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

HISHAM HAMED, Individually and Case No.
derivatively on behalf of
SIXTEEN PLUS CORPORATION, SX-2016-CV-00650
Plaintiff,

v.
FATHI YUSUF, ISAM YOUSUF and
JAMIL YOUSUF,
Defendants,
and
SIXTEEN PLUS CORPORATION,
a nominal Defendant.

SIXTEEN PLUS CORPORATION,
Plaintiff, Consolidated with
v. Civil No.
MANAL MOHAMMAD YOUSEF, SX-2016-CV-00065
Defendant,

and
MANAL MOHAMMAD YOUSEF,
Counter-Plaintiff,
v.
SIXTEEN PLUS CORPORATION,
Counter-Defendant.

MANAL MOHAMMAD YOUSEF,
Plaintiff, Consolidated with
v. Civil No.
SIXTEEN PLUS CORPORATION SX-2017-CV-00342
Defendant,

and
SIXTEEN PLUS CORPORATION,
Counter-Plaintiff,
v.
MANAL MOHAMMAD YOUSEF,
Counter-Defendant.

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Pursuant to Notice, the videotaped deposition of ISAM YOUSUF was taken on Tuesday, July 25th, 2023, beginning at 10:02 a.m. via Zoom videoconference before Kathryn M. Benhoff, Notary Public.

ALL PARTICIPANTS VIA ZOOM VIDEOCONFERENCE

A P P E A R A N C E S

ON BEHALF OF HISHAM HAMED & SIXTEEN PLUS CORP.:

CARL J. HARTMANN, III, ESQUIRE

2940 Brookwind Drive

Holland, Michigan 49424

carl@carlhartmann.com

JOEL H. HOLT, ESQUIRE

Law Offices of Joel H. Holt

2132 Company Street

Christiansted, VI 00820

holtvi@aol.com

ON BEHALF OF DEFENDANTS ISAM & JAMIL YOUSUF,
PLAINTIFF/DEFENDANT MANAL YOUSEF:

JAMES HYMES, III, ESQUIRE

Law Offices of James L. Hymes, III, P.C.

P.O. Box 990

St. Thomas, VI 00804-0990

jim@hymeslawvi.com

ON BEHALF OF DEFENDANT FATHI YUSUF:

CHARLOTTE K. PERRELL, ESQUIRE

STEFAN B. HERPEL, ESQUIRE

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PAMELA BAYLES, ESQUIRE
Dudley, Newman, Feuerzeig, LLP Law House
1000 Frederiksberg Gade
P.O. Box 756
St. Thomas, VI 00804-0756
cperrell@dnfvi.com
sherpel@dnfvi.com

FOR THE NOMINAL DEFENDANT SIXTEEN PLUS CORPORATION:

KEVIN A. RAMES, ESQUIRE
K.A. RAMES, P.C.
2111 Company Street - Suite 3
Christiansted, VI 00820
kevin.rames@rameslaw.com

ALSO PRESENT:

Ben Pelta-Heller, Videographer
Jamil Yousuf

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I N D E X

WITNESS:

ISAM YOUSUF

EXAMINATION:

By Mr. Hartmann

7

EXHIBITS

Exhibit No.	Description	PAGE
Exhibit 11	HAMD685703	37
Exhibit 22	HAMD204155	67
Exhibit 53	Response to plaintiff 2nd request for Interrogatories to Defendant	85
Exhibit 54	HAMD493359	95
Exhibit 78	HAM4D202892	113

1 IT IS HEREBY STIPULATED AND AGREED that the
2 reading and signing of this deposition are not waived.

3 VIDEOGRAPHER: Good morning. We are going
4 on the record at 10:02 a.m. on Tuesday, July
5 25th, 2023. This is media unit one of the
6 video recorded deposition of Isam Yousuf, taken
7 by counsel in the matter of Hamed, et al., v.
8 Yusuf, et al. My name is Ben Pelta-Heller,
9 representing Veritext and I'm the videographer.
10 The court reporter is Kathy Benhoff from the
11 firm Veritext. Counsel and all present,
12 including remotely, now state their appearances
13 and affiliations for the record and the
14 reporter please swear in the witness.

15 MR. HARTMANN: This is Carl Hartmann
16 representing Sixteen Plus and Hamed.

17 MR. HYMES: Good morning. This is Jim
18 Hymes. I represent the deponent.

19 MS. PERRELL: Good morning. Charlotte
20 Perrell representing Mr. Fathi Yusuf.

21 THE WITNESS: Good morning. This is Isam

1 Yousuf.

2 MR. HOLT: This is Joel Holt representing
3 Sixteen Plus.

4 REPORTER: Is that everybody? All right.
5 The attorneys participating in this deposition
6 acknowledge that I am not physically present in
7 the deposition room and that I will be
8 reporting this deposition remotely. They
9 further acknowledge that in lieu of an oath
10 administered in person, I will administer the
11 oath remotely. The parties further agree that
12 if the witness is testifying from a state where
13 I am not a Notary that the witness may be sworn
14 in by an out-of-state Notary. If any party has
15 an objection to this manner of reporting,
16 please state now. And hearing none, we'll
17 proceed.

18 ISAM YOUSUF,
19 having been duly sworn, testified as follows:

20 E X A M I N A T I O N

21 BY MR. HARTMANN:

1 Q Good morning, Mr. Yousuf.

2 A Good morning, sir.

3 Q My name is Carl Hartmann. I'll be asking
4 you questions today. I'd like to just give you a
5 couple of items about the conduct of the deposition.
6 First of all, at any time, if you don't understand
7 something I say or need me to repeat it, just stop
8 us and let me know. Okay?

9 A Yes, sir.

10 Q Second, if you need to take a break at any
11 time for any reason, simply stop us. We'll go off
12 the record and we can take any amount, we'll take
13 any amount of break -- third -- I'm getting a lot of
14 feedback. There. Third, if at any time you want to
15 speak separately to your lawyer, who is not there
16 with you; is that correct?

17 A Yes, sir, no.

18 Q Okay. If any time you want to stop the
19 proceedings and speak to your lawyer separately from
20 another room by telephone, we'll do that. Okay?

21 A Yes, sir.

1 Q All right. I'm going to ask you a few
2 questions that just are basic background questions,
3 and the first one is a request for you for a favor
4 in a way. There are about nine people named
5 Mr. Yousuf in this case spelled nine different ways,
6 and so I would ask your permission to be able to
7 call you Isam when I ask you questions.

8 A Or Sam or Isam, whatever you want.

9 Q Okay. Thank you very much. And could you
10 state where you physically are at the moment?

11 A I am in St. Maarten, Netherlands Antilles.

12 Q Netherlands Antilles?

13 A Yeah, or used to be.

14 Q Okay. And is that on the island of
15 St. Maarten?

16 A Island of St. Maarten.

17 Q I see. And where physically are you? Are
18 you in a lawyer's office or are you at your home?

19 A No, I am at the hotel, employer, employee
20 at the hotel.

21 Q Okay. And is there anyone there with you

1 when this deposition is being taken or are you
2 alone?

3 A My son next to me just to help me with the
4 computer.

5 Q Okay. Is that -- what's your son's name,
6 please?

7 A Jamil Yousuf.

8 Q Okay. And is Jamil going to be a witness
9 in his own deposition tomorrow?

10 A Yes, sir.

11 Q Okay. How dependent are you on him for
12 your, for the witness for the computer use? Because
13 normally, we exclude witnesses until their testimony
14 has been taken. If it's necessary, I'll allow it.

15 A I don't know much, but he not going to say
16 nothing. He not going to talk nothing.

17 MR. HYMES: But Carl, he's a party, so
18 he's allowed to listen in, so I don't think
19 there's a problem here.

20 Q Okay. I'm sorry. You're right. Okay.

21 Now, I'm going to ask you a few questions to just go

1 to your ability to testify here today.

2 A Yes, sir.

3 Q Are you on any sort of medications or do
4 you have any sort of condition that would interfere
5 with your ability to clearly and fully answer
6 questions today?

7 A I don't think so. I feel good today. I
8 am diabetic, but that's all, yeah. Probably my
9 life.

10 Q All right. And can you give me, spell out
11 for the court reporter your full name, please?

12 A Isam, I-S-A-M, Mohmad, M-O-H-M-A-D. Last
13 name Yousuf, Y-O-U-S-U-F.

14 Q Okay. And could you give me your address?
15 And if you could spell out the street name for the
16 court reporter.

17 A Right at the moment right now, No. 15
18 Simpson Bay Road, No. 15 Simpson, S-I-M-P-O-S-O-N,
19 Road, or called Airport Road.

20 Q And is that in Dutch or French
21 St. Maarten?

1 A Dutch.

2 Q Okay. And for how long have you lived at
3 that address?

4 A Is more than about ten year, physically
5 move hundred person, but I have a house in Point
6 Blanche. I have another building, which is I have
7 apartment unit at another location, and I have this
8 location, which is I start to stay most.

9 Q Thank you. I'm now going to ask you some
10 questions about your own personal history.

11 A Yes, sir.

12 Q Can you tell me in what country you were
13 born?

14 A I born in Jordan.

15 Q And could you give me your date of birth?

16 A February 20, 1952.

17 Q And today what age are you?

18 A Right now, I am 71.

19 Q Okay. And when you were born in Jordan,
20 were you issued a birth certificate?

21 A Of course, they issue birth certificates.

1 Q And on the birth certificate, was your
2 name spelled in Arabic or in some other language?

3 A Mostly Arabic, yeah, unless you request it
4 in other language.

5 Q Okay. The reason I ask that is because --
6 and correct me if I'm wrong about this -- you are
7 related to Fathi Yusuf, Manal Yousef, Jamil Yousuf
8 and, and Mr. Hamadan, who's passed away?

9 A Uh-huh.

10 Q You are relatives to all of those people;
11 is that correct?

12 A Yes, sir.

13 Q But it's true, isn't it, that you -- how
14 do you spell your last name?

15 A Y-O-U-S-U-F.

16 Q Okay. And how does Mr. Fathi Yusuf spell
17 his last name?

18 A I think it's different, but I really don't
19 know how he spell it, but it's different, but all,
20 all the spelling, because we translate from Arabic
21 to English and the man, and the translator is always

1 different in the names. You know, Yousuf even the
2 same, he translate it Y-O-U-S-U-F, sometime
3 Y-O-U-S-E-F, but in Arabic is the same name. Is
4 only one Yousuf, yeah.

5 Q So just for the court reporter's benefit,
6 I'm going to go down the names of those people who
7 are your relatives quickly, okay?

8 A Yes, sir.

9 Q Okay. We have the spelling for Fathi,
10 F-A-H-T-I, Yusuf, Y-U-S-U-F.

11 A Yeah.

12 Q What is his relationship to you?

13 A Uncle.

14 Q Okay. And we have Manal Yousef, spelled
15 M-A-N-A-L Y-O-U-S-E-F.

16 A That's my sister.

17 Q Okay. And we have you and Jamil spell
18 your last name how?

19 A Jamil, same like my last name, Yousuf,
20 Y-O-U-S-U-F. That's my son.

21 Q And his first name is spelled?

1 A J-A-M-I-L.

2 Q Okay. And he's your son?

3 A Yes, sir.

4 Q And how about Mohammad Yousef, sometimes
5 know as Mohammad Hamadan?

6 A That's my father.

7 Q Okay. And could you explain to me why
8 your father has a different last name than yours?

9 A I should carry, but he's, you know, he's
10 the generation before me. They put the fourth last
11 name, Hamadan. If me, I have to state four names,
12 then my last name is Mohammad Yousuf Mohammad,
13 really. My son, he have to be Jamil Isam Mohammad
14 Yousuf. We use four names. We didn't use the
15 family name.

16 Q Okay. And, and what was, what name is
17 Hamadan? How did he get that name?

18 A That's from his fifth grand, I think a
19 grandfather to him or a grand-grandfather to my
20 father.

21 Q Okay. And how do you spell Hamadan?

1 A As I told you, everyone spell it different
2 when it come translate, but if I want to spell it, I
3 will spell it Hamadan, H-A-M-A-D-A-N.

4 Q H-A-M-D-A-N?

5 A Yeah.

6 Q Thank you.

7 A Yes, sir.

8 Q Thank you. And now, I'd like to cover a
9 little bit of your history. You said you were born
10 in Jordan. Did you ever live in Jordan for any
11 period of time?

12 A While there, yeah, I live, but in our
13 situation, there is Palestine and Jordan. Part of
14 Palestine was divide. Then they join Jordan. Then
15 I born really in Palestine under the authority of
16 Jordan until 1967. 1967 until 1970, which is the
17 occupation what they call West Bank, then I move to
18 Jordan for about six, seven year.

19 Q And where did, and where did you go after
20 you lived in Jordan? What year and where did you
21 go?

1 A '7 to 1970. After that, I went to Kuwait.

2 Q Okay. And when you were -- so just so I'm
3 clear, you consider yourself as having been born in
4 Palestine; is that correct?

5 A Palestine, well, I didn't carry the
6 Palestinian passport. I carry the Jordanian
7 passport, and I'm Jordanian until they split in
8 1984. They send me back to Palestine, but I choose
9 to keep the Jordanian passport.

10 Q Okay. Now, let's go back to where you
11 lived after -- you went to Kuwait, and what years
12 were you in Kuwait?

13 A '70 to '73.

14 Q Okay. And what did you do while you were
15 in Kuwait?

16 A I finish schooling there.

17 Q And, and what degree or other end of
18 education did you reach?

19 A I, that what I finish in Kuwait, high
20 school.

21 Q Okay. And when you left Kuwait, where did

1 you go next?

2 A I go to United States, specifically
3 St. Croix.

4 Q Okay. That would be St. Croix in the
5 United States Virgin Islands?

6 A Virgin Island, yeah.

7 Q Okay. And what years did you live there?

8 A From 1973, I stay for about a year. Then
9 I went about a year to New York, me and my father.
10 Then I went back the same year, which is like in
11 '74. Then a year I live in New York. After that, I
12 stay in St. Croix until 1985.

13 Q Okay. And what did you do while you were
14 in St. Croix?

15 A My father gave -- well, first I did all of
16 things until I start to get to know the island.
17 Then my father sponsor me with about \$100,000, and I
18 bought a gas station.

