

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

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD 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

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

JURY TRIAL DEMANDED

Consolidated with

Case No.: SX-2014-CV-287

Consolidated with

Case No.: SX-2014-CV-278

Consolidated with

Case No.: ST-17-CV-384

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED, *Plaintiff,*

vs.

UNITED CORPORATION, *Defendant.*

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED, *Plaintiff*

vs.

FATHI YUSUF, *Defendant.*

FATHI YUSUF, *Plaintiff,*

vs.

MOHAMMAD A. HAMED TRUST, *et al,*
Defendants.

**HAMED'S MOTION TO STRIKE YUSUF CLAIM Y-6 ON PROCEDURAL GROUNDS:
\$49,997 "BLACK BOOK BALANCE" ALLEGEDLY OWED**

Yusuf has raised as one of his claims, designated as Y-6, a claim for \$49,997, based on what is referred to as the "Black Book".¹ Hamed asks that the claim be struck prior to depositions and briefing *as a matter of law*,² on procedural grounds—pursuant to the applicable VI statute of limitations ("SOL"). Yusuf admitted the following two dispositive facts in discovery responses on May 15, 2018: (1) all "Black Book" claims were in or before 1994, and (2) none of the documents the FBI/DOJ seized in 2001 (that Yusuf had previously argued tolled the statute of limitations) were taken (and thus unavailable to Yusuf) within a six year period following the events alleged—and thus that seizure did not affect the running of the six year time limit under the SOL.

Facts

In response to discovery in this action, Yusuf admits that the 'complete' Black Book is before the Master and can be reviewed. See **Exhibit 2**, Yusuf response to RFPD 7.

RFPD 7 of 50:

Request for the production of documents, number 7 of 50, relates to Claims Y-6 and Y-7 - as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Y-6 - Black Book Balances Owed United" and "Y-7- Ledger Balances Owed United."

Please provide the complete Black Book referenced in Yusuf Exhibits to the Original Claims. . . .

Response

The **complete Black Book** bate-stamped FY004411-004477 was previously produced. (Emphasis added.)

¹ At times, Yusuf has described this claim as belonging to different persons/entities. As can be seen below, whether this is a debt to Yusuf as Mike Yusuf has testified (**Exhibit 1**), or a United claim as Yusuf asserts at times, and seems to assert here, is *totally* irrelevant.

² As discussed in detail below, when his initial SOL defense collapsed due to his admissions in discovery, Yusuf improperly attempted to assert two new defenses into 'excess verbiage' in response to an RFA. However, as also discussed below, these two new defenses are also invalid as a matter of law. But, more to the point, neither requires any factual inquiry, as even if the facts as stated are taken by the Special Master as true for the purpose of this motion -- they raise is no defense as a matter of law.

As can be seen in **Exhibit 3**, the Black Book is neither an accounting, nor is it actually probative of anything. Leaving that point aside, and more importantly, all entries were made in 1994 or before. Thus, as Yusuf admits, all of these claims were already more than six years old before the FBI or DOJ raided the stores and took documents. See **Exhibit 4**, Yusuf response to RFA 4 of 50:

Admit or deny that claims listed in Exhibit G to Yusuf s Original Claims, Relevant Black Book Entries, occurred in 1994 or earlier, and occurred more than six years before the FBI seized document[s].

Response:

Admit.³

Thus, the relevant facts as to this issue are undisputed and of record.⁴

³ After the admission, Yusuf adds additional verbiage that is not part of a proper response to a *Request to Admit*. As discussed below, this "testimony" is irrelevant to a SOL motion. He states:

Further responding, Defendants state shows that in Yusuf's earlier declaration he explained that "[u]nder the business agreement between Hamed and me that I now describe as a partnership, profits would be divided 50-50 after deduction for rent owed to United, among other expenses" and that "[u]nder our agreement, I was the person responsible for making all decisions regarding when the reconciliation would take place" and that Yusuf had the discretion to determine when the reconciliation would take place. See August 12, 2014 Yusuf Declaration, p. 2. **At the time that these United debts were incurred**, the grocery store at the Plaza Extra East location was not operating as a result of a fire at that store and the Plaza Extra Tutu Park Store was not yet open. Such circumstances constitute extraordinary circumstances, which operate to trigger an equitable tolling as to the pursuit of such debts. (Emphasis added.)

⁴ Although Yusuf improperly refused to answer the Interrogatory on this issue, that that is not relevant in light of the May 15, 2018, RFA and RFPD responses.

Interrogatory 14 of 50

Interrogatory 14 of 50 relates to Claim Y-6 as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Black Book Balances Owed United" and Exhibit G to Yusuf s Original Claims, Relevant Black Book Entries.

Please fully describe Exhibit G - Relevant Black Book Entries, including but not limited to, the physical location of where this "Black Book"

Applicable Law

A. Statute of Limitations Generally.

The statute of limitation applicable in this action is clear as a bell. 5 V.I.C. §31(3), provides the statute of limitations for actions for debt, breach of contract and conversion of property. The applicable SOL is 6 years. Further, as noted in *United v. Waheed Hamed*, 2013 WL 3724921 (V.I.Super. 2013) (Dunston, J.) the statute of limitations for “accounting” and “recoupment/constructive trust” is also 6 years:

While Plaintiff lists “accounting” and “constructive trust or recoupment” as separate counts, they are equitable remedies, and therefore not separate causes of action. Thus, they do not carry a statute of limitations apart from the independent causes of action upon which they rely. *Id.* at *2 (footnotes omitted).

Thus, the limitations period for Yusuf's claim is 6 years. It should also be noted this would be the case even if this were viewed as an equitable claim, as 5 V.I.C. § 32(a) provides:

(a) An action of an equitable nature shall only be commenced within the time limited to commence an action as provided in this chapter.

was when it was found, who first found this "Black Book," the total number of pages in this "Black Book," how this "Black Book" made it to its physical location, when the "Black Book" was placed in the location where it was found, whether the FBI ever had possession of this "Black Book", and if so for what dates, an explanation of each entry in Exhibit G, including, but not limited to, what the designation "ck #" signifies, including the bank account associated with the entry; the date of the transaction for each entry (including the year); a description of each expenditure/description (e.g., p.2, what does "Less Fathi Yusuf \$2,500.00 mean), an explanation of why each entry is a business expense of the Partnership, a description of the documents supporting each expenditure/description (e.g., an invoice), a translation of each Arabic word/phrase/description in the exhibit, and the length of time that passed between each entry and the date the FBI seized the document - with a description of all bank, investment and other documents referenced in the exhibit or your explanation.

Response:

Defendants object to this Interrogatory because it is vague, ambiguous, and compound such that the total number of Interrogatories together with their sub parts and other discovery exceeds the maximum allowable number of Interrogatories under the JDSP and violates both the spirit and the terms of the JDSP limiting the number of Interrogatory questions.

In *James v. Antilles Gas Co.*, 2000 WL 1349233 (V.I. Super. 2000) (Cabret, J.), it was held that the statute of limitations governing counterclaims relates back to the time the original complaint was filed. Thus, as Judge Brady has stated here, the statute of limitations for the damage claims asserted in Defendants' counterclaim for debt, breach of contract, conversion, breach of fiduciary duty, recoupment/constructive trust and accounting are all barred to the extent they arose prior to 6 years before the complaint was filed, which was on September 17, 2012. As previously found, this bars all damages based on these causes of action that arose before September 17, 2006. Thus, Plaintiff seeks an order barring the instant claim as it is based on entries that arose before September 17, 2006.

B. Yusuf's Original Defense to the SOL

In all prior filings, Yusuf has alleged that the FBI/DOJ seizure of documents in 2001-2002 tolled the SOL. The logic was that Yusuf lacked access to the relevant documents, which tolled the SOL from 2001 to the present. However, Yusuf has now admitted that all Black Book entries were before 1994 and, thus, outside of the FIRST running of the SOL. Thus, the SOL applies and no additional law is necessary or applicable.

C. New Yusuf Defense 1 of 2

As to the first "new" Yusuf defense which was "sort of" added at the end of an RFA—and thus is without legal effect, it is without any legal support. It is also sort of a "United" defense—although the law is identical whether the claimant is United or Yusuf. Yusuf argues:

At the time that these United debts were incurred, the grocery store at the Plaza Extra East location was not operating as a result of a fire at that store and the Plaza Extra Tutu Park Store was not yet open. Such circumstances constitute extraordinary circumstances, which operate to trigger an equitable tolling as to the pursuit of such debts.

Thus, Yusuf proposes a brand new defense to the SOL—one that has never been addressed to or decided by the VI Supreme Court (or any other Court in any jurisdiction).

It goes like this:

There is a defense to the Statute of Limitations when the party involved alleges that he was deprived of time to file at the very beginning of the time period in which the statute ran. If there is a fire or other similar event "[a]t the time that. . .debts were incurred" the SOL must be waived, despite the fact that the party had full knowledge of the claim and there has been no impediment to the bringing of a complaint for years thereafter.

Thus a *Banks* analysis of the law of other jurisdictions and the best rule for the VI must be done.

Plaintiff's counsel certifies by the signing of this document that they have reviewed the law of every jurisdiction. Yusuf does not suggest he did not have knowledge of these claims when they were entered into the Black Book or that he couldn't have filed from 1995 to September 19, 2006 for some reason. Thus, no such defense of problems "at the time that these. . .[claims] were incurred" has been held to exist anywhere--Hamed's counsel can locate no decision that would create a defense of "even though we knew of this years ago, we had a fire so we couldn't file in many the ensuing years."

Because of this, there is no majority rule as to this 'defense', except that the statute provides that one has six years to file after an event unless the party is prevented from doing so. All of the entries were made in 1994 and before. Similarly, there is no minority rule, because there simply is no such defense. The best rule for the USVI is, therefore, the wording of the statute--and the many years of SOL decisions that require filing within the requisite time period absent any reason that one could not file.

D. New Yusuf Defense 2 of 2

As to the second "new" Yusuf defense which was also "sort of" added at the end of a RFA—and thus is also ineffectual, it is without any legal support. This 'defense' relies on

the "the business agreement between Hamed and me that I now describe as a partnership" and thus would seem to be a Yusuf "claims" defense. Yusuf argues:

Further responding, Defendants state shows [sic.] that in Yusuf's earlier declaration he explained that "Under the business agreement between Hamed and me that I now describe as a partnership, profits would be divided 50-50 after deduction for rent owed to United, among other expenses" and that "[u]nder our agreement, I was the person responsible for making all decisions regarding when the reconciliation would take place" and that Yusuf had the discretion to determine when the reconciliation would take place. See August 12, 2014 Yusuf Declaration, p. 2.

Thus, the applicable law, as previously pointed out (repeatedly) by Judge Brady, is RUPA. Claims pursuant to an accounting in a partnership dissolution are barred by the same time limits, as expressly stated in in VI RUPA section 26 V.I.C. § 75(c):

(c) The accrual of, and any time limitation on, a right of action for a remedy under this section is governed by other law. A right to an accounting upon a dissolution and winding up does not revive a claim barred by law. (Emphasis added).⁵

The law of the case is set forth in Judge Brady's decision dated July 25, 2017, at 9-10, and his November 15, 2017 denial of reconsideration.

