virgin Islands 2016 MAY 31 P 3: 12

Rule 11. Subpoena

(a) Form and issuance. A subpoena shall be issued by the judge or clerk or deputy clerk under the seal of the court. It shall state the name of the court and the title, if any, of the proceeding, and if the witness is to testify on behalf of the Government, it shall so note, and shall command each person to whom it is directed to attend and give testimony at the time and place specified therein. The clerk shall issue a subpoena, signed and sealed, to a party requesting it, who shall fill in the blanks before it is served.

(b) Indigent defendants. A judge may order, at any time, that a subpoena be issued on motion or request of an indigent defendant in a criminal case.

(c) For production of documentary evidence and of objects. A subpoena may also command the person, to whom it is directed, to produce books, papers, documents, or other objects designated therein. The judge, on motion made promptly, may quash or modify the subpoena if compliance would be unreasonable or oppressive. The judge may direct that books, papers, documents, or other objects designated in the subpoena be produced before the court at a time prior to the trial or prior to the time when they are to be offered in evidence, and may upon their production permit the books, papers, documents, or other objects or portions thereof, to be inspected and copied by the parties and their attorneys, or by a probation officer.

(d) Service. A subpoena may be served by any person who is not a party and who is not less than 18 years of age. Service of a subpoena may be made by delivering a copy thereof to the person named. A subpoena requiring the attendance of a witness at a hearing or trial may be served at any place within the territory.

(e) Contempt. Failure by any person without adequate excuse to obey a subpoena served upon him may be deemed a contempt of the court from which the subpoena issued.

Exhibit A to Banco Popular Subpoena

Please produce the following records:

1. All bank non-payroll canceled checks or wire transfer receipts (or photocopies or other copies of them in a digital medium that reflect both the front and back sides of the documents) for the period of July 1, 2012 through June 30, 2013 -- for all accounts of Plaza Extra Supermarkets, United Corporation d/b/a Plaza Extra Supermarkets, United Corporation and Plessen Enterprises. For non-check or wire accounts (i.e. credit or other card transactions) supply all representative transaction documents.

Those accounts include, but are not limited, to:

191-063789	Credit Card
191-013307	Credit Card
191-063789	Credit Card
192-026143	Credit Card
191-148830	Operating
191-256269	Operating

If there are other Banco Popular Plaza Extra Supermarkets, United Corporation d/b/a Plaza Extra, United Corporation or Plessen Enterprises accounts that are not listed above, please provide the information requested in this exhibit for all of those accounts as well.

2. All documents reflecting the application for, opening, maintenance, signature identification, and modification of all accounts of Plaza Extra Supermarkets, United Corporation d/b/a Plaza Extra Supermarkets, United Corporation and Plessen Enterprises -- as well as all external or external emails, correspondence, notes and any other documents that appear in your business records or computer systems regarding these accounts.

3. All bank statements and deposit slips for the years 1998-2015.

4. Documents reflecting what accounts (both those listed and any others) that have been open and closed and the dates of such opening and closing.

D-5

JOEL H. HOLT, ESQ.P.C.

2132 Company Street, Suite 2
Christiansted, St. Croix
U.S. Virgin Islands 00820

Tel. (340) 773-8709
Fax (340) 773-8677
E-mail: holtvi@aol.com

August 31, 2016

Mr. Edwin Diaz
Banco Popular
PO Box 362708
San Juan, Puerto Rico 00936-2708

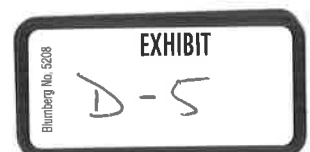
**Re: Status of Subpoena
Hamed v Yusuf, 12-SX-CV-370
Case BPPR 34077-01JUN16**

Dear Mr. Diaz:

Thank you for your most recent document production in response to a subpoena issued on May 31, 2016 to Banco Popular in the *Hamed v Yusuf, 12-SX-CV-370* case on St. Croix.

Below is a summary of the missing items. Additionally, I have attached a chart that shows what has been produced in response to the subpoena and what is still missing by account.

