





*Supplemental Response to Hamed's Discovery*  
*Waleed Hamed et al. vs. Fathi Yusuf et al.*  
 Case No.: STX-2012-CV-370  
 Page 3

Fathi Yusuf	Cairo Amman Bank	01 532 172349 00	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	
Fathi Yusuf	Cairo Amman Bank	02 033 172349 00	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	

Fathi Yusuf	Cairo Amman Bank	02 503 172349 00	Yusuf shows that this account was a joint account used by the Partnership and to purchase properties. He believes that it has been closed. He references Bates No. FY010158 - 59 for his response.	Based upon the information at Bates Numbers FY010158 - 59, it appears the account was opened on March 19, 1998 with a \$100 deposit and then a more significant deposit on \$50K on July 98.	All of the transactions of which Yusuf is aware are contained in FY010158 - 59- running from 1998 -1999.	All of the transactions of which Yusuf is aware are contained in FY010158 - 59- running from 1998 - 1999.	All of the transactions of which Yusuf is aware are contained in FY010158 - 59- running from 1998 -1999.	All of the transactions of which Yusuf is aware are contained in FY010158 - 59- running from 1998 - 1999.	It is Yusuf's belief that the account is closed.	It is Yusuf's belief that the account is closed. He does not have a specific recollection but recalls that all of the accounts in his name were closed a number of years ago which he believes is consistent with the information in FY010158-59.	
Fathi Yusuf	Cairo Amman Bank	02 528 172349 00	Yusuf shows that this account was a joint account used by the Partnership and to purchase properties. He believes that it has been closed. He references Bates No. FY010160 - 61 for his response.	Based upon the information at Bates Numbers FY010160 - 61, it appears the account was opened on December 10, 1998 with a \$665K deposit. It appears that after December 2000 the account was not used for any significant amounts.	All of the transactions of which Yusuf is aware are contained in FY010160 - 61 running from 1998 -2001.	All of the transactions of which Yusuf is aware are contained in FY010160 - 61 - running from 1998 - 2001.	All of the transactions of which Yusuf is aware are contained in FY010160 - 61 - running from 1998 -2001.	The Balance on December 31, 2001 was \$374.07.	It is Yusuf's belief that the account is closed.	It is Yusuf's belief that the account is closed. He does not have a specific recollection but recalls that all of the accounts in his name were closed a number of years ago which he believes is consistent with the information in FY010160 - 61 .	

Fathi Yusuf	Cairo Amman Bank	02 533 172349 00	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	Yusuf shows that he does not recall this specific account but that this account would have been a joint account used by the Partnership. He believes that it has been closed.	
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**B. Domestic -**

Yusuf shows that as to domestic assets that he owns from September 17, 2006 to the present:

**1. Bank Accounts**

Yusuf has had three (3) personal checking bank accounts from September 17, 2006 to the present. His current account is with Banco Popular, Account No. 19-303984 and it was opened in or about February 2016 along with the account for his wife 591-450334, attached Bates No. FY016321-348. Prior to that account, he maintained a personal checking account with Scotia Bank. The Scotia Accounts are listed in the BDO tables. *See* Table 40 and 40(a) and Supporting Documentation provided in the Dropbox link under the Fathi Yusuf folder. The two Scotia Accounts are: 1) Scotia Account No. 365620 and 55157126. Yusuf is unsure exactly when these accounts with Scotia closed, but recalls they were closed around late 2015 or early 2016. The source of the funds for these accounts was either the Partnership or the United Shopping Center. Yusuf, like all of the Hameds, periodically receives proceeds from jointly owned entities such as Plessen, Sixteen Plus and Peters Farm.

**2. Brokerage Accounts**

Yusuf had no active brokerage accounts from September 17, 2006. Yusuf does not recall ever having a brokerage account in his name or jointly with anyone. However, he has reviewed the information categorized by BDO and sees a brokerage account in his name with Merrill Lynch with a minimal balance. *See* Table 40, 40A and 40B and Supporting Documentation provided in the dropbox link under the Fathi Yusuf folder. Yusuf does not recall the Merrill Lynch Retirement account 140-82627 and does not believe that it is open or active. To the extent that he funded this earlier Merrill Lynch account, the source of the funds for the account was either the Partnership or the United Shopping Center. Again, Mr. Yusuf, like all of the Hameds periodically receives proceeds from jointly owned entities such as Plessen, Sixteen Plus and Peters Farm and they may also have been source of any funds into this account. As to the other account identified by BDO in its review of the documentation, Merrill Lynch Account 140-16484, Yusuf received confirmation from Merrill Lynch that this account was for Mohamed Hamdan and not Mr. Yusuf. *See* attached letter from September 21, 2016, FY14912 and this account is the subject of an earlier ruling from the Master.