By its plain language, Section 75 unambiguously provides that during the life of the partnership) a "partner may maintain an action against the partnership or another partner for legal or equitable relief, with or without an accounting as to the partnership business;" and that "**accrual of, and any time limitation on, a right of action for a remedy under this section is governed by other law. A right to an accounting upon a dissolution and winding up does not revive a claim barred by law.**" "The effect of those rules is to compel partners to litigate their claims during the life of the partnership or risk losing them." National Conference of Commissioners on

⁵ This same provision has been enacted and uniformly followed in RUPA jurisdictions. See, e.g., *Baghdady v. Baghdady*, 3:05-CV-1494, 2008 WL 4630487 (D. Conn. Oct. 17, 2008) (quoting *Fike v. Ruger*, 754 A.2d 254, 264 (Del.Ch.1999), *aff'd* 752 A.2d 112 (Del.2000) and citing *TIFD v. Fruehauf*, 883 A.2d 854, 866 (Del.Ch.2004)), quoting from it as follows:

the language of the statute was adopted verbatim from § 405 of RUPA, which other states also adopted. In Delaware, one court stated with respect to this statute: "Thus, **it is clear under RUPA that a right of action arising during the life of a partnership is not revived merely because a dissolution occurs and a separate right to an accounting on dissolution arises.**" (Emphasis added.)

Uniform State Laws; Uniform Partnership Act; Section 405(c) comment 4.
(Emphasis added.)

This is about the fifth time this has been asserted and rejected in various forms.

Argument

Yusuf has admitted that his claims occurred in and prior to 1994. That is outside of the time limits of the VI SOL. Yusuf has conceded, by admissions in discovery, that his initial defense that "the FBI/DOJ had my documents at the end of the SOL period", is inapplicable. Yusuf improperly attempted to assert two new defenses which are invalid as a matter of law—as even if all relevant facts as stated by Yusuf are taken by the Special Master as true for the purpose of this motion, there still is no defense as a matter of law.

Thus, before the parties bear the burden of depositions and briefing, Hamed's motion must be granted.

Conclusion

There is no claim here. There never has been, Yusuf has known this all along—and certainly after Judge Brady's decision that is directly applicable.

Dated: May 21, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of May, 2018, I served a copy of the foregoing by email (via CaseAnywhere), as agreed by the parties, on:

Hon. Edgar Ross (w/ 2 Mailed Copies)
Special Master

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CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

This document complies with the page or word limitation set forth in Rule 6-1(e).



Maher Yusuf testifying for United (as its President) in this April 3, 2014, deposition, captioned "30(B)(6) OF UNITED CORP. - MAHER "MIKE" YUSUF) at pages 73-75

Q. (Mr. Hartmann) Okay. And I now am going to show you an Exhibit numbered 149, which is Bates numbered at the upper right-hand corner, HAMD200105, and is a letter addressed on United Corporation stationery to Mr. Mohammad Hamed on August 22nd, 2012 from Fathi Yusuf. Did -- did Fathi Yusuf draw up this letter, or did you?

A. I don't recall if it was me, or me and him, or me alone. I -- I -- I don't -- I don't remember.

Q. Okay. But both of these letters were sent from Fathi Yusuf, right?

A. Yes

Q. Okay. As a matter of fact, let's look at -- at 144. That's the one with the math on it, or 146, whichever you want.

A. Okay

Q. Yeah, it's the same one. What does the signature on 144 or 146 say? Whose signature is that?

A. That's my signa --

Q. You recognize it?

A. -- my signature.

Q. Your signature. But it says, For the Fathi Yusuf, right?

A. Right.

Q. Why would Fathi Yusuf -- you were the president, right, of United?

A. Yes

Q. And -- and these were not adjustments for United Corporation, these were adjustments for Plaza Extra Supermarkets, is that correct?

A. Yes.

Q. Is that why Fathi Yusuf's name appears on all three of these, because these are partnership reconciliations?

A. Yes. It's for -- it's withdrawals from the store.

Q. Okay

A. I mean, what's so hard in that?

Q. Nothing. (Emphasis added.)

Ex. 1

UNITED CORPORATION

4-C & 4-D Estate, Ston Farm

P.O. Box 763

Christiansted, VI 00820

Date: August 22, 2012.

HAND DELIVERY**Mohammed Hamed**
By Waleed Hamed

Dear Mohammed Hamed,

Re: Set-Off

Your response letter, through your agent Waleed Hamed, does not deny the validity of any of the amounts stated as owing and outstanding to United Corporation. Your letter requests that an accounting be done for other matters, which is a separate issue. Please reduce to writing those other matters you contend are owed, and provide the supporting documentation.

Accordingly, the amount requested will be withdrawn.

Thank you.

Cordially,


Fathi Yusuf

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

WALEED HAMED, as Executor of the)
Estate of MOHAMMAD HAMED,)

Plaintiff/Counterclaim Defendant,)

v.)

FATHI YUSUF and UNITED CORPORATION,)

Defendants/Counterclaimants,)

v.)

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

Additional Counterclaim Defendants.)

WALEED HAMED, as Executor of the)
Estate of MOHAMMAD HAMED,)

Plaintiff,)

v.)

UNITED CORPORATION,)

Defendant.)

WALEED HAMED, as Executor of the)
Estate of MOHAMMAD HAMED,)

Plaintiff,)

v.)

FATHI YUSUF,)

Defendant.)

FATHI YUSUF and)
UNITED CORPORATION,)

Plaintiffs,)

v.)

THE ESTATE OF MOHAMMAD HAMED,)
Waleed Hamed as Executor of the Estate of)
Mohammad Hamed, and)
THE MOHAMMAD A. HAMED LIVING TRUST,)

Defendants.)

CIVIL NO. SX-12-CV-370

ACTION FOR INJUNCTIVE
RELIEF, DECLARATORY
JUDGMENT, AND
PARTNERSHIP DISSOLUTION,
WIND UP, AND ACCOUNTING

Consolidated With

CIVIL NO. SX-14-CV-287

ACTION FOR DAMAGES AND
DECLARATORY JUDGMENT

CIVIL NO. SX-14-CV-278

ACTION FOR DEBT AND
CONVERSION

CIVIL NO. ST-17-CV-384

ACTION TO SET ASIDE
FRAUDULENT TRANSFERS

DUDLEY, TOPPER
AND FEUERZEIG, LLP

1000 Frederiksberg Gade

P.O. Box 756

St. Thomas, U.S. V.I. 00804-0756

(340) 774-4422

EX. 2

**RESPONSE TO HAMED'S SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS PURSUANT TO THE CLAIMS DISCOVERY PLAN OF 1/29/2018
NOS. 6-7 OF 50 AS TO Y-6, BLACK BOOK BALANCE OWED UNITED,
Y-7 LEDGER BALANCES OWED UNITED, AND
Y-9 UNREIMBURSED TRANSFERS OWED UNITED**

Defendant/Counterclaimants Fathi Yusuf ("Yusuf") and United Corporation ("United")(collectively, the "Defendants") through their attorneys, Dudley, Topper and Feuerzeig, LLP, hereby provide their Responses to Hamed's Second Request for Production of Documents Pursuant to the Claims Discovery Plan of 1/29/2018, Nos. 6-7 of 50 As To Y-6, Black Book Balance Owed United, Y-7 Ledger Balances Owed United, and Y-9 – Unreimbursed Transfers Owed United.

GENERAL OBJECTIONS

Defendants make the following general objections to the Interrogatories. These general objections apply to all or many of the Interrogatories, thus, for convenience, they are set forth herein and are not necessarily repeated after each objectionable Request to Admit. The assertion of the same, similar, or additional objections in the individual responses to the Interrogatories, or the failure to assert any additional objections to a discovery request does not waive any of Defendants' objections as set forth below:

(1) Defendants object to these Interrogatories to the extent they may impose obligations different from or in addition to those required under the Virgin Islands Rules of Civil Procedure.

(2) Defendants object to these Requests for Production to the extent that they use the words "any" and "all" as being overly broad, unduly burdensome, immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

**DUDLEY, TOPPER
AND FEUERZEIG, LLP**

1000 Frederiksberg Gade

P.O. Box 756

St. Thomas, U.S. V.I. 00804-0756

(340) 774-4422

Further responding, Yusuf identifies and produces (where not previously produced) the following documents which are otherwise non-objectionable and responsive to this request:

The complete Black Book bate-stamped FY 004411 – 004477 (previously produced).
See also attached Bates FY 014955 which was previously produced as Exhibit H to Yusuf's Accounting Claims.

RFPDs 7 of 50:

Request for the production of documents, number 7 of 50, relates to Claims Y-6 and Y-7 – as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Y-6 – Black Book Balances Owed United" and "Y-7- Ledger Balances Owed United."

Please provide the complete Black Book referenced in Yusuf Exhibits to the Original Claims, G- Relevant Black Book Entries and the complete ledger document referenced in Exhibit H – Ledger Sheets Reflecting United's Payments for Plaza Extra.

Response:

The complete Black Book bate-stamped FY 004411 – 004477 was previously produced. *See* also attached Bates FY 014955 which was previously produced as Exhibit H to Yusuf's Accounting Claims.

FY 004411

five-across®

4 Column
COLUMNAR
BOOKS

JAN. '92 - MAY '94

Ex. 3

YUSF106891

February 1992 out standing checks

		out standing checks	187.80 ✓		1
108	2	1 Hussein Iraq	1,409. - ✓		2
109	3	4 U.E. Water and Power Authority	725.79 ✓		3
110	4	5 R. Wolff	645. - ✓		4
111	5	10 St. Mary's School	990. - ✓		5
112	6	13 R and R. Cleaners	1,200. - ✓		6
113	7	18 Larry Motta	300. - ✓		7
114	8	20 Bill Gustave	65. - ✓		8
115	9	20 Ectab Services	950. - ✓		9
116	10	21 Tropical Supply, Inc	19.38 ✓		10
117	11	24 Larry Motta	300. - ✓		11
118	12	24 Theophilus Elizee	1,134. - ✓		12
119	13	24 WABA	1,528.07 ✓		13
120	14	24 Barnett Frank D.D.S.	550. - ✓		14
121	15	29 Larry Motta	300. - ✓		15
16		S.C.	7.50 ✓		16
17		D.M. check Deposit slip	15.94 ✓		17
18		D.M. Check Book	53.84 ✓		18
19			10,381.32	10,381.32	19
1-31	20	2 Balance in Bank	13,378.70		20
21	21	3	1,093.75 ✓		21
22	22	18	2,880.43 ✓		22
23	23	18	3,016.00 ✓		23
24	24	21	3,098.70 ✓		24
25	25	21	340. - ✓		25
26	26	21	1,457.02 ✓		26
27	27	24	2,875. - ✓		27
28	28	26	2,833.88 ✓		28
29	29	27	633.35 ✓		29
30	30				30
31	31		31,606.83		31
	32		100. -		32
			868.01		

March Deposit

FY 004414

1	Balance in Bank	2/29/92	22,713.52	1
2	2		2,000.00	2
3	2		800.00	3
4	2		5,345.47	4
5	2		800.00	5
6	6		6,549.75	6
7	13		11,340.72	7
8	13		218.88	8
9	20	Redeposit	3,855.06	9
10	20		4,696.50	10
11	27		14,995.91	11
12				12
13			<u>74,295.81</u>	13
14				14
15				15
16				16
17				17
18				18
19				19
20				20
21				21
22				22
23				23
24				24
25				25
26				26
27				27
28				28
29				29
30				30
31				31
32				32

