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.) CIVIL NO. SX-12-CV-370
FATHI YUSUF and UNITED CORPORATION, Defendants/Counterclaimants, v.	 ACTION FOR INJUNCTIVE RELIEF, DECLARATORY JUDGMENT, AND PARTNERSHIP DISSOLUTION, WIND UP, AND ACCOUNTING
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,))))
Additional Counterclaim Defendants. WALEED HAMED, as Executor of the	Consolidated With
Estate of MOHAMMAD HAMED,)) CIVIL NO. SX-14-CV-287
Plaintiff, v. UNITED CORPORATION,	 ACTION FOR DAMAGES AND DECLARATORY JUDGMENT
Defendant. WALEED HAMED, as Executor of the Estate of MOHAMMAD HAMED,))) CIVIL NO. SX-14-CV-278
Plaintiff, v.) ACTION FOR DEBT AND) CONVERSION
FATHI YUSUF,)
Defendant.)

YUSUF'S OPPOSITION TO HAMED MOTION TO COMPEL HAMED CLAIM H-151 – CHECKS WRITTEN TO FATHI YUSUF FOR PERSONAL USE

Hamed's Current Motion to Compel Relating to Hamed H-151–Checks Written to Faithi Yusuf for Personal Use is premised upon Yusuf's alleged failure to fully respond to Hamed Interrogatory No. 38 and Requests to Produce No.s 4 and 40.

I. Interrogatory 38 Should Be Limited Consistent with the Master's September 5, 2021 Order and Responses Previously Served Are Sufficient, Hence, There is No Need to Further Compel

As to Interrogatory 38, Hamed seeks information as to all sources of deposits to Fathi Yusuf's personal accounts or transfers out of Fathi Yusuf's personal accounts. Interrogatory 18 also seeks information as to all deposits into and out of the United Corporation accounts.

A. Transfers To and From Fathi Yusuf's Accounts

The Master also has limited discovery to information in which the Partnership fund was the source of the income for the acquisition of assets. *See* September 5, 2021 Order, p. 20 ("...the Master finds the information sought...regarding assets where the Partnership fund was not the source for the acquisition of such assets irrelevant."). This interrogatory seeks information relating to income sources that are unrelated to the Partnership fund and thus, are also irrelevant. However, all partnership distributions to Fathi Yusuf (*i.e.* income from the Partnership) have been identified and thus, there is no need to further compel any discovery as to this Interrogatory. *See* Exhibit 1 – Yusuf's Responses to Interrogatory No. 38.

B. Transfers To and From United Corporation Accounts from September 17, 2012.

As Gaffney has advised Hamed on multiple occasions, all of the financial information relating to the United Corporation (for the Partnership) have been provided to Hamed contemporaneously through the Sage 50 Accounting software. In addition, Hamed has had access to all accounting records of United reflecting any checks or transfers made during the

timeframe in question. Moreover, during this phase, the parties had a dual signature requirement on all checks (one Yusuf and one Hamed) so that Hamed is fully aware of any and all checks written from United. Additionally, as to cancelled checks, Gaffney has explained that the banks do not provide copies of cancelled checks. As all of the financial information relating to United has been provided to Hamed simultaneously, said information has already been produced and there is no need to compel further information. *Id.* Hence, the Motion to Compel should be denied.

II. Request to Produce No. 4 – Fully Responded To, No Need to Compel

Request to Produce No. 4 provides: "For all of the Partnership bank accounts, please provide all bank statements reflecting checks written to Fathi Yusuf, the United Corporation, as well as the cancelled checks from 9/17/2006 to present." Yusuf shows that he fully responded to same in his original response dated March 1, 2018, which provided:

Yusuf objects to this Request for Production as it is unclear as to checks written to United Corporation. Further responding, Yusuf shows that this request is properly directed to John Gaffney. Yusuf shows that this Request along with other discovery recently submitted should be direct to John Gaffney and maintain that these items were not included in the original list of Gaffney Items 41 through 141 in what appears to be an attempt to circumvent the agreement for John Gaffney to respond to discovery and that payment for his time to be at the expense of the Hamed pursuant to the Join Discovery and Scheduling Plan. According to the request, it appears that John Gaffney has already advised that he does not have all of the cancelled checks from the various bank accounts.

