

From: [Carl Hartmann](#)
To: ["Charlotte Perrell"](#); ["Stefan Herpel"](#); ["Pamela Bayless"](#)
Cc: ["Jim Hymes"](#); ["Rauna Stevenson"](#); ["JOEL HOLT"](#); ["Kim Japinga"](#)
Subject: Rule 37 Conf -- Regarding letters of Permission to access Island Appliances Account
Date: Friday, November 4, 2022 12:14:00 PM
Attachments: [image001.png](#)
[Doc from BFC transmitting Island Appliances per subpoena - Pages from HAMD692934-HAMD692973--Box 26 - Tab 1 -BFC.pdf](#)

Charlotte:

When we resume the Rule 37 conference on Fathi's discovery responses, I want to discuss getting the same letter of permission from him as is discussed with Jim in the email below (already copied to you.) That same BFC response to subpoena lists Hamden Diamond and Fathi Yusuf account materials transmitted to the police. As Fathi was the signatory, director of Hamden Diamond and was in full control of both accounts, I would like letters to BFC and the police/prosecutor as well. Again, if he will not do so, we will—and we will bear the costs.

Thank you,

Carl

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From: Carl Hartmann <carl@carlhartmann.com>
Sent: Friday, November 4, 2022 12:05 PM
To: 'Jim Hymes' <jim@hymeslawvi.com>; 'Rauna Stevenson' <rauna@hymeslawvi.com>
Cc: 'Charlotte Perrell' <cperrell@dnfvi.com>; 'Stefan Herpel' <sherpel@dnfvi.com>; 'Pamela Bayless' <Pbayless@dnfvi.com>; 'JOEL HOLT' <holtvi@aol.com>; 'Kim Japinga' <kim@japinga.com>
Subject: Follow-up Regarding letters of Permission to access Island Appliances Account

Jim:

As we discussed (and as you were going to contact Isam regarding) I have news regarding the bank records for the Isam Yousuf / Island Appliances accounts. Attached is a letter (in French) from BFC to the

SRPJ (Service Régional de Police Judiciaire) the French judiciary police regional service. It confirms that the SRPJ sent a summons to BFC and that BFC is transmitting the documents to the police—this is the cover letter. The response refers to “YOUSUF ISSA-ISLAND APPLIANCE: accounts n° 60.63541 & 60.20186, Account statements, accounting documents”. This confirms the existence, collection, transmission and party holding the results of an official governmental investigation carried out pursuant to lawful process—which is the proper basis for such a request on my part. The “facts” therein (i.e., the actual documents, clearly satisfy *R. Evid. 803(8)*.

These are indisputably accounting materials of your client’s--accounts within his control--and both BFC and the SRPJ (or the prosecutor) clearly would have them. They will show whether \$4 million was slowly built up in Manal’s account from her father over time, or, as I know the accounts will show (based on the French Banking Commission Report has already stated—see below) 10 consecutive deposits in January 1997 amounting to \$1.5 million – which was then transferred to Sixteen Plus.

Therefore, I again ask that if Isam will not request these as he should under Rule 26, he provide me with a letter allowing Hamed to do so at our expense. Our Sint Maarten counsel stands ready to effectuate the request. This seems a reasonable alternative to asking Judge Brady for such an order.

Carl

01/97	Cash deposits	US\$1.5M	Himself	These amounts were deposited in 10 consecutive transfers. At this point, at least a monitoring file should have been set up (s.
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... sheet dated December 1992 which merely mentions the total assets; it was only

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