19 Q Okay. Now, during that time, did you
20 become an American citizen?

21 A Yes, sir.

1 Q Tell me a little bit about how that
2 process worked. How did you become an American
3 citizen?

4 A Well, my father, he was a U.S. resident
5 and he apply for me, and I travel from Kuwait to
6 United States with document to be a naturalized, to
7 be, to get a green card. Then after I stay for
8 about nine year -- about five year, I apply for the
9 passport.

10 Q Okay. And tell me how you applied for the
11 passport. You already had a green card if I
12 understand you.

13 A Yes, sir.

14 Q So what did you do next?

15 A Well, just the legal way. I went to law
16 immigration. They give you form. You fill it out.
17 They see you have five years already in the island.
18 You go testify. They do the necessary. I cannot
19 remember everything right now. After that, you go
20 to court and you swear to be a citizen, and I did
21 swear.

1 Q And do you recall what you swore to?

2 A I do not swear. I swear the way you just
3 told me swear, I swear.

4 Q Okay. Now, when you did that, did you
5 give up your Jordanian passport?

6 A No, it was not necessary, no.

7 Q Okay. So presently, you have, do you
8 still have a Jordanian passport?

9 A Yes, sir.

10 Q Okay. And presently, do you still have an
11 American passport?

12 A Yes, sir.

13 Q And after you left St. Croix, where did
14 you go next?

15 A 1985, I move down to St. Maarten.

16 Q Okay. And why did you move to
17 St. Maarten?

18 A Because I was supposed to do business with
19 Hamed and Fathi, and we had some problem and I
20 choose to pull out, and I move to St. Maarten.

21 Q Okay. And what year was that?

1 A 1985.

2 Q And have you remained in St. Maarten from
3 1985 to the present?

4 A Yes, sir.

5 Q Okay. And what do you do in St. Maarten?
6 Just generally.

7 A At the moment, I have a hotel, a small
8 hotel, not a big hotel.

9 Q And what's the name of the hotel?

10 A Travel Inn Hotel.

11 Q And what's its address, please?

12 A No. 15 Simpson Bay Road, No. 15 Airport
13 Road, the same way.

14 Q Okay. And when you arrived in
15 St. Maarten, did you apply for St. Maarten
16 citizenship?

17 A Well, not when I arrive. After about ten
18 years, I applied for the Dutch passport.

19 Q Okay. And did you receive a Dutch
20 passport?

21 A Yes, sir, I do.

1 Q And do you remember what year you received
2 the Dutch passport?

3 A 1999.

4 Q Okay. So is it correct to say that you
5 now hold three passports?

6 A Yes. Still they could have asked me to
7 give up the Dutch, but they don't ask me to give it
8 up or give up the Jordanian.

9 Q Okay. And when you travel, for instance,
10 since you moved to St. Maarten, have you traveled to
11 the United States?

12 A Yes, sir.

13 Q And when you've traveled to United States,
14 do you present at the border the Dutch passport, the
15 Jordanian passport or the American passport?

16 A More the American. When I go through
17 United States, I carry the American. If I go
18 through France, I carry the Dutch, and I was there
19 last November, I think. I was through United
20 States.

21 Q Okay. Well, I'd like to ask you a couple

1 questions about that if I could, please. Since you
2 left the United -- you were living in St. Croix and
3 you left there you said. Since the time you left
4 St. Croix, how many, approximately how many times
5 did you return to the United States or the Virgin
6 Islands?

7 A Maybe seven to ten time between, between
8 '85 and 2002. Yeah.

9 Q Okay. And so let's take that period.
10 Between '85 and 2002, why were you returning to the
11 United States?

12 A Why I --

13 Q Excuse me. I'm sorry. Let me rephrase
14 that.

15 A Yeah.

16 Q When you were returning, were you going
17 back to the mainland U.S. or St. Croix?

18 A You ask me about St. Croix, and I am
19 answering about St. Croix. I travel to St. Croix
20 eight to ten or twelve time. To the United States,
21 I go almost every year because I do business with

1 the United States.

2 Q Okay. And let's talk about each of those
3 two things separately. First, let's talk about the
4 period from 1985 to 2002.

5 A Yeah.

6 Q Your trips to St. Croix, why were you
7 traveling to St. Croix?

8 A First, I had a lot of family down there,
9 nieces, cousins, a lot of friend. My cousin get
10 married. Always I have to do something for my
11 children. Always I have a reason to go there, but
12 not for fun, you know.

13 Q Okay. And did you travel there for
14 business?

15 A To St. Croix? No.

16 Q Okay. Now, let's talk about the -- you
17 said you traveled to the mainland United States for
18 business almost yearly.

19 A Yeah.

20 Q What, what business were you doing?

21 A I, at that time when I was traveling, I

1 had the furniture store.

2 Q And what was the name of the furniture
3 store?

4 A Island Appliances.

5 Q Okay. And what did you travel to the
6 United States for for Island Appliances?

7 A To attend trade shows or meet companies or
8 mostly trade show, and I do my purchasing in August
9 for the season, which is December. To meet a new
10 supplier or see new merchandise, you know.

11 Q All right. Did you, did you buy goods
12 from American suppliers?

13 A Yes, at that time, I used to buy, yeah,
14 always. That's main supplier is United States.

15 Q Okay. And tell me a little bit about
16 Island Appliances. When did you first -- did you
17 start Island Appliances?

18 A Yes, sir.

19 Q And when did you start Island Appliances?

20 A 1986.

21 Q And tell me how you started it.

1 A What do you mean, how?

2 Q Just what you did to begin.

3 A Well, I just apply for license,
4 everything. I get -- I went to Miami. I bought
5 from Miami. Then until the show come, then I
6 went -- because I used to be in the furniture
7 business before. Then I went to the old supplier.
8 I get in touch with them and they start to give me
9 credit, and we, that's the way I start.

10 Q And when you formed Island Appliances, did
11 you form it as a corporation? Did you actually
12 register it as a corporation?

13 A No, individual. They call it individual.
14 Self and individual business.

15 Q And if I looked at your business records
16 from that time, who would I see is listed as owning
17 it? Was it just you or were you --

18 A Just me.

19 Q Just you?

20 A Just me, yeah.

21 Q Okay. And did anybody else ever own it?

1 A No, just me alone.

2 Q Okay. And what years did you operate
3 Island Appliances?

4 A '86 I told you until 2'02 or 2'03. I
5 cannot remember the year exactly.

6 Q Okay. And why did it end, or how and why
7 did it end?

8 A Why it end, because I open the hotel as I
9 told you and then start to concentrate in the hotel.

10 Q Okay. And in addition to furniture, did
11 you also sell appliances?

12 A Well, that's why they call it furniture
13 store. At that time, no specializing in business.
14 You put furniture, appliances, and that's why, what
15 my attention was to put appliances first, but I find
16 that is not that good alone. I combine it with the
17 furniture.

18 Q I see. And among the items you sold, you
19 sold things such as bedding and mattresses?

20 A Bedding and mattresses. Yes, I did.

21 Q Go ahead.

1 A No, I did, I did sell mattresses, yeah.

2 Q Okay. And did you ever have employees who
3 worked for you?

4 A Employees? Yes, always I have employees.

5 Q And who were those employees? Can you
6 give me their names?

7 A Oh. First one is my brother, Ayed. He
8 join with me and he was working with me.

9 Q And how do you spell his name?

10 A A-Y-E-D. My nephew, his name Akram,
11 A-K-R-A-M. I had somebody by name Pisnil
12 (phonetic). I don't know how to -- he's a Haitian
13 guy was working with me. Another Jamaican guy. You
14 know these guys, they're not like family. They get
15 lost, they stay with you a year, six month, and then
16 you have to get new ones.

17 Q Right. And did Jamil ever work for you?

18 A Jamil? Jamil in 2000 or say in 1995, he
19 was living here. He work with me now. Yeah.

20 Q And did your father, Mohammad Yousuf
21 Hamadan --

1 A Yeah.

2 Q -- did he ever own the business?

3 A Always, all his life, he have a business.

4 Q No, did he own Island Appliances at all?

5 A No. He support me with it, but he never
6 own it.

7 Q Did he ever work in it?

8 A No.

9 Q Okay. Thank you very much.

10 A Yeah.

11 Q Now, did you, after you moved to St. Croix
12 and then eventually to St. Maarten, did you ever
13 live in Jordan again?

14 A Yeah, almost every year, one time or two
15 time was my wife, she decide she want to live in
16 Jordan and she want to raise the kids. At that
17 time, I have five. We are working hard, and she
18 decide to live down there. Then I have to travel.

19 Q Okay. And did you own a house or an
20 apartment in Jordan at that time?

21 A A house up to now.

1 Q And do you happen to recall the address of
2 that house?

3 A No. 3 Disa, D-I-S-A, Street, Garden Area.

4 Q And did you have bank accounts in Jordan
5 at that time?

6 A Yes, sir.

7 Q And just to clarify, what years would you
8 have had that house in Jordan?

9 A Since '89. Cost me like \$200,000 in '89.

10 Q And do you still own it?

11 A I still own it, yeah, and I going to build
12 it up over this year.

13 Q I'm sorry. I missed the last part.

14 A Yeah, and I going to make a little bigger
15 this year.

16 Q Oh, okay.

17 A Yeah.

18 Q Have you ever, other than the information
19 you've given me about visiting the United States,
20 have you ever lived anywhere in mainland United
21 States?

1 A No, is only one time as I told you, I
2 think early '74 until somewhere around September,
3 October when it start to get cold, I went back to
4 the Virgin Islands, St. Croix.

5 Q Okay. Now, I'd like to ask you a couple
6 of questions specifically about your father.

7 A Yes, sir.

8 Q Okay. Do you know if at some point in his
9 life your father was arrested?

10 A Arrested? Was, yes, yes.

11 Q In what country was -- oh, I'm sorry.

12 A In Syria.

13 Q Okay. And could you tell me what he was
14 arrested for?

15 A Accusation, really. He used to be a
16 manufacturer for electric commercial ovens, and
17 somebody just suspect oh, this material is, is not
18 supposed to enter Syria, even it was in the trade
19 show a year before. They hold him for that. All,
20 just sometime they trouble you to make money out of
21 you. They feel he is a man he have it and trouble

1 him, let's get something out of him, and they really
2 get, they get almost at that time, 1970, 1975, '76,
3 I don't know what year exactly, they get \$100,000
4 just to put him out.

5 Q I see. And --

6 A \$100,000 at that time, you could call it a
7 million now.

8 Q And was he, was he jailed in Syria?

9 A Yeah, he was under, under investigation.
10 He don't get no time, nothing. They just put you
11 over there. Everybody know Syria, the Middle East
12 is not a democratic country, and sometimes they
13 throw you and they forget about. After, beside
14 that, he never got questioned or held or anything
15 anywhere else.

16 Q Okay. I'll move on in a second. I forgot
17 to ask you two questions about people that worked in
18 Island Appliances. Did Yusra Yusuf (phonetic) ever
19 work for Island Appliances?

20 A No, sir.

21 Q Did Manal Yousef ever --

1 A No.

2 Q -- work for Island --

3 A No.

4 Q -- Appliances?

5 A No.

6 Q Okay. Thank you.

7 A All right.

8 Q Yusra Yusuf, Fathi Yusuf's daughter, is
9 married to your brother, Ayed, is she not?

10 A Yes, sir, you know it, yeah. Yeah, she
11 married to my -- she's my sister-in-law now. My
12 cousin, then she become a sister-in-law.

13 Q Okay. So I'd like to ask you some
14 questions about Island Appliances, and I know that
15 this was a long time ago, so I'm not looking for
16 exact numbers or things like that, but I'd like to
17 get a sense of how big an operation it was. Do you
18 know the approximate square footage or square
19 meterage of the store?

20 A It was two level. Of course, I start
21 somewhere else. In a year, I put my building, which

1 is like 220 meter each level, and that come up to
2 five, two level, it come up to 5000.

3 Q 5000 what?

4 A 5000 square feet. I sell that 1987. I
5 rent first, then I built. I rent until I finish
6 building. In 1989, I purchase a warehouse which is
7 about 7000 or 7, 6800 square feet.

8 Q Okay. And could you tell me if
9 approximately -- and I'm interested mostly for the
10 purposes of this case in the years between 1996 and
11 2001.

12 A Yes, sir.

13 Q Could you tell me approximately what your
14 gross sales were per year in that time?

15 A Oh, maybe average around, let's see,
16 120 -- a million six, million seven.

17 Q Okay. And could you tell me what your net
18 profit would be on a million six or a million seven?

19 A Well, our personal expenses very
20 expensive, but at least \$300,000 a year.

21 Q Okay. And, and could you give me the

1 address and could you spell the name of the street,
2 please, for Island Appliances?

3 A No. 12 Cangadier Street.

4 Q And could you spell Cangadier?

5 A C-A-N-G-A-D-I-E-R, which is in the heart
6 of Phillipsberg.

7 Q In the heart of Phillipsberg?

8 A Yes, sir.

9 Q And is Phillipsberg on the Dutch or French
10 side?

11 A Dutch, Dutch side.

12 Q And did you live on the French or the
13 Dutch side?

14 A I built in the Dutch side.

15 Q Right. Did you have a separate residence?

16 A I didn't get you.

17 Q In addition to the store, did you also
18 have a house?

19 A Yes, I have a house, my own house.

20 Q And was that on the French or the Dutch
21 side?

1 A In the Dutch side.

2 Q And what was the address of that house?

3 A All right. You see the system here in
4 St. Maarten not like America. Address, address
5 forever. One time I had a No. 28 Point Blanche.
6 Then become, the same location, it become 30. Then
7 end up 31, but I'm still used to No. 30.

8 Q And could you spell Point Blanche, please?

9 A P like people, O-I-N-T, Blanche,
10 B-L-A-C-H.

11 Q B-L-A-N-C-H-E?

12 A C-H, yeah.

13 Q C-H. Okay. And could you tell me, in
14 Island Appliances, you said it was an individual, an
15 individual business. Did you open bank accounts for
16 it?

17 A Yes, sir.

18 Q Okay. And in what year did you open the
19 bank accounts for it?

20 A Well, I open in the Dutch side right away
21 immediately the same year, but after a while, I

1 think around early '90s, I open in the French side.

2 Q Okay. I'd ask the reporter to place the
3 Exhibit 11 where the witness can see it.

4 A Yeah.

5 Q Can you see this document, sir?

6 A Yeah.

7 Q Okay. Can you see it well enough to read
8 the exhibit number at the top which says H-EX-011?

9 A Yes, sir.

10 Q And can you read it well enough to see
11 what the text says? There you go.

12 A Yeah, that's a little, but I think I have
13 (inaudible). All right. Ministere de L'Interieur,
14 Republique Francaise, Direction Generale. Yeah, I
15 could read it. Yeah, I could read it.

