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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,

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.

KAC357 Inc., Plaintiff,

VS.

HAMED/YUSUF PARTNERSHIP,

Defendant.

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

Consolidated with

Case No.: ST-18-CV-219

HAMED REPLY TO YUSUF'S OPPOSITION TO HAMED'S MOTION TO COMPEL RE REVISED CLAIM Y-11 – LIFESTYLE ANALYSIS

I. INTRODUCTION

Hamed filed his Motion to Compel regarding Yusuf's revised claim, Y-11 (Lifestyle Analysis) on August 1, 2021. Yusuf filed his Opposition on February 3, 2022. Additionally, this is a companion motion -- Hamed filed a Motion for Summary Judgment regarding Yusuf's revised claim Y-11 – Lifestyle Analysis, on July 31, 2021.

II. Yusuf's Opposition

This reply follows the order of the Yusuf Opposition.

A. Interrogatory 33

Given Special Master Ross's September 5, 2021 Order, Hamed withdraws Interrogatory 33 with respect to domestic accounts and non-parties.

B. Request for the Produce Documents ("RFPDs") 30 and 31

1. RFPD 30

On September 5, 2021, Special Master Ross ordered

ORDERED that Hamed's motion to compel as to RFPD 30 . . . GRANTED as to the parties on the condition that it is limited as follows:

<u>RFPD 30</u>. Please produce copies of all original tax returns filed by United and Fathi Yusuf from 1986 to date; information unrelated the Partnership fund may be redacted.

* * * *

ORDERED that, within thirty (30) days from the date of entry of this order, Yusuf shall file supplemental responses to . . . RFPD 30. . . (pp. 29-30)

Yusuf has not complied with this Order, despite the Special Master ordering that Fathi Yusuf's tax returns from 1986 to date must be produced, allowing information unrelated

to the Partnership fund be redacted. Yusuf stated in his October 22, 2021 Supplemental Responses to Hamed's Discovery that

John Gaffney, Comptroller for United has access to the United tax returns and those of Mr. Yusuf. He is off-island until December. **However, we have requested his response to provide the information and we will supplement as soon as it is provided.** (p. 6) (Emphasis added.)

About a month later on November 21, 2021, Yusuf produced by email his personal tax returns for 2020-2013 only. Hamed requests that the remainder of Fathi Yusuf's personal tax returns be produced (1986-2012). There is no dispute about this – it should be ordered again—until Yusuf produces what he has been ordered to produce and what he has said he will produce.

2. RFPD 31

Given Special Master Ross's September 5, 2021 order, Hamed withdraws RFPD 31 with respect to domestic accounts and non-parties.

C. Interrogatory 35 – Sources of Income

Contrary to Yusuf's blanket statement, Interrogatory 35 has not identified "all sources of income for 1) Fathi. . . from September 17, 2006 to the date of your response and identify the source of all funds for the acquisition of such assets." The BDO report did not provide <u>any</u> information regarding Partnership withdrawals for Fathi Yusuf for the time period of September 17, 2006 to the date of Yusuf's response. (See BDO revised chart of claims, **Exhibit 11**) It is difficult to believe that Yusuf received no funds from the Partnership from 2006 forward. At a minimum, Yusuf should produce an accounting of the bi-weekly paychecks he received from the Partnership. He also should identify any other Partnership distributions, whether they were made in the form of cash or check.

Hamed does not believe that the Special Master's September 5, 2021 Order relieves Yusuf of the responsibility to identify sources of Partnership income for Mike, Nejeh and Yusuf Yusuf as employees of the Partnership. That is not discovery of a third person, but, rather, of the Partnership. Their payroll checks should be listed at a minimum, as well as other checks and cash distributions from the Partnership accounts.

As an aside, if Yusuf is claiming that the Special Master's Order requires that only Partnership funds should be considered, then Yusuf's Lifestyle Analysis should withdraw all of the many deposits, payments to credit cards and investments not purchased or paid for by Partnership funds from the Hamed side of the "lifestyle" analysis prepared by BDO. Either what is good for the goose is good for the gander or it is not—Yusuf cannot have it both ways; using Hamed's and refusing his own.