Further responding, Yusuf directs Hamed's attention to Table 35(b) of the BDO Report which chronicles those checks written to Fathi Yusuf from 2001 to 2012. The supporting documentation for the allocation was also previously provided to Hamed with the original submission of the Yusuf Accounting Claims on September 30, 2016. To the extent that there are additional checks to which Hamed seeks clarification not otherwise listed in Table 35(b), please identify same and this response will be supplemented.

See Yusuf's Objections and Responses dated March 1, 2018 – Exhibit 6 to Hamed's Motion to Compel dated August 8, 2021. Contrary to Hamed's assertions, these tables and the supporting documentation, produced years ago is detailed and organized. To the extent that there are limited distributions after September 17, 2006, that is consistent as to all of the parties. Even the Hamed parties' distributions appear to decline during that timeframe. The reason is the fact that after the FBI raid in October of 2001, Federal Monitors were in place monitoring the financial operations of the Plaza Extra stores and any withdrawal had to be approved by the monitors. Further, the Hamed and Yusuf family employees had increased their salaries, which eliminated much of the need to remove funds from the store on a regular basis, as had been the practice previously when the salaries were extremely low. However, for purposes of this Motion, the responses are more than adequate and there is no need to compel additional responses.

III. Request to Produce 40 – Wedding Gifts

The Request seeks the production of "any and all documents relating to gifts to Mafi Hamed and Shawn Hamed and/or their spouses at the time of their weddings to Yusuf's daughters as to Fathi Yusuf or his spouse or his daughters seeking return, credit or offset in divorce proceedings." Yusuf objected "on the grounds that 'the proposed discovery is not relevant to any party's claim or defense.' V.I. R. Civ. P. 26(b)(2)(C)(iii)."

In his Motion to Compel as to this request for *documents*, Hamed, instead, states he "must have a basic explanation of Yusuf's position on this and all the related documents. It must be a simply and direct statement." *See* Hamed Motion to Compel as to H-151 – Checks Written to Fathi Yusuf's Personal Use, p. 9. He then argues that this is not a "huge demand – as there are

few documents involved: the withdrawals totaling \$3 million, the gift letters and any checks, emails or correspondence."

Yusuf shows that his original objections are valid. The documents he has as to the transfers have been provided years ago. In the BDO Report, they were accounted for as against both Hamed and Yusuf, resulting in a "wash" as between the partners. In the BDO Report, the explanation provided is:

During the period covering October 2001 through December 2012, a total of \$3,000,000 was withdrawn through checks issued from the Partnership as gifts to Hisham Hamed and his spouse (\$1,500,000) and to Mufeed Hamed and his spouse (\$1,500,000). We should mention that both spouses are daughters of Mr. Yusuf.

Therefore, for purposes of our analysis it was determined that this amount represented distributions from the Partnership. We adjusted Mr. Hamed's and Mr. Yusuf's distribution by \$1,500,000 for said period.³³

³³ Refer to Exhibit 17 and Table 1.

See Exhibit 17 is attached hereto. Exhibit 17 reflects a number of obvious items:

- <u>Waleed Hamed signed the checks</u>: Waleed was aware of the checks and executed them. Hence, as the party who wrote the checks, he will be able to attest as to his recollection of the circumstances surrounding their issuance. This further underscores that the Hamed's were fully aware that the funds were to be withdrawn.
- 2. <u>The Checks Were Endorsed to Mufeed Hamed and Cashed by Mufeed Hamed</u>: Both checks were endorsed to Mufeed Hamed and deposited by Mufeed Hamed. Hence, the Hameds received the funds immediately and they were never deposited into a Yusuf account. Hence, the Hameds issued the checks, signed the checks, the checks were endorsed to a Hamed and deposited by a Hamed.