Account	Missing Items
190-199075 – UNITED CORPORATION PARTNERSHIP LIQUIDATING EXPENSE ACCOUNT	--Application to open the account --External or internal emails related to the account --Correspondence related to the account --Document(s) reflecting the date the account was opened
190-199091 - UNITED CORPORATION PARTNERSHIP CLAIMS RESERVE ACCOUNT	--Application to open the account --External or internal emails related to the account --Correspondence related to the account --Document(s) reflecting the date the account was opened
191-013307 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	--July 1, 2012-June 30, 2013 checks --External or internal emails --Correspondence related to the account --Forms evidencing the two signature requirement --Forms evidencing the closure of the account --1998-2015 bank statements and deposit slips --Document(s) reflecting the date the account was closed




Account	Missing Items
191-063789 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	--July 1, 2012-June 30, 2013 checks --External or internal emails --Correspondence related to the account, --Forms evidencing the two signature requirement --Forms evidencing the closure of the account --1998-2015 bank statements and deposit slips --Document(s) reflecting the date the account was closed
191-148830 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	--July 1, 2012-June 30, 2013 checks --External or internal emails --Correspondence related to the account, --Forms evidencing the two signature requirement --Forms evidencing the closure of the account --1998-2015 bank statements and deposit slips --Document(s) reflecting the date the account was closed
191-256269 - UNITED CORPORATION DBA PLAZA EXTRA (Plaza Extra West) [account closed]	--January-July 30, 2013 checks --May have missing checks for 2012, unable to tell without bank statements --External or internal emails --Correspondence related to the account --Forms evidencing the two signature requirement --Forms evidencing the closure of the account --1998-2015 bank statements --1998-2011 deposit slips, plus may have missing deposit slips from 2012-2015—unable to tell without bank statements --Document(s) reflecting the date the account was closed
191-295027 - UNITED CORPORATION DBA PLAZA EXTRA (Operations Account, STX) [account closed]	--External or internal emails --Correspondence related to the account, --Forms evidencing the closure of the account -- March and October-December 2015 bank statements -- March-December 2015 deposit slips --Document(s) reflecting the date the account was closed
191-295043 - UNITED CORPORATION DBA PLAZA EXTRA (Credit Card Account)	--External or internal emails --Correspondence related to the account -- March-December 2015 deposit slips
191-295191 - UNITED CORPORATION DBA PLAZA EXTRA (Telecheck Account)	--External or internal emails --Correspondence related to the account --Bank statements and deposit slips for 1998-February 2015 -- Documents reflecting the date the account was opened
191-295310 - UNITED CORPORATION DBA PLAZA EXTRA (STX East Store)	--External or internal emails --Correspondence related to the account --Bank statements and deposit slips for 1998-2015
192-026143 - UNITED CORPORATION DBA PLAZA EXTRA (Ideal Business Acct, St. Thomas) [account closed]	--July 1, 2002-June 30, 2013 checks --External or internal emails --Correspondence related to the account, --Forms evidencing the closure of the account --Bank statements and deposit slips for 1998-2014, January 2015-June 2015 --Document(s) reflecting the date the account was closed
United Corporation account(s)	--All items are missing
Plessen Enterprises, Inc. account(s)	--All items are missing

Mr. Edwin Diaz
Letter regarding status of subpoena
Page 3 of 3

I would appreciate a time table for when I can expect the remaining documents.
If you have any questions, please do not hesitate to give me a call.

