

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

**HISHAM HAMED, individually, and  
derivatively, on behalf of SIXTEEN PLUS  
CORPORATION,**

*Plaintiff,*

v.

**FATHI YUSUF, ISAM YOUSUF and  
JAMIL YOUSEF**

*Defendants,*

and

**SIXTEEN PLUS CORPORATION,**

*a nominal Defendant.*

**Case No.: 2016-SX-CV-650**

**DERIVATIVE SHAREHOLDER  
SUIT, ACTION FOR DAMAGES  
AND CICO RELIEF**

**JURY TRIAL DEMANDED**

**PLAINTIFF HISHAM HAMED'S  
SECOND REQUEST FOR ADMISSIONS TO DEFENDANT JAMIL YOUSUF**

Plaintiff Hamed, by counsel, propounds the following 2nd Requests for Admissions pursuant to Rule 36 of the *Virgin Islands Rules of Civil Procedure* (V.I. R. CIV. P.) on Defendant Isam Yousuf.

**ADMISSIONS**

**17. ADMIT** you received funds from or on behalf of Sixteen Plus Corporation as payment of interest due under the Note at issue here to Manal Yousef in 1998.

(hereinfter the "1998 interest funds.")

**18. ADMIT** you deposited those 1998 interest funds in a bank, investment fund or other third party entity after receipt.

**19. ADMIT** Y[ ] received those 1998 interest funds from Wally Hamed

*Requests 20-23 intentionally omitted..*

**24. ADMIT** that the 1998 interest funds were deposited in your own name.

**25. ADMIT** that the 1998 interest funds were deposited in Manal's name.

**26. ADMIT** that the 1998 interest funds were deposited in a third party's or entity's name.

**27. ADMIT** that the 1998 interest funds were NOT deposited but were retained by you as cash.

**28. ADMIT** that the 1998 interest funds were NOT deposited but were retained by Manal as cash.

**29. ADMIT** that the 1998 interest funds were NOT deposited but were retained by a third person or entity as cash.

**30. ADMIT** that you did not pay income tax in the USVI for the 1998 interest funds.

**31. ADMIT** that you did not pay FIRPTA tax in the US for the 1998 interest funds.

**32. ADMIT** that you did not pay income tax in the USVI for the 1998 interest funds for Manal.

**33. ADMIT** that you did not pay FIRPTA tax in the US for the 1998 interest funds for Manal.

**34. ADMIT** that Manal did not pay USVI income tax or US FIRPTA for the 1998 interest funds.

**35. ADMIT** you received funds from or on behalf of Sixteen Plus Corporation as payment of interest due under the Note at issue here to Manal Yousef in 1999 and 2000 (hereinfter the "1999 & 2000 interest funds.")

**36. ADMIT** you deposited those 1999 & 2000 interest funds in a bank, investment fund or other third party entity after receipt.

37. **ADMIT** those funds were received from Wally Hamed.
38. **ADMIT** that the 1999 & 2000 interest funds were deposited in your own name.
39. **ADMIT** that the 1999 & 2000 interest funds were deposited in Manal's name.
40. **ADMIT** that the 1999 & 2000 interest funds were deposited in a third party's or entity's name
41. **ADMIT** that the 1999 & 2000 interest funds were NOT deposited but were retained by you as cash.
42. **ADMIT** that the 1999 & 2000 interest funds were NOT deposited but were retained by Manal as cash.
43. **ADMIT** that the 1999 & 2000 interest funds were NOT deposited but were retained by a third person or entity as cash.
44. **ADMIT** that you did not pay income tax in the USVI for the 1999 & 2000 interest funds.
45. **ADMIT** that you did not pay FIRPTA tax in the US for the 1999 & 2000 interest funds.
46. **ADMIT** that you did not pay income tax in the USVI for the 1999 & 2000 interest funds for Manal.
47. **ADMIT** that you did not pay FIRPTA tax in the US for the 1999 & 2000 interest funds for Manal.
48. **ADMIT** that Manal did not pay USVI income tax or US FIRPTA for the 1999 & 2000 interest funds.

**Dated:** September 15, 2022



**Carl J. Hartmann III, Esq.**  
*Co-Counsel for Hisham Hamed*  
2940 Brookwind Dr. Holland, MI 49424  
(340) 642-4422  
carl@carlhartmann.com

### **CERTIFICATE OF SERVICE**

I hereby certify that this document complies with the page or word limitation set forth in Rule 6-1(e) and that on September 15, 2022 I served a copy of the foregoing by hand/ email, as agreed by the parties, on:

**Charlotte Perrell, Esq.**  
**Stefan Herpel, Esq.**

Law House, 10000 Frederiksberg Gade  
P.O. Box 756  
St. Thomas, VI 00804-0756  
Tel: (340) 774-4422  
[sherpel@dtflaw.com](mailto:sherpel@dtflaw.com)

**James L. Hymes, III, Esq.**  
V.I. Bar No. 264  
1131 King Street, Suite 310  
Tel: (340) 776-3470  
Fax: (340) 775-3300  
[jim@hymeslawvi.com](mailto:jim@hymeslawvi.com)

**Kevin A. Rames, Esq.**  
2111 Company Street, Suite 3  
Christiansted, VI 00820  
Tel: (340) 773-7284  
Fax (340) 773-7282  
[kevin.rames@rameslaw.com](mailto:kevin.rames@rameslaw.com)

A handwritten signature in blue ink, appearing to read "C. J. Herpel", with a long horizontal flourish extending to the right.