In 2019, Yusuf opened a brokerage account with E-Trade. The source of the funds from that account are from United. As this account was opened after the split of the stores, Yusuf is noting it for purposes of completeness but it is not relevant to any issues pending in this matter.

**3. Request to Produce 30:**

Following the Court's Order of March 17, 2022, the interrogatory was revised to read:

"Please produce copies of all original tax returns filed by United and Fathi Yusuf from 1986 to date."

**Supplemental Response:**

Yusuf and United previously provided:

United Tax Returns from 2002 thru 2010, Bates Numbers FY 00374 – 004121.

On November 19 and 20, 2021, Yusuf supplemented as to his tax returns by providing the following:

Yusuf personal tax returns from 2002 thru 2020, Bates Number FY016166 – 016320. After diligent search, Yusuf has been unable to locate tax returns prior to 2002.

**4. Request to Produce 31:**

Following the Court's Order of March 17, 2022, the request was revised to read:

"Please produce copies of all documents including statements relating to any operating, savings, credit, investment, trust, escrow or other accounts in which United [and] Fathi...or any company which they have more than 49% control, have or had any interest in the Virgin Islands or elsewhere, including but not limited to Jordan and West Bank, Palestine, from 1986 to date."

**Supplemental Response:**

**A. Foreign -**

On October 22, 2021, Yusuf and United filed the following response as to foreign holdings:

In response, Yusuf produced on October 22, 2021, the documents attached to wit:

Exhibit 1 – Excel Spreadsheet as to Foreign Accounts

Exhibit 2

A- Opposition to Motion to Compel 12-30-2018

B- Supplemental Discovery 1-15-2021

C- 1- Supplemental Discovery Responses 1-7-19

2- Bates Document UC002961 – UC003033 – Mohammad

3- Bates Document FY-002143

- 4- Bates Document UC002900 -UC002974
  - 5- Bated Document FY3016 - FY3089
  - 6- Notice of Service of Supplemental Responses
  - 7- Corrected Notice of Service of Supplemental Responses
  - D- December 20, 2018 Supplemental Discovery
  - E- List of Foreign Accounts in Yusuf's Account Claims as Exh. K
  - F- Hamed Answers to Discovery Regarding Foreign Accounts and Prop.
- Exhibit 3 – FBI Cash Movement Diagram  
Exhibit 4 – Table of Accounts – Yusuf from BDO Report  
Exhibit 5 – Cairo Aman Account – Checks to Wally  
Exhibit 6 – Arab Bank Statement – FY00192 – FY00219  
Exhibit 7- Cairo Bank Statement – FY00220 – FY00272  
Exhibit 8- French Commercial Bank Stmt – FY004358  
Exhibit 9- Draft Summary Sheet – FY10158-59 -Cairo Aman – 503-349 – FY  
Exhibit 10- Draft Summary Sheet – FY10155 – BFC – 7790 – FY  
Exhibit 11- Banco Fanchaise – FY00396-FY00406.  
Exhibit 12- United Corporation Tax Returns – 2002-2010

The above accounts and information was sourced from Partnership funds.

Yusuf has no other foreign accounts or investments as defined by this request.

United has no other foreign accounts or investments as defined by this request.

## **B. Domestic –**

As set forth in response to Interrogatory No. 33 above, Yusuf shows that:

### **1. Bank Accounts**

Yusuf has had three (3) personal checking bank accounts from September 17, 2006 to the present. His current account is with Banco Popular, Account No. 19-303984 and it was opened in or about February 2016 along with the account for his wife 591-450334, attached Bates No. FY016321-348. Prior to that account, he maintained a personal checking account with Scotia Bank. The Scotia Accounts are listed in the BDO tables. *See* Table 40 and 40(a) and Supporting Documentation provided in the Dropbox link under the Fathi Yusuf folder. The two Scotia Accounts are: 1) Scotia Account No. 365620 and 55157126. Yusuf is unsure exactly when these accounts with Scotia closed, but recalls they were closed around late 2015 or early 2016. The source of the funds for these accounts was either the Partnership or the United Shopping Center. Yusuf, like all of the Hameds, periodically receives proceeds from jointly owned entities such as Plessen, Sixteen Plus and Peters Farm.