Cordially,


Joel H. Holt

Banco Popular Document Status Regarding May 31, 2016 Subpoena

Subpoena Item	Item Received	Item Outstanding
<p>1. All bank non-payroll canceled checks or wire transfer receipts (or photocopies or other copies of them in a digital medium that reflect both the front and back sides of the documents) for the period of July 1, 2012 through June 30, 2013 -- for all accounts of Plaza Extra Supermarkets, United Corporation d/b/a Plaza Extra Supermarkets, United Corporation and Plessen Enterprises. For non-check or wire accounts (i.e. credit or other card transactions) supply all representative transaction documents.</p> <p>Those accounts include, but are not limited, to:</p>	See below	See below
190-199075 - UNITED CORPORATION PARTNERSHIP LIQUIDATING EXPENSE ACCOUNT	N/A	N/A
190-199091 - UNITED CORPORATION PARTNERSHIP CLAIMS RESERVE ACCOUNT	N/A	N/A
191-013307 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	None	--July 1, 2012-June 30, 2013 checks
191-063789 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	None	--July 1, 2012-June 30, 2013 checks
191-148830 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	None	--July 1, 2012-June 30, 2013 checks
191-256269 - UNITED CORPORATION DBA PLAZA EXTRA (Plaza Extra West) [account closed]	Checks – 2012	--January-July 30, 2013 checks --May have missing checks for 2012, unable to tell without bank statements
191-295027 - UNITED CORPORATION DBA PLAZA EXTRA (Operations Account, STX) [account closed]	N/A	N/A
191-295043 - UNITED CORPORATION DBA PLAZA EXTRA (Credit Card Account)	N/A	N/A
191-295191 - UNITED CORPORATION DBA PLAZA EXTRA	N/A	None
191-295310 - UNITED CORPORATION DBA PLAZA EXTRA (STX East Store)	Checks -- March 2015	None
192-026143 - UNITED CORPORATION DBA PLAZA	None	--July 1, 2002-June 30, 2013 checks

Banco Popular Document Status Regarding May 31, 2016 Subpoena

Subpoena Item	Item Received	Item Outstanding
EXTRA [account closed]		
United Accounts	None	--July 1, 2002-June 30, 2013 checks
Plessen Accounts	None	--July 1, 2002-June 30, 2013 checks
2. All documents reflecting the application for, opening, maintenance, signature identification, and modification of all accounts of <u>Plaza Extra Supermarkets</u> -- as well as all external or internal emails, correspondence, notes and any other documents that appear in your business records or computer systems regarding these accounts.	See Below	See Below
190-199075 - UNITED CORPORATION PARTNERSHIP LIQUIDATING EXPENSE ACCOUNT	Original signature card, addendum to the deposit accounts agreement IDEAL BUSINESS, United's articles of incorporation, business license, certificate of registration, court order, court order 2, United's by-laws, and EIN Number	--Application to open the account --External or internal emails related to the account --Correspondence related to the account
190-199091 - UNITED CORPORATION PARTNERSHIP CLAIMS RESERVE ACCOUNT	Original signature card, addendum to the deposit accounts agreement IDEAL BUSINESS, United's articles of incorporation, business license, certificate of registration, court order, court order 2, United's by-laws, and EIN Number	--Application to open the account --External or internal emails related to the account --Correspondence related to the account
2. All documents reflecting the application for, opening, maintenance, signature identification, and modification of all accounts of <u>United Corporation d/b/a Plaza Extra Supermarkets</u> -- as well as all external or external emails, correspondence, notes and any other documents that appear in your business records or computer systems regarding these accounts.	See Below	See Below
191-013307 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	Original signature card and updated signature card requiring 2 signatures, original account application, and certificate of resolution, addendum 1 to the deposit accounts	--External or internal emails --Correspondence related to the account --Forms evidencing the two signature requirement