Yusuf is unaware as to how these funds were treated in the divorce proceedings of one of his daughters. These are all of the documents of which Yusuf is aware relating to these withdrawals. There is no further need to compel any information as Yusuf has properly and adequately responded to same.

For these reasons, Hamed's Motion to Compel should be denied.

By:

Respectfully submitted,

DUDLEY NEWMAN FEUERZEIG, LLP

DATED: February 2, 2022

<u>s/Charlotte K. Perrell</u>
CHARLOTTE K. PERRELL (V.I. Bar No. 1281)
Law House 1000 Frederiksberg Gade
P.O. Box 756
St. Thomas, VI 00804-0756
Telephone: (340) 715-4422
Telefax: (340) 715-4400
E-Mail: cperrell@dnfvi.com

Attorneys for Fathi Yusuf and United Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of February, 2022, I caused the foregoing **Yusuf's Opposition to Hamed's Current Motion to Compel Relating to Hamed Claim H-151 – Checks Written for Fathi Yusuf's Personal Use,** which complies with the page and word limitations of Rule 6-1(e), to be served upon the following via the Case Anywhere docketing system:

Joel H. Holt, Esq. LAW OFFICES OF JOEL H. HOLT Quinn House - Suite 2 2132 Company Street Christiansted, St. Croix U.S. Virgin Islands 00820 E-Mail: <u>holtvi.plaza@gmail.com</u> Carl J. Hartmann, III, Esq. 5000 Estate Coakley Bay – Unit L-6 Christiansted, St. Croix U.S. Virgin Islands 00820 E-Mail: <u>carl@carlhartmann.com</u>

Mark W. Eckard, Esq. ECKARD, P.C. P.O. Box 24849 Christiansted, St. Croix U.S. Virgin Islands 00824 E-Mail: mark@markeckard.com

The Honorable Edgar D. Ross E-Mail: <u>edgarrossjudge@hotmail.com</u> Jeffrey B.C. Moorhead, Esq. JEFFREY B.C. MOORHEAD, P.C. C.R.T. Brow Building – Suite 3 1132 King Street Christiansted, St. Croix U.S. Virgin Islands 00820 E-Mail: jeffreymlaw@yahoo.com

and via U.S. Mail to:

The Honorable Edgar D. Ross Master P.O. Box 5119 Kingshill, St. Croix U.S. Virgin Islands 00851 Alice Kuo 5000 Estate Southgate Christiansted, St. Croix U.S. Virgin Islands 00820

s/Charlotte K. Perrell

INDEX OF EXHIBITS

Exhibit 1 – Yusuf's Responses to Interrogatory No. 38

Exhibit 17 – Exhibit 17 to preliminary BDO Report

Ex	hi	b	it	1
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IN THE SUPERIOR C	OURT OF THE VIRGIN ISLANDS
DIVISI	ON 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,

Defendant.

v.

UNITED CORPORATION,

Defendant. WALEED HAMED, as Executor of the Estate of MOHAMMAD HAMED,

Plaintiff,

FATHI YUSUF,

v.

FATHI YUSUF and UNITED CORPORATION,

Plaintiffs,

v.	
THE ESTATE OF MOHAM Waleed Hamed as Executor of	
Mohammad Hamed, and THE MOHAMMAD A. HAN	MED LIVING TRUST
Defend	lants.

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

Response to Hamed's Sixth Set of Interrogatories Waleed Hamed et al. vs. Fathi Yusuf et al. Case No.: STX-2012-CV-370 Page 2

RESPONSES TO HAMED'S SIXTH INTERROGATORIES PER THE CLAIM DISCOVERY PLAN OF 1/29/2018 NOS. 33-41 OF 50

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 Sixth Set of Interrogatories per the Claims Discovery Plan of 1/29/2018, Nos. 33-41 of 50.

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 Interrogatories 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.