March 1992 With Draw

ck #	date	paid to	amount	
	1	out standing checks	1,500.00 ✓	1
122	2 3	Woolworth Dept. store	671.52 ✓	2
123	3 7	Larry Motta	300.00 ✓	3
124	4 9	V.I. Water and power Aut.	44.98 ✓	4
125	5 10	St. Croix Avis	102.00 ✓	5
126	6 9	Theo Dependable Security	1,134.00 ✓	6
127	7 14	Larry Motta	300.00 ✓	7
128	8 14	Bill Gustave	150.00 ✓	8
129	9 18	Law office of Bryant, White	901.04 ✓	9
130	10 18	Steve Niskey	400.00 ✓	10
—	11 29	Returned check DM ✓	3,835.06 ✓	11
—	12 13	Returned Deposit DM ✓	218.88 ✓	12
131	13 20	Larry Motta	300.00 ✓	13
132	14 21	Tropical Supply, INC	306.79 ✓	14
133	15 23	Theophiles Elizee	1,134.00 ✓	15
135	16 26	Dept. of Finance	37,057.71 ✓	16
134	17 26	V.I. telephone corp.	141.30 ✓	17
136	18 26	Dept. of Finance	589.80 ✓	18
—	19 23	Returned check DM ✓	416.50 ✓	19
137	20 27	V.I. Water and Power Aut.	1,136.47 ✓	20
138	21 28	Larry Motta	300.00 ✓	21
139	22 30	MAHER YUSUF	207.79 ✓	22
14	23	S.C.	7.50 ✓	23
	24			24
	25		51,155.34	25
	26			26
	27			27
	28			28
	29			29
	30			30
	31			31
	32			32

April Deposit

FY 004416

1	2	3	4	5
1	Bal. in Bank		62,675.54	1
2	2 Redeposit		416.50 ✓	2
3	2		4,740.00 ✓	3
4	7		3,215.00 ✓	4
5	9		285.00 ✓	5
6	9		340.00 ✓	6
7	9		517.83 ✓	7
8	14		10,221.28 ✓	8
9	21		200.33 ✓	9
10	21		4,605.00 ✓	10
11	22		3,790.00 ✓	11
12	24		2,469.50 ✓	12
13	30		835.41 ✓	13
14			94,311.39	14
15				15
16				16
17				17
18				18
19				19
20				20
21				21
22				22
23				23
24				24
25				25
26				26
27				27
28				28
29				29
30				30
31				31
32				32

April with draw

	1	2	3	4				
1	1				Out standing ck		39,535.07 ✓	1
2	140	2	4		Larry Motta		300.00 ✓	2
3	141	3	4		Void		—	3
4	142	4	4		Waheed Hamed		165.00 ✓	4
5	—	5	2		Returned ck OM ✓		517.83 ✓	5
6	143	6	6		Theo Dependable Security		1,034.00 ✓	6
7	144	7	6		Cesar Ruiz		100.00 ✓	7
8	145	8	10		Rudy Carnes		4,085.71 ✓	8
9	146	9	11		Larry Motta		300.00 ✓	9
0	147	10	13		Mohamad Yusuf		12,000.00 ✓	10
11	148	11	16		Sheldon Rudloff		699. — ✓	11
12	149	12	17		Ocean System Research, INC-		45. — ✓	12
13	150	13	18		Larry Motta Void		300	13
14	152	14	20		V.I. Telephone corp.		220.45 ✓	14
15	151 152	15	20		VOID		—	15
16	154	16	21		Theophila Etizee		1,034. — ✓	16
17	155	17	21		Cesar Ruiz		100. — ✓	17
18	156	18	21		Bryan, White and Ass. P.C.		364.86 ✓	18
19	157	19	24		V.I. Water and Power Auth.		1,325.21 ✓	19
20	158	20	24		Larry Motta		300.00 ✓	20
21	159	21	25		Larry Motta		300.00 ✓	21
22	160	22	25		Fathi Yusuf		300.00 ✓	22
23	161	23	27		Ideal Elevator, Co.		772.00 ✓	23
24	163	24					63,489.13	24
25	163	25	29		Maher Yusuf		3,000. — ✓	25
26		26					66,489.13	26
27	165	27	29		St. Mary's School		999. — ✓	27
28		28			Service charge		7.50	28
29		29					67,486.63	29
30		30						30
31		31						31
32		32						32

1	Bal. in Bank		28,586.76 ✓	1
2	6		8,017.50 ✓	2
3	6		4,783.50 ✓	3
4	7		1,095.50 ✓	4
5	8		950. - ✓	5
6	13		340. - ✓	6
7	13		3,445.33 ✓	7
8	14		1,190.00 ✓	8
9	15		4,854. - ✓	9
10	19		3,090. - * - -	10
11	21		933. - * - -	11
12	28		972. - * - -	12
13	29		797.91 * - -	13
14	29	lx 42,579.41	1,730.01 xx *	14
15			60,788.51	15
16				16
17			53,262.59	17
18				18
19				19
20				20
21				21
22				22
23				23
24				24
25				25
26				26
27				27
28				28
29				29
30				30
31				31
32				32

Deposit June

1	Bal Bank		41,097.14	1	
2	2		4,252.59*	2	196
3	5		4,531.00*	3	198
4	5		27,155.57*	4	199
5	1		7,192.50*	5	
6	1		92.77*	6	194
7	9		3,657.50*	7	195
8	11		3,830.30*	8	196
9	12	Re-Deposit	781.29*	9	197
10	12		1,993.23*	10	198
11	15		1340.00*	11	199
12	18		60,571.49 ✓	12	200
13	18		517.83	13	201
14	22		1,091.50	14	202
15	26	Redeposit	517.83	15	203
16	26		1,965.50	16	204
17	30		8,733.00	17	206
18			<u>114,494.29</u>	18	207
19				19	208
20				20	209
21				21	
22				22	210
23				23	211
24				24	212
25				25	213
26				26	214
27				27	215
28				28	216
29				29	
30				30	
31				31	
32				32	

June 1992

	1	2	3	4
1		Out standing ck	6,397.93 ✓	1
190	2	1 Dept. of Finance	4,142.23 ✓	2
191	3	4 Ideal Elevator Co.	32.00 ✓	3
192	4	4 U and W Industrial Supply	271.00 ✓	4
	5	6 Return ck. DM	781.25	5
194	6	4 Theo Elizee Security	1,134.00 ✓	6
195	7	5 Ocean Systems Research	45.00 ✓	7
196	8	6 Larry Motta	300.00 ✓	8
197	9	11 WAPA	44.98 ✓	9
198	10	11 American Express Co.	509.91 ✓	10
199	11	11 Brammer, chasan and O'Conul	175.00 ✓	11
200	12	12 Adnan Rahhal	31,379.00 ✓	12
201	13	13 Larry Motta	300.00 ✓	13
202	14	16 Bryant, White and Ass.	869.56 ✓	14
203	15	19 American Express	884.18 ✓	15
205	16	19 Theophillis Elizee	1,134.00 ✓	16
206	17	20 Larry Motta	300.00 ✓	17
207	18	20 Augustu Lucien	80.00 ✓	18
208	19	20 Rudy Carnes	1,900.00 ✓	19
209	20	20 Larry Motta	63.37 ✓	20
	21	23 Return ck DM	517.83 ✓	21
210	22	26 Larry Motta	300.00 ✓	22
211	23	27 Enrique Arrago	1,000.00 ✓	23
212	24	29 U.I. Water and Power Aut.	1,341.24	24
213	25	29 WABA	204.40	25
214	26	29 U.I. Telephone Corp.	167.59	26
215	27	30 Bureau of Interat Revenue	987.03	27
216	28	6 Return ck DM	781.25 ✓	28
29		S.C.	7.50 ✓	29
30			55,269.00	30
31				31

Deposit July

FY 004422

Date	Description	Amount	Page
1	Bal. in Bank	62,005.55	1
2	1	2,297.91	2
3	2	1,190.00	3
4	6	3,102.00	4
5	7	2,723.00	5
6	8	4,473.50	6
7	8 Redeposit	517.83	7
8	14	1250.00	8
9	14	340.00	9
10	14	3,630.50	10
11	21	1,560.33	11
12	21	1,197.75	12
13	27	7,542.50	13
14	28 Re-deposit	1,197.75	14
15	29	2,186.38	15
16	30 32,701.58xx	300.00	16
17	31	<u>1,982.91</u>	17
18		<u>97,502.91</u>	18
19			19
20			20
21			21
22			22
23			23
24			24
25			25
26			26
27			27
28			28
29			29
30			30
31			31
32			32

July 1992

1		Out standing ck		2,780.26	X	1
216	2	1	Committee to Elect Redfield	1,000.00	X	2
217	3	+	Wincott & Ass. Restrooms VOID	2,500.00		3
218	4	2	MAHER YUSUF	3,543.73	X	4
219	5	2	Theo Elizee Security Services	1,134.00	X	5
220	6	4	Larry Motta	300.00	X	6
221	7	4	Ocean System Research Inc.	90.00	X	7
222	8	6	Inter-ocean Insurance	5,000.00	X	8
223	9	6	Fathi YUSUF	295.00		9
	10	8	Return ck DM	517.83	X	10
224	11	9	Bill Thomas	413.89	X	11
225	12	11	Larry Motta	300.00	X	12
226	13	11	Pet-Lock Electrical Supplies	121.50	X	13
227	14	14	U.I. Water power Aut.	44.98	X	14
228	15	15	Xerox Corp.	5,945.00	X	15
229	16	15	Reliable Rental	117.00	X	16
230	17	16	Inter-Ocean Insurance	34,962.11	X	17
231	18	17	Theo Elizee	1,134.00	X	18
233	19	18	Larry Motta	300.00	X	19
232	20	17	Tropical Supply INC.	122.41	X	20
234	21	20	MARK 21 Industries	297.75	X	21
235	22	24	Best Furniture	500.00	X	22
236	23	25	Larry Motta	300.00	X	23
	24	24	Return ck DM	1,197.75	X	24
237	25	29	Mahmoud Idheila	2,000.00		25
238	26	29	Ghazi Said Abdallah	16,000.00	X	26
239	27	31	U.I. Bureau of Internal Revenue	2,935.89	X	27
240	28	31	Wilbur Abramson	1,400.00	X	28
	29	31	S.C.	7.50	X	29
30						30
31						31
32						32
				82,670.60		

Deposit August

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	
		Bal. in Bank				27,318.20																										
2	3					3,000.00																										
3	6					1,665.00																										
4	7					1,190.00																										
5	7					2,941.-																										
6	10					4,605.48																										
7	10		23,537.64			2,830.50	xx																									
8	12					1,250.00																										
9	13					975.-																										
10	17		Re-deposit			500.-																										
11	19					1,317.83																										
12	21					1,100.00																										
13	24					8,490.48																										
14	24		Loan payment			3,000.00																										
15	24					500.00																										
16	31					1,190.00																										
17	31				4,500.33	xxx	xxx																									
18																																
19																																
20																																
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26																																
27																																
28																																
29																																
30																																
31																																
32																																

August 1992

1	1	Out standing ck				12,485.59	1
2	241 2 1	Larry Motta				300.00 ✓	2
3	242 3 3	Theo Elizee				1,134.00 ✓	3
4	243 4 3	Rudy Caines				3,400.00 ✓	4
5	244 5 3	WAPA				209.43 ✓	5
6	245 6 3	WAPA				1,407.02 ✓	6
7	246 7 3	V.I. Telco.				115.84 ✓	7
8	247 8 8	Larry Motta				306.29 ✓	8
9	248 9 8	St. Croix, Avis				59.50 ✓	9
10	249 10 10	Francis Gustave				100. — ✓	10
11	250 11 10	Xerox Corp.				634.87 ✓ x x	11
12	259 12 12	Zenon Const Corp.				15,000. — ✓	12
13	252 13 12	Theo. Elizee				1,134. — ✓	13
14	253 14 12	The Glass Shop				765.90 ✓	14
15	254 15 15	Larry Motta				300.00 ✓	15
16	255 16 15	Ocean System Res.				70.00 ✓	16
17	— 17 15	Return - ck				500.00 ✓	17
18	256 18 22	Larry motta				300.00 ✓	18
19	257 19 22	Larry motta				29.65 ✓	19
20	258 20 22	Albert David trust.				16,500. — ✓	20
21	260 21 26	Island Countertop Company				1,000.00 ✓	21
22	261 22 29	Larry Motta				300.00 ✓	22
23	262 23 29	Theo Elizee				1,134.00 ✓	23
24	264 24 31	Viteleo				81.55 ✓	24
25	265 25 31	V.I. Bureau of Internal Revenue				1,351.27 ✓	25
26	266 26 31	Prudential				372.00 ✓	26
27	27					59,070.91	27
28	28	Bank charges				7.50	28
29	29					59,078.41	29
30	30						30
31	31						31
32	32						32