D. Interrogatory 37—Partnership Distributions to Yusuf Family and United

Again, Yusuf is evading answering Interrogatory 37, which requests that all distributions from the Partnership to the Yusuf family and the United Corporation be identified. From September 17, 2006 to the date of the BDO report, no distributions from the Partnership are listed for Yusuf, Yusuf's family or the United Corporation. (See **Exhibit 11**) At a bare minimum, the payroll checks for Yusuf and his family members should have been listed. This is goose and gander again—Yusuf (and BDO use these amounts from Hamed but refuse them for Yusuf. THIS IS DISCOVERY, how can the identical comparative numbers be totally irrelevant? During this timeframe, additional Yusuf family members not working for the Partnership received Partnership distributions to pay taxes. (See, e.g., **Exhibit 13**). Those MANY distributions were not identified in the BDO report. Additionally, any payments from the Partnership to the United Corporation

should have been listed as well. None were produced in the BDO report, nor were any independently listed as a response to this interrogatory. Thus, Yusuf's assertion that "the responses originally provided are more than adequate. . ." is not true.

Yusuf states in his Opposition, "[t]o 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 the timeframe." (p. 5) In that case, this entire claim should be dismissed, as that is now (After Judge Brady's Limitation Order) the SOLE basis for the Yusuf claim. Thus, Yusuf must produce his. That is not an excuse for failing to identify Partnership distributions, no matter how large or small. Rule 26 of Virgin Islands Rules of Civil Procedure ("Rule 26") is the foundational rule governing discovery. It broadly allows discovery regarding "any nonprivileged matter that is relevant to any party's claim or defense. Information within this scope of discovery need not be admissible in evidence to be discoverable." V.I. R. CIV. P. 26(b)(1), emphasis added. There is no exception for "limited distributions." As with all of these interrogatories and document requests, the information is needed for Hamed's defense of determining Yusuf offsets to the Hamed family withdrawals.

E. RFPD 26—Bank, Brokerage, Retirement and Credit Card Statements

Yusuf states that the Special Master's Order of September 5, 2021 is limited to parties to the case. Even with this limitation, Yusuf has not responded to this request. First, the BDO report did not cover any Yusuf documents from September 17, 2006-September 30, 2016 for Fathi Yusuf or other Yusuf family members. No documents for that time period were produced in response to this document request. (See **Exhibit 11**)

Second, Yusuf states that "('...[t]he Master finds the information sought...regarding assets where the Partnership fund was not the source for the acquisition of such assets irrelevant.')." (p. 6) If Yusuf is using this data for the Hameds, this does not exempt Yusuf from producing any statements showing funds sitting in his bank, brokerage and retirement accounts that were a result in whole or in part of deposits from Partnership funds and any statements showing withdrawals derived from funds originating from the Partnership. These categories are the entire basis of the Yusuf's lifestyle analysis. Yusuf is claiming that any, regardless of whether it came from Partnership funds or not, deposits to bank, brokerage or retirement accounts should be credited to Yusuf. Similarly, Yusuf claims that any Hamed payments to their personal credit cards should be credited to Yusuf, whether the source of those payments came from other income not related to the Partnership (such as the rental income the Hameds received from apartments they own) or the source was from Partnership issued paycheck.

Finally, to the extent that the Partnership paid the credit card charges for Yusuf family members, those documents should be produced as well. Yusuf family members (as well as Hamed family members) have used their own credit cards to pay for Partnership expenses and then were reimbursed by the Partnership. (See **Exhibit 14**) Irrespective of whether the Hamed family members were paying for Partnership expenses, Yusuf claims in his lifestyle analysis that these reimbursements should be credited to Yusuf (and in a leap toward the absurd, Yusuf actually claims that **any** payments the Hameds made toward their credit card charges should be a Partnership credit to him).

Hamed's Reply re Revised Claim Y-11 – *Lifestyle Analysis*

Page 7

In order to prepare his defense to this nonsensical claim, Hamed needs to

understand how much Yusuf and his family has received from the Partnership for this

time period to understand the offset.

III. Sanctions

If the Special Master deems it appropriate, Hamed is requesting sanctions with

respect to Interrogatory 30. He will not collect monetary amounts, but the point should be

made. This interrogatory should have been fully answered in October 2021 and it is still

outstanding in February 2022.

IV. Conclusion

Hamed's interrogatory and request for documents discussed above clearly fall within

Rule 26's scope allowing discovery regarding "any nonprivileged matter that is

relevant to any party's claim or defense." (Emphasis added). Hamed has patiently

been trying to get responses to this discovery since May 15, 2018, with no success.

Accordingly, Hamed respectfully requests that the Master compel Yusuf to answer

Interrogatories 35 and 37 and RFPDs 26 and 30.