(3) Defendants object to these Interrogatories 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

Response to Hamed's Sixth Set of Interrogatories Waleed Hamed et al. vs. Fathi Yusuf et al. Case No.: STX-2012-CV-370 Page 10

Interrogatory 38 of 50:

Like Yusuf ROG 14. Identify all assets or amounts in excess of \$10,000 that were transferred to or from Fathi Yusuf or United Corporation from September 17, 2012 to date and what was the value of said assets upon transfer?

Response:

Defendants object to this Interrogatory as 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.

Defendants further object on the grounds that the responsive information cannot be readily obtained by making reasonable inquiries as these inquiries require the skilled and detailed attention and focus of John Gaffney, former Partnership accountant, to revisit his accounting and work papers. Yusuf is no longer being paid to function as the Liquidating Partner to answer questions on behalf of the Partnership and the accounting that took place during the liquidation process. Likewise, John Gaffney is no longer employed by the Partnership to function in the role as Partnership accountant. To respond to these questions, the expertise and knowledge of John Gaffney is necessary, which diverts him away from his employment with United. Rather, if Hamed seeks information from John Gaffney for questions as to the accounting efforts he undertook as the Partnership accountant, Hamed should be required to compensate John Gaffney for his time in researching and preparing those responses. Furthermore, many of these inquiries as to the Partnership accounting are duplicative of questions Gaffney has previously addressed at or near the time that the transactions took place. Reorienting now as to transactions from years

ago constitutes an undue burden and causes unnecessary time and expense. If Hamed seeks to revisit these issues, Hamed should bear the cost.

Without waiving any objections, all transfers from United Corporation d/b/a Plaza Extra Stores and accounting information reflecting any transactions have been provided to the Hamed's contemporaneously through the Sage 50 Accounting software. In addition, Hamed has had access to all accounting records for United reflecting any checks or transfers made during the timeframe in question. Hence, the information has been provided to Hamed and the burden of reproducing same would be equal for Hamed to gather.

Response to Hamed's Sixth Set of Interrogatories Waleed Hamed et al. vs. Fathi Yusuf et al. Case No.: STX-2012-CV-370 Page 15

DATED: May (5^{M}) , 2018

DUDLEY, TOPPER AND FEUERZEIG, LLP

By:

CHARLOTTEK. PERRELL (V.I. Bar #1281) Law House 1000 Frederiksberg Gade - P.O. Box 756 St. Thomas, VI 00804-0756 Telephone: (340) 715-4422 Facsimile: (340) 715-4400 E-Mail: cperrell@dtflaw.com

Attorneys for Fathi Yusuf and United Corporation

CERTIFICATE OF SERVICE

It is hereby certified that on this 15^{+1} day of May, 2018, I caused the foregoing a true and exact copy of the foregoing **RESPONSE TO HAMED'S SIXTH INTERROGATORIES PER THE CLAIMS DISCOVERY PLAN OF 1/29/2018, NOS. 33-41** to be served upon the following via Case Anywhere docketing system:

Joel H. Holt, Esq. LAW OFFICES OF JOEL H. HOLT 2132 Company, V.I. 00820 Email: joelholtpc@gmail.com

Mark W. Eckard, Esq. HAMM & ECKARD, LLP 5030 Anchor Way – Suite 13 Christiansted, St. Croix U.S. Virgin Islands 00820-4692 E-Mail: mark@markeckard.com Carl Hartmann, III, Esq. 5000 Estate Coakley Bay, #L-6 Christiansted, VI 00820 Email: carl@carlhartmann.com

Jeffrey B.C. Moorhead, Esq. C.R.T. Building 1132 King Street Christiansted, St. Croix U.S. Virgin Islands 00820 E-Mail: jeffreymlaw@yahoo.com

Exhibit 17 - to BDO Report

Fathi Yusuf PO Box 503358 St. Thomas, USVI 00805

July /___, 2011

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Mufeed Hamed PO Box 763 Christiansted, USVI 00821

Dear Mufeed:

This correspondence will acknowledge and memorialize my conveyance today of a gift in the amount of \$750,000 to you,

I am giving you the unrestricted right to the immediate use of this money for whatever purpose you desire. I expect no repayment of this gift from me, whether in the form of cash, property, or future services.