DM

xxx

Deposit September 1992

FY 004426

1	Bal. in Bank			7,936.35	1	
2	1			1,500.00 ✓	2	26
3	3			340.00 ✓	3	26
4	3			1,865.00 ✓	4	26
5	4			2,870.00 ✓	5	27
6	8	6,744.69	xx	1,665.00 ✓	6	27
7	10			3,630.50 ✓	7	27
8	8 (Re-deposit)	2,779.78	xx	1,197.75 ✓	8	27
9	14			3,657.50 ✓	9	27
10	14			4,400.00 ✓	10	27
11	15			797.91 ✓	11	27
12	15			2,225.00 ✓	12	27
13	17			517.83 ✓	13	27
14	23			1,058.00 ✓	14	27
15	24	8,324.52	xx	7,542.50 ✓	15	28
16	30 (Loan payment)			2,500.00 ✓	16	28
17	30			1,536.31 ✓	17	28
18					18	29
19				45,239.65	19	29
20					20	28
21					21	28
22	From page, next	47,210.91			22	28
23	Bank charges	7.50			23	28
24					24	29
25		41,218.41			25	29
26					26	29
27					27	29
28					28	29
29					29	29
30					30	29
31					31	29
32					32	29

September 1992

	1	2	3	4			
	1				Out standing etc.		3,443.82
267	2	2			E. Arroyo		1,000.00 ✓
268	3	4			WAPA		1,414.34 ✓
269	4	3			Westren food		255.00 ✓
270	5	4			WABA		717.00 ✓
271	6	5			Larry Motta		300.00 ✓
272	7	5			St. Croix Avis		59.50 ✓
273	8	8			Bellows International		242.00 ✓
274	9	9			Fathi YUSUF		2,000.00 ✓
275	10	10			Theo Society Service		1,134.00 ✓
276	11	10			R. Wolf		55.00 ✓
277	12	11			WAPA		259.16 ✓
278	13	11			Enrique James		65.00 ✓
279	14	11			AT and T		56.86 ✓
280	15	12			Bryan, white and Assoc.		6,875.96 ✓
281	16	12			Larry Motta		300.00 ✓
282	17	12			Larry Motta		47.18 ✓
283	18	19			Larry Motta		300.00 ✓
284	19	19			E. Arroyo		5,000.00 ✓
286	20	21			American Express	STT.	1,020.00 ✓
287	21	22			E. Z. Rental		200.00 ✓
288	22	23			Theo ELIZEE		1,134.00 ✓
289	23	24			Larry Law suit		7,000.00 ✓
290	24	26			Larry Motta		300.00 ✓
291	25	26			Rudy Caines		300.00 ✓
292	26	26			E. Z. tool Rental		400.00 ✓
293	27	23			Dept. of planning & N. Resources		50.00 ✓
294	28	28			Core State First Penn -		2,058.50 ✓
295	29	28			Core State First Penn -		2,415.00 ✓
296	30	28			Standard and Poor's Corp -		100.72 ✓
298	31	30			V.I. Bureau of Internal Revenue		1,310.12 ✓
	32						40,013.16
					Returned check		1,197.75 ✓

9/8

YUSF106907

October, 1992

	1	2	3	4
1	Bel. in Bank		13,046.58	1
2	1		1,675.-	2
3	1		1,400.-	3
4	2		1,190.-	4
5	2		1,500.-	5
6	5		1,766.-	6
7	5	7,238.87	300.- x2	7
8	6		1,150.-	8
9	8		1,665.-	9
10	9	12,377.57 6,692.90	4,457.50 xx	10
11	13		1,690.-	11
12	13		2,830.60	12
13	20	11,566.56	2,075.00 xxx	13
14	22		517.83	14
15	27		1,058.00	15
16	29		7,542.50	16
17	30	Re-deposit	1,197.75	17
18				18
19		20,302.04	45,061.66 xix	19
20				20
21				21
22				22
23				23
24				24
25				25
26				26
27				27
28				28
29				29
30				30
31				31
32				32

October, 1992

	1	2	3	4			
	1				Out standing ck.	9,025.31 ✓	1
299	2	9/30			V.I. telephone carb.	61.90 ✓	2
300	3	10/1			Committee to Elect Kenneth	500. - ✓	3
301	4	2			WABA	273.23 ✓	4
302	5	2			WABA	1,394.49 ✓	5
303	6	2			Print Maker, INC.	352. - ✓	6
304	7	2			Commissioner of Finance	342. - ✓	7
305	8	2			Commissioner of Finance	378. - ✓	8
306	9	2			Wilbur Abramson	1,400. - ✓	9
307	10	3			Larry Motta	300. - ✓	10
308	11	6			E.Z. Tool Rental	817. - ✓ XX	11
309	12	6			Theo Elizee	1,134.00 ✓	12
310	13	8			MAHER Yusuf	1,000.00 XX	13
311	14	9			Glidden Company	128.27 ✓	14
312	15	9			Ali Hardware	100.75 ✓	15
313	16	9			St. Croix Axis	55.25 ✓	16
314	17	9			Rudy Caines	2,000.00 ✓	17
315	18	9			Enrigne James	95. - ✓	18
316	19	9			Wahed Hamed	1,500. - ✓	19
317	20	10			Larry Motta	300. - ✓	20
318	21	10			Rudy Caines	300. - ✓ XX	21
319	22	12			Bryant, White & Ass.	131.87 ✓	22
320	23	16			Vitelco	58.50 ✓	23
321	24	17			Larry Motta	300.00 ✓	24
322	25	17			Gannet Hardware	97.47 ✓	25
323	26	20			Theo Dependable Security	1,134.00 XXX	26
324	27	24			Larry Motta	300.00 ✓	27
325	28	30			Govr. V.I. Bureau of Internal Rev	1,280.60 XX	28
326	29	31			Larry Motta	300.00 ✓	29
327	30	31			WAPA	732.46 ✓	30
	31				S.C.	2.50 ✓	31
						<u>25,799.58</u>	

November 1992

		Out Standing ck		1	2	3	4
						2,573.31	
1	328	1	3	Theo Elizee		1,134.00	✓ 1
2	329	2	4	Rudy Caines		1,875.00	✓ 2
3	330	3	4	WAPA		43.77	✓ 3
4	331	4	4	WAPA		297.44	✓ 4
5	332	5	4	Glidden Co.		87.52	✓ 5
6	333	6	4	St. Croix Avis		63.75	✓ 6
7	334	7	7	Larry Motta		300.00	✗ 7
8	335	8	13	Larry Motta		300.00	✓ 8
9	336	9	16	Augustin Angol		100.00	✓ 9
10	337	10	18	Rudy Caines		1900.00	✓ 10
11	338	11	19	Theo Elizee		1,134.00	✓ 11
12	339	12	20	Gannet Hardware		49.90	✓ 12
13	340	13	21	Larry Motta		300.00	✓ 13
14	341	14	24	Fathi Yusuf		5,000.00	✓ 14
15	342	15	28	Larry Motta		300.00	✓ 15
16	343	16	28	Rudy Caines		800.00	✗ 16
17	344	17	30	Bureau of Internal Revenue		1,232.69	✓ 17
18	345	18	30	Mr. Rooter		65.50	✓ 18
19	346	19	30	V.I. telephone		75.44	✓ 19
20		20	20	Returned check	1,198.75	1,197.75	✓ 20
21		21	21	S.C.		7.50	✓ 21
22		22	22				22
23		23	23			18,837.57	23
24		24	24	check-Book		82.03	24
25		25	25				25
26		26	26			18,919.60	26
27		27	27				27
28		28	28				28
29		29	29				29
30		30	30				30
31		31	31				31
32		32	32				32

December 1992

FY 004432

1	-	Bal. in Bank		29,365.30	1
2	1			7,542.50	2
3	2			1,500.-	3
4	2			4,472.91	4
5	4			1,665.00	5
6	8			3,197.75	6
7	8			2,116.00	7
8	8			2,900.00	8
9	9			1,190.00	9
10	10			517.83	10
11	10			3,657.50	11
12	11			2,830.50	12
13	11	Re-Deposit	47,692.97 xx	797.71	13
14	17			1,530.-	14
15	21	Re-Deposit		797.91	15
16	28			517.83	16
17	28		33,417.68 xx	1,500.-	17
18	31	Re-Deposit		<u>1,197.75</u>	18
19				67,098.94	19
20				64,296.69	20
21					21
22					22
23					23
24					24
25					25
26					26
27					27
28					28
29					29
30					30
31					31
32					32

December 1992

			Out standing ck			2,142.54	✓
1	342	1	Theophilus Elizee			1,134.00	✓
2	348	2	Caribbean cooling			471.00	✓
3		3	Returned check			797.91	✓
4	349	4	Wilbur Abramson			1,400. -	✓
5	350	5	WABA			307.67	✓
6	352	6	WABA			2,222.01	✓
7	353	7	Larry Motta			300. -	✓
8	354	8	St. Croix, Avis, Inc.			59.50	X
9	355	9	MR. Rooter, plumber			145. -	✓
10	356	10	Larry Motta			300. -	✓
11	357	11	Rudy Caines			1,500. -	✓
12	358	12	Sydney Brooks			261.50	X
13		13	Returned check			797.91	✓
14	359	14	THEOPHILUS ELIZEE			1,134.00	✓
15	361	15	BRYANT, WHITE ASSOC.			3,042.49	✓
16	362	16	FATHI YUSUF			10,000.00	✓
17	363	17	LARRY MOTTA			300.00	✓
18	364	18	WAPA			234.29	✓
19	365	19	WAPA			1,381.65	✓
20	366	20	RUDY CAINES			800.00	✓
21	367	21	LARRY MOTTA			300.00	✓
22	368	22	ST. CROIX AVIS			42.50	
23	369	23	LARRY MOTTA			967.4	✓
24	370	24	VITELCO			91.15	✓
25	371	25	CROWN CARIBBEAN, LTD.	XX		4000.00	X
26	372	26	THEOPHILUS ELIZEE			1,134.00	X
27	373	27	AUR. INTERNAL REVENUE			915.39	X
28	374	28	" " " "			1,333.42	X
29	375	29	DEPT. OF FINANCE			2,601.36	X
30	376	30	LARRY MOTTA			300.00	X
31	377	31	H.M.S. PEST CONTROL			1800.00	X
32			Bank Service charge			7.50	

January 1993

Deposit

1	2	3	4
		35,109.93	1
1 2 4		975.-	2
1 3 5		800.-	3
1 4 5		1,058.-	4
1 5 7		6,037.50	5
6 8	Re-deposit	1,195.-	6
7 11		950.-	7
8 12		8,342.50	8
9 12		5,000.00	9
10 13		2,830.50	10
11 15	Re-Deposit	1,197.75	11
12 15		514.60	12
13 25	Re-Deposit	1,197.75	13
14 25		1,650.00	14
15 27		4.-	15
16 27		1,250.-	16
17 28		517.83	17
18			18
19		68,610.42	19
20			20
21			21
22			22
23			23
24			24
25			25
26			26
27			27
28			28
29			29
30			30
31			31
32			32