Banco Popular Document Status Regarding May 31, 2016 Subpoena

Subpoena Item	Item Received	Item Outstanding
	handbook	--Forms evidencing the closure of the account
191-063789 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	Original signature card and updated signature card requiring 2 signatures, original account application, certificate of resolution, and tax withholding information	--External or internal emails --Correspondence related to the account --Forms evidencing the two signature requirement --Forms evidencing the closure of the account
191-148830 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	Original signature card and updated signature card requiring 2 signatures, original account application, addendum 1 to the deposit accounts agreement, back up withholding information,	--External or internal emails --Correspondence related to the account --Forms evidencing the two signature requirement --Forms evidencing the closure of the account
191-256269 - UNITED CORPORATION DBA PLAZA EXTRA (Plaza Extra West) [account closed]	Original signature card and updated signature card requiring 2 signatures, certificate of resolution, addendum to the deposit accounts agreement and back up withholding information	--External or internal emails --Correspondence related to the account --Forms evidencing the two signature requirement --Forms evidencing the closure of the account
191-295027 - UNITED CORPORATION DBA PLAZA EXTRA (Operations Account, STX) [account closed]	Original signature card, certificate of resolution, addendum to the deposit accounts agreement, and back up withholding information	--External or internal emails --Correspondence related to the account --Forms evidencing the closure of the account
191-295043 - UNITED CORPORATION DBA PLAZA EXTRA (Credit Card Account)	Original signature card, original account application, addendum to the deposit accounts agreement, and back up withholding information	--External or internal emails --Correspondence related to the account
191-295191 - UNITED CORPORATION DBA PLAZA EXTRA	Original signature card, original account application, addendum to the deposit accounts agreement, certificate of resolution, and back up withholding information	--External or internal emails --Correspondence related to the account
191-295310 - UNITED CORPORATION DBA PLAZA EXTRA (STX East Store)	Original signature card, original account application, certificate of resolution, and back up withholding information	--External or internal emails --Correspondence related to the account
192-026143 - UNITED CORPORATION DBA PLAZA EXTRA (Ideal Business Acct, St. Thomas) [account	Original signature card, updated signature card requiring 2 signatures, original account application, addendum to the deposit	--External or internal emails --Correspondence related to the account, --Forms evidencing the closure of the

Banco Popular Document Status Regarding May 31, 2016 Subpoena

Subpoena Item	Item Received	Item Outstanding
closed]	accounts agreement, back up withholding info, and certificate of resolution	account
2. All documents reflecting the application for, opening, maintenance, signature identification, and modification of all accounts of <u>Plessen Enterprises</u> -- as well as all external or external emails, correspondence, notes and any other documents that appear in your business records or computer systems regarding these accounts.	None	All
2. All documents reflecting the application for, opening, maintenance, signature identification, and modification of all accounts of <u>United Corporation</u> -- as well as all external or external emails, correspondence, notes and any other documents that appear in your business records or computer systems regarding these accounts.	None	All
3. All bank statements and deposit slips for the years 1998-2015.	See below	See below
190-199075 - UNITED CORPORATION PARTNERSHIP LIQUIDATING EXPENSE ACCOUNT	Deposits and Statements – 2/28/15-12/31/15	None
190-199091 - UNITED CORPORATION PARTNERSHIP CLAIMS RESERVE ACCOUNT	Deposits and Statements – 2/28/15-12/31/15	None
191-013307 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	None	--1998-2015 bank statements and deposit slips
191-063789 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	None	--1998-2015 bank statements and deposit slips
191-148830 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	None	--1998-2015 bank statements and deposit slips
191-256269 - UNITED CORPORATION DBA PLAZA EXTRA (Plaza Extra West) [account closed]	Deposits – 2012-2015	--Bank statements 1998-2015 --Deposit slips 1998-2011, plus may have missing deposits from 2012-2015—unable to tell without bank statements.
191-295027 - UNITED CORPORATION DBA PLAZA EXTRA (Operations Account, STX) [account closed]	Statements – 4/1/15-9/4/15	--Bank statements March, October – December 2015 --Deposit slips March-December 2015
191-295043 - UNITED CORPORATION DBA PLAZA	Statements – 3/6/15-12/31/15	--Deposit slips March-December 2015