Sincerely, Fathi Yusuf

Sworn to before me this day of July, 2011

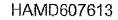
Notary Public





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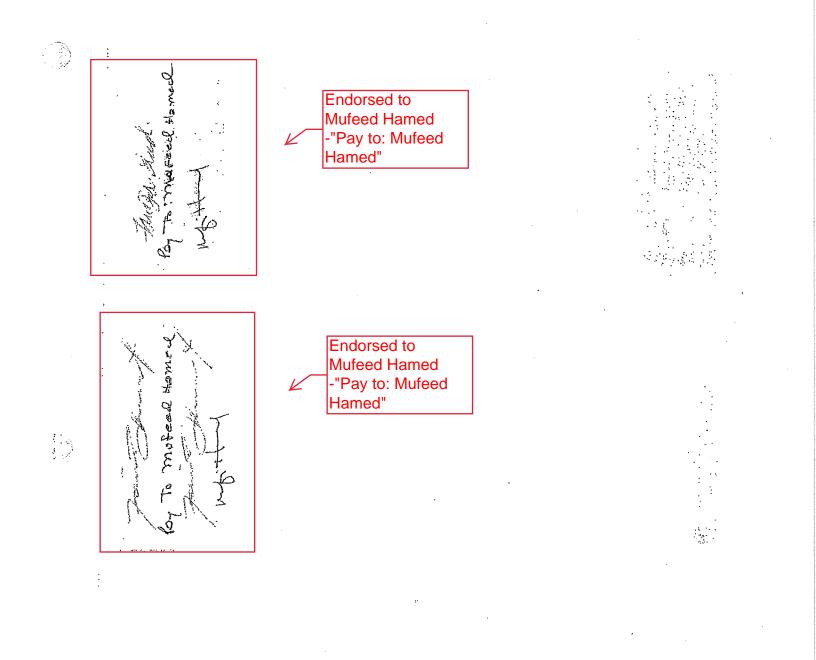


Confidential Protective Order

1104 Plaza Extra Supermarket 340-719-1870 14 Estate Plessen F'sted, St Croix, USVI 00840 101-806/216 DATE PAY TO THE ORDER 375000.00 \sim つん C Signed by ٩Q Waleed Hamed Distribution FOR PÅ? #001104# #021606069# 058#60092918# Married Contemporate Party UNITED CORPORATION D/B/A PLAZA EXTRA 240-778-8240 PO BOX 769 CHRISTIANSTED, USVI 00821-0763 1149 101-606/216 D.B. \$ 750,000.00 20000/100 Signed by Waleed 5cotiabcink THE BANK OF NOVA SCO ST. CRORE US, NOR STATE 3 ai Teductor for 1900114911 CO2160606912 058+6008641311 a distan

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Confidential Protective Order



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HAMD607615

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Confidential Protective Order Fathi Yusuf PO Box 503358 St. Thomas, USVI 00805

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July /___, 2011

Hisham Hamed PO Box 763 Christiansted, USVI 00821

Dear Hisham:

This correspondence will acknowledge and memorialize my conveyance today of a gift in the amount of \$750,000 to you.

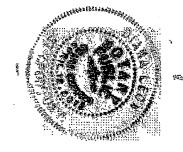
I am giving you the unrestricted right to the immediate use of this money for whatever purpose you desire. I expect no repayment of this gift from me, whether in the form of eash, property, or future services.