### **2. Brokerage Accounts**

Yusuf had no active brokerage accounts from September 17, 2006. Yusuf does not recall ever having a brokerage account in his name or jointly with anyone. However, he has reviewed the information categorized by BDO and sees a brokerage account in his name with Merrill Lynch with a minimal balance. *See* Table 40, 40A and 40B and Supporting Documentation provided in

the dropbox link under the Fathi Yusuf folder. Yusuf does not recall the Merrill Lynch Retirement account 140-82627 and does not believe that it is open or active. To the extent that he funded this earlier Merrill Lynch account, the source of the funds for the account was either the Partnership or the United Shopping Center. Again, Mr. Yusuf, like all of the Hameds periodically receives proceeds from jointly owned entities such as Plessen, Sixteen Plus and Peters Farm and they may also have been source of any funds into this account. As to the other account identified by BDO in its review of the documentation, Merrill Lynch Account 140-16484, Yusuf received confirmation from Merrill Lynch that this account was for Mohamed Hamdan and not Mr. Yusuf. See attached letter from September 21, 2016, FY14912 and this account is the subject of an earlier ruling from the Master.

In 2019, Yusuf opened a brokerage account with E-Trade. The source of the funds from that account are from United. As this account was opened after the split of the stores, Yusuf is noting it for purposes of completeness but it is not relevant to any issues pending in this matter.

In addition to the Supporting Documentation provided in the dropbox link under the Fathi Yusuf folder, Yusuf also attaches hereto the following Bates stamped documents:

Banco Popular Account Records, FY016321-348,

Scotia Account Records (see attached)

Scotia Credit Card Records (see attached).

**i. Interrogatory 35**

Following the Court's Order of March 17, 2022, the interrogatory was revised to read:

"Please identify all sources of income for 1) Fathi...from September 17, 2006 to the date of your response and identify all funds for the acquisition of such assets."

**Supplemental Response:**

Yusuf shows that he had the following sources of income from September 17, 2006 to date of these responses and the source of the funds for the acquisition of such assets as follows:

- i. **The Partnership** – Yusuf received salary from the Partnership. That salary was established with the approval of the Federal Monitor (as were all the salaries). In addition, Yusuf would receive distributions from the Partnership via a check or receipt.
- ii. **United Corporation - Tenant Account** – Yusuf received income from the collections of United from the various tenants of the United Shopping Center. He did not receive a regular salary but various funds when needed. Yusuf also agreed to have United forebear the collection of rent from the Partnership for substantial periods of time so as to allow greater cashflow for the grocery store operations. United had purchased the Shopping Center prior to the establishment of the partnership.

- iii. **Plessen** – Yusuf periodically receives distributions from Plessen. His distributions are known to the Hamed's and are made at the same time that the Hamed's receive their distributions. Partnership funds were used to purchase properties held in the name of Plessen.
- iv. **Sixteen Plus** – Yusuf periodically receives distributions from Sixteen Plus. His distributions are known to the Hamed's and are made at the same time that the Hamed's receive their distributions. Partnership funds were used to purchase properties held in the name of Sixteen Plus.
- v. **Peters Farm Investment Corp.** - Yusuf periodically receives distributions from Peters Farm Investment Corp. His distributions are known to the Hamed's and are made at the same time that the Hamed's receive their distributions. Partnership funds were used to purchase properties held in the name of Peters Farm.
- vi. **Y & H Investments** – This was an entity previously established for the purchase of some property. Yusuf does not receive any income from that company but may have received distributions periodically as the Hameds would have received.

**ii. Interrogatory 37:**

Following the Court's Order of March 17, 2022, the interrogatory was revised to read:

“Identify all distributions from the Partnership to any member of the Yusuf family or United Corporation from September 17, 2006 to present.”

**Supplemental Response:**

Yusuf shows the following:

As to **Fathi Yusuf**:

1. **Checks:** Fathi received \$4,284,706.25 from the partnership in checks between September 2006 and December 2012. That amount is comprised of the \$2,784,706.25 check, which Yusuf has shown is a reconciliation amount for prior withdrawals by the Hameds. The remaining \$1,500,000.00 relates to the amounts paid to Fathi Yusuf and his wife Fawzi Yusuf and endorsed into the Hamed accounts.