16 Q Okay. And in the upper righthand side, do
17 you see it says it's dated St. Maarten, May 14,
18 2003?

19 A Yes, sir, I see it.

20 Q And if you scroll down just a little bit,
21 do you can see that it's, it's a report from Police

1 Lieutenant Sylvain?

2 A Yes, sir.

3 Q Nicolas Sylvain?

4 A Yeah.

5 Q Okay. And do you see the, says re money
6 laundering, financing of terrorist activities,
7 offenses under legislation respecting illicit drugs
8 and foreigners?

9 A Yeah.

10 Q Okay. And do you see it states that the
11 matter is against Yusuf, Fathi, et al.?

12 A Uh-huh.

13 Q Okay. Were you aware that you along with
14 Fathi Yusuf were the subject of a criminal
15 investigation in --

16 A Yeah, they tried to involve me with it.
17 Yeah, they tried to involve me, but they could not
18 find anything in the court of St. Maarten. They
19 could not find. They ask for to be extradite to
20 United States, and I have the right to be judge in
21 St. Maarten. If I get a judgment to be served a

1 year or, or more, they transfer me to United States.
2 I get judge, judgment to be less than a year, I
3 could serve it in St. Maarten, but when, when I face
4 the three judges, they dismiss me.

5 Q Okay. And could you tell me a little bit
6 about how that, how you were involved in the
7 investigation? For instance, were you arrested?

8 A No. Investigation of whom? Nobody
9 investigate me from the U.S. One time I was in
10 front of a jury in St. Thomas, and from there, they
11 turn me from, from witness to suspect.

12 Q Okay. On St. Maarten, were you ever in
13 jail?

14 A In St. Maarten, except for that one, no,
15 And I don't call it jail, of course. I was held to
16 be transferred to the United States.

17 Q Okay. Where were you held?

18 A In the jail.

19 Q Okay. And that was the jail on the French
20 side?

21 A In the Dutch side. I didn't have nothing,

1 yeah.

2 Q Okay. On the Dutch side?

3 A In the Dutch side, because I'm resident in
4 the Dutch side.

5 Q Okay. I'd like to turn over to page 3 of
6 this document at the top. Okay. And I'd like to go
7 down this, the discussion on this page about the
8 bank, about bank accounts that were involved.

9 A Yes, sir.

10 Q And I'm just going to ask you some
11 questions. Okay?

12 A Yeah.

13 Q Okay. The first line on Exhibit 11, page
14 3 of 11, states Euro account number 60201869000 --

15 A Yeah.

16 Q -- was opened in the name of Yousuf,
17 Isam --

18 A Yeah.

19 Q -- trade name Island Appliances, on
20 February 13th, 1995.

21 A Yes, sir.

1 Q Is that the account you were talking about
2 opening?

3 A I never, I never open account in 1995,
4 never anywhere in the world. I never open account
5 in 1995. Just to let you know, euro account in
6 1995, euro was not existing yet in the whole world.
7 Euro was discussed in 19, 1998 and they start to use
8 it in 1999. Then no way I could open in February
9 13, 1995, a euro account.

10 Q Okay. If you look at the next line, it
11 says that there's a signature card for account
12 63541 --

13 A Yeah.

14 Q -- a dollar account --

15 A Yes, sir.

16 Q -- and for 20186, a franc account --

17 A Yeah.

18 Q -- opened on February 13th, 1995.

19 A As I told you, I never open account in
20 1995. This account is mine. It was open early 1990
21 or 1991.

1 Q Okay. So you did have those, you did have
2 those two accounts?

3 A With top account, I never have euro.
4 There is no euro to have that 1995.

5 Q Okay. Let me ask the question a different
6 way.

7 A Yeah, uh-huh.

8 Q You did have an account No. 63541?

9 A Yes, sir, that dollar account, yeah.

10 Q Okay. And that was at Banque Francaise
11 Commerciale?

12 A Yes, sir.

13 Q And you did have account 20186 --

14 A Yeah.

15 Q -- in francs and that was also at Banque
16 Francaise Commerciale?

17 A Francs, yes. At that time, we have the
18 francs. They using the franc, but it was not open
19 in 1995.

20 Q Okay. It also says that you presented a
21 copy of a passport showing your birthdate is

1 February 20th, 1952, in Jordan. Did you present,
2 when you owned these accounts, did you present that
3 passport?

4 A Yes, I, if they say it there, yes, I
5 present it, yeah, but not in 1995.

6 Q Okay.

7 A Yeah.

8 Q I'm going to refer, instead of repeatedly
9 saying Banque Francaise Commerciale --

10 A Also, as they say, you put me toward it
11 now, I present a copy of a transfer order 1397 --
12 no, not this one. I using a ID. I saw it somewhere
13 in the paper all the way below. I use, I use a ID
14 when I open the account in 1995. That's what the
15 FBI say. They try to link me to them, anyhow, you
16 know, using an ID without a passport September 27,
17 1999. How I could -- issue in 1999. How I could
18 present to the bank other ID issue in 1999 and 1995.

19 Q Okay.

20 A Yeah.

21 Q But at the moment, I know you were kind of

1 reading down below this, but I just want --

2 A Yeah.

3 Q -- I just want to be clear that --

4 A I don't want you to bash it. Then if we
5 going to ask, ask everything, yeah.

6 Q Okay. But for the moment --

7 A Yeah.

8 Q -- let me just be clear that you
9 individually went into the bank -- I'm going to
10 call, instead of calling Banque Francaise
11 Commerciale --

12 A BFC.

13 Q -- I'm going to call it BFC, okay?

14 A BFC, yeah.

15 Q Okay. So just walk me through this
16 process. You walked into Banque Francaise -- into
17 BFC --

18 A Yeah.

19 Q -- and presented a passport --

20 A Yeah.

21 Q -- and said to them -- what did you say to

1 them?

2 A I say to them I need to see an account
3 manager to open an account, and that was normal.

4 Q Okay. This was not a corporation opening
5 account, was it?

6 A No, was normal. Same while they, they saw
7 the license. They saw the document that I could
8 open under that name, yeah.

9 Q Okay. And again, that was an
10 individual --

11 A Yeah.

12 Q -- an individual account?

13 A Yeah.

14 Q Okay. But in addition to it being an
15 individual account, it also said somewhere like on
16 the checks or on the account, it also said trade
17 name Island Appliances; is that correct?

18 A Yes, sir.

19 Q Okay. And who's the signator on that
20 account? Anyone besides you?

21 A No, only me.

1 Q Okay. And from 1990 -- from the time you
2 opened it, whatever year that was --

3 A Yeah.

4 Q -- until 2002 when you closed the
5 business, did you -- was anybody else ever a
6 signator?

7 A No. Only that I have to sign any
8 transaction.

9 Q Okay. And as you pointed out, you're
10 mentioned a number of times in this report as having
11 these, having these accounts, and those were the
12 only accounts you ever had either personally or for
13 the business at BFC; is that correct?

14 A Yes, sir.

15 Q Okay. At this point, we've been running
16 for one hour. I'd like to take a five-minute break
17 for the witness.

18 A You young. You want to go?

19 Q I'm young. I'm 70 years old.

20 A I'm older than you. I could continue.

21 All right.

1 VIDEOGRAPHER: Going off the record. The
2 time is 10:56 a.m.

3 (Brief recess.)

4 VIDEOGRAPHER: We are back on video
5 record. The time is 11:04 a.m. This begins
6 media unit No. 2.

7 BY MR. HARTMANN:

8 Q Okay, sir. I believe you wanted to say
9 something about the last question you were asked?

10 A Yeah, I want to say something. I meant
11 when I say you, you was talking to me about two
12 account and you ask me is that yours. I told you
13 yes, the two account, the franc account and the
14 dollar account.

15 Q Okay. And --

16 A The other, the other account is not mine.

17 Q Okay. We'll get to that other account
18 right now, as a matter of fact. If you go further
19 down on page 3 to where --

20 A Yeah.

21 Q -- it says dollar account 60635419040, is

1 that the account you're talking about?

2 A Yeah, that's my account.

3 Q So dollar account 60635419040 --

4 A Yes, sir.

5 Q -- it says was opened in the name of
6 Yousuf, Isam --

7 A Yeah.

8 Q February 13th, 1995. That was also your
9 account? That's a third account?

10 A No, that's the same account, but they use
11 a number to make different between the dollar and
12 the franc. That's only I have dollar and franc.
13 No, no euros and no other, any other currency.

14 Q Okay. So you only had one dollar account?

15 A One dollar account, yeah.

16 Q Okay. But this dollar account that's been
17 listed here, 60635419040, is your dollar account?

18 A That is my dollar account. The 91 is a
19 extra for internal thing, and sometimes even they
20 didn't use the 40. They use just 354190.

21 Q 354190?

1 A Yeah.

2 Q Okay. So I'll refer, I'll refer to this
3 as 354190.

4 A Yeah.

5 Q Your dollar account?

6 A Yeah.

7 Q Okay. Now, if you look about four lines
8 down there --

9 A Yeah.

10 Q -- towards the bottom, there are two lines
11 that have asterisks in front of them. One of them
12 says this account was credited with 8,782,962 U.S.
13 dollars on 4/19/2002.

14 A Yeah.

15 Q Okay. And is that true? Did you deposit
16 \$8,700,000 in that account on 4/19/2002?

17 A My account, it was closed in March 2002.
18 I didn't know how I could deposit this amount large
19 sum and send it back again to someone else. I
20 didn't know where it going. Is no way. My account
21 was closed in March 2002.

1 Q Okay. And --

2 A And that's we talking April 19, 2002. How
3 it can be, I didn't know.

4 Q Okay. And the next line down says -- that
5 first line referred to a credit. The second line
6 says that the account was debited --

7 A Yeah.

8 Q -- for a slightly different number,
9 8,859,094 U.S. dollars on 4/19/2002.

10 A Yeah.

11 Q I take it you didn't do that, either?

12 A I told you, my account was closed. There
13 is nothing I could answer about this question
14 because my account was closed in March and you
15 talking about something in April. That's, the FBI,
16 they want to connect me to Plaza Extra somehow.

17 Q I see.

18 A You could tell my account. Go back to the
19 front pages, you will find Mr. Alexandre Lillianpage,
20 everybody say the account was closed in 2000, 2002
21 in March.

1 Q Okay. And just, just so I'm clear
2 again --

3 A Yeah.

4 Q -- was Fathi Yusuf a signator on either
5 your dollar account or your franc account at BFC?

6 A No.

7 Q Was Waleed Hamed a signator on either your
8 dollar account or your franc account --

9 A No.

10 Q -- at BFC?

11 A No.

12 Q Okay. Now, I'd like to turn over if you
13 would to page 6 of this document. It's marked --

14 A Yeah.

15 Q -- HEX-011, 6 of 11, and if you go down to
16 the, to the last paragraph on that page.

17 A Yeah, you want to lift it up, yeah.

18 Q Okay. The third paragraph down in the
19 block quote starts with the words Mohamed Yousuf.
20 Do you see that?

21 A I didn't see it yet.

1 Q Take your time.

2 A Yeah, Island Appliances. Oh, that's a
3 Yousuf Akmed (phonetic), Khalid Hamed. Isam Yousuf,
4 yeah.

5 Q Okay. Okay. So it says Isam Mohamed
6 Yousuf is the holder of account 606354190.

7 A Yeah.

8 Q Which of your accounts is that?

9 A That the same ones. Yeah, the same one
10 for Island Appliances.

11 Q Okay. So it says you transferred to your
12 account with Cairo Ammam Bank in Jordan \$1,400,000.
13 Did you do that?

14 A Well, I think my father, he is the one he
15 did. I sign that the transfer paper, and that was
16 my father money.

17 Q Okay. So, so you're saying that you had
18 your father's money in Island Appliances' account?

19 A Yes, sir.

20 Q And you transferred that to your account
21 in Cairo Ammam Bank in Jordan?

1 A Yes, sir.

2 Q Okay. And why did you do that?

3 A I told you, that's my father money and he
4 ask me to do that. I transfer it.

5 Q So your father, and this would be Mohamed
6 Yousuf Hamdan?

7 A Yes, sir.

8 Q And how did he ask you? Was it written or
9 verbal?

10 A No. Well, he ask verbal, but I write it
11 for him in transaction paper to that accepted by the
12 bank, and we did it in the bank. Was written after
13 that, but when he ask, he ask verbal.

14 Q Okay. Now, if you turn over to page 8 of
15 11 of this document?

16 A Uh-huh. Keep going. Yeah.

17 Q Okay. And this is a, I'll represent to
18 you that this is a statement about the reporting by
19 Mr. Gumbs of BFC to the police.

20 A Yes, sir. Can you lift it up a little
21 bit? Yeah.

1 Q And who is Mr. Gumbs?

2 A The account manager. He was my account
3 manager.

4 Q At BFC?

5 A At BFC, yeah.

6 Q Right. And how long did you do business
7 with Mr. Gumbs?

8 A Well, Mr. Gumbs, he came to the bank the
9 way he say it, I cannot remember, but the way he say
10 it in 1994, and I was already a client by him by the
11 bank.

12 Q Okay.

13 A Yeah, he move to the bank in 1994.

14 Q Okay.

15 A At that time, I get to know him.

16 Q So now, look at the first line on the next
17 page. It says --

18 A Yeah.

19 Q -- it says, "Mr. Gumbs said that he had
20 been contacted in 1994 by Isam Yousuf, who wanted to
21 open an account with BFC." So that's, Mr. Gumbs was

1 wrong about that; is that correct?

2 A No, was he mistaken or as I told you, the
3 FBI, they change the word. The end of 1994, I
4 contact them that Waleed and Fathi, they want to
5 open account with them. He say let me, let me see
6 and he get back to me, and at the time, they came in
7 February and they open the account, but my account
8 is long before that --

9 Q Okay. So now --

10 A -- because I am, I am the one who
11 introduce Fathi and Waleed to Mr. Gumbs, and if I
12 could introduce somebody to a bank, it mean I am a
13 customer there, so a good client there.

