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**Subject:** Rule 37 Request as to 2nd and 3rd Interrogatory Responses in 65/342  
**Date:** Tuesday, September 20, 2022 5:15:00 PM

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Jim:

Pursuant to Rule 37, I would like to schedule a conference to discuss the following—in addition to the items discussed in my prior email.

## **Interrogatories #2**

### **Interrogatory 17:**

Describe in detail the full response to Interrogatory #9, unless you had no such accounts, none were in your name or no such accounts existed where you were a beneficiary -- for the stated time period. If there were no such accounts, state, as agreed "I had, had in my name or was the beneficiary of no such accounts for that time period."

### **RESPONSE:**

**A copy of my Power of Attorney to Jamal has been produced, as have copies of my passports.** I have no documents relating to my receipt of funds from Sixteen Plus. My brother gave me cash from time to time as I needed it.

Hamed Position: This is unresponsive. It seeks any accounts in her name or as to which she is/was a beneficiary. I want to know where and on what account numbers I need to get local subpoenas for. Account name, institution and account number -- and years open. If her response is "from 1995 to the present I have had no bank or other accounts and was the beneficiary of none—that is false...as she was a beneficiary on those of at least ISam or Island Appliances. If here response is I was a beneficiary of accounts held by ISAM and had none of my own, then she has to make reasonable inquiry of ISam to get them.

### **Interrogatory 19:**

Please describe all of the following with a full description of the documents, dates and persons involved:

- A. All taxes paid to the US Virgin Islands Government for the three payments of \$360.000 from the Virgin Islands Corporation, Sixteen Plus. (I.e. all VI sourced income.)

### **RESPONSE:**

**As a non-US Resident, and non-US Citizen, I did not think I have to pay taxes. If I do, I do not mind paying them when the case is over.**

- B. All taxes paid to the US Government for the three payments of \$360,000 from the Virgin Islands Corporation, Sixteen Plus. (I.e. all US source income.)

**RESPONSE:**

**As a non-US Resident, and non-US Citizen, I don't think I have to pay tax, and if I have to pay, I do not mind paying when the case is over.**

Hamed Position: Both unresponsive. The correct response is "I did not pay taxes to the USVI government for the \$360,000 I received. Same as to US government"

- C. All taxes paid to the governments of your residence and citizenship for the three payments of \$360,000 from the Virgin Islands Corporation, Sixteen Plus.

**RESPONSE:**

**As a non-US Resident, and non-US Citizen, I did not think I have to pay taxes. If I do, I do not mind paying them when the case is over.**

Hamed Position Same here, but I'd be careful about pleading she did not think she had to pay taxes in either STM or West Bank.

- D. All transfers of funds to you or for your benefit for those three payments.

**RESPONSE:**

**I receive cash from my brother from time to time, as needed.**

Hamed Position: What times? Approximate years and amounts. Small or large amounts.

**Also--RESPONSE:**

All funds received by my brother have been disbursed to me over time, **and there are none left to be distributed.**

Hamed Position: What were they spent on? When—does she have any assets worth \$350k ?

- Query as to taxes in her place(s) of residence

- Hamed Position Same here, but I'd be careful about pleading she did not think she had to pay taxes in either STM or West Bank.

### **Interrogatories #3**

Most of these do not provide the facts on which she will rely – thus you are on notice that she will move to strike most the defenses.

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