Banco Popular Document Status Regarding May 31, 2016 Subpoena

Subpoena Item	Item Received	Item Outstanding
EXTRA (Credit Card Account)		
191-295191 - UNITED CORPORATION DBA PLAZA EXTRA (Telecheck Account)	Statements – 3/12/15-12/31/15	--Bank statements and deposit slips for 1998-February 2015
191-295310 - UNITED CORPORATION DBA PLAZA EXTRA (STX East Store)	None	--Bank statements and deposit slips for 1998-2015
192-026143 - UNITED CORPORATION DBA PLAZA EXTRA (Ideal Business Acct, St. Thomas) [account closed]	Deposits and Statements – 7/1/09-7/13/15	--Bank statements and deposit slips for 1998-2014, January 2015-June 2015
United Corporation Accounts	None	--Bank statements and deposit slips for 1998-2015
Plessen Accounts	None	--Bank statements and deposit slips for 1998-2015
4. Documents reflecting what accounts (both those listed and any others) that have been open and closed and the dates of such opening and closing.	See below.	See below.
190-199075 - UNITED CORPORATION PARTNERSHIP LIQUIDATING EXPENSE ACCOUNT	None	Document(s) reflecting the date the account was opened
190-199091 - UNITED CORPORATION PARTNERSHIP CLAIMS RESERVE ACCOUNT	None	Document(s) reflecting the date the account was opened
191-013307 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	Opened - 5/4/1994 [Information for non-personal accounts form]	Document(s) reflecting the date the account was closed
191-063789 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	Opened – 10/18/2000 [Information for non-personal accounts form]	Document(s) reflecting the date the account was closed
191-148830 - UNITED CORPORATION DBA PLAZA EXTRA [account closed]	Opened – 10/17/2006 [Information for non-personal accounts form]	Document(s) reflecting the date the account was closed
191-256269 - UNITED CORPORATION DBA PLAZA EXTRA (Plaza Extra West) [account closed]	Opened – 12/28/2011 [Information for non-personal accounts form]	Document(s) reflecting the date the account was closed
191-295027 - UNITED CORPORATION DBA PLAZA EXTRA (Operations Account, STX) [account closed]	Opened – 3/6/2015 [Information for non-personal accounts form]	Document(s) reflecting the date the account was closed
191-295043 - UNITED CORPORATION DBA PLAZA EXTRA (Credit Card Account)	Opened – 3/6/2015 [Information for non-personal accounts form]	None
191-295191 - UNITED CORPORATION DBA PLAZA EXTRA (Telecheck Account)	None	Documents reflecting the date the account was opened
191-295310 - UNITED CORPORATION DBA PLAZA	Opened – 3/16/2015 [Information for non-	None

Banco Popular Document Status Regarding May 31, 2016 Subpoena

Subpoena Item	Item Received	Item Outstanding
EXTRA (STX East Store)	personal accounts form]	
192-026143 - UNITED CORPORATION DBA PLAZA EXTRA (Ideal Business Acct, St. Thomas) [account closed]	Opened – 10/20/1993 [Information for non-personal accounts form]	Document(s) reflecting the date the account was closed
United Accounts	None	Document(s) reflecting the date the account was opened and, if relevant, closed
Plessen Accounts	None	Document(s) reflecting the date the account was opened and, if relevant, closed

D-6

From: Joel Holt <holtvi@aol.com>
To: SGrey <SGrey@nicholsnewman.com>
Cc: ghodges <ghodges@dtflaw.com>
Bcc: carl <carl@carlhartmann.com>; kim <kim@japinga.com>
Subject: Re: Bank of Nova Scotia
Date: Mon, Sep 12, 2016 7:38 am

Please have the documents segregated and sent to Greg and let's see what he claims is not relevant—we can then go from there.

Joel H. Holt, Esq.
2132 Company Street
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709

—Original Message—

From: Sam Grey <SGrey@nicholsnewman.com>
To: Joel Holt <holtvi@aol.com>
Cc: Gregory H. Hodges <ghodges@dtflaw.com>
Sent: Sun, Sep 11, 2016 3:32 pm
Subject: RE: Bank of Nova Scotia

Thanks Greg and Joel

I may have deleted the original email in error. My apologies.

Joel, I think we are all in agreement. However, if you and Greg can't agree as to the relevance of the documents, I think you will need to get a court order or issue a new subpoena.