14 Q Okay. If you look at the fourth of the
15 bulleted points down, it says, "Later, Yousuf Isam
16 introduced his uncle, Yusuf Fathi" --

17 A Yeah.

18 Q -- who was accompanied by his son-in-law,
19 Hamed Waleed."

20 A Yeah.

21 Q So you introduced Fathi and Waleed to

1 Mr. Gumbs?

2 A Waleed, and, and I didn't know, the end of
3 1994 and they went and they get back to the island
4 with the proper document and he open account for
5 them or I don't know exactly, but yes, I introduce
6 Fathi and Waleed to them.

7 Q Okay. And if you'd turn over to page 10
8 of this document.

9 A Yeah.

10 Q At the top, it says identities of
11 individuals and companies, and the first name there
12 is yours.

13 A Yeah.

14 Q It gives your name and address --

15 A Yeah.

16 Q -- and it says at the bottom that Yousuf
17 Isam Mohamed also held an American passport issued
18 on September 11th, 1986.

19 A Yeah.

20 Q So when you --

21 A Continue, continue reading, and I present

1 ID there 1570 issued by by St. Maarten in September
2 27, 1999. That's what I was looking at. How in
3 1994 or '95 I could present a ID in 1999. All this
4 it was FBI, they want to link me to Plaza Extra
5 somehow, and I didn't have nothing to do with Plaza
6 Extra.

7 Q Okay. So were you a signator -- it says
8 that you introduced Mr. Yusuf -- I'm sorry,
9 Mr. Fathi Yusuf and Waleed Hamed to the bank and
10 they opened their own accounts?

11 A Yeah.

12 Q Okay. Were you a signator on those
13 accounts?

14 A No, nothing.

15 Q Okay. And do you know if Fathi and Waleed
16 also opened an account called Hamdan Diamond
17 Corporation?

18 A I really didn't know what they open. I
19 didn't stay long after that introduction the first
20 time. Then they went back home. They bring their
21 paper and they went at even at their own. I was not

1 there at the, at the time of the opening. I was not
2 with them. The first time I introduce them. They
3 told him we have a Plaza Extra. It is I didn't know
4 how many thousand square meter, which is like over
5 40,000 square feet, and we do so, we do so. Then he
6 ask them for proper document to bring a history, you
7 know, and they went at their own at the time of the
8 open the account. I was not with them.

9 Q Okay. And you say that you were not a
10 signator on any of their accounts?

11 A No. I wish. I could get a couple of
12 million.

13 Q Okay. And despite not being a signator on
14 the accounts, did you receive all of the banking
15 correspondence and statements from the three
16 accounts, the Fathi Yusuf account, the Waleed Hamed
17 account and the Hamdan Diamond account --

18 A Yeah.

19 Q -- at your Island Appliances address?

20 A Yeah, as a non-resident in the island,
21 they have to have a local address, and they gave my

1 business address. Sorry.

2 Q Okay. So would it be fair to say that all
3 of, all of their bank statements, canceled checks
4 and other information coming from BFC on the
5 Fathi --

6 A I cannot, I cannot say all. I receive
7 some. What they went and pick up, because they used
8 to come a lot to the island, mostly Waleed. I
9 didn't know what he pick up by himself, what it
10 reach me, what lost in the mail between Dutch and
11 the French, you know, but what they would come to my
12 store, I came inside even have to look. I just know
13 the name, yeah, that's my people statement. I keep
14 it until somebody come. I give it to them.

15 Q Okay. So you're saying that the banks
16 sent you all these, sent you the documents at the
17 Island Appliances account and that either Fathi or
18 Waleed would come and collect those, those papers
19 from you?

20 A No, I say what I say. What reach me, I
21 give it to one of them. Okay? The rest maybe they

1 pick up at the bank, too. I didn't, I didn't know
2 what the bank send, what they don't send.

3 Q Let's just deal with the ones that came to
4 you, the ones --

5 A Yeah.

6 Q -- the ones you know all about.

7 A Yeah.

8 Q Did you, did you sometimes send those by
9 mail to, to them in the Virgin Islands?

10 A I cannot remember, really, but if
11 something doesn't interest me, I cannot recall it.
12 I didn't know exactly how.

13 Q Okay. Before we go on --

14 A I cannot, I cannot go to it to see. I
15 dealing with bank, and most of what this is is not
16 important, you know, and I open it. They send me a
17 statement. You balance \$10,000, I know it. I have
18 manager, too. Then I didn't know anything about it
19 and I keep it. Whether they come or I send it or
20 how, I cannot remember.

21 Q Okay. Before we go on, sir, could you

1 once again adjust the camera on your computer?

2 We're losing the lower half of you.

3 A Yeah, yeah, yeah. I'm so short. That's
4 why. Yeah.

5 Q Okay. Good. Okay. So just to be clear,
6 the bank would send you the documents for the Hamdan
7 Diamond account, the Fathi Yusuf account and the
8 Waleed Hamed account. BFC would send you these and
9 they would come to you?

10 A Yeah.

11 Q Okay. Once you had them, did you ever
12 then re-mail those things up to the United States?

13 A I cannot remember. I cannot remember. I
14 don't think there is a reason for me because
15 especially Waleed, he used to come every, almost
16 every other week. I don't know if I ever sent it.

17 Q Okay. Now, did you ever deposit money
18 into any of those three accounts for Fathi, for
19 Waleed or for Hamdan Diamond?

20 A No, never, never.

21 Q You never took cash to the bank and

1 deposited it into the accounts?

2 A No.

3 Q Okay. You never took checks or money
4 orders and deposited --

5 A No.

6 Q -- into the accounts?

7 A No.

8 Q Did you ever receive cash from Waleed
9 Hamed or Fathi Yusuf?

10 A What do you mean? What do you mean? I --

11 Q Did they ever --

12 A I receive, all the time I receive from
13 Waleed, which is the interest payment in cash.

14 Q Interest payment on a note he owed to you?

15 A Yeah.

16 Q Okay. Aside from the interest payments he
17 paid --

18 A No.

19 Q -- were you ever supplied with cash, money
20 orders or other negotiable instruments by either
21 Waleed or Fathi?

1 A No, we didn't have no business between us
2 before that. Before that I can have no business
3 with them to give me money or, no.

4 Q And so if you never received any money
5 from them, did you ever receive any money from
6 anybody else from the Virgin Islands other than the
7 interest payments you were getting on your own loan?

8 A From these guys, no. From somebody else,
9 I cannot remember who it were owe me \$5000, \$2000
10 and he gave it to me. I didn't know --

11 Q Okay. But --

12 A -- but these guys, I don't, I never
13 receive cash from them.

14 Q Okay. So you never, would it be fair to
15 say that you never received cash from anybody in the
16 St., in St. Croix or in the Virgin Islands in the
17 amounts of 10, 20, 50, \$100,000 at a time?

18 A I cannot remember if I receive.

19 Q You can't remember if anybody ever --

20 A You talking, you talking about anybody.
21 Specific somebody for me, I will answer you direct,

1 yes or no. Anybody, who's anybody in the Virgin
2 Island. There is what, 50,000 people in the Virgin
3 Island. If a friend was there and he give me \$500
4 to do something for him, could be.

5 Q Okay. But did anyone give you \$50,000?

6 A No.

7 Q Did anybody give you \$20,000?

8 A No.

9 Q Did anybody give you \$10,000?

10 A Even, even \$1000, I don't remember anybody
11 give me money from the Virgin Island.

12 Q Okay. So, so would it also be fair to
13 say, then, that you never, you never transferred
14 money that had come out of Plaza Extra Supermarket
15 to Manal Yousef or Yousara -- Yusra, excuse me --

16 A Uh-huh.

17 Q -- or anybody else to deposit into bank
18 accounts?

19 A Maybe the question you talk about there is
20 extra money.

21 Q Yeah. Did you ever --

1 A No.

2 Q Did you ever receive money from anybody in
3 St. Croix or the U.S. Virgin Islands in excess of
4 \$10,000 that you then transferred to either Yusra,
5 Manal, Jamil --

6 A No.

7 Q -- or anybody else for deposit?

8 A No.

9 Q Okay. Did you ever receive a mattress, a
10 shipment of mattresses into which had been placed an
11 amount in excess of \$10,000 from anybody in
12 St. Croix or St., or the Virgin Islands?

13 A One time I remember not because, I just
14 because come and statement, I deal with a company in
15 Miami and my cousin Ali, he open a factory partner
16 with the same factory in Miami, and he was talking
17 to me to order from them mattresses. I told them
18 maybe I will see when the time come, I will see. I
19 cannot remember what year is that or what, but at
20 the end, I find out myself always I need the
21 warehouse in Miami because always I could sell a few

1 things, other material and put it with the mattress
2 and ship to St. Maarten. I don't recall I ever get
3 any mattress from St. Croix. We talk about it, but
4 I don't remember they ever ship any mattresses for
5 me from St. Croix, and I told them look, you going
6 to ship freight to St. Croix and St. Croix ship it
7 for me, and with each mattress, I must order frame,
8 other thing. I order pillows, I order sheet, I
9 order this and that from other supplier than your
10 factories somewhere and instead come loose cargo, I
11 put it in your container and you ship it to me.
12 Then I cannot use St. Croix outlet.

13 Q Okay. Let me ask the question a slightly
14 different way. Did you ever receive a mattress
15 where the mattress itself or the container contained
16 a large amount of cash packed with the mattress in
17 excess of \$10,000?

18 A I never receive mattresses. What I
19 recall, I never receive mattresses from St. Croix.

20 Q Okay. And did you --

21 A No, and either money from St. Croix.

1 Q And did you ever receive a mattress from
2 anybody that was packed with money or had money
3 packed along with it in the shipping container?

4 A Never, no. Sometimes mattresses combined
5 with other furniture are important thing. I cannot
6 buy a big quantity. I used to consolidate it in
7 Miami, and she would do me, but St. Croix, I cannot
8 recall I ever buy from that company there.

9 Q Okay. I'd like you to now look at what is
10 going to be shown to you as Exhibit 22.

11 A Yeah.

12 Q Just a second while we put it up on the
13 screen, okay?

14 A Yeah. Yes, sir.

15 Q Okay. And can you read the Exhibit
16 No. H-EX-022 at the top?

17 A Yeah.

18 Q And do you recognize what type of document
19 this is?

20 A That's I guess is a bank statement.

21 Q From BFC?

1 A From BFC.

2 Q Okay. And do you see there who the
3 account holder is on the right side at the top?

4 A Yusuf Fathi.

5 Q Okay. So this would be one of the
6 accounts that Fathi Yusuf opened after you had
7 introduced him?

8 A I really don't know is the same account
9 number or the same thing. Is not in my head what
10 their account number, but that, that is Yusuf.
11 That's my uncle.

12 Q Okay. If you turn to page 3 of this
13 document?

14 A Yeah.

15 Q And do you, do you recognize what document
16 this is?

17 A That's a deposit, yeah.

18 Q Okay. And can you tell me whose
19 handwriting that is?

20 A I don't think is my handwriting. Who, I
21 don't know.

1 Q Okay. And does it represent that you
2 deposited \$50,000 into Fathi Yusuf's account?

3 A No, I didn't. I never deposit any money
4 in Fathi Yusuf account.

5 Q Well, this is your handwriting, isn't it?

6 A No, I didn't think, I didn't think so.
7 No, is not my handwriting.

8 Q That is not your handwriting?

9 A No.

10 Q And that is not you filling in the
11 \$50,000?

12 A No, is not me, because why I should fill
13 it up if it's not my account. Why should fill it
14 up. Is not my account, is not my handwriting.

15 Q Okay. I want to go off the record for
16 just a second.

17 VIDEOGRAPHER: Going off the video record.

18 The time is 11:33 a.m.

19 (Discussion off the record.)

20 VIDEOGRAPHER: We are back on the video
21 record. The time is 11:34 a.m. This begins

1 media unit No. 3.

2 BY MR. HARTMANN:

3 Q Okay. I'd like to talk to you now about
4 the mortgage and loan to Manal that's at issue in
5 this case. Do you know what mortgage and note I'm
6 talking about?

7 A Yes, sir. The loan was given by me to
8 Sixteen Plus.

9 Q That's correct.

10 A Yeah.

11 Q Okay. I'd like you if you would to tell
12 me, start at the very beginning of that whole
13 interaction where your father gives you money, and
14 I'd like to kind of come forward in time about what
15 happened, and we don't have to rush through this, so
16 if you could tell me how the idea of your father
17 giving you money for your sister first came up and
18 when.

19 A Well, came on as my father, he was about
20 70 years old. My sister, she was not making
21 children. He had some investment in the Caribbean.

1 He had access to deposit money to my account. Then
2 he say this amount you could see in the account, I
3 want to leave it to your sister, and that's where
4 come that when I invest it for her, or he recommend
5 to invest it for her.

6 Q Okay. Let's go back over that. I'd just
7 like to ask you some specific questions. You
8 said --

9 A Yeah.

10 Q -- this happened when your father was
11 about 70. What year would that have been?

12 A Maybe '93. I think about '93.

13 Q Okay. So in 1993, how did this happen?
14 You had a single discussion or a series of
15 discussions? Did it happen at dinners or in an
16 office? How did it --

17 A It was order. Is my father. It was
18 order, the money from him, the money in your
19 account, leave it for Manal. Manal, she don't make
20 children, and (inaudible), usually, the lady, she
21 don't make children, maybe they try for 10, 12 year.

1 Then he divorce her for they want children. Then he
2 want her to be secure.

3 Q So did, did he give the money to you or
4 did he tell you to use your money for her?

5 A No, he, he deposit money along this year
6 and he say that is \$4 million, the \$4 million in
7 your account, \$4 million something, that's out of
8 the money out of that account is for your sister.

9 Q Okay. So your father deposited \$4 million
10 into your account?

11 A More than that. No, more than that he
12 deposit.

13 Q Okay. And when you say he deposited, did
14 he have signatory power on your account?

15 A No, he didn't have, but I could, I could
16 deposit money in your account. Give me your account
17 number, I go and put \$10,000 in your account.

18 Q Okay.

19 A But these days, all right. The old times,
20 they never specific about moving the money. Right
21 now, yes, maybe where he get it from, sign, sign

1 here that you deposit it for him, but before, in
2 1992, '93, they never ask you.

3 Q Okay. And which of your accounts did he
4 deposit it into? Was it the franc --

5 A The, in BFC bank.

6 Q Okay. So that was the BFC dollar account?

7 A Yeah.

8 Q Okay. Okay. So, so did he or you talk to
9 Manal about that?

10 A Well, I let her know that our father, he
11 left \$4 million .5 for her.

12 Q And did you tell her about it or did he
13 tell her about it?

14 A I really cannot remember, or maybe he told
15 her, he told her in front of me.

16 Q Okay.

17 A Yeah.

18 Q And so if I looked at your account at BFC
19 Bank, let's say -- you said that you thought it
20 happened in maybe '93?