Specifically, Fathi received the above referenced checks from the following Partnership accounts<sup>1</sup>:

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<sup>1</sup> Yusuf acknowledges the Master's direction that the information provided not to simply refer to the BDO Report as responsive. The tables and charts therein, set forth all of the information in a clear and concise manner and are utilized so as to provide clarity.

Supplemental Response to Hamed's Discovery  
 Waleed Hamed et al. vs. Fathi Yusuf et al.  
 Case No.: STX-2012-CV-370  
 Page 9

Family Member: Fathi Yusuf

Type of Account	Account Number	Account Owner	Year												Total		
			2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012			
Telecheck	800-86413	United Corporation DBA Plaza Extra													\$ 750,000.00	2,784,706.25	\$ 3,534,706.25
Checking Account	312010	United Corporation DBA Plaza Extra	71,000.00	546,000.00	112,147.00	224,908.40											514,128.00
Checking Account	65811	United Corporation DBA Plaza Extra		466,000.00													150,000.00
Unknown	058-60092918	United Corporation / Plaza Extra													750,000.00		750,000.00
Total Checks accounted for			\$ 70,000.00	\$ 666,400.00	\$ 113,147.00	\$ 224,908.40	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,500,000.00	\$ 2,784,706.25	\$ 5,359,144.65

\$4,284,706.25

Of the amounts that came from United account 600-86413, they are more specifically enumerated as follows:

Account Owner: United Corporation DBA Plaza Extra  
 Supermarket Location: Sion Farm, St. Croix  
 Financial Institution: Scotiabank  
 Type of Account: Telechecks  
 Account Number: 058-60086413

Year	Statement Date	Transaction Date	Check #	Amount	Adjustment	Adjusted Amount	Pay to the order of	Tickmarks/ Note
2011	N/A	7/7/2011	1149	\$ 750,000.00	\$ (375,000.00)	\$ 375,000.00	Fathi Yusuf	1
2011	N/A	7/7/2011		750,000.00	(375,000.00)	375,000.00	Fathi Yusuf	2
Total Year 2011				1,500,000.00	(750,000.00)	750,000.00		
2012	N/A	8/15/2012	1154	2,784,706.25		2,784,706.25	United Corporation	3
Total Year 2012				2,784,706.25	-	2,784,706.25		
Total				\$ 4,284,706.25	\$ (750,000.00)	\$ 3,534,706.25		

Notes:

- 1 We observed an affidavit signed by Mr. Fathi Yusuf referencing a gift to Mr. Mufeed Hamed for \$750,000. Ms. Fawzia Yusuf signed a similar affidavit for the same amount. A total of \$1,500,000 where withdrawn from Plaza Extra accounts through checks #1149 and #1104 (\$750,000 each) using the Plaza Extra St. Croix accounts #058-60092968 and #058-60086413. Since Mr. Mufeed's wife was Ms. Amal Yusuf, this amount is considered a Partnership distribution from both families.
- 2 We observed an affidavit signed by Mr. Fathi Yusuf referencing a gift to Mr. Hisham Hamed for \$750,000. Ms. Fawzia Yusuf signed a similar affidavit for the same amount. A total of \$1,500,000 was deposited in Mr. Hisham Hamed personal account # 191-85515 on 8/24/2011, amount was observed in bank statement. Since Hisham's wife was Ms. Hoda Yusuf we considered this amount as a Partnership distribution from both families.
- 3 Check #1154 was paid to the order of United Corporation from Plaza Extra account #058-60086413 for \$2,784,706.25 dated 8/15/2012 and signed by Fathi Yusuf and Maher Yusuf.

Of the amounts from United Account #058-60092918, Yusuf shows the following detail:

Account Owner: United Corporation / Plaza Extra  
 Supermarket Location: Christiansted  
 Financial Institution: Scotiabank  
 Type of Account: Unknown  
 Account Number: 058-60092918

Year	Statement Date	Transaction Date	Check #	Amount	Adjustment	Adjusted Amount	Pay to the order of	Tickmarks/ Notes
2011	N/A	7/7/2011	1104	\$ 750,000.00	\$ (375,000.00)	\$ 375,000.00	Fawzia Yusuf	1
2011	N/A	7/7/2011		750,000.00	(375,000.00)	375,000.00	Fawzia Yusuf	2
Total Year 2011				1,500,000.00	(750,000.00)	750,000.00		
Total				\$ 1,500,000.00	\$ (750,000.00)	\$ 750,000.00		