Dated: February 7, 2022

Carl J. Hartmann III, Esq.

Co-Counsel for Plaintiff 2940 Brookwind Drive Holland, MI 49424

Email: carl@carlhartmann.com

Tele: (340) 642-4422

Joel H. Holt, Esq.

Counsel for Plaintiff Law Offices of Joel H. Holt 2132 Company Street,

Christiansted, VI 00820

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February 2022, I served a copy of the foregoing by email (via CaseAnywhere), as agreed by the parties, on:

Hon. Edgar Ross

Special Master edgarrossjudge@hotmail.com

Charlotte Perrell
Stefan Herpel
Law House, 10000 Frederiksberg Gade
P.O. Box 756
St. Thomas, VI 00802
Cperrell@dnfvi.com
Sherpel@dnfvi.com

CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

Carl, Hard

Carly, Harb

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

Dated: February 7, 2022

Exhibit 13

ANDREOZZI, BLUESTEIN, FICKESS, MUHLBAUER WEBER, BROWN, LLP

9145 MAIN STREET CLARENCE, NEW YORK 14031 PHONE: (716) 565-1100 FAX: (716) 565-1920

September 7, 2012

VIA FACSIMILE (202-307-5020) & US MAIL

Maggie Doherty c/o US Marshall Service CS-3, Suite 402 Washington, DC 20530-1000

Re: United Corporation Tax Matters

Dear Ms. Doherty:

Please be advised that we request the release of funds from United Corporation to pay deposits on third quarter 2012 USVI shareholder income tax liabilities arising from the operations of United Corporation.

Based on the profit percentage from United Corporation's unaudited financial statements as of December 31, 2011 and extrapolating that upon the 2012 gross receipts, we estimate that the flow through taxable income from United's retail grocery operations during the third quarter 2012 results in an approximate shareholder tax liability as follows:

Name	Percent of Ownership	Tax Deposit
Fathi Yusuf	36%	\$144,000
Fawzia Yusuf	36%	\$144,000
Nejeh Yusuf	7%	\$28,000
Zayed Yusuf	7%	\$28,000
Yusuf Yusuf	7%	\$28,000
Maher Yusuf	7%	\$28,000
TOTAL	100%	\$400,000

Thank you for your prompt attention to these matters.

Very truly yours,

Randall P. Andreozzi

ANDREOZZI, BLUESTEIN, FICKESS, MUHLBAUER WEBER, BROWN, LLP

9145 Main Street Clarence, NY 14031 Telephone: (716)565-1100 Facsimile: (716)565-1920



□ Urg	gent 🗆 For Review	☐ Comment	□ Origina	l Will Not Follow	☐ Original To	Follow
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Do:			Matter:			
Phone	: (202) 553-8427		Date:	9/7/2012	-	
Fax:	202-307-5020		Pages:	2 Total		
To:	Ms. Maggie Dohert	у	From:	Randall Andreozz	zi 	

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Xerox Color 560 Transmission Report

G3-ID Local Name Company Logo Date & Time: 09/07/2012 11:35 AM

Page: 1(Last Page)

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ANDREOZZI, BLUESTEIN, FICKESS, MUHLBAUER WEBER, BROWN, LLP 9145 Main Street Clarence, NY 14031 Talephone: (*16)565-1100 Facskrille: (*716)565-1920



To:	Ms. Maggie Doherty	From: Randall Andreozzi	
Faxo	202-307-5020	Pages: 2 Total	
Phone	e: (202) 553-8427	Date: 9/7/2012	
Re:		Matter:	_
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#	Job	Remote Station	Start Date & Time	Duration	Pages	Protocol	Contents	Status
1	9066	2023075020	9-7; 11:35 AM	22 Secs	2/2	Super G3		Completed

Exhibit 14

Engagement Report
Joel H. Holt, Esq.
c/o Plaza Supermarket Partnership and Subsidiaries

EXHIBIT 14





5001 Chandler's Wharf P.O. Box 24390 GBS Christiansted, VI 00824 T. 340-719-8261 F. 340-719-2775 www.jvz-cpa.com

September 28, 2016

Joel H. Holt, Esq. 2132 Company Street Christiansted, VI 00820

Re: Mohammad Hamed, et.al v. Fathi Yusuf and United Corporation

Dear Attorney Holt:

Jackson Vizcaino Zomerfeld, LLP (JVZ or we) is a licensed Certified Public Accountant firm in the U.S. Virgin Islands.