21 A '93, '94, something like this.

1 Q Okay. So if I looked in your bank account
2 in 1993 and 1994, I would see over \$4 million in
3 there?

4 A Over five, maybe.

5 Q Over \$5 million in there?

6 A Over \$5 million.

7 Q Okay. And did you keep any records from
8 that account?

9 A Well, usually, as I do, after they close
10 that account and I didn't have, and I didn't have no
11 problem, we never aware going to be questioning and
12 problem with the FBI and this, then I get rid of it.

13 Q You get rid of it?

14 A Yeah.

15 Q Okay. And do you know if during the time
16 you had that account open prior to 2002 when you
17 closed it, do you know if the bank was asked to
18 supply all of your account documents to the French
19 police?

20 A No, I didn't know. I find out after 2003
21 that the police was searching, but the problem, it

1 become the year, only the year 1996. If they say we
2 open in 1995, why they come pick up 1995? They was
3 trying to involve me with Plaza Extra.

4 Q And I guess --

5 A Why, why they pick up only 1996?

6 Q I guess the question --

7 A I'll stop talking.

8 Q The question I -- okay.

9 A That's indicate something to you, you
10 know. If this the bank manager, whether they are
11 right or wrong, they talking I meet him in 1994.
12 Why you give him only -- and they say in a different
13 occasion that's 1995, why you give him only 1996.

14 Q I'm asking a slightly different question,
15 which is did you find out that the French police had
16 obtained all of your banking records on your BFC
17 accounts in part of their investigation? Did you
18 eventually find that out?

19 A Yeah, I find out, but long after, you
20 know. I didn't know exactly what year. I know that
21 they was searching, but after my account close,

1 everything, then I find out.

2 Q Okay. And when you found out that the
3 French police had subpoenaed and obtained all of
4 your BFC banking records --

5 A Yeah.

6 Q -- did you ever talk to either BFC or the
7 police about those records, about the fact that the
8 police had your records?

9 A After I find they try to involve me, I try
10 to get the record. Sometimes I didn't know exactly
11 what year. I tried to go to the bank. I know the
12 bank takes so long in the French side, but go, come
13 back, go, come back, maybe for two years. Then I
14 give it to a lawyer, and the lawyer himself give up,
15 too. They don't give him anything. They told them
16 that's it, you know in the law we cannot give you,
17 but for the FBI, I'm sure they release everything
18 from 1990 and up if they have a record about me.

19 Q Okay. What was the name of that lawyer
20 that you hired to look for your documents?

21 A He's not in the island any, anymore,

1 and -- can I ask my son --

2 Q Sure.

3 A -- about his name? Seek (phonetic) or
4 something. He's, he's a lawyer, French lawyer from,
5 originally from Africa.

6 Q Would it help you to ask your son about
7 his name?

8 A Yeah, he -- oh, Jamil. He want to check
9 with somebody about it. Somebody know that lawyer,
10 yeah. Serge, I think his name Serge.

11 Q First name or last name?

12 A Last name, I don't know it. He used to
13 travel the island once a month and he used to worry
14 from France and Guadaloupe. That's why I went to
15 him, because he operate where there is connect with
16 the main bank office.

17 Q Okay. And could you spell that last name?

18 A I tell you -- well, Serge usually
19 S-U-R-G-E, I think.

20 Q Okay. Should we wait for Jamil to check
21 that or should we proceed?

1 A No, no, no, continue. If he come. He
2 going to call a friend, he used to be friend of him
3 to find out what his name.

4 Q Okay. So now, we've arrived at a point
5 prior to 1995, somewhere between '93 and '95 --

6 A Yeah.

7 Q -- where your father has deposited in
8 excess of \$5 million into your BFC French dollar
9 account?

10 A That's what I mean. From 1995 until 19,
11 1996. That's his name.

12 Q Oh, okay. S-E-R-G-E -- could you move it
13 a little to your right? Thank you. B-I-L-L-E?

14 A Yes, sir.

15 Q Thank you very much. So, so when we
16 arrive in, in 1995 and '96, 1996, you have \$5
17 million in your BFC dollar account --

18 A Yeah, more than five, more than five.

19 Q Okay. And tell me now how, how it came
20 about that that money found its way into this
21 mortgage and note. What happened next?

1 A I didn't get you. I didn't get the answer
2 -- the question.

3 Q Okay. You had \$5 million in the BFC
4 dollar account --

5 A Yeah.

6 Q -- for Manal?

7 A Yeah.

8 Q Okay. And were there any documents
9 anywhere showing the gift or the money in the
10 account?

11 A The money in the account, but I didn't
12 have no document it was as a gift or to who going or
13 what to do with it. No, it was my father, and I
14 take his word and he trust me, too.

15 Q Okay. And, and that money was never
16 physically in any account that belonged to Manal; is
17 that correct? It never went into her bank account
18 or a trust account or an investment account in her
19 name?

20 A At the end, the way he ask me to do, I try
21 to invest it to what the Sixteen Plus.

1 Q Okay. But it was never in an account in
2 her name, right?

3 A No.

4 Q Okay. So now, this money is in your
5 account. How did the idea of investing her money in
6 the Sixteen Plus mortgage come up?

7 A Well, he ask me to try to invest it. How
8 I find out about Sixteen Plus, they want investor, I
9 cannot recall, but it come out. I cannot recall
10 really exactly.

11 Q Did someone approach you about making an
12 investment or did you approach them saying I have
13 money and I want to make an investment?

14 A Well, as I told you, in 1995 when they
15 come to open the account, Fathi and Waleed, I told
16 them my father did so-and-so and so-and-so. We are
17 family and Waleed is a brother-in-law or, or Hamed
18 is a brother-in-law for Fathi. Then we know about
19 each other, and they know I want to invest it. Then
20 they come up with the idea there is a piece of land,
21 we could make money, we could do this, we could do

1 that, we could do that and we could pay you so much
2 interest per year, and that's what my father, he
3 want came into that this money make income, not to
4 be in her hand and her husband, he force her somehow
5 to turn it to him and he tell her bye-bye. You
6 know, that's the idea of my father, you know. Let
7 them live good from the interest or from the income
8 what they welcome. That's his idea.

9 Q Okay. And did you ever deal with anybody
10 other than Waleed or Fathi with regard to that note
11 and the loan?

12 A No. What you mean, them two or what?

13 Q Did you ever talk to anybody, negotiate
14 with or have any other contact with anybody other
15 than Fathi and Waleed with regards --

16 A No.

17 Q -- to the note?

18 A No, is only the two of them.

19 Q Okay. You never spoke, you never spoke,
20 for instance, to Mike Yusuf?

21 A Who?

1 Q Mike, Mahair (phonetic)?

2 A Mahair? No, don't remember, no.

3 Q Did you ever talk to Hisham Hamed?

4 A Hisham? No, and if you recall, Hisham I
5 think at that time maybe he ten years old. No way
6 to talk to Hisham.

7 Q Okay. So during the course of your
8 discussions with -- I'm just going to say now
9 instead of saying over and over Sixteen Plus
10 Corporation --

11 A Yeah.

12 Q -- I'm just going to say Fathi and Waleed.

13 A Yeah, good, yeah.

14 Q Okay. So during the course of your
15 discussions with Fathi and Waleed about the note and
16 mortgage, was there ever anything written down?

17 A Yeah, at the time, they told me we need
18 some money, we going to do this and that and that
19 for your sister and there is a deal about the land.
20 All right. If you say could send some money that we
21 could show the bank we are whatever we are, we could

1 afford to buy it. Yeah, they had, they had, they
2 had the writing to me before I send the first \$2
3 million in February.

4 Q Okay. When you say they sent a writing,
5 you mean they sent the note and the mortgage?

6 A No, no, just outside.

7 Q Okay. Like letters or e-mails or
8 something?

9 A Yeah, something like this, yeah. At that
10 time, mostly faxes.

11 Q Faxes?

12 A Yeah.

13 Q Okay. Do you have any of those documents?

14 A No, but I get original one, the note.
15 That note, I didn't need it anymore.

16 Q Okay. So, so you have no, nothing in
17 writing prior to the note and mortgage any longer in
18 your possession?

19 A No.

20 Q Okay. So tell me about how the, how the,
21 you got the note and mortgage and sent the money to

1 St. Croix.

2 A What you mean? I didn't get your
3 question.

4 Q Okay. Tell me about the process by which
5 you worked out the note and mortgage and then sent
6 the money to St. Croix.

7 A That the way I told you I send him the
8 first \$2 million. Then they say, I don't know,
9 around August or early September, they told me the
10 deal is we are afford the other half. I request for
11 the note, and I get, I get the note. Then I send
12 them the \$2 million.

13 Q Okay. Do you remember approximately the
14 date that you sent the \$2 million?

15 A I could look if you want. I cannot
16 remember all these things.

17 Q No, that's okay. You can look at anything
18 you want.

19 A Okay. From the FBI document and it say in
20 September '97, \$2 million.

21 Q And also in February of 1997?

1 A Also, the first one in February, February
2 1997.

3 Q Okay. I'm going to ask you to look at
4 Exhibit 53.

5 A Where? All right. I look at, yeah.

6 Q It's going to be put up on the screen.

7 A Yeah. Yes.

8 Q And if we could go to the highlighted
9 text.

10 A 53, yeah.

11 Q There you go.

12 A Yeah. What you want me to read, the one
13 in the --

14 Q The one in the box.

15 A The one in the box. All monthly account
16 -- can you make it a little bigger?

17 Q Yeah, just a second.

18 A Yeah. All monthly account is made for any
19 checking, saving, investment, brokerage account
20 title to you in your name from 1990 through 1997.

21 Q This is you, you're answering my questions

1 and you say you have none of those documents?

2 A Yeah, yeah.

3 Q Okay. Could we go to the next highlighted
4 one, please?

5 A Yeah.

6 Q Okay. And I also asked you about whether
7 there were written communications with anyone for
8 Sixteen Plus from '96 forward, and you said that you
9 have no such writings?

10 A No.

11 Q Okay. Could we go to the next one,
12 please? Whoa, back. Right there. And could you
13 make that larger? Okay. So No. 16 -- 15 here, the
14 question was asked of you, it said do you have any
15 documents providing the directive from anybody to
16 authorize the wire transfers that were sent on or
17 about February 19th, 1997, and September 4th, 1997,
18 and you said that there were none. I'd like to talk
19 to you about that a little bit.

20 A If I talk to anyone authorize wire
21 transfer. If I talk to anyone? Oh, yeah.

1 Q Okay.

2 A Yeah.

3 Q So we're agreed that the two transfers
4 were on February 19th and September 4th, on or about
5 those dates, and so the question I'm asking about
6 the first one, the February 19th transfer --

7 A Yeah.

8 Q -- is how were you told how much and where
9 to send and what account to send it to?

10 A I really cannot remember all these small,
11 but the fact is there is a mortgage and there is
12 this. How it happen exactly, the address also or
13 the bank account number, Waleed gave it to me, and I
14 don't know his address in the Virgin, his account
15 number and, or Sixteen Plus or -- and Waleed, he
16 give me all this information.

17 Q Okay. And how did he give you that
18 information? Was it in a faxe, in a letter or on a
19 phone call?

20 A I really know could be in the phone. I
21 don't know exactly. They was together, they was

1 here, I cannot remember.

2 Q Okay. But the person that you dealt with
3 on the wire transfer on the first \$2 million on
4 February 19th, '97, was Waleed Hamed?

5 A Waleed and Fathi in the beginning. We
6 talk everything after that. I could see there is
7 confidence between Fathi and Waleed. Then what they
8 were, Waleed said, I do it because I know they have
9 a good relation with each other.

10 Q Okay. And when they told you to send that
11 money to them and when you sent it to them, where
12 did you send it from? What account did you send it
13 from?

14 A Same BFC account, my account, Island
15 Appliances account.

16 Q Okay. This is the, the dollar account at
17 BFC?

18 A Dollar, yeah.

19 Q Okay. And prior to your sending that
20 money, did you already have the note and mortgage in
21 your hands?

1 A For the first \$2 million?

2 Q Yes.

3 A Yes. I had it.

4 Q You had the note and mortgage?

5 A Yeah.

6 Q Okay. And did you have a lawyer look at
7 that note and mortgage?

8 A A lawyer to look, no.

9 Q Did you ask anybody to look at the note
10 and mortgage?

11 A Not really. He was like family. We was
12 like family, and we never think there is going to be
13 a problem with the user or especially in my side
14 that I will be involved in their business, you know.

15 Q Okay.

16 A It's strictly honest deal and this and
17 trust like family.

18 Q Okay. And before you sent them the money
19 and signed the documents, did you make or ask for
20 any changes to either the note or the mortgage?

21 A I really cannot remember if we, if we

1 negotiate, I negotiate the amount. Yes, maybe there
2 was offer. That could be.

3 Q Okay. And that would have been with
4 Waleed and Fathi?

5 A As I told you, mostly with Waleed.

6 Q Okay. And, and when you sent the money,
7 how physically did you do that? What did you do to
8 cause that money to go to, to them?

9 A Wire transfer.

10 Q Okay. So you went to BFC and arranged for
11 a wire transfer to the Sixteen Plus account on
12 St. Croix?

13 A I didn't get you.

14 Q Did you go to the BFC branch and
15 physically arrange for a wire transfer to the
16 Sixteen Plus account on St. Croix?

17 A Yes. Not St. Croix, in St. Maarten. I
18 went to BFC bank to send them money to St. Croix.

19 Q Okay. And, and did you fill out that wire
20 transfer request? Was that filled out in your
21 handwriting?

1 A Yeah, it should be.

2 Q Okay. Okay. And at the time you did
3 this --

4 A Did what?

5 Q -- your father was still alive, was he
6 not?

7 A What you talking about? What time you
8 talking about?

9 Q In February of 1996, your father was still
10 alive, was he not?

11 A 1996? February 1996, or you want to say
12 February 1997?

13 Q I'm sorry. February -- you're right.
14 February 1997.

15 A Yes, he was still alive.

16 Q Okay. And did he participate in any way
17 in this deal or the transfer? Did he know about it?

18 A He know about.

19 Q He did know about it?

20 A He know. He know about it, but he didn't
21 go to the bank, and couple of days later, he went

1 back, back home. How much he know about it, I
2 didn't know.