Disbursement

1		out-standing checks	30,380.17	1
378	2 9	WABA	43.77 ✓	2
379	3 9	Larry Motta	300.00 ✓	3
380	4 16	Theophilus Elizee	1,194.00 ✓	4
381	5 14	Larry Motta	300.00 ✓	5
382	6 23	Rudy Caines	1,500.00 ✓	6
383	7 23	Larry Motta	300.00 ✓	7
384	8 25	Bryant, White & Associates	730.33 ✓	8
385	9 27	Theophilus Elizee	1,134.00	9
386	10 28	V.I. Telephone Corp.	101.41 ✓	10
387	11 28	Wilbur Abramson	1,400.00 ✓	11
388	12 28	Allan Chitolie	1,200.00 ✓	12
389	13 30	Larry Motta	300.00	13
390	14 30	WABA	352.10	14
391	15 30	WABA	1,038.79	15
16				16
17			40,214.57	17
18	7	Returned checks	1,197.75	18
19	21	" "	1,197.75	19
20		" " DM	4.00	20
21		S.C.	7.50	21
22				22
23			42,621.57	23
24				24
25				25
26				26
27				27
28				28
29				29
30				30
31				31
32				32

Feb., 1993

Deposit

	2	3	4
1		28,856.24	1
2	1	1,340.-	2
3	3	500.-	3
4	3	797.91	4
5	4	9,042.50	5
6	4	3,453.52	6
7	8	3,590.00	7
8	10	2,830.50	8
9	10	2,140.-	9
10	15	500.-	10
11	16	4,940.-	11
12	22	1,522.50	12
13	22		13
14	22	<hr/> 59,513.47	14
15			15
16			16
17			17
18			18
19			19
20			20
21			21
22			22
23			23
24			24
25			25
26			26
27			27
28			28
29			29
30			30
31			31
32			32

March 1993

Deposits

1	2	3	4	1
2			46,126.81	2
3	1		517.83	3
4	2		1,058.00	4
5	3		2,815.00 2,815.00	5
6	4		1,190.00	6
7	5		95.00	7
8	5		875.00	8
9	8		1,990.00	9
10	9		475.00	10
11	10		2,830.50	11
12	11		1,297.91	12
13	12	31,270.46 XA	3,923.33	13
14	19		3,074.75	14
15	12	Re-Deposit	801.91	15
16	22		565.94	16
17	24		7,542.50	17
18	29	14,731.85	633.35	18
19				19
20			<u>75,467.87</u>	20
21			4,200.00	21
22				22
23				23
24				24
25				25
26				26
27				27
28				28
29				29
30				30
31				31
32				32

March, 1993

Disbursement

				803.15 ✓	
1	1			46,126.81	1
2	407	2 1	U.I. Bureau of Internal Revenue	1,244.20 ✓	2
3	408	3 3	Wally Hamed	5,000. - ✓	3
4	409	4 5	WABA	1,836.42 ✓	4
5	410	5 6	Larry Motta	331.40 ✓	5
6	411	6 6	St. Croix, Avis	29.75	6
7	413	7 10	Theophilus Elizee	1,134. - ✓	7
8	412	8	Avis Rent a-car	20,000. - ✓	8
9	414	9	Rudy Caines	1,500. - ✓	9
10	415	10	Larry Motta	300. - ✓	10
11	-	11 16	Returned check Daisy Herbert	797.91 ✓	11
12	-	12 16	Bank Debt.	4.00 ✓	12
13	416	13 16	Bryant, White And Associates	343.75 ✓	13
14	417	14 20	Larry Motta	303.45 ✓	14
15	418	15 20	WABA	288.42 ✓	15
16	419	16 22	Theophilus Elizee	1,134. - ✓	16
17	420	17 23	Najah Yusuf	2,000. - ✓	17
18	421	18 24	U.I. telephone corp-	65.02 ✓	18
19	422	19 27	Larry Motta	300. - ✓	19
20	423	20 29	WABA	1,394.20 ✓	20
21	424	21 29	Rudy Caines	1,900. -	21
22	425	22 29	Mohamed Hamed	15,000. - ✓	22
23	427	23 29	U.I. Bureau of Internal Revenue	1,220.29	23
24	428	24 29	Wilbur Abramson	1,400. - ✓ XX	24
25		25			25
26		26		58,336.02	26
27		27	Service charge	7.50 ✓	27
28		28		58,343.52	28
29		29			29
30		30			30
31		31			31
32		32			32

April 1993

FY 004440

1				20,280.29	1
2	1			2,297.91	2
3	1			3,100.00	3
4	2			340.00	4
5	5			675.00	5
6	7			6,115.99	6
7	7	20,815.11	XX	2,033.00	7
8	12			17,686.33	8
9	14			2,079.41	9
10	19			1,000.13	10
11	21			425.00	11
12	26			950.00	12
13	27	Re-deposit		797.91	13
14	29	Re-Deposit		4.00	14
15	29			500.00	15
16					16
17				58,334.97	17
18					18
19					19
20					20
21					21
22					22
23					23
24					24
25					25
26					26
27					27
28					28
29					29
30					30
31					31
32					32

April, 1993

	1	2	3	4	
1	1		Out-standing checks	3,156.04 ✓	1
2	429 ²	3	Larry Motta	300. - ✓	2
3	430 ³	5	WABA	46.04 ✓	3
4	431 ⁴	5	Corestate First Pennsylvania	10,010.00 ✓	4
5	432 ⁵	10	Larry Motta	300. - ✓	5
6	433 ⁶	10	Sydney Brookes	215. - ✓	6
7	-	7	19 Bank charges	4. - ✓	7
8	-	8	19 Returned check Daisy Heibert	797.91 ✓	8
9	434 ⁹	13	Avis Rent-A-Car	6,666.66 ✓	9
10	435 ¹⁰	14	Bryant, white and Associates	62.50 ✓	10
11	436 ¹¹	17	Larry Motta	300. - ✓	11
12	437 ¹²	17	Caribbean Coling Co -	60. - ✓	12
13	438 ¹³	20	MAJAH YUSUF	1,000. - ✓	13
14	439 ¹⁴	20	First office supplies	49.30 ✓	14
15	440 ¹⁵	24	Larry Motta	300. - ✓	15
16	441 ¹⁶	26	WABA	407.91 ✓	16
17	442 ¹⁷	24	Theo Elizee	1,134. -	17
18	443 ¹⁸	24	Theo Elizee	1,062. -	18
19	445 ¹⁹	26	V.I. telephone corp.	144.09 ✓	19
20	446 ²⁰	26	Wahced Hamed	5,000. -	20
21	447 ²¹	28	St-croix, 2000	500. -	21
22	448 ²²	28	American Express co -	91.73	22
23	449 ²³	29	Bureau of Internal Revenue	1,141.57	23
24	451 ²⁴	29	Bryant, white and Associates	855.15	24
25	25				25
26	26			33,603.92	26
27	27				27
28	28				28
29	29				29
30	30				30
31	31				31
32	32				32

May, 1993

	1	2	3	4	
1					34,508.02
2	3				3,790.74
3	5				1,295.50
4	5				675.-
5	7				3,196.-
6	10	W	32,883.54	XX	7,453.83
7	11				950.00
8	12				1,306.12
9	14				859.25
10	18				340.-
11	20		Re-Deposit	16,694.90	801.91 XX
12	21				1,250.-
13	24				8,017.50
14	25				1,517.83
15					
16					<u>64,961.70</u>
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					

May, 1993

1	2	3	4
			9,784.45 ✓
1	1		
2	452	1 Larry Motta	300. - ✓
3	3	5 Returned check Daisy Herbert	797.91 ✓
4	4	5 Charges on returned check	4. - ✓
5	453	5 4 Maher YUSUF	4,000. - ✓
6	454	6 4 WABA	1,722.67 ✓
7	455	7 5 Theophilus Elizee	1,134. - ✓
8	456	8 8 Larry Motta	300. - ✓
9	457	9 12 Caribbean Hydro-tech, Inc	636. - ✓
10	458	10 14 Robert Berg	4,400. - ✓
11	459	11 14 Najah YUSUF	1,500. - ✓
12	460	12 14 Wally Hamed	5,000. - ✓
13	461	13 15 Larry Motta	300. - ✓
14	462	14 15 Rudy Cains	2,800. - ✓
15	463	15 17 Corestate First Pennsylvania	3,000. - ✓
16	464	16 19 Theophilus Elizee	1,134. - ✓
17	465	17 20 WABA	1,395.28 ✓
18	466	18 21 V.I. telephone Corp.	54.86 ✓
19	467	19 21 Bryant, White and Associates	213.30 ✓
20	468	20 21 Larry Motta	300. - ✓
21	469	21 22 Larry Motta Rudy Cains	300. - ✓
22	470	22 24 Bert F. Lee	22,000. -
23	471	23 28 Bureau of Internal Revenue	1,490.11
24	473	24 29 Larry Motta	300. -
25	25		
26	26		62,866.58
27	27	Bank Service Charge	7.50
28	28		
29	29		
30	30		
31	31		
32	32		

June, 1993

FY 004444

	1	2	3	4	
1			25,877.73		1
2	2		1,500.-		2
3	3		800.-		3
4	7		1,766.-		4
5	7		500.-		5
6	7		797.91		6
7	9		5,135.83		7
8	10		797.91		8
9	7		3,055.-		9
10	11	15,980.49	XX 2,830.50		10
11	15		500.00		11
12	17		1,250.-		12
13	17		475.-		13
14	24		7,542.50		14
15	29		1,492.83		15
16	29		1,500.00		16
17	30		1,297.91		17
18					18
19			57,119.12		19
20					20
21					21
22					22
23					23
24					24
25					25
26					26
27					27
28					28
29					29
30					30
31					31
32					32

July 93

FY 004446

1		Balance in Bank.		25,483.86	1
2	1			2,791. —	2
3	1			2,480. —	3
4	6			350. —	4
5	8			5,929.33	5
6	9			1,597.91	6
7	12			1,500. —	7
8	12			4,030.50	8
9	13			340. —	9
10	14	9,281.74	W AX	1,250. —	10
11	19			900. —	11
12	30			200. —	12
13	30			9,035.33	13
14				<hr/>	14
15				55,887.93	15
16	30			475. —	16
17				<hr/>	17
18					18
19				56,362.93	19
20					20
21					21
22					22
23					23
24					24
25					25
26					26
27					27
28					28
29					29
30					30
31					31
32					32

July 93

1	1	out-standing checks		7,	300.11	✓	1
2	494	3 Larry Motta			300.00	✓	2
3	495	3 Rudy Gains	X	1,	100.-	✓	3
4	496	7 Earl Schmidt			500.-	✓	4
5	497	7 Robert sinaper			250.-	✓	5
6	498	8 Mohamad Hamed			100.-	✓	6
7	499	10 Larry Motta			300.-	✓	7
8	500	10 St. Croix, Avis, Inc-			46.75	✓	8
9	501	12 Fathi YUSUF			200.-	✓	9
10	502	13 Theophilus Elizee		1,	134.-	✓	10
11	503	13 Inter-ocean Insurance Agency, Inc.		20,	240.-	✓	11
12	504	16 Fathi YUSUF		1,	500.-	✓	12
13	505	17 Larry Motta			300.-	✓	13
14	506	17 WABA			46.04	✓	14
15	507	20 Caribe Do-it Center			390.00	✓	15
16	508	24 Larry Motta			300.00	✓	16
17	509	24 WABA			355.32	✓	17
18	510	24 Amy Agustin Monell			550.-	✓	18
19	511	24 Fathi YUSUF		1,	500.-	✓	19
20	512	27 Theophilus Elizee	1,134.-		1,134.00		20
21	513	28 WABA	1,847.20		1,347.20	✓	21
22	514	28 V.T. telephone Corp-			83.99	✓	22
23	515	23 Larry Motta			300.-	✓	23
24	516	24 Bureau of Internal Revenue			1,249.66		24
25	25						25
26	26				46,027.12		26
27	27	S.C.			7.50	✓	27
28	28						28
29	29						29
30	30						30
31	31						31
32	32						32