Sincerely, Fathi Yusuf

Additional and the second second

Sworn to before me this day of July, 2011

Notary Public





HAMD594276

BANCO POPULAR DE PUERTO RICO. P.O. BOX 362708 SAN JUAN PR. 00936-2708

BANCO POPULA

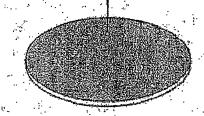
HISHAM M HAMED PO BOX 3649 KINGSHILL VI 00851-3649

191-185) POPULAR PL

This statement reflect your transactions after July 29, 2011 to August 31, 2011

Bank Relationship Summary

Checking Accounts Savings/Money Market Certificates/IRA/CAE = Total DEPOSITS 1,491,115.12 0.00 0;00. 1,491,115.12 Reserve Credit Cards Loans in Total CREDIT 0:00 0.00. 0,00 0.00 **Checking Accounts** \$1,491,£15.12 100.00%



Popular Plus Account Detail

CHECKING

BALANCE INFORMATION **Beginning Balance** + Deposits/Credits Checks/Debits Ending Balanc : 40,776.00 1,573,693,76 123,354.64 1,491,115/1 Annual Percentage Average Daily Balance* Days in Statement Cycle Periodic Rate **Yield Earned** 402,403.30 0:0006859 33 00.25%; **REGULAR AND ELECTRONIC CREDITS** Description Date Description Amount Date: Amount

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	Date	Description		Amount	Date	Description		Amount
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	08-01	Payment Reference: 13001183632 Citi Card Online Payment Payment	XXXXXX1234	5,562,58	08-15	Reference: 12226995011 Mortgage US Virgin Islan	đ	5,085,5
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LIAMPEADAD

En Caso de Errores o Preguntas sobre su Estado de Crienta o Relativo a Transferencias Electrónicas de Fondos:

St listed plense, que su estado de cuenta o recibo tiene algún error o si pecesita más infontiación cobre alguna transacción en su estado o recibo, favor de llamarico a TELEBANCO POPULAR®, a los siguientes telefonos: (769) 724-3650 (área metropolitana), 1-858-724-3650 (ísla); telefonos dispenibles para audicimpedidos (TDD), (787) 753-9677 (área metropolitana), 1-800-981-9666 (ísla); 1.V.E.U. v Tortola, 1-888-724-3650 o escubanos a: escribanos az

Banco Popular de Puerto Rico, Centro de Súluciones al Cliente, PO Box 362705, San Juan, Puerto Rico 00936-2708,

Debenios recibir su reclamación dentro de los 60 días siguentes a la férha del envio del Primer estado en que apareda el error. Indiquenos su nombre y número de cuenta, la fecha y número de la transaction, el motivo da su reclamación o duda y la tentidad en dólaras del supuesto error.

Investigaramos su reclamación y corregiremos cualquier error con pronitad. Si demoramos, mas de 10 clas laborables, acreditatemos su cuenta por la cantidad del alegado arror, de manera que ustad pueda hacer uso de ase clinero durante el tiempo que nos tome completar nuestra investigación.

TRANSFERENCIAS LECTRONICAS

AGOS O CHEQUES

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El CARGO POR INTERESES se conduta aplicando la TASA PERIODICA. DIARIA al Balance Sujato a intereses Peridente de Pago, el ruial se determina sumanido los balances adeudados en cada día comprendido dentro das comprendidos dentro de into periodo. El balance adeudado durante cada día del periodo de facturación se determina sumando el balance final del días comprendidos dentro de into periodo. El balance adeudado durante cada día del periodo de facturación se determina sumando el balance final del día comprendidos hechos y creditos u otros debitos y restando a esos cualesquiera pagos hechos y, creditos u otros debitos y restando a esos cualesquiera pagos hechos y, creditos u otros debitos y restando a esos cualesquiera pagos hechos y, creditos abonados duranse (día. Sólo para cuentas con tasa variable: Las Tasas Periodicás y los APR pueden variar para cada periodo de facturación.

Ouo Debera Harer. Si entrende oue su estatio de Cuenta Tiena Un Error - Si usted endende que existe algun error en su Estato de Cuenta escilbanos - a da siguiente direction: BANCO POPULAR DE PUERTO: RICO: Centro de Soluciones, al Cliente, PO Box 262708. San Juan, Puerto Rico 08936-2798. En su conunitación provenos la siguiente información:

- Información de la Cuenta: Su nombre y número de cuenta.
- **`**#-Contidad: La cantidad en dolares del alegado error.
- Descripción del Problema: Si enkiende que hay un error en su factora, describa lo que entiende está erroneo y una explicación de por que usted considera que existe un error.