3 Q Okay. I just want to, since you didn't
4 seem absolutely clear, I just want to clarify one
5 thing. If you'd put up Exhibit 53, please.

6 A Yeah.

7 Q And page, page 2 at the bottom.

8 A Yeah.

9 Q Okay. You said in response to our
10 questions that Island Appliances and Isam Yousuf are
11 the names on the account --

12 A Yeah.

13 Q -- and that your father had access to it?

14 A Yeah.

15 Q Okay. You then said under B that your
16 father directed to transfer the funds to Sixteen
17 Plus as an investment for the benefit of your
18 sister. Is that true?

19 A Yes.

20 Q Okay. Then in C, and this is the one I'm
21 looking at --

1 A I'm not seeing.

2 Q -- "I filled out the transfer form and the
3 handwriting on it is mine. It was done at the
4 direction of my father"; is that correct?

5 A Yeah. Yeah.

6 Q Okay. I'm going to re-read that again,
7 and don't answer until I finish it. Okay?

8 A Yeah, yeah.

9 Q Okay. Item C was, "I filled out the
10 transfer form and the handwriting on it is mine.
11 This was done at the direction of my father." Is
12 that correct?

13 A Yes, correct.

14 Q Okay. All right. So after you had sent
15 that transfer of \$2 million by hand writing out the
16 request and giving it to BFC Bank --

17 A Yeah.

18 Q -- the money was transferred, and do you
19 remember if you ever received any kind of written
20 acknowledgment or any other documentation from BFC,
21 from the St. Croix bank or from Sixteen Plus or

1 Waleed or Fathi saying yep, we've got the \$2
2 million, thank you, you satisfied the first --

3 A Well, deposit the slip, it show when it
4 was sent from BFC and was in my hand all that time.
5 After that, someone call me and tell me yes, we get
6 it. Otherwise, I keep asking about it.

7 Q Okay. So, so by -- and at what point did
8 your father pass away?

9 A What?

10 Q When did your father pass away?

11 A He left the end of February from here, and
12 I, in March, the end of March or beginning of March.

13 Q March of 1997?

14 A 1997.

15 Q So that would have been a month after the
16 \$2 million had been transferred?

17 A Yep. The first \$2 million, yeah.

18 Q Okay. So between the time of your
19 father's passing and when you sent the second \$2
20 million, did you have any written communications
21 with Sixteen Plus or Fathi or Waleed about the

1 money?

2 A Yeah, they sent me the promissory note.
3 Then I transfer the money for them.

4 Q Okay. That's the second \$2 million?

5 A Yeah, or yeah, something like that.

6 Q Okay. And tell me how you transferred
7 that second \$2 million.

8 A It should be, it's only one way transfer
9 it from the bank. Go to the bank. They transfer
10 it. It's only one way.

11 Q Okay. So I'd like to just for a second go
12 back over something we've just been talking about to
13 make sure I'm clear, okay. So if you would -- I'm
14 going to have document No. H-54, Exhibit 54 put on
15 the screen, and if you could look at that and tell
16 me --

17 A Yeah.

18 Q -- what the document is.

19 A Yeah, or their voucher.

20 Q Okay. And what is this -- did you fill
21 out this document?

1 A This? No, I didn't have nothing to do
2 with Nova Scotia. That's Nova Scotia Bank.

3 Q So this is the money going into the Nova
4 Scotia Bank?

5 A Yeah.

6 Q And you had nothing to do with that one.
7 I'm sorry. I pulled up the wrong one. On the, on
8 the document, can you read the place where it
9 says that --

10 A You change it, get -- which document?

11 Q Okay. I'm sorry. That was my mistake.
12 Okay. So when you sent the second \$2 million in
13 September of 1997 --

14 A September.

15 Q Okay. When you sent the money in 19, the
16 second money in 1997 after your father's death, do
17 you know if your father's estate had been probated?

18 A What do you mean?

19 Q Were there any legal proceedings dealing
20 with your father's money or accounts or anything
21 like that?

1 A I still, I still don't get the question.

2 Q Okay.

3 A Come, come more direct, yeah.

4 Q Yep. When your father died --

5 A Yeah.

6 Q -- was there any kind of legal proceeding
7 about his death?

8 A Well, he was a heart patient and he get
9 many heart attack once, and we was expecting him
10 that, and he was die everything.

11 Q Okay. I'm sorry. I'm not being clear.
12 Let me start the question over again.

13 A Yeah.

14 Q Your father had, you said your father had
15 property and assets, correct?

16 A Yeah.

17 Q In 1997, so in 1997 when he died --

18 A I didn't say 1997. He had property and
19 assets, yeah.

20 Q Okay. And when he died, where did those
21 property and assets go?

1 A When you talking about money, some of the
2 money was in St. Maarten in my account. Property is
3 still in Jordan.

4 Q Okay. And, and who got his money and
5 property?

6 A There is small couple of pieces is still
7 to his heirs, but the big amount is still in
8 Palestine, is not divided. I get a million
9 something that remain in my account that's for me,
10 and some sister, some sister they got something, but
11 there's a lot undivided up to now.

12 Q Okay. And did any of that division take
13 place in any court anywhere? Did any member of the
14 family ever go into any court or did any court ever
15 rule about who got what out of his estate?

16 A No, nobody.

17 Q Okay. So this was --

18 A Now, now we try, there's couple of piece
19 in Jordan we try to divide it for the heirs, but the
20 one in Jordan over 200 acre, up to now, there is
21 some give to other sister, but the rest is

1 undivided.

2 Q Okay. Are you familiar with the term
3 probate in American law?

4 A No. What it is, probate?

5 Q Probate. The division of property by a
6 will, usually done by a court.

7 A Yeah, yeah, yeah.

8 Q Okay. No proceeding like that ever
9 occurred?

10 A No, we usually really justly, we got claim
11 unless he say specific gift X so, so, so, we have to
12 give him and that's it, and for my case, since it
13 was in my account already is he didn't have to write
14 anything about.

15 Q Okay. And so now, let's, let's move to
16 the period after the, after the full \$4 million was
17 given.

18 A Yeah.

19 Q So we're now in September of 1997. The
20 money is in. What happens next with regard to the
21 note and the mortgage?

1 A What do you mean, what happen?

2 Q Well --

3 A I hold it in my hand. I keep it by me.

4 Q Okay. And is money supposed to be paid?

5 A Yeah, the interest is supposed to be paid
6 every year.

7 Q And where is that interest supposed to be
8 sent?

9 A To me, because I was in charge in the
10 whole transaction for Manal.

11 Q Okay. And, and so what did happen next?
12 In other words, you lent the money, and now, what
13 was the next thing that occurred? Did someone send
14 you interest? Did you write a letter --

15 A Oh, that what you want. Waleed, he bring
16 interest in 1998, 360, 1999 and 2001.

17 Q Was each of those \$360,000?

18 A Yes, sir.

19 Q Okay. And let's take the first one.

20 A Yeah.

21 Q That was in what year?

1 A 1998.

2 Q Okay. So in 1998, tell me exactly what
3 happened.

4 A What? Ask me the question what happen. I
5 get the money from Waleed.

6 Q Well, tell me, for instance, where did
7 that occur, how did it occur, what did you do with
8 it, all that kind of stuff. For instance, I'll take
9 you through some serious questions.

10 A Happen maybe in my store. He bring the
11 money, and that time I give him a receipt and I
12 thank him.

13 Q Okay. And when you say he brought it in
14 the store, he physically came there?

15 A Yes, sir.

16 Q And what did he give you exactly?

17 A Cash money.

18 Q Okay. And in what form?

19 A I really cannot remember what form. Must
20 be mix. 360 is not a small money, but mostly should
21 be a large amount --

1 Q Okay. Was it --

2 A -- large space.

3 Q Was it in, was it in \$1 and \$5 bills?

4 A In what?

5 Q \$1 bills and \$5 bills?

6 A No way. Should be more than, should be
7 more than that. 20, 50, 100.

8 Q Okay. So he brought you -- and what was
9 it in? Was it in a bag, a suitcase, a box?

10 A Really, I cannot remember how he, how he
11 have it, but he bring it in a handbag.

12 Q In a handbag?

13 A Yeah, in a handbag. In the handbag, he
14 was have them in the envelopes and what I really
15 didn't know.

16 Q \$360,000 in bills must be a pretty big
17 chunk of money.

18 A Yeah.

19 Q Physically big.

20 A No, not that big. If you bring it 50 and
21 small handbag, you could put 36 \$100 or a bigger,

1 you put them in 50, a little bigger, you put them.
2 It's in a hand, good size handbag. Could fit even
3 if it was all of it 20.

4 Q Okay. And then you said you wrote him a
5 receipt?

6 A Yes, sir.

7 Q Did you keep a copy of that receipt?

8 A He supposed to keep the copy. He have the
9 copy. He get the copy from me.

10 Q Okay. But did you keep a copy as well?

11 A At that time, maybe I have it, but right
12 now, I didn't have it, but he's the one should be
13 more concerned to have it than me. I get what he
14 owe me, or what my sister owe.

15 Q What would have happened if --

16 A My sister.

17 Q -- what would have happened if, if you had
18 said, if he had said I never gave you this money or
19 I gave you \$700,000?

20 A I will, I will tell him, I will tell him
21 pay it back again. If he want to deny that he give

1 me 1998 360, I will be more happy. I'll take it oh,
2 maybe I'm forgetting, give me another 360.

3 Q Okay. But what if it went the other way?
4 What if he said I actually gave you 720?

5 A If he say he cannot pay 700 in one year,
6 why he want to pay in advance. Nobody will pay in
7 advance.

8 Q But if he --

9 A Have to give --

10 Q -- if he said he did give it to you, how
11 would you prove it if you didn't keep a receipt?

12 A I didn't get you. He have, he's the one
13 he have to prove that he make the payment. He is
14 the one who have to have the proof that he make me
15 the payment.

16 Q Okay. So that was the first payment, and
17 what did you do with that money?

18 A Oh, money thing, 360 really money thing.
19 I think I remember I go to Bishalan (phonetic) with
20 part of it. My sister, she got something. These
21 thing.

1 Q I'm not clear. You now had \$360,000 in
2 bills in a handbag.

3 A Yeah.

4 Q What was the next thing you did? Did you
5 go and deposit it to the BFC bank?

6 A No, didn't go to BFC bank. I didn't --

7 Q Where did the handbag go?

8 A If I, if I -- huh?

9 Q Where did that handbag full of money go?

10 A Well, he carry it back. It's his handbag,
11 not my handbag.

12 Q Okay. So now, you have a handbag with
13 \$360,000. Where did you put it?

14 A Huh?

15 Q Where did you put the \$360,000 in cash?

16 A At that moment, in the store. Then I
17 start to use a little bit by a little bit. I gave
18 my sister some money, you know. Then some in the
19 bank. I, I pay some bills I supposed to pay.

20 Q Okay. So, so the money is sitting in
21 \$360,000 and it's in the store. Do you have a safe

1 in the store? Did it go in a safe?

2 A I had a safe, but I didn't think, and that
3 night I left it, that moment I left it, but to keep
4 it forever there. Anyway, it doesn't last forever.
5 Doesn't last forever. I carry it home. I gave my
6 sister some. I pay Elan (phonetic) some money, and
7 I start to use the money.

8 Q Okay. So --

9 A Yeah.

10 Q So I'm just trying to slow the process
11 down. There's \$360,000 sitting in your handbag at
12 the store. Now, you said the next thing you did was
13 you took it home?

14 A Must be, yeah.

15 Q Okay. And where did you put the \$360,000
16 at home?

17 A Where? In my room until the second
18 morning, I, I start to use it, deposit some, give my
19 sister some, pay some. During that week or that
20 month, there is nothing left almost. Yeah.

21 Q Okay. So you started paying the money

1 out. Do you remember how much you gave Manal?

2 A I really cannot remember how much exactly,
3 but whenever she ask something, I give her.

4 Q Approximately how much in that first month
5 did you give her?

6 A Maybe the first time she, I gave her 25 or
7 \$20,000 if I remember or recall correct to back up
8 at the supermarket.

9 Q Okay.

10 A Back up that supermarket. Anyway, when I
11 sit down and sit with her and show her where her
12 money gone, she pay something in account for me.
13 She purchase this. I give her that. Where I live,
14 I use it for second month or any time. I really
15 cannot recall all the detail.

16 Q Okay. And you said that you used some of
17 it to pay your bills. Did you mean your personal
18 bills or Island Appliances' bills?

19 A Well, at that time, my bills because I was
20 buying a piece of land to put the hotel in it.

21 Q To put what?

1 A To build a hotel.

2 Q Okay.

3 A Yeah.

4 Q So, and you said you think that that money
5 was gone within a month?

6 A Should be more than a month. Should be
7 more than a month, not a month.

8 Q About how long?

9 A Within four to six month, four to six
10 month, but the main thing is that urgent thing, I
11 did it in the first week of what come. I don't
12 recall what it was for and how I did it. I cannot
13 recall.

14 Q Okay. And some of it was used to buy the
15 land for Island Appliances' building?

16 A No, no, no, for Travel Inn Hotel.

17 Q Oh, for the hotel. Okay. And does Manal
18 own any part of the hotel?

19 A No.

20 Q Okay. So let's move to the second chunk
21 of money. You said in 1999, right?

1 A Yeah.

2 Q Waleed then brought you another 360?

3 A Yeah.

4 Q Okay. Tell me how that worked.

5 A The same way before. I cannot remember
6 how he bring it, but the same way before, and I
7 spend it the same way, too. At that time, I was
8 doing construction. I start construction for the
9 hotel, and I was paying there for Travel Inn.

10 Q Okay. With --

11 A And Manal, she get what she need.

12 Q We've reached 12:30, so we're going to
13 break for lunch for an hour.

14 A Yeah.

15 Q If you would return by 1:30, we'll pick up
16 right where we left off. Is that okay?

17 A That's good. No problem.

18 Q Okay. Thank you so much.

19 A All right.

20 VIDEOGRAPHER: Going off the record. The
21 time is 12:29 p.m.

1 (Lunch recess.)

2 VIDEOGRAPHER: We are back on the video
3 record. The time is 1:29 p.m. This begins
4 media unit No. 4.

5 BY MR. HARTMANN:

6 Q You don't have to swear again. We're
7 ready. Okay. Sir, could you tell me, we were
8 dealing with the second of the \$360,000 payments,
9 the one in 1999. Could you tell me as you did with
10 the first one how that occurred?