Sam

From: Joel Holt [<mailto:holtvi@aol.com>]
Sent: Saturday, September 10, 2016 2:08 AM
To: Sam Grey <SGrey@nicholsnewman.com>
Cc: Gregory H. Hodges <ghodges@dtflaw.com>
Subject: Fwd: Bank of Nova Scotia

Sam-Here is the email I previously sent on this issue

Joel H Holt
2132 Company St.
Christiansted, VI 00820
340-773-8709

Begin forwarded message:

From: Joel Holt <holtvi@aol.com>
Date: August 31, 2016 at 11:04:56 PM GMT+2
To: SGrey@nicholsnewman.com
Cc: ghodges@dtflaw.com, nizar@dewood-law.com
Subject: Re: Bank of Nova Scotia



I am willing to agree to this protocol, but subject to reserving any rights to object at a later date if this does not result in either documents being produced to us or an acceptable explanation as to why none are relevant. I really think the deposits into the account as well as the account documents (opening the account, information gathering forms, etc.)

Joel H Holt
2132 Company St.
Christiansted, VI 00820
340-773-8709

On Aug 30, 2016, at 2:55 PM, Sam Grey <SGrey@nicholsnewman.com> wrote:

Good afternoon

I agree with Greg's assessment.

Joel, any objection to me providing the documents to Greg for review?

Sam

From: Gregory H. Hodges [<mailto:ghodges@dtflaw.com>]
Sent: Thursday, August 25, 2016 3:48 PM
To: Sam Grey <SGrey@nicholsnewman.com>
Cc: 'Joel Holt' <holtvi@aol.com>; 'Nizar DeWood, Esq.' <nizar@dewood-law.com>
Subject: RE: Bank of Nova Scotia

Sam,

I disagree with Joel. The 8/5/16 Order, attached to the email below, denied my motion as moot because the "Master has informed the Court that both banking institutions have complied with the Subpoenas." As you will recall, in your attached letter of 7/14/16, after noting my objection to the production of any documents regarding United's "tenant account," you said: "Both of you have agreed that you have no objection to the BNS producing documents relative to the subpoena without including the account information that Greg has objected to." It is my understanding that shortly after your letter, BNS produced documents responsive to the subpoena without including the tenant account information, as agreed. Obviously, I do not know what Judge Ross informed Judge Brady regarding "both banking institutions have[ing] complied with the Subpoenas." For all we know, he informed Judge Brady that BNS had complied with the subpoena as limited by the parties' agreement memorialized in your letter, which arguably would have rendered my motion moot. If, however, Judge Brady was informed that BNS had already complied with the subpoena without limitation, he clearly was misinformed and my motion would not have been rendered moot.

I am sure all of us would like to avoid the need for reissuing a subpoena, further motion practice or keeping BNS in the middle of a dispute in which it has no stake. Because I have no idea of the scope/extent of the tenant account information that has been withheld from production, I suggest that you send these documents to me for review on the chance that United may not object to production. In any event, I ask you to continue to withhold these documents from production to Joel, who at this point has no client to enforce or issue subpoenas, until the uncertainties outlined above are resolved.

Regards,
Greg

Gregory H. Hodges

Dudley, Topper and Feuerzeig, LLP
Law House, 1000 Frederiksberg Gade
St. Thomas, VI 00802
Direct: (340) 715-4405
Fax: (340) 715-4400
Web: www.DTFLaw.com

<image002.jpg>

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From: Joel Holt [<mailto:holtvi@aol.com>]
Sent: Thursday, August 25, 2016 11:29 AM
To: sgrey@nnlglaw.com
Cc: Gregory H. Hodges
Subject: Bank of Nova Scotia

Sam-the Court denied the motion to quash the subpoena (copy of Order attached), so now the documents that were withheld (while the agreed upon documents were produced) need to be produced. Please inform the Bank of Nova Scotia to produce these documents. Let me know if you have any questions.

Joel H. Holt, Esq.
2132 Company Street
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709

D-7



Caja 12
56 x 60

Caja 13
61 x 64

Caja 6
24 x 28

Caja 10
46

Caja 14
65 x 67

Caja 4
75 x 18

Caja 7
29 x 34

PP10-Ready

36

Sturberg Inc. 5208

EXHIBIT

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