Usted debe contactarnos denino de los 50 das siguientes a la fesha del envío del Estado de Cuenta Jorde aparece el alegado erros. Usted debe politicarnos los alegados errores potenciais <u>por escrito</u>. Usted puede llantarnos por telefono, pero al hacer resto el Banco no está obligado a investiga: los alegados errores potenciales y usted podía tener que pagar la capitidad en disputa. Mientras realizamos la investigación, sobre si ocurrió o no el alegado error, aplicará lo siguiente:

El Bance no tomará ninguna acción para cobrar la cantidad reclamada ni Infolinateinos slicha cantidasi ieslainada como atrasada.

La tartitad en reclamación podrá piermanacer en su estado de cuenta, y podriamos continuar cargiando intereses sobre esa cantidad. Sin embargo, si determananos que hemos cometido un error, ustad no tendra que pagar la cantidad en disputa ni intereses o cargo relacionado. a esa cantidad.

Aunque usted no tendra que paga la cantidad en disputa, usted es: responsable del resto del balance de su cuenta,

El Bañco puede aplicar cualquior cantidad no pagada contra su limite de crécito, 1.0

Idientias investiganos, aplicarán las misinas replas a la cambdad en reclamación, según discutido amita. Al concluir la investigación, le informatemos nuestra decisión. En ese montento, si entendemos que usua debe una cantidad y usted no ha pagado poliemos reportar su cuenta como marcos. morosa,

El crédito por cheques depositados será provisional hasta el recibo del pago. de los infonos:

Importante - Important Para su protección, favor de weillica: su balance, pára so cifal le sugermos seguir al procedimiento a continuación;

For your, protection, please, verify, your balance; Wa suggest you, follow, the protecture outlined below,

1. Compare las transacciones, de: este estado contra su talonado: Reste los cargos y/o pagos a la Reserva, stapica, Check che transactions. Check the transactions against stub in checkbook. Subtract any charges end/or payments to your Reserve, if applicable.

2. En la columna a la derecha, anote las transactiones pendientes a la fecha de esté estado. List in column at right all outstanding transactions for. Unis statement period.

.... TOTAL Transacciones pendientes de paga Outstanding transactions

humero Cantidad Number Amount

KOINL	••••	••	
3. Anote el balance llinal del estado. Enter final balance from statement:		1779 1977 1977 1977 1977 1977 1977 1977	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
4 Añàda los depósitos electuados despues de la fecha de este estado. Add depósite máde after date, of stetoment:			· · · · ·
SUBTOTAL			
5. Reste el total de tansacciones pendentes Subtract total of outstanding: transactions.		**************************************	······
Este debe ser el balance en su Islonatio. Your checkbook should show this balance.	<u>8194 - 19.88 - 11 baş</u> ı		<u></u>
TOTAL	•	· · · ·	

Abroviaturas ACUM - Acumulados A10 - Ajuste ATH - Cajero Aulomätko: CAR - Cargo CDD - Cheque Depositado Devuello CP - Cheque Postechado CTA - Cuenta FINAN - Financiamiento FND - Fondos No Disponibles GAR - Garantizado REV - Revertido, Reveisión SF - Sin Porkio SG · Schlegiro TRANF - Transferencia, Transferidos

Abbreviations. A/C - Account ACCUM - Accumulated ADJ - Adjustment ATH . Automated Teller Mach CHAR - Charge. FINAN - Financing GUAR - Guerántesd NAR - Non-Avallaple Funds NSF - Non-Sufficient Funds O/D - Overdraft PDC - Post Dated Check REV - Reversed, Reversel RDC - Returned Deposited Che SAV - Savings. TRANF «Transfer, Transferred

Confidential