11 A For the second 360?

12 Q Yeah.

13 A Exact same way. Like I use some of it. I
14 gave her some when she need it. I was in
15 construction in '99. I use it, but whenever she,
16 she ask for 20, 15, 30, I give her.

17 Q When you say you were in construction,
18 does that mean you were into the construction of the
19 hotel?

20 A Yeah. 1999.

21 Q Do you have any sense of how much money of

1 the, of the \$360,000 went to Manal out of that, that
2 payment?

3 A I really cannot recall, you know. Pays
4 came to me by Waleed. I have it for how long I have
5 it. When she ask for the first some money, she
6 never ask for \$500, \$10,000, \$1500 -- \$15,000,
7 something like this. I really, I didn't have no
8 recall then of this.

9 Q Okay. And would the same thing be true of
10 the third payment?

11 A The third payment, and after the third
12 payment, I continue giving her whenever she ask for
13 almost two year.

14 Q Okay. So you've said that you were
15 handling this entire thing for her. You received
16 the payments. You did all the documents and all
17 that kind of stuff.

18 A Yeah.

19 Q What did you do -- is that correct?

20 A Yes, sir.

21 Q Okay. And what happened in -- there was a

1 payment made in 2000. What happened in 2001?

2 A 2001? They had, there was, they could not
3 pay me because they was in a problem.

4 Q And what was the problem?

5 A Plaza Extra problem, and I think that's
6 the problem. What it was, Plaza, they didn't build
7 the houses, the stores. That's what I know.

8 Q Okay. So who told you that in 2001 there
9 was going to be no interest payment?

10 A I didn't get you.

11 Q In 2001, who told you that there would be
12 no interest payment?

13 A I didn't ask, even. I know they have a
14 problem. I wouldn't ask from the beginning, and I
15 cannot remember who told me there is no payment, but
16 everybody, all the whole Caribbean, they know these
17 guys, they was raided and they have control of the
18 store, and whether they told me or I know it in
19 advance, they are under control.

20 Q Okay. So when you say they had a problem,
21 are you talking about the September 18th, 2003,

1 criminal indictment?

2 A No, I talking from the beginning day of
3 the raid, they get.

4 Q So this would be the 2001 raid by the FBI
5 on the Plaza Extra Supermarkets?

6 A Yeah, I guess that's why, that's why they
7 cannot pay me.

8 Q Okay. Now, after that raid, there was
9 eventually an indictment; is that correct?

10 A I think so. For them or are you talking
11 about me?

12 Q Well, for you and them. Weren't you all
13 indicted?

14 A For them, I didn't know, but for me, I get
15 something, 2'03, 2'02. I really cannot remember
16 which year.

17 Q Okay. I'm going to ask the moderator to
18 put up Exhibit 78, at page 12. So I'm going to ask
19 you to look at this document.

20 A Uh-huh.

21 Q And do you recognize it as an indictment

1 in criminal No. 2003-147?

2 A Yes, sir.

3 Q And if you look on the left side at the
4 names of the people who were indicted --

5 A Fathi --

6 Q -- are you one of the people that was
7 indicted?

8 A Yes, I'm the one before the last.

9 Q Okay. And if you switch over to page 7 --
10 excuse me, 14.

11 A In the same --

12 Q In that same document, at paragraph 6.

13 A 14 and in 8 or in 6?

14 Q In 6.

15 A Uh-huh. Defendant Isam Yousuf, uh-huh.

16 Q Okay. Is that identify, the person
17 identified in that indictment in paragraph 6 you?

18 A I don't understand what you mean. 6, Isam
19 Yousuf is me.

20 Q Okay. I'm just asking, does paragraph 6
21 identify you as one --

1 A Yeah, that's, that's me, yeah.

2 Q Yes. Okay. Now, I would ask you to turn
3 over to page 17. Page 17 at paragraph 19, and I'm
4 going to read paragraph 19 into the record. You can
5 follow along with me.

6 A 17 I can see. Yeah, 19, yeah.

7 Q Okay. "Defendants Fathi Yusuf and Waleed
8 Hamed smuggled and caused to be smuggled millions of
9 dollars of unreported cash from the Virgin Islands
10 to the island of St. Maarten in the French West
11 Indies, where it was deposited into accounts at
12 Banque Francaise Commerciale that they and Defendant
13 Isam Yousuf controlled." Okay.

14 A I didn't, I didn't have no control with no
15 more than my address was in their bank statement.
16 That's all. I didn't have no control.

17 Q Okay. Now, I'll ask you to switch over to
18 page 21, subparagraph D. I'll read it into the
19 record if you'll follow along with me.

20 A All right.

21 Q "Beginning at least as early as about July

1 of 1996 and continuing at least through in or about
2 January 2000, Defendants Fathi Yusuf, Waleed Hamed
3 and Isam Yousuf on numerous occasions deposited
4 unreported cash into accounts they controlled at
5 banks in St. Maarten." Is that --

6 A I explain to you that FBI, they want to
7 involve me somehow in case they find that I know
8 something. That's why they each one they get almost
9 like 100 count. I get, I don't know where they find
10 four or five count about me, you know. They was
11 trying heavily to involve me and bring me to United
12 States to be a witness on them I think because they
13 know they didn't have nothing against me.

14 Q I now ask you to look at page 25 of this
15 exhibit. This is count, count two of the complaint,
16 money laundering conspiracy, and paragraph 27 states
17 that, "Beginning at least as in or about January
18 1996 and continuing through at least in or about
19 October 2001 in the District of the Virgin Islands
20 and elsewhere, Defendants", and are you named in
21 that the list of Defendants?

1 A Yeah, Isam Yousuf. I see Isam Yousuf.

2 Q Okay. And it's alleged that you knowingly
3 conspired and agreed with each other and others
4 known and unknown to the grand jury to do a number
5 of things that are listed in the subparagraph
6 starting with A below. For instance --

7 A Yeah.

8 Q -- A says that you conducted and attempted
9 to conduct financial transactions involving mail
10 fraud, money laundering, use of monetary instruments
11 and funds, transportation, smuggling, concealing and
12 disguising laundered funds. Do you deny those
13 things as well?

14 A I think he talking about them, not me,
15 because when they tried to extradite me to the
16 United States, the procedure, they supposed to send
17 what I've been charged, what I am charged for and
18 they supposed to send evidence, and the time -- and
19 they have 60 days to send approval. When the 60
20 days finish, they don't send nothing. Is only FBI,
21 they say eyewitness Isam told me. Have I told FBI

1 about myself, I was trafficking money, and they said
2 that even if I was, they didn't send nothing for
3 that judge to look at it. For 60 days, I was in
4 jail waiting for the document. They don't have
5 nothing to send about me.

6 Q Okay. So let's talk about that a little
7 bit. It's been alleged in the complaint in this
8 case and in the statement by Waleed Hamed that money
9 was taken out of the cash registers and from other
10 places in the Plaza Extra stores. Do you know about
11 that allegation?

12 A No, I don't.

13 Q Okay. It's also alleged in the complaint
14 in this case and in the statement of Waleed Hamed
15 that millions of dollars in cash were transmitted in
16 small amounts by Fathi Yusuf, Waleed Hamed and other
17 persons to avoid taxation in the Virgin Islands to
18 you in St. Maarten. Do you know about those
19 allegations?

20 A I read in here, that's what I hear, but
21 it's true, it's not true, I really don't know.

1 Q Okay. And so you're stating that you
2 never received envelopes full of cash from Fathi
3 Yusuf or Waleed Hamed?

4 A No.

5 Q Okay. And --

6 A Beside, beside the 360 we talking about?

7 Q Yep.

8 A I can say I received no cash whatever,
9 yeah, small or bag.

10 Q And you deny that you acted in concert
11 with Yusra and Manal to deposit those amounts into
12 various accounts in St. Maarten?

13 A No.

14 Q You did not do that; is that correct?

15 A I didn't do that, no.

16 Q Okay. Can you tell, explain to me, the
17 FBI and others have traced millions of dollars into
18 these accounts in St. Maarten. Can you explain to
19 me, if the money wasn't being sent to you and you
20 and Yusra and Manal were not depositing this money
21 in those accounts, could you explain to me how that

1 cash was getting into those accounts?

2 A Well, ask them. I, I answer about my
3 account, but about them, I really didn't know.

4 Q So, so is it you know that --

5 A My money -- huh?

6 Q Go ahead.

7 A I'm not involve anything, anyway. If they
8 deposit in their account, I don't know. I'm not
9 involve in it. I don't know how much they deposit.

10 Q Okay. And the money, and all money that
11 you transferred from your bank account to the bank
12 account in Ammam, Jordan, that was, that was all
13 your private money or your father's money?

14 A My father money.

15 Q Okay. And the \$8 million deposited in
16 that way and then withdrawn in that way through your
17 account, you say that never took place; is that
18 correct?

19 A If you ask any banker, he will tell you no
20 way to receive \$8 million and transfer it the same
21 day. That's one point. No way. The fund have to

1 be cleared before they direct it somewhere else.

2 All right. Second thing, I told you in March 2002,
3 my account was closed. This \$8 million you talking
4 about, it's in April something, 2002, '2. I don't
5 know, I don't know. That's not my account.

6 Q Okay.

7 A I really didn't get it. It's 2000, March
8 2002, my account closed. How I could receive or
9 transfer money while my account closed and how the
10 bank could say that or the FBI say that, I don't
11 know who say that. I believe them, they're trying
12 to involve me somehow.

13 Q Okay. So let's go back to the note and
14 the mortgage that you were administering for Manal.

15 A Yeah.

16 Q You, you were Manal's agent for the
17 purpose of dealing with this money, the note and the
18 mortgage; is that correct?

19 A Yeah. Yes, sir.

20 Q Okay. As her agent, when the, when the
21 payments stopped coming and there's no 2001 payment;

1 is that correct?

2 A Yeah.

3 Q And there was no 2002 payment or 2003
4 payment or 2004 payment; is that correct?

5 A Uh-huh.

6 Q Did you ever write to anybody or retain a
7 lawyer to try to collect those amounts?

8 A Maybe I took in 2009 or 2000 something
9 like this, yeah, just to find out what going on,
10 because all six, seven years, yes, nobody would be
11 through this and that and nothing done. Then I took
12 a lawyer (inaudible).

13 Q And who was that lawyer?

14 A I think Mr. Snow.

15 Q Okay. And what did you say to Mr. Snow?

16 A I just told him exactly I have a note for
17 my sister and I used to get payment, but lately, I'm
18 not getting it. Before I used to understand, but
19 right now, I really don't understand why.

20 Q Okay. And did you pay Mr. Snow for his
21 services?

1 A Any time. If I say hello to him, he send
2 me a bill.

3 Q Okay. But the demand letter Mr. Snow sent
4 for the note and mortgage, you paid him to do that;
5 is that correct?

6 A Yeah, and we help my sister. Anything,
7 when you say you, I pay him in behalf of my sister,
8 yeah.

9 Q Okay. Did you get any receipts from him
10 or any documents from him?

11 A Not really at this moment. Maybe at that
12 time, he gave me, but right now, I don't have
13 nothing in my hand.

14 Q Do you have them anywhere, not just in
15 your hands?

16 A Huh? No, I didn't have them, but maybe I
17 had them, but when this finish, I didn't have
18 nothing to do with Snow, and I said he get what he
19 want and I get the service I want.

20 Q Okay. Let me back up to be clearer in my
21 question. You went to Mr. Snow and you retained him

1 to write a demand letter on the note and mortgage;
2 is that correct?

3 A Yeah, I think something like this, yeah.

4 Q Okay. And you paid him to do so; is that
5 correct?

6 A Yes, sir.

7 Q Okay. And he produced a letter and
8 perhaps a receipt to you for the money you gave him
9 and you received that. Do you still have that in
10 your possession?

11 A That's what I tell you. No, I didn't have
12 it.

13 Q You don't have it anymore?

14 A I didn't have it anymore. I said
15 something done, finished, I don't need it.

16 Q Okay. Well, is that finished?

17 A With him, with the lawyer. Then I try to
18 choose another lawyer. It doesn't finish yet.

19 Q Okay. And I just, at this point, I'd like
20 to go back and just cover what documents you say you
21 don't have and what documents you've, you told --

1 A Regarding whom?

2 Q Well, I'm going to cover them one by one.
3 Just a second here.

4 A Uh-huh.

5 Q I want to rearrange this document. Just a
6 second. Okay. If we could pull back up 53, Exhibit
7 53, please.

8 A Where you have it?

9 Q Okay. This may go back over some stuff,
10 but I want to make sure that the record is very
11 clear about, about what you say about documents, so
12 I'm going to ask you to turn to page 11 of this
13 document.

14 A 11? 11, yeah.

15 Q I just want to go through several of these
16 document requests and your responses.

17 A Oh, oh, oh, all monthly account statement
18 for any checking, saving and --

19 Q Let me, let me --

20 A -- in your name for 1990 through 1997.

21 Q Let me just do it this way. I'll read the

1 request and your answer, and you tell, just tell me
2 if your answer here is correct, okay? These are
3 your responses to our document requests. Document
4 request No. 1, "All monthly account statements for
5 any checking, savings, investment, brokerage account
6 titled to you or in your name from 1990 through
7 1997", and you say that you have none; is that
8 correct?

9 A For me personally, I didn't have.

10 Q You don't have?

11 A For me personally, I didn't have.

12 Q And do you have them for Island
13 Appliances?

14 A Either after I close, I, also, I didn't
15 have them.

16 Q Okay.

17 A We talking, we talking 27 years. Yeah.

18 Q Request No. 2 is, "All written
19 communications between you and Fathi Yusuf since
20 1996 regarding any matters related to United
21 Corporation, Sixteen Plus, Manal Mohammad Yousef or

1 anything to do with Manal Mohammad's loan to Sixteen
2 Plus as evidenced by the promissory note attached as
3 Exhibit 1." Is it correct that you have no such
4 written communications any longer?

5 A For, for Sixteen Plus and this, I didn't
6 have nothing, no.

7 Q No.

8 A Because the promissory note.

9 Q Okay. Request No. 3 is, "Any
10 communications between you and Jamil since 2008
11 regarding any matters related to United Corporation,
12 Sixteen Plus, Manal Mohammad Yousef or anything to
13 do with Manal Mohammad's loan to Sixteen Plus as
14 evidenced by the promissory note."