August 93

FY 004448

1	Balance in Bank	12,711.97	1
2	3	340.00	2
3	3	1,900.00	3
4	5	1,865.00	4
5	9	2,561.12	5
6	10	4,128.41	6
7	11	300.00	7
8	16	3,923.33	8
9	17	1,250.00	9
10	31	800.00	10
11	27	632.00	11
12	26	2,050.83	12
13	24	1,066.80	13
14	24	2,100.00	14
15		1,500.00	15
16			16
17		<u>35,629.46</u>	17
18			18
19			19
20			20
21			21
22			22
23			23
24			24
25			25
26			26
27			27
28			28
29			29
30			30
31			31
32			32

Sept., 93

FY 004450

1				20,222.06	1
2	1			1,500. -	2 534
3	2			975. -	3 535
4	3			414.50	4 536
5	7			2,790. -	5 537
6	7			1,249.50	6 538
7	9			1,987.91	7 539
8	15			10,159.89	8 540
9	14			952. -	9 541
10	17			800. -	10 542
11	20	19,779.56	W x X	5,423.33	11 544
12	23			1,315.00	12 543
13	30			10,176.33	13 546
14	30			1,250. -	14 547
15				<hr/>	15 548
16				59,215.52	16 549
17					17 550
18					18 551
19					19 552
20					20 553
21					21 554
22					22 555
23					23 556
24					24 557
25					25 558
26					26 559
27					27
28					28
29					29
30					30
31					31
32					32

October, 93

FY 004452

1				28,183.31	1
2	1			475. --	2
3	5			1,845. --	3
4	5			1,500. --	4
5	7			675. --	5
6	12			1,000. --	6
7	13			797.91	7
8	13	14,986.13	W xx	2,140. --	8
9				3,645.83	9
10	22	Re Deposit		1,000.00	10
11	21			781.25	11
12	22			800.00	12
13	25			416.50	13
14	27			2,363.50	14
15	29			975.00	15
16	29			475.00	16
17				<hr/>	17
18				47,073.30	18
19					19
20					20
21					21
22					22
23					23
24					24
25					25
26					26
27					27
28					28
29					29
30					30
31					31
32					32

October, 93

1	2	3	4	5
1	1			7,149.95 -
2	560 ²	1	Inter-ocean Insurance	2,682.80 -
3	561 ³	1	Juan P. Contreras	278. - -
4	562 ⁴	2	Larry Motta	300. - -
5	563 ⁵	5	Theo. Elizee	1,134. - -
6	564 ⁶	5	V.I. Water and Power Authority	398.67 -
7	565 ⁷	5	V.I. Water and Power Authority	2,011.67 -
8	566 ⁸	9	Larry Motta	300. - -
9	567 ⁹	13	Juan P. Contreras	182. - -
10	568 ¹⁰	13	NAJAH YUSUF	1,500. - -
11	569 ¹¹	13	The Mano School	5,000. - -
12	570 ¹²	13	NAJAH YUSUF	700. - -XX
13	571 ¹³	16	Larry Motta	300. - -
14	572 ¹⁴	16	Rudy Cairns	300. - -
15	573 ¹⁵	16	The Glidden Co.	16.61 -
16	574 ¹⁶	16	WABA	43. - -
17	575 ¹⁷	17	Internal Revenue Service	3,739.55 -
18	576 ¹⁸	17	American Express Co.	555.38 -
19	577 ¹⁹	17	The Glidden Co.	2,243.24 -
20	578 ²⁰	18	Omar Saleh	2,000. - -
21	579 ²¹	17	Monarch Heavy Equ.	750.00 -
22	580 ²²	18	Vitelco	61.76 -
23	581 ²³	18	WAPA	2,557.50 -
24	582 ²⁴	29	V.I. Bureau of Internal Revenue	1,559.74
25	583 ²⁵	23	Larry Motta	300.00 -
26	584 ²⁶	19	Theo Elizee	1,134.00 -
27	585 ²⁷	30	Larry Motta	300.00 -
28	28		Returned ck. Naturamas	1,000.00 -
29	29		Returned ck. S.C.	4.00 -
30	30		S.C.	7.50 -
31	31			<u>38,509.29</u>
32	32			

Nov., 93

FY 004454

1	2	3	4
1			10,423.65
2	2		8,340.41 ✓
3	3		1,250.00 ✓
4	4		2,690.00 ✓
5	5		517.83 ✓
6	5	Bank Charge	4.00 ✓
7	8		675.00 ✓
8	9		1,190.00 ✓
9	9		340.00 ✓
10	10	20,157.45 XX	800.00 ✓
11	15		1,250.00 ✓
12	18		3,066.00 ✓
13	23		340.00 ✓
14	24		7,542.50 ✓
15	26		1,500.00 ✓
16	29		3,469.76 ✓
17	29		1,197.75 ✓
18	30		2,645.83 ✓
19	30		1,492.83 ✓
20			<u>48,735.56</u>
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
32			

Nov., 93

	1	2	3	4			
	1				Out standing	1,859.74 -	1
586	2	4			WAPA	342.70 -	2
587	3	4			Rudy Carnes	2,000.00 -	3
588	4	4			St. Anois Axis	51.00 -	4
589	5	6			Larry Motta	300.00 -	5
590	6	6			Theophilus Elizee	1,134.00 -	6
591	7	10			WAPA	86.00 -	7
592	8	13			Larry Motta	300.00 - xx	8
593	9	23			Vita/co	71.25 -	9
594	10	23			Braniff Chase & O'Connell	153.00	10
595	11	23			Theophilus Elizee	1,134.00 -	11
596	12	23			Larry Motta	300.00 -	12
597	13	23			Pablo M. Quinones	150.00 -	13
598	14	27			Larry Motta	300.00 -	14
599	15	29			Larry Motta	300.00	15
600	16				U.I. Bureau of Intercensus	715.60 -	16
601	17	28			American Express Co.	333.50	17
602	18	26			WAPA	2,395.87 -	18
603	19	26			WAPA	346.92 -	19
	20				Larry Motta	300.00	20
	21	24			Transfer to Acct# 182-321543	20,000.00 -	21
	22				S.C.	7.50 -	22
	23					<u>31,647.98</u>	23
	24						24
	25						25
	26						26
	27						27
	28						28
	29						29
	30						30
	31						31
	32						32

Dec. 93

1	2	3	4
1			21,884.37
2	2		475.00 -
3	6		675.00 -
4	7		3,640.00 -
5	10		1,190.00 -
6	14		2,050.00 -
7	14		975.00 -
8	20	19,080.17	7,542.50 -
9	21	Re-Deposit	1,197.75 -
10	21		340.00 -
11	23		300.00 -
12	23		797.91 -
13	24		2,645.83 -
14	28		1,000.00 -
15	29		517.83 -
16	29		975.00 -
17	30		1,500.00 -
18	31		1,192.75 -
19			
20			48,903.44
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
32			

Dec., 93

								4696.39	4696.39
1	1			Out. standing ck					
2	604	2	4	Larry Motta				300.00	
3	605	3	4	Rudy Carnes				2,000.00	
4	606	4	4	Theophilus Elizee				1,134.00	
5	607	5	11	Larry Motta				300.00	
6	608	6	11	Rudy Carnes				600.00	
7	609	7	11	VS WAPA				53.74	
8	610	8	18	Larry Motta				300.00	
9	611	9	25	Larry Motta				300.00	
10	612	10	10	St. Mary's School				1,110.00	
11	613	11	30	WAPA				1,872.57	
12	614	12	14	Theophilus Elizee				1,134.00	
13	615	13	20	Sydney Broeke				86.00	
14	616	14	20	Cruzan Environmental Service				265.00	
15	617	15	21	Pablo M. Quinones				100.00	
16	618	16	21	Frank Medin		xx		5,000.00	
17	619	17	21	Mohamad Hamed				6,550.00	
18	620	18	22	Bryant, white and Associates				2,879.86	
19	621	19	24	Eileen Mitchell				350.00	x
20	622	20	24	Larry Motta				300.00	
21	629	21	27	Tropical Shipping				1,836.22	
22	630	22	27	U.I. Bureau of Internal Revenue				731.82	x
23	623	23	30	Caribe Do-it Center				36.64	
24	624	24	31	U.I. Bureau of Internal Revenue				1,532.78	x
25	625	25	29	WAPA				309.74	x
26	634	26	28	V.I. Telephone Corp.				70.89	x
27	633	27	28	Rudy Carnes				2,800.00	x
28	632	28	28	Theophilus Elizee				1,134.00	x
29	631	29	28	Anthony Tavernier				2,000.00	
30		30						39,883.22	
31	601	31	18	American Express Co.				333.50	
32		32		S.C. Return ck				11.50	
								41,197.25	

4110 S.4

JAN. 194

1	1		out standing chkr			2,801.39 -	1
2	627	2	✓ SONNY'S REFRIGERATION			727.40 -	2
3	636	3	3 AMEX. EXPRESS CO.			✓ 63.80 -	3
4	599	10	LARRY MOTTA (2 WKS.)			600.00 -	4
5	625	5	5 Tropical Shipping			1,927.75 -	5
6	626	6	5 U.I. Bureau of Internal Revenue			281.43 -	6
7	628	7	5 Anthony Tavernier			1,000.00 -	7
8	637	8	12 THEOPHILUS ELIZEE			648.00 -	8
9	638	9	12 TEXACO CARIBBEAN, INC.			226.65 -	9
10	639	10	14 Bryant White and Ass.			47.74 -	10
11	640	11	14 The Manor School			5,100.00 -	11
12	641	12	15 Larry Motta			300.00 -	12
13	642	13	15 WAPA			53.74 -	13
14	643	14	15 American Express			13.89 -	14
15	644	15	15 Brammer, Chason and O'Connell			153.00 -	15
16	645	16	22 Larry Motta			300.00 -	16
17	646	17	22 Errol Lindsey			563.19 -	17
18	647	18	22 U.I. Telephone Corp.			68.00 -	18
19	648	19	22 St. Croix Avis, Inc.			51.00 XX	19
20	649	20	29 Larry Motta			300.00 -	20
21	650	21	31 WAPA			328.35 -	21
22		22	S.C.			7.50 -	22
23		23					23
24		24				22,062.18 -	24
25		25					25
26		26					26
27		27					27
28		28					28
29		29					29
30		30					30
31		31					31
32		32					32

Feb. 1994

FY 004460

1	4510 Bal in Bank		17,165.54		3
2	2		1,575.00 ✓		2 6:
3	2		1,190.00 ✓		3 6
4	3		340.00 ✓		4 6
5	3		500.00 ✓		5 6
6	3		1,500.00 ✓		6 6
7	4		7,542.50 ✓		7 6
8	8		1,283.28 ✓		8 6
9	8		205.17 ✓		9 6
10	10		950.00 ✓		10 6
11	10	18,690.09	517.83 ✓		11 6
12	14		800.00 ✓		12 6
13	14		1,250.00 ✓		13 6
14	15	22,075.64	1,198.00 ✓		14 6
15	17		2,645.83 ✓		15 6
16	17		200.00 ✓		16 6
17	23		Returned 1,197.75 ✓		17
18	28		1,475.00 ✓		18
19					19
20			36,527.90		20
21					21
22					22
23					23
24					24
25					25
26					26
27					27
28					28
29					29
30					30
31					31
32					32