Notes:

- 1 We observed an affidavit signed by Mr. Fathi Yusuf referencing a gift to Mr. Mufeed Hamed for \$750,000. Ms. Fawzia Yusuf signed a similar affidavit for the same amount. A total of \$1,500,000 where withdrawn from Plaza Extra accounts through checks #1149 and #1104 (\$750,000 each) using the Plaza Extra St. Croix accounts #058-60092968 and #058-60086413. Since Mr. Mufeed's wife was Ms. Amal Yusuf, this amount is considered a Partnership distribution from both families.
- 2 We observed an affidavit signed by Mr. Fathi Yusuf referencing a gift to Mr. Hisham Hamed for \$750,000. Ms. Fawzia Yusuf signed a similar affidavit for the same amount. A total of \$1,500,000 was deposited in Mr. Hisham Hamed personal account # 191-85515 on 8/24/2011, amount was observed in bank statement. Since Hisham's wife was Ms. Hoda Yusuf we considered this amount as a Partnership distribution from both families.

It is Yusuf's position that the checks payable to him and wife Fawzi Yusuf for \$750,000 should not be counted as a distribution to him. Or if counted, a corresponding amount should be credited to the Hameds.

2. As to **Maher Yusuf**: Mike received a distribution in the amount of \$2,000.00 on or about January 28, 2012 as evidenced by a receipt #45913 (Bates Number HAMD594283).

Mike also received the benefit of payments made to his attorney's in the criminal case. The issue of whether attorney's fees paid by the Partnership should be attributed to the individuals is currently pending. If so, then the amount designated by the Court would constitute a distribution to Mike Yusuf.

3. As to **Nejah Yusuf**: Nejah received the benefit of payments made to his attorney's in the criminal case. The issue of whether attorney's fees paid by the Partnership should be attributed to the individuals is currently pending. If so, then the amount designated by the Court would constitute a distribution to Nejah Yusuf.
4. As to the period after the suit was filed, any distributions between the parties have been tracked, evenly allocated and consented to by the parties and thus, are not in dispute. All of the checks received by each family member was provided to the Hameds in the Sage accounting information. Yusuf and family members also received payroll checks of which all parties are aware and are not in dispute.

iii. **Request for Production of Documents No. 26:**

Following the Court's Order of March 17, 2022, the interrogatory was revised to read:

"With respect to Y-11, please provide all bank account statements documenting deposits, all brokerage and retirement accounts documenting deposits and all credit card statements in the names of Fathi...(individually and any combination of joint accounts...), from September 17, 2006 to September 30, 2016."

**Supplemental Response:**

Yusuf provides the attached Dropbox link which has all of the documents reviewed by BDO relating to any member of the Yusuf family. The Fathi Yusuf folder therein contains all bank account statements and brokerage and retirement accounts information of which Yusuf has for the period referenced of which Yusuf has in his care, custody or control.

As to additional information, Yusuf also produces herewith the following account information from his current bank account with Banco Popular, prior accounts with Scotia Bank and his Scotia credit cards statements.

iv. **Non-Parties:**

Following the Court's Order of March 17, 2022, the Master further directed:

"Accordingly, the Master will order Fathi Yusuf and United to produce all documents either relating to the non-parties or containing the non-parties' information that Fathi Yusuf and/or United provided to Yusuf's accounting expert Fernando Scherrer of BDO Puerto Rico, P.S.C. in this matter."

**Supplemental Response:**

Yusuf provides the attached Dropbox link, which has all of the documents reviewed by BDO relating to any member of the Yusuf family. It is categorized by each family member, with various folders for accounts, receipts, etc. by year and then copies of each document. Yusuf notes that all of this information was previously produced to Hamed in August of 2016 as Exhibit J – jump drive. (The jump drive also has all of the information reviewed by BDO for each member of the Hamed family as well – that is not recreated here as not responsive to the Court's direction.)

**DUDLEY NEWMAN FEUERZEIG, LLP**

**DATED:** May 17, 2022

By: s/Charlotte K. Perrell  
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*Attorneys for Fathi Yusuf and United Corporation*

**CERTIFICATE OF SERVICE**

It is hereby certified that on this 17<sup>th</sup> day of May, 2022, I caused the foregoing a true and exact copy of the foregoing **SUPPLEMENTAL RESPONSES TO HAMED'S DISCOVERY** to be served upon the following via Case Anywhere docketing system:

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