You have retained us to render an expert opinion in the litigation captioned Hamed v. Yusuf et al., docket number Civ. No. SX-12-CV-370. Attached is our analysis of the financial accounting for January 1, 2012 through June 30, 2016 as per Fathi Yusuf.

For the Firm

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****	and Mohammad Hamed	16
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VIII	April 28, 2016 Request to J Gaffney re GL by Item No	227-289
IX	John Gaffney's response Letter dated 05.17.16 to Holt including	
	supporting documents	290-826
X	2015-2016 Issues Identified by Item No	827-862

EXHIBITS

Item Nos. 221/223

Description: Nejeh Yusuf entries.

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

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

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

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

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

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

Response:

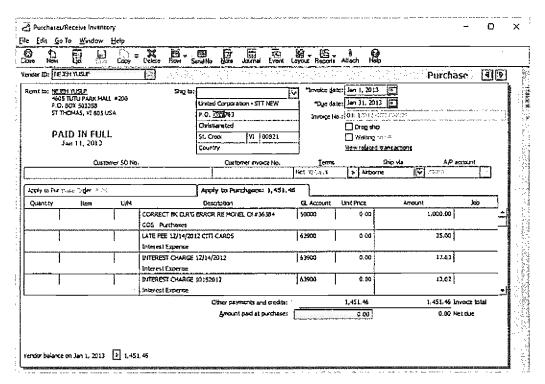
In lieu of documentation under Hamed control in St. Thomas, I provided screen prints and explanations of each item herein.

Willie Hamed scrutinized Nejeh Yusuf's expense reimbursement requests very carefully before co-signing a check to pay any of them. There were many requests that Willie refused to co-sign from 2012 until the store auction on April 30, 2015.

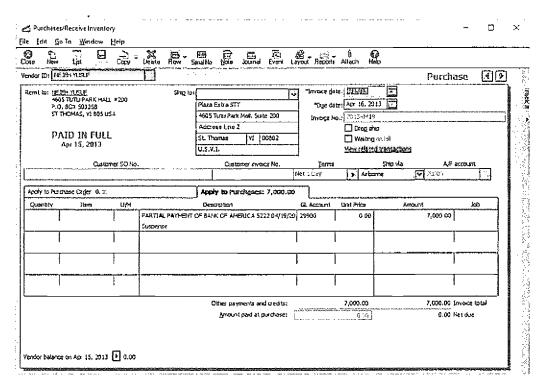
The items herein are the expenditures approved by Willie Hamed.

List of documents provided:

ITEM 221 - 223:



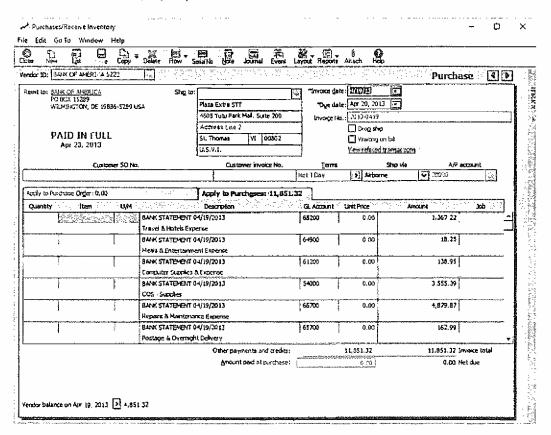
THE ABOVE VOUCHER APPEARS TO RELATE TO A MONEL PURCHASE THAT WAS PAID FIRST BY NEJEH USING HIS PERSONAL CREDIT CARD. MY GUESS IS THAT THE ORIGINAL MONEL VOUCHER WAS UNDERSTATED AS WAS THE REIMBURSEMENT OF NEHEH'S CREDIT CARD WHICH RESULTED IN LATE FEES. THESE RECORDS ARE IN ST. THOMAS. KEEP IN MIND ALL PAYMENTS WE'RE DUAL SIGNED BY ONE YUSUF AND ONE HAMED. WILLIE SCRUTINIZED ALL OF NEJEH'S PURCHASES AND WAS NOTORIOUSLY LATE IN PAYING THEM AND SO NEJEH INSISTED THAT LATE FEES BE COVERED BY PE STT.