Feb. 1994

1	1		Out standing			1,610.54	1
2	651	2	Rudy Cairnes			500.00 -	2
3	652	2	WAPA			1,982.88 -	3
4	653	5	Larry Motta			300.00 -	4
5	654	4	Bureau of Internal Revenue			1,802.00 -	5
6	655	4	Bureau of Internal Revenue			900.00 -	6
7	656	4	America Express			1,838.26 xx	7
8	657	8	Larry Motta			300.00	8
9	658	9	St. Croix Avis,			46.75	9
10	659	10	WAPA			52.52	10
11	660	11	Rudy Cairnes			800.00	11
12	661	12	Larry Motta			300.00	12
13	662	13	Spring's Ref.			95.00	13
14	663	14	Vitelco			104.50	14
15	664	15	Larry Motta			300.00	15
16	665	16	U.S. Bureau of Internal Revenue.			647.39	16
17		17					17
18		18				11,579.54	18
19		19	chicking S.F.			4.00 -	19
20		20	S.C.			7.50 -	20
21		21	Return check			<u>1,197.75</u> ✓	21
22		22					22
23		23				12,789.09	23
24		24					24
25		25					25
26		26					26
27		27					27
28		28					28
29		29					29
30		30					30
31		31					31
32		32					32

March, 1997

	1	2	3	4		
1	1	Out standing ck			2,697.16	1
2	666 ²	8 V.I. Water & Power Authority			1,685.47	2
3	667 ³	8 Rudy Caines			1,200.00	3
4	668 ⁴	5 Mark 21 Industries			20,000.00	4
5	669 ⁵	5 Roe-Win Corp.			2,200.00	5
6	670 ⁶	7 V.I. Water & Power Authority			322.60	6
7	671 ⁷	7 V.I. Daily News			16.20	7
8	672 ⁸	5 American Express			600.85	8
9	673 ⁹	5 Bryant, White & Associates			343.75	9
10	674 ¹⁰	7 Cruzan Environmental Services			381.73	10
11	675 ¹¹	7 Superior Block, Inc.			832.30	11
12	676 ¹²	14 Plaza Extra			10,000.00	12
13	677 ¹³	14 WAPA			10.37	13
14	678 ¹⁴	20 Bryant, White & Ass.			892.84	14
15	679 ¹⁵	14 Best Furniture			100.00	15
16	680 ¹⁶	14 Caribe Do-It Center			37.70	16
17	681 ¹⁷	19 Larry Motta			300.00	17
18	682 ¹⁸	8 Returned checks (786.25 + 4.00)			785.25	18
19	683 ¹⁹	3 Returned check (416.50 + 4.00)			420.50	19
20	684 ²⁰	685 *Missing (See Below) *Stolen Checks				20
21	686 ²¹	26 VOID				21
22	687 ²²	26 Larry Motta			300.00	22
23	688 ²³	26 Rudy Caines			1200.00	23
24	689 ²⁴	26 Rudy Caines			4000.00	24
25	690 ²⁵	18 Pinaire Express			202.00	25
26	691 ²⁶	17 Leroy Smith			475.57	26
27					45404.29	27
28		Checking Serv. Fee			7.50	28
29					45411.79	29
30						30
31						31
32						32

April, 94

4/1994

1	1	Outstanding Checks	1900 ⁰⁰ ✓	1
2	690 2	Larry Motta	30000 ✓	2
3	691 3	WAPA	175767 ✓	3
4	692 4	American Express	187254 ✓	4
5	693 5	WAPA	14806 ✓	5
6	6		<u>597827</u>	6
7	7	This Account No. 182-3216-05		
8	8	HAS BEEN CLOSED.		
9	9	4/19/94		
11	11	29 Stop Payment Charge	15.00	11
13	13			13
14	14		0 * *	14
15	15		8 5 7 9 . 0 8 +	15
16	16		2 3 9 5 . 5 0 +	16
17	17		1 2 . 0 0 +	17
18	18		1 6 0 0 . 0 0 +	18
19	19		1 5 0 0 . 0 0 +	19
20	20		7 5 0 . 0 0 +	20
21	21		9 7 5 . 0 0 +	21
22	22		8 0 0 . 0 0 +	22
23	23		6 7 5 . 0 0 +	23
24	24		9 5 0 . 0 0 +	24
25	25		1, 2 5 0 . 0 0 +	25
26	26		1, 6 0 0 . 0 0 +	26
27	27		1, 5 6 2 . 5 0 +	27
28	28		4 7 5 . 0 0 +	28
29	29		2 3, 1 2 4 . 0 8 *	29
30	30		0 * *	30
31	31		1, 9 0 0 . 0 0 +	31
32	32		3 0 0 . 0 0 +	32

New Account April 1994 Core States

NY						Balance	
001	1	4/5	Larry Motta	✓	60000		1
002	2	4/30	V.L. Bureau of Internal Rev.		97829		2
003	3	4/30	Rudy Cairn		120000		3
004	4	4/30	D & W One-Stop Booksmith		3600		4
005	5	4/30	Vitelco		11376		5
006	6	4/30	St. Croix Avis, Inc.		4675		6
007	7	4/30	WAPA (Me Yung)		38945		7
008	8	4/30	WAPA (PLAZA)		159809		8
009	9	4/30	Larry Motta		30000	10,174 ⁹⁷	9
	10				526234		10
	11						11
	12		Balance		10,174 ⁹⁷		12
	13		Add 4/27 deposit		1500.00		13
	14		Sec. Chgs.		(7.50)		14
	15				<u>11,667.47</u>		15
	16		Balance				16
	17		for April 94				17
	18						18
	19						19
	20						20
	21						21
	22						22
	23						23
	24						24
	25						25
	26						26
	27						27
	28						28
	29						29
	30						30
	31						31
	32						32

New Account
182 600135

May 1994

FY 004468

		Deposits			
1	Bank Balance		10,174.97		1
2	5/2/94 Deposit "Herbert"		✓ 1,000.00		2
3	5/2/94 Deposit "Dr. Diaz"		✓ 1,000.00		3
4	5/2/94 Deposit		✓ 975.00		4
5			13,149.97		5
6	5/4/94		✓ 340.00		6
7	5/4/94		✓ 1,500.00		7
8	5/5/94		✓ 675.00		8
9	5/5/94		✓ 750.00		9
10	5/9/94		✓ 2,645.83		10
11	5/9/94		✓ 834.25		11
12	5/9/94		✓ 359.35		12
13	5/10/94		✓ 1,250.00		13
14	5/10/94		✓ 413.00		14
15	5/14/94		✓ 533.22	26,735.40	15
16	5/17		✓ 200.00		16
17	5/17		✓ 500.00 ✓	29,235.40	17
18	5/18		✓ 475.00		18
19	5/23		✓ 2,116.00		19
20	5/23		✓ 2,645.83	34,472.23	20
21	5/24		✓ 562.00 ✓		21
22	5/25		✓ 300.00	38,034.23	22
23	5/27 EILEEN'S Returned 5/21		✓ -975.00	59,009.23	23
24	5/31		✓ 340.00		24
25	5/31		✓ 1,190.00	40,539.23	25
26			50,714.20	- 975.00	26
27				39,564.23	27
28					28
29					29
30					30
31					31
32					32

May 1994

1	2	3	4
1000	"Expenditures"		Bal
101	5/9/94 Larry Motta	300.00 ✓	1
102	5/9/94 Sonny's Refrig. Serv.	115.00 ✓	2
103	5/9/94 Sonny's Refrig. Service	85.00 ✓	3
104	5/9/94 WAPA	103.70 ✓	4
105	5/12 St. Mary's School	665.00 ✓	5
106	5/12 St. Mary's School	100.00 ✓	6
107	5/12 American Express	1634.61 ✓	7
108	5/14 Larry Motta	300.00 ✓	8
109	5/16 Rudy Cairns	200.00 ✓	9
110	5/16 Rudy Cairns	1200.00 ✓	10
111	5/22 Plaza Extra	1006.00 ✓	11
112	5/23 Steve Nicky	400.00 ✓	12
113	5/23 Sonny Refrig. Serv.	255.72 ✓	13
114	5/23 Rudy Cairns	900.00 ✓	14
115	5/21 Larry Motta	300.00 ✓	15
116	5/23 American Express "VOID"	"VOID"	16
117	5/25 Steven Nicky	325.00 ✓	17
118	5/24 Prudential Bucho	3000.00 ✓	18
119	5/25 St. Croix Honda	209.00 ✓	19
120	5/26 Larry Motta	300.00 ✓	20
121	5/26 Vitelco	86.29 ✓	21
122	5/26 WAPA	250.37 ✓	22
123	5/26 V.D. Dennis f. alt. Cas. (Cross Credit)	603.00 ✓	23
124	5/30 Amal Yusuf	200.00 ✓	24
125	5/31 Returned Chk. "Eileen's Fashion"	-975.00 ✓	25
26			26
27			27
28			28
29			29
30			30
31			31
32			32

June 1994

	1	2	3	4	
1					
2					
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31					31
32					32

St. Thomas Debit

1	wire mesh	1,410.37	1
2	Floor tile	4,467.57	2
3	Freight on steel and Roofing <u>Forwarder</u>	1,498.28	3
4	Floor plate include Freight	429.00	4
5	3 H Beam W6X20X50#	775.68	5
6	Different of Vulcraft shipment	10,289.89	6
7	Angel Iron <u>used</u>	2,600.00	7
8	Security mesh F.O.B. Miami	325.00	8
9	check #1237 postmaster <u>tracks</u>	9.95	9
10	3,000 tracks	690.90	10
11	one Forklift with a tank	18,329.74	11
12	3 Ballet Chacks	1,190.25	12
13	freight on Refrigeration		13
14	parts shipped from main	\$101.96	14
15	Freight tropical tracks	200.00	15
16	120 Silicone caulking (Tubes 720)		16
10-17	Cases deposit in Bank #1631	50,000.00	17
10-18	Rand I Electric #1632	5,000.00	18
10-19	Excise tax on Fias Brother's	124.05	check 1600
10-19	Ocean Freight on 4 "	863.40	" 1659
10-17	Paint C/idden	2,243.26	" 577
22	40 cases anti slip tile	2,040.00	22
23	Tax freight on tile	234.00	23
24	10 cases anti slip tile	510.00	24
25	Tax freight on tile	58.50	25
26	Cargo sending oil for Compressor	78.00	26
27	oil purchas for St. Thomas Compressor	190.00	27
28	Lady Romney Freight on tile	30.00	28
29			29
30			30
31			31
32			32

united paid out

(3)

1	1					1
2	2			137,591.37		2
3	10 3	17	Paint to st. Thomas	2,243.26	# 577	3
4	10 4	17	monarch Heavy Equipmat	752. -	579	4
5	5		transferred money	20,000.00		5
6	12 6	21	Frank Medlin	5,000.00	# 618	6
7	12 7	30	Caribe Do-it Center	36.64	# 623	7
8	12 8	27	Tropical shipping	1,836.22	# 629	8
9	12 9	27	V.I. Bureau of Internal Revenue	731.82	# 630	9
10	12/20	28	Anthony Tavernier floor tile	2,000.00	# 631	10
11	11		Tropical shipping	1,927.75	# 625	11
12	12		V.I. Bureau of Internal Revenue	281.43	# 626	12
13	1 13	4	Anthony Tavernier floor tile	1,000.00	# 628	13
14	2 14	4	American Express	1,836.26	# 656	14
15	15					15
16	16			175,234.75		16
17	17		Less for Gross R. tax	1,032.87	# 2071	17
18	18					18
19	19			174,201.88	665	19
20	3 20	5	Mark 21 Industries	24,000.00	668	20
21	3 21	5	ROLO - win	2,200.00	669	21
22	3 22	5	Bryant, White and Associates	318.75	673	22
23	3 23	7	Cruzan Environmental	381.73	674	23
24	3 24	7	Superior Block	832.30	675	24
25	25			197,834.66		25
26	26		motta checks	600.00	2147 & 2148	26
27	2 27	22		197,234.66		27
28	3 28	14		10,000.00	# 676	28
29	29			207,234.66		29
30	3 30	20		860.99	# 678	30
31	31			208,095.65		31
32	32		Less cash fuel	13,800.00		32
				194,295.65		