15 A Yeah, that's my son. If I didn't talk to
16 him direct, he hear me what I'm talking about.

17 Q Right. But --

18 A That's all, but nothing to discuss right
19 away, no, in 2008.

20 Q Okay. The question is, are there any
21 written communications or documents between you and

1 Jamil since 2008 relating to any of these things,
2 anything written?

3 A No.

4 Q Okay. The next one is also about written
5 communications. Document request No. 4, "All
6 written communications between you and any family
7 member of Fathi Yusuf since 1996 regarding any
8 matters related to United Corporation, Sixteen Plus,
9 Manal Mohammad Yousef or anything to do with Manal
10 Mohammad's loan to Sixteen Plus as evidenced by the
11 promissory note."

12 A I didn't have any.

13 Q You don't have any. Okay. Document
14 request No. 5, "All written communications with any
15 person affiliated with or representing Sixteen Plus
16 from 1996 to now." Do you have any written
17 communications with anybody regarding Sixteen Plus,
18 Manal or the mortgage --

19 A What I, I mean, I don't have right now,
20 but I had written between me and them. I say that
21 to you I have written, but now, I didn't have it.

1 Q So you had them, but you've disposed of
2 them; is that correct?

3 A They are like, like all right, the first
4 million, \$2 million, the second \$2 million, the
5 payment, I had everything. I had everything, but
6 after I get the note, I didn't need them anymore.
7 Same thing we have from me, a receipt. If they have
8 it, they don't have it, I don't know, but we had
9 something between us.

10 Q Okay. Document request No. 13, "All
11 documents detailing how the note and mortgage
12 between Manal Yousef and Sixteen Plus were arranged
13 for." You don't have any documents about the
14 negotiation, drafting, execution, delivery or
15 recordation of the note and mortgage, do you?

16 A At the moment, no, or at the time I answer
17 this, no, but before, I had notes or past or
18 something like this. I had, but after I get the
19 original thing, I didn't need all these notes.

20 Q Okay. And that includes documents drafted
21 or executed by any lawyers? You didn't keep any of

1 those, either?

2 A No.

3 Q Or any documents from the banks where the
4 funds originated or were transferred, you don't have
5 those, either?

6 A That's a long time. Whenever I think we
7 going to fall in this thing to be part of the thing,
8 and as I told you, I was trying to get my record
9 from the bank. I requested from them. They give me
10 go on thumb, go on thumb. After that, I give a
11 lawyer \$5000. The same thing, he don't get me
12 nothing. After that, I didn't know wherever he is
13 without getting me anything.

14 Q Okay. Document request No. 14, this asks
15 for documents reflecting the source of the funds
16 that you used to make the wire transfer. You said
17 those came from your father, and I believe you've
18 already testified that you have no documents
19 relating to your father's providing that money to
20 you, your putting it into the bank or your using it;
21 is that correct?

1 A Yeah, I didn't have no document. He was
2 putting it direct to that account.

3 Q Okay. Document request No. 15, documents
4 providing the directions from anyone to authorize
5 the wire transfers from February 19th, '97, or
6 September 4th, 1997. Again --

7 A Yeah.

8 Q -- I think you've testified that you got
9 no instructions in writing from either Fathi or
10 Waleed; is that correct?

11 A Yeah. All the document that are from
12 anyone to authorize, no direct, you know.

13 Q Okay. Document request No. 17 asks for
14 documents showing the transfer of any funds by Manal
15 to you or to BFC Island Appliance. Did Manal ever
16 put any money into --

17 A Manal, she didn't have no account
18 whatsoever in her.

19 Q Okay. And so she never, she never --
20 excuse me. Just let me finish my question. So she
21 never deposited any money into that BFC account or

1 gave it to you?

2 A No. Even in my account, she never deposit
3 anything.

4 Q Okay. Okay. So let's go back to the note
5 and the mortgage. Did you keep any -- and the issue
6 of documents and records. Did you keep any sort of
7 documents or records with regard to the amounts of
8 money that you distributed to Manal Yousef as a
9 result of the note and mortgage?

10 A I dissolve it one by one after she get it,
11 and that's it. I didn't keep it.

12 Q When you say that, you mean you just gave
13 her --

14 A Like if I give her \$10,000, maybe I keep
15 it in a notebook by me. I didn't know. I guess
16 maybe she keep a note, but when her money finish by
17 me, that's it. I didn't need that note.

18 Q So did --

19 A My sister, I trust her and she trust me.

20 Q Over the period of time --

21 A That's for not to make mistakes, yeah.

1 Q Over the period of time that you were
2 receiving the \$360,000 payments, did you distribute
3 out to Manal a total of three times \$360,000?

4 A I didn't get you. You mean like 360, 360,
5 360? No.

6 Q No, I mean, if I added up all the money
7 you gave to Manal from 1998 to 2002 --

8 A Yeah.

9 Q -- would it come out three times 360, the
10 total amount?

11 A Yes.

12 Q So you gave her over a million dollars in
13 cash, 5 and 10 and \$15,000 at a time?

14 A Yeah, maybe this amount. We settle the
15 account. What I had between me and her, I cannot
16 remember, but what it would take, I write it until
17 2'03, 2'04 and I finish with her.

18 Q Well, you received \$1,800,000; is that
19 right?

20 A A million 9 -- a million 800, yeah.

21 Q Okay. So did you distribute out to Manal

1 Yousef in cash \$1,800,000?

2 A Yes, sir.

3 Q Okay. And that was between -- before
4 2002; is that correct?

5 A 2004, maybe, up to '4, yeah.

6 Q Okay. Up to '4?

7 A Maybe, yeah.

8 Q And how did you transfer that money to
9 her? In other words, did you deposit it into a bank
10 account?

11 A I don't transfer it because she didn't
12 have no bank account. I don't transfer nothing to
13 her because she don't have bank account. I gave
14 her. Probably she put it in her husband account and
15 they do what they want, but I never transfer
16 anything to her.

17 Q Okay. So let's take, let's take 19 -- or
18 I'm sorry. You said it went as far as 2006. Let's
19 take 2006. At that time, where were you living?

20 A 2006? I have address as in Point Blanche.
21 I have address in Simpson Bay suite, which is I have

1 apartment there. Probably in hotel. I think at
2 that time not, not in Point Blanche, but either
3 Simpson Bay suite or Travel Inn Hotel.

4 Q Okay. And where was she living?

5 A Somewhere in --

6 Q 2006.

7 A Somewhere in St. Maarten.

8 Q Okay. And do you know her address in
9 St. Maarten?

10 A In St. Maarten.

11 Q Yeah.

12 A No, I know area, I mean, Gold Bay, but
13 what house number, what road number, name, I really
14 don't know.

15 Q Okay. And so tell me how you supplied the
16 money for her. Would she come to your place? Would
17 you take it to her? Let's say you were going to
18 give her \$15,000. Just walk me through how it
19 worked.

20 A Really, I cannot remember, but mostly I
21 carry it. Mostly I carry it, or I give it to her

1 husband because he have to do something with the
2 money. As soon she tell me, maybe I give it to her.
3 I go home, I give it to her, or I go to her
4 husband's store.

5 Q And how would you do that? Would it be
6 like a bunch of small bills in an envelope or a roll
7 of bills? How exactly did you --

8 A If I have, if I have a payment with say
9 \$10,000, I'm not going to carry a single dollar. I
10 going to make it until it reach like 50s and 100
11 that easy to count and give it to them. You don't
12 want to give somebody \$15,000 or \$10,000 or \$5000,
13 5000 single and fives.

14 Q Okay. And you said originally, you used
15 some of the money to buy the land for the hotel when
16 you were building the hotel. How did you get the
17 money back from that to give her the \$1,800,000?

18 A I had, I had my business going. I had my
19 business going, but the cash flow, maybe I didn't
20 have it, all right. I use it from the business,
21 from what there were. I just give her. My business

1 was going.

2 Q Okay. I need to understand something.
3 Maybe you can help me. How many children did your
4 father have?

5 A My father, we are two brother and five
6 sister, five sisters, or four sister.

7 Q So six all together or six not including
8 you?

9 A Including me.

10 Q Okay. So he had six children?

11 A Uh-huh.

12 Q And you said this was not distributed
13 pursuant to probate law or anything else. I think
14 you said it was distributed according to Sharia law;
15 is that correct?

16 A What is that? I didn't understand.

17 Q This money was given from your father to
18 his children under Sharia law?

19 A What is Sharia law? I didn't get you.

20 Q Sharia?

21 A Oh, Sharia, Sharia.

1 Q Yeah.

2 A No, it was exception for Manal because she
3 have exception situation.

4 Q Okay. Under Sharia law generally, would
5 it be true to say that the sons would receive say an
6 eighth -- I mean the daughters would receive an
7 eighth and the sons would receive twice that?

8 A Well, (inaudible) way to get creation, the
9 son get more than, but what he did he did while he's
10 alive. What he did while he's alive, he can do what
11 he want. After he die, we go to Sharia, but when
12 he's alive, he could whatever he want. Is his
13 money.

14 Q And do you know how much each child has
15 received or is scheduled to receive from his estate?

16 A His cash, cash money is only me and Manal.
17 She got, I got. The rest is provided for them in
18 Palestine and Jordan.

19 Q Okay. So if I understand you correctly,
20 all the cash pretty much went to Manal?

21 A And me.

1 Q And you. And how much did you get?

2 A Million.

3 Q Million?

4 A Yeah.

5 Q And the rest of the kids are going to take
6 out of property in Jordan?

7 A What?

8 Q The rest of the kids will get property --

9 A Property, property over there, yeah.

10 Q Okay. And the reason Manal got all the
11 cash was because she was a special case?

12 A Yes, sir.

13 Q Okay. Okay. So we were up to the
14 question of your having sent this demand letter,
15 having Mr. Snow, the lawyer, send the demand letter
16 to --

17 A Uh-huh.

18 Q -- Sixteen Plus. What kind of response
19 did Mr. Snow get?

20 A We didn't like the respond from the
21 lawyer. Then he said well, leave me alone, I don't

1 want to interfere with this. He don't like the
2 answer.

3 Q That was Mr. Snow saying that or the other
4 side's lawyer?

5 A No, Mr. Snow.

6 Q So Mr. Snow said he didn't want to be
7 involved anymore?

8 A Yeah, he said before not, nothing about
9 Dutch island or something, American. The lawyer, he
10 say I don't know who the lawyer is. I don't want to
11 say rude, but aggravate him, and that's, he say I
12 don't want, I don't want this case.

13 Q Okay. So, so now, you have an unpaid note
14 and mortgage, and Mr. Snow has, has quit as your
15 lawyer. What did you do next to enforce the note
16 and mortgage?

17 A Well, I think first that because I start
18 to be aware they had a problem, and I was try to
19 arrange a meeting between them that my sister, she
20 will get paid, you know. Unfortunately, I could not
21 involve between them because Waleed reject me and my

1 intention was that they go back normal, no problem.
2 Then I see also the same way is no way to interfere
3 between them. I want to make it easier to put like
4 the money, but no respond. I went to Waleed. I
5 told him I could make Fathi listen to you if you
6 have something to say, so he said where he was
7 before, why you don't come before. I didn't know
8 what between you and him. I didn't know. I knew it
9 end up that I could not do anything. We turn to a
10 lawyer in St. Croix.

11 Q When you say you turned to a lawyer, was
12 that Kye Walker?

13 A After all thing. All right. After I give
14 up on me doing something between them and do
15 everything in the best way, I start to search for a
16 lawyer.

17 Q Okay. And did you find a lawyer in
18 St. Croix?

19 A Yes, it was a lady, we involve with a lady
20 lawyer and --

21 Q Is her name Kye Walker?

1 A Huh? Walker, Walker, yeah.

2 Q That's spelled K-Y-E W-A-L-K-E-R?

3 A I think so.

4 Q Yes.

5 A Yeah.

6 Q Okay. And what happened when you went to
7 her?

8 A Well, we communicate from here through
9 phone and messages and we send that (inaudible).

10 Q When you say we, who do you mean, we?

11 A I didn't get you. Me, me.

12 Q You said we communicated with her.

13 A Me, me, me, and help of my son, too.

14 Q Okay. So it was you and Jamil talking --

15 A Yeah.

16 Q -- to Walker?

17 A Yeah.

18 Q Okay. And what did you say?

19 A Jamil, he didn't know much about events.
20 He was talking to her and a few things she ask
21 questions, yeah.

1 Q Okay. And did you retain the services of
2 Kye Walker for Manal's benefit?

3 A We, we -- huh? We pay in advance.

4 Q Okay. Did you send Kye Walker a check?

5 A I don't remember check or whether I
6 transfer, but she receive it.

7 Q Okay. And do you have a copy of that
8 check or wire transfer?

9 A Maybe, maybe I could find this, yeah.
10 Since this problem, I start to keep some record,
11 yeah.

12 Q Okay. Will you please look for that
13 document, and if you find that document, would you
14 provide that to your present counsel so he can
15 supply it to me?

16 A Let me just get a note or (inaudible)
17 knows it now. Okay. Yeah, I will.

18 Q Okay. So you retained her, and did she go
19 into court and file documents for you, for Manal?

20 A That's what she supposed to do, but we
21 find out like six, seven month and she didn't do

1 nothing.

2 Q Okay. And then what happened?

3 A Then I start to find out how hard it going
4 to be. First my lawyer in St. Maarten and he give
5 up at me. Second, Miss Walker and look like eight
6 months she had doing nothing, and as I told you, I
7 was trying to do something between them like
8 mediation because I hear they had some mediation
9 between the other community, you know. Then, but
10 Waleed is stuck between.

11 Q Okay. And when that didn't work out, what
12 did you do next?

13 A Well, I reckon my son, he had opportunity
14 from his aunt. We start to search for, until we get
15 Mr. Hymes.

16 Q Okay. And who spoke to Mr. Hymes to
17 obtain representation for Manal?

18 A Well, my son and me, because we working in
19 the same thing, and what he don't know, my son, he
20 ask me about it. I respond to my (inaudible).

21 Q Okay. So you, when you say your son, you

1 mean Jamil, right?

2 A Yeah, Jamil, because we all come the same
3 office.

4 Q Okay. So you and Jamil contacted Attorney
5 Hymes?

6 A Yeah.

7 Q And you were acting as Manal's agent; is
8 that correct?

9 A Until that moment, until Jamil the agent,
10 but Jamil, he didn't know much about the case. Then
11 he was asking me.

12 Q Okay. But together the two of you acting
13 as an agent for Manal retained Mr. Hymes to