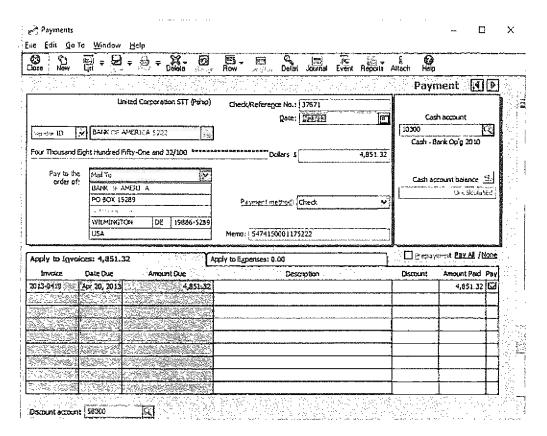
THIS IS AN UNUSUAL TRANSACTION BECAUSE IT'S A PAYMENT OF A CREDIT CARD WITH A CREDIT CARD. THIS IS THE FIRST INSTANCE I HAVE SEEN OF THIS BEING DONE. FORTUNATELY OUR CONTROL SYSTEM IS DESIGNED TO CREATE AN AUDIT TRAIL OF SUCH ACTIVITY. THE BOA CR MEMO BELOW IS THE OFFSET.

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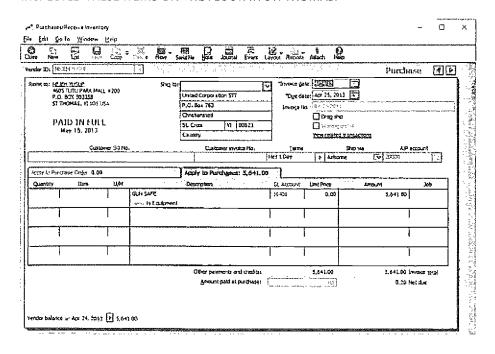
THIS ABOVE BOA CR MEMO RELATES TO REIMBURSEMENT OF VARIOUS EXPENDITURES BY NEIEH (SEE BELOW). THE SUPPORT FOR THIS IS IN ST. THOMAS. THE SCREEN PRINT IMMEDIATELY BELOW THIS VOUCHER IS THE REMAINDER OF THE PAYMENT. (\$7000 PAID BY NEIEH'S CITICARD PLUS \$4851 PAID BY CHECK 37671 EQUALS \$11,851).



TO GAIN A BETTER UNDERSTANDING OF THE CONTROL SYSTEM, PLEASE REVIEW THE DETAIL OF SUSPENSE A/C 29900 FOR THE MONTH OF APRIL 2013. NOTE THAT THE BALANCE IN A/C 29900 IS ALWAYS ZERO, OTHERWISE AN ERROR EXISTS OR THERE IS UNFINISHED BUSINESS. NOTE ALSO THAT EACH DEBIT HAS A CORRESPONDING CREDIT. THIS IS HOW WE MAINTAIN THE INTEGRITY OF CHARGES IN THE SYSTEM. FOR EXAMPLE, THE ONLY CHARGES YOU WILL SEE IN UTILITIES — ELECTRIC EXPENSE IS "WAPA". YOU WILL NEVER SEE "CITICARD" AS WAS THE CASE IN 2012 AND PRIOR YEARS.



I REMEMBER THE VOUCHER BELOW AS I QUESTIONED ITS INCLUSION ON THE FIXED ASSETS SCHEDULE AND LEARNED THAT THIS WAS ACTUALLY A PURCHASE OF GUN SAFES FOR RESALE. I VISUALLY INSPECTED THESE ITEMS ON THE FLOOR IN ST. THOMAS.



4/18/16 Attachment IX - John Gaffney's response letter to Joel Holt and supporting documentation 5.17.16 Page: 1 United Corporation STT (Pship) Vendor Ledgers For the Period From Jan 1, 2013 to Dec 31, 2013 Filter Criteria includes: 1) IDs: NEJEH YUSUF. Report order is by ID.