W 2 2 1

1				1,000. -	1
2			sent m/d	750 -	2
3			Rent	500 -	3
4		check # 1/2 #396		2,500. -	4
5		check # 408		5,000. -	5
3-29-93		check # 425		15,000. -	6
4-20		446		5,000. -	7
5-14		460		5,000. -	8
6-19		1039 & 1040		1,500. -	9
7-8 ¹⁰		1215		2,500. -	10
8-9 ¹¹		1381		2,500. -	11
9-9 ¹²		1550		2,500. -	12
9-30 ¹³		557		5,000. -	13
11-4 ¹⁴		1799		5,000. -	14
12-21 ¹⁵		<u>619</u>		6,550. -	15
12-46		1927		1,500. -	16
3-5 ¹⁷		10,000 + 5,000 - 2,000		1,500. -	17
5-14-94		Cash #99158	make 1/2	5,000. -	18
6-19-94		#136	Father	15,000. -	19
6-20-94		Five	(Father) W/uff	5,000. -	20
7-13-94		Five	(Father) W/uff	2,500. -	21
7-15-94		NOTE 7/15		13,710. -	22

united owes plaza as of

12-31-1993 \$ 399,295.00

Plaid 399,295.00

(1)

ck #									
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
200	4/6/12	Adnan Rahhel					31,379.00		4
211	5/6/17	Encique Arrugo					1,000.00		5
216	6/7/11	Committee to Elect Redfield					1,000.00		6
	7/4/8	Return che					781.25		7
228	8/7/15	Xerox Corp.					5,945.00		8
250	9/8/10	Xerox Corp.					634.87		9
251	10/8/12	Zenon Const.					15,000.00		10
258	11	Land					16,500.00		11
267	12/9/2	E. Arroyo					1,000.00		12
269	13/93	Western Food Re-Zoning					255.00		13
648	14/7/4	Lilliana Belardo					500.00		14
649	15/9/11	Bent Lawnetz					500.00		15
279	16/9/11	AT and T					56.86		16
280	17/9/12	Attorney Fee					2,728.08		17
284	18/9/19	E. Arroyo					5,000.00		18
286	19/9/21	American Express					1,020.00		19
287	20/9/22	E.Z. Rental					200.00		20
289	21/9/23	law suit					7,000.00		21
	22	Cash Backhoe operator					50.00		22
292	23/9-26	E.Z. Rental					400.00		23
	24	2 wine for Arroyo					30.74		24
293	25/23	Planning of Natural Resources					50.00		25
294	26/28	Banks					2,058.50		26
295	27/28	Bank					2,615.00		27
	28	Rent.					194,058.00		28
296	29	Standard & Poor's Corp.					100.72		29
297	30	Key travel					500.00		30
300	31/10/11	K. MAPP					500.00		31
303	32	Print Maker, INC					352.00		32

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

WALEED HAMED, as Executor of the)	
Estate of MOHAMMAD HAMED,)	
)	
Plaintiff/Counterclaim Defendant,)	CIVIL NO. SX-12-CV-370
v.)	
)	ACTION FOR INJUNCTIVE
FATHI YUSUF and UNITED CORPORATION,)	RELIEF, DECLARATORY
)	JUDGMENT, AND
Defendants/Counterclaimants,)	PARTNERSHIP DISSOLUTION,
v.)	WIND UP, AND ACCOUNTING
)	
WALEED HAMED, WAHEED HAMED,)	
MUFEED HAMED, HISHAM HAMED, and)	
PLESSEN ENTERPRISES, INC.,)	
Additional Counterclaim Defendants.)	Consolidated With
WALEED HAMED, as Executor of the)	
Estate of MOHAMMAD HAMED,)	
)	CIVIL NO. SX-14-CV-287
Plaintiff,)	
v.)	ACTION FOR DAMAGES AND
)	DECLARATORY JUDGMENT
UNITED CORPORATION,)	
)	
Defendant.)	
WALEED HAMED, as Executor of the)	
Estate of MOHAMMAD HAMED,)	CIVIL NO. SX-14-CV-278
)	
Plaintiff,)	ACTION FOR DEBT AND
v.)	CONVERSION
)	
FATHI YUSUF,)	
)	
Defendant.)	
FATHI YUSUF and)	
UNITED CORPORATION,)	
)	CIVIL NO. ST-17-CV-384
)	
Plaintiffs,)	ACTION TO SET ASIDE
v.)	FRAUDULENT TRANSFERS
)	
THE ESTATE OF MOHAMMAD HAMED,)	
Waleed Hamed as Executor of the Estate of)	
Mohammad Hamed, and)	
THE MOHAMMAD A. HAMED LIVING TRUST,)	
)	
Defendants.)	

**RESPONSE TO HAMED'S SECOND REQUEST TO ADMIT PER THE CLAIMS
DISCOVERY PLAN OF 1/29/18, NOS. 4-6 OF 50 AS TO YUSUF CLAIM Y-6 BLACK
BOOK BALANCE OWED UNITED, Y-7 LEDGER BALANCES OWED UNITED, AND
Y-9 UNREIMBURSED TRANSFERS OWED UNITED**

Defendant/Counterclaimants Fathi Yusuf ("Yusuf") and United Corporation ("United")(collectively, the "Defendants") through their attorneys, Dudley, Topper and Feuerzeig, LLP, hereby provide their Responses to Hamed's Second Request to Admit Per the Claims Discovery Plan of 1/29/2018, Nos. 4-6 of 50 as to Yusuf Claim Y-6, Black Book Balance Owed United, Y-7 Ledger Balances Owed United, and Y-9 – Unreimbursed Transfers Owed United.

GENERAL OBJECTIONS

Defendants make the following general objections to the Requests to Admit. These general objections apply to all or many of the Requests to Admit, thus, for convenience, they are set forth herein and are not necessarily repeated after each objectionable Request to Admit. The assertion of the same, similar, or additional objections in the individual responses to the Requests to Admit, or the failure to assert any additional objections to a discovery request does not waive any of Defendants' objections as set forth below:

(1) Defendants object to these Requests to Admit to the extent they may impose obligations different from or in addition to those required under the Virgin Islands Rules of Civil Procedure.

(2) Defendants object to these Requests to Admit to the extent that they use the words "any" and "all" as being overly broad, unduly burdensome, immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

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(3) Defendants object to these Requests to Admit to the extent they seek information which is protected by the attorney-client privilege or work-product doctrine, including information prepared in anticipation of litigation, or for trial, by or on behalf of Defendants or relating to mental impressions, conclusions, opinions, or legal theories of their attorneys or representatives, or any other applicable privilege or doctrine under federal or territorial statutory, constitutional or common law. Defendants' answers shall not include any information protected by such privileges or doctrine, and documents or information inadvertently produced which includes such privileged information shall not be deemed a waiver by Defendants of such privilege or doctrine.

(4) Defendants object to these Requests to Admit to the extent that they seek information and documents concerning any matter that is irrelevant to the claims or defenses of any party to this action, and not reasonably calculated to lead to the discovery of admissible evidence.

(5) Defendants object to these Requests to Admit to the extent that they use terms or phrases that are vague, ambiguous, or undefined. Defendants' response to such request will be based upon their understanding of the request.

(6) Defendants object to these Requests to Admit to the extent they seek documents or information not in the possession, custody or control of Defendants, on the grounds that it would subject them to undue burden, oppression and expense, and impose obligations not required by the Virgin Islands Rules of Civil Procedure.

(7) Defendants have not completed either their discovery or preparation for trial of this matter. Accordingly, Defendants' responses to these Requests to Admit are made without prejudice to their right to make any use of, or proffer at any hearing or at trial evidence later

discovered, and are based only upon information presently available. If any additional, non-privileged, responsive information is discovered, these Requests to Admit will be supplemented to the extent that supplementation may be required by the Virgin Islands Rules of Civil Procedure.

(8) Defendants object to these Requests to Admit to the extent that they are compound and not a single Request. Hence, these Requests to Admit should be counted as more than a single Request such that when all of the subparts are included together with other Requests to Admit they exceed the 50 Requests to Admit established in the Joint Discovery and Scheduling Plan.

RESPONSES TO REQUESTS TO ADMIT

Request to Admit 4 of 50:

Request to admit number 4 of 50 relates to Claim Y-6 – as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Black Book Balances Owed United."

Admit or deny that claims listed in Exhibit G to Yusuf's Original Claims, Relevant Black Book Entries, occurred in 1994 or earlier, and occurred more than six years before the FBI seized document.

Response:

Admit. Further responding, Defendants state shows that in Yusuf's earlier declaration he explained that "[u]nder the business agreement between Hamed and me that I now describe as a partnership, profits would be divided 50-50 after deduction for rent owed to United, among other expenses" and that "[u]nder our agreement, I was the person responsible for making all decisions

regarding when the reconciliation would take place” and that Yusuf had the discretion to determine when the reconciliation would take place. *See* August 12, 2014 Yusuf Declaration, p. 2. At the time that these United debts were incurred, the grocery store at the Plaza Extra East location was not operating as a result of a fire at that store and the Plaza Extra Tutu Park Store was not yet open. Such circumstances constitute extraordinary circumstances, which operate to trigger an equitable tolling as to the pursuit of such debts.

Request to Admit 5 of 50:

Request to admit number 5 of 5 relates to Claim Y-7 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Ledger Balances Owed United.”

Admit or deny that the claims listed in Exhibit H to Yusuf’s Original Claims, Ledger Sheets Reflecting United’s Payment for Plaza Extra, except for one transaction for \$3000, occurred in 1995 or earlier, and occurred more than six years before the FBI seized the document.

Response:

Admit that the transactions occurred in 1995 or earlier but denied as to whether they occurred more than six years before the FBI seized the document. Further responding, Yusuf shows that in his earlier declaration he explained that “[u]nder the business agreement between Hamed and me that I now describe as a partnership, profits would be divided 50-50 after deduction for rent owed to United, among other expenses” and that “[u]nder our agreement, I was the person responsible for making all decisions regarding when the reconciliation would take place” and that Yusuf had the discretion to determine when the reconciliation would take place. *See* August 12, 2014 Yusuf Declaration, p. 2.

Request to Admit 6 of 50:

Request to admit number 6 of 50 relates to Claim Y-9 as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Unreimbursed Transfers from United."

Admit or deny that the claims listed in Exhibit I to Yusuf's Original Claims, Summary and Supporting Documentation of Unreimbursed Transfers from United, occurred in 1996, and occurred more than six years before the FBI seized the document.

Response:

Admit that the unreimbursed transfers from United in Exhibit I occurred in 1996, but deny that the same occurred more than six years before the FBI seized the document. Further responding, Yusuf shows that in his earlier declaration he explained that "[u]nder the business agreement between Hamed and me that I now describe as a partnership, profits would be divided 50-50 after deduction for rent owed to United, among other expenses" and that "[u]nder our agreement, I was the person responsible for making all decisions regarding when the reconciliation would take place" and that Yusuf had the discretion to determine when the reconciliation would take place. *See* August 12, 2014 Yusuf Declaration, p. 2.

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DATED: May 15th, 2018

By:



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Corporation*

CERTIFICATE OF SERVICE

It is hereby certified that on this 15th day of May 2018, I caused the foregoing a true and exact copy of the foregoing **RESPONSE TO HAMED'S SECOND REQUEST TO ADMIT PER THE CLAIMS DISCOVERY PLAN OF 1/29/2018** to be served upon the following via Case Anywhere docketing system:

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