Vendor ID Vendor	Date	Trans No	Type	Paid	Debit Amt	Credit Amt	Balance
NEJEH YUSUF	1/1/13	01012012-CITI	PJ	*	Carrier of the Control of the Contro	1,451.46	1,451.46
NEJEH YUSUF	1/11/13	37060	CDJ		1,451.46		0.00
	4/15/13	37637	CDJ		7,000.00		-7,000,00
	4/15/13	2013-0419	ΡĴ	•	•	7,000.00	0,00
	4/24/13	04-24-2013	ΡJ	•		5,641.00	5,641.00
	5/15/13	37857	CDJ		40.00	40.00	5,641.00
	5/15/13	37846	CDJ		5,641.00		0.00
	10/28/13	10-28-2013	ΡĴ	*		159.00	159.00
	10/29/13	38756	CDJ		159.00		0.00
	11/25/13	10-12-2013	₽J	*		465.00	465.00
	12/10/13	39032	CDJ	_	465.00		0.00
Report Total					14,756.46	14,756.46	0.00

4/18/16Addmclamant IX - John Gaffney's response letter to Joel Holt and supporting documentation 5.17.16 Page: 1 United Corporation STT (Pship)

General Ledger

For the Period From Apr 1, 2013 to Apr 30, 2013
Filter Criteria includes 1) IDs 29900 Report order is by ID. Report is printed with shortened descriptions and in Detail Format.

Account ID Account Description	Date	Reference	Jrni	Trans Description	Debit Amt	Credit Amt	Balance
29900	4/1/13	ETYVE SUMMORE SVANSKARENSKARENSKA V SVANSKE STANSKARENSKA SUVERUSEK . N		Beginning Balance	m unaddinimenteter og er er de delegenet de	- market mykhiteren von medder med er net fraudsmitenel mer * ne	метере престой с основно съебинациями. В сеня споля на
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	4/2/13	CM04-02-2	ΡJ	WATER & POWER		49,192.01	
	4/2/13	CM04-02-2	PJ	WATER & POWER		11,000.00	
	4/2/13	CM04-02-2	ΡJ	WATER & POWER		11,000.00	
	4/2/13	04-02-2013	ΡĴ	MERRILL LYNCH -	20,000.00	,	
	4/2/13	04-02-2013	ΡĴ	MERRILL LYNCH -	15,000.00		
	4/2/13	04-02-2013	ΡĴ	BANCO POPULAR	49,192.01		
	4/2/13	04-02-2013	ΡĴ	BANCO POPULAR	11,000.00		
	4/2/13	04-02-2013	ΡĴ	BANCO POPULAR	11,000.00		
	4/3/13	306840	ΡĴ	BANCO POPULAR	12,603.00		
	4/3/13	CM 306840	ΡĴ	BJ'S WHOLESALE	12,000.00	12,603.00	
	4/3/13	04-03-2013	ΡĴ	BANCO POPULAR	4,518.00	12,000.00	
	4/3/13	306953-1	ΡĴ	BANCO POPULAR	21,401.39		
	4/3/13	306953-2	PJ	BANCO POPULAR	30,000.00 26,446.75		
	4/3/13 4/3/13	04-03-2013 CM 04-03-2	PJ PJ	BANÇO POPULAR TROPICAL SHIPPI	20,440.70	26,446.75	
					E 222 CE	20,440,70	
	4/3/13	04-03-2013	PJ	BANCO POPULAR	5,233.25	5 000 05	
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	4/3/13	04-03-2013	ΡJ	WAHEED HAMED	40 204 00	4,518.00	
	4/4/13	6217-2830	ΡJ	DISCOVER CARD	10,381.09	40.004.00	
	4/4/13	CM 6217-2	PJ	SAM'S CLUB - PAI		10,381.09	
	4/4/13	04-04-2013	PJ	TROPICAL SHIPPI	00 070 00	99,676.00	
	4/4/13	04-04-2013	PJ	BANCO POPULAR	99,676.00	00.000.00	
	4/9/13	CM 6217-2	ΡJ	SAM'S CLUB	00 000 00	29,925.83	
	4/9/13	6217-2849	ΡJ	BANCO POPULAR	29,925.83		
	4/9/13	CM 04-09-2	ΡJ	EARTHLINK - PAI		26.90	
	4/9/13	04-09-2013	ΡJ	BANCO POPULAR	26.90		
	4/10/13	CM 04-10-2	ΡJ	TROPICAL SHIPPI		33,271.00	
	4/10/13	04-10-2013	ΡJ	BANÇO POPULAR	33,271.00		
	4/11/13	CM 306953	ΡJ	BJ'S WHOLESALE		21,401.39	
	4/11/13	CM 306953	₽J	BJ'S WHOLESALE		30,000.00	
	4/11/13	CM 04-11-2	₽J	PEPSICO CARIBB		21,803.39	
	4/11/13	04-11-2013	РJ	BANCO POPULAR	21,803.39		
	4/15/13	CM2013-04	ΡJ	BANK OF AMERIC		7,000.00	
	4/15/13	2013-0419	ΡJ	NEJEH YUSUF - P	7,000.00	•	
	4/17/13	306975	ΡJ	BANCO POPULAR	61,815.90		
	4/17/13	CM 306975	ΡJ	BJ'S WHOLESALE		61,815.90	
	4/17/13	CM 6217-2	PJ	SAM'S CLUB		6,280.77	
•	4/17/13	6217-2899	ΡJ	BANCO POPULAR	6,280.77	•	
	4/19/13	CM04-19-2	PJ	TROPICAL SHIPPI	•	32,186.10	
	4/19/13	04-19-2013		BANCO POPULAR	32,186.10		
	4/23/13	CM 6217-2	ΡĴ	SAM'S CLUB	,	32,171.04	
	4/23/13	6217-2878	ΡĴ	BANCO POPULAR	32,171.04		
	4/24/13	04-24-2013	ΡĴ	MERILL LYNCH -	1,383.18		
	4/24/13	CM33529	ΡĴ	ALL FUN GIFTS IN	.,	684.39	
	4/24/13	33529	ΡĴ	MERILL LYNCH	684.39	201100	
	4/24/13	CM04-24-2	ΡĴ	AT&T - PAID WITH	50 1100	1,383.18	
	4/26/13	04-26-2013	ΡĴ	ST THOMAS GAS		2,883.91	
	4/29/13	04-29-2013	ΡJ	BANCO POPULAR	74,500.00	~,000.01	
	4/29/13	04-29-2013	РJ	BANCO POPULAR	48,500.00		
	4/29/13	04-29-2013	PJ	BANK OF AMERIC	14,781.43		
	4/29/13			USVI INTERNAL R	14,701.43	74,500.00	
		CM04-29-2	PJ				
	4/29/13	CM04-29-2	PJ	USVI INTERNAL R		48,500.00	
	4/29/13	CM04-29-2	PJ	USVI INTERNAL R	0.000.01	14,781.43	
	4/29/13	04-29-2013	ΡJ	BANCO POPULAR	2,883.91	000 00- 0-	
				Current Period Cha	683,665.33	683,665.33	
	4/30/13			Ending Balance			

4/18/16/Actachana:Ne IX - John Gaffney's response letter to Joel Holt and supporting documentation 5.17.16 Page: 1 United Corporation STT (Pship) Vendor Ledgers

For the Period From Jan 1, 2013 to Jun 30, 2013 Filter Criteria includes 1) IDs. BANK OF AMERICA 5222. Report order is by ID.

Vendor ID Vendor	Date	Trans No	Туре	Paid	Debit Amt	Credit Amt	Balance
BANK OF AMERICA 522	1/20/13	STATEMENT 0	PJ	*	er rote direct Proportional describer of the	3,384.68	3,384.68
BANK OF AMERICA	1/30/13	37217	CDJ		3,384.68		0.00
	1/30/13	01302013-6	ΡJ	•		45,000.00	45,000.00
	1/30/13	37223	CDJ		45,000.00		0.00
	2/20/13	STATEMENT 0	PJ	*		4,057.60	4,057.60
	3/5/13	37378	CDJ		4,057.60		0.00
	4/15/13	CM2013-0419	ΡJ	*	7,000.00		-7,000.00
	4/19/13	2013-0419	ΡJ	*		11,851.32	4,851,32
	4/23/13	37671	CDJ		4,851.32		0.00
	4/29/13	04-29-2013-3	PJ	*		14,781.43	14,781.43
	4/29/13	37721	CDJ		14,781.43		0.00
	5/3/13	6217-28944-30	PJ	*		3,979.73	3,979,73
	5/7/13	37750	CDJ		3,979.73		0.00
	6/4/13	06-04-2013-1	РJ	•	•	36,756.54	36,756.54
	6/6/13	37930	CDJ		1,876.80	1,876.80	36,756.54
	6/6/13	37930	ÇDJ		36,756.54		0.00
	6/24/13	06-24-2013-1	ΡJ	*		1,338.20	1,338,20
	6/25/13	38040	CDJ		1,338.20		0.00
•	6/25/13	S106213882	ΡJ	*	,	836.29	836.29
	6/26/13	38056	CDJ		836.29	PROPERTY OF THE CONTRACT OF TH	0.00
Report Total					123,862.59	123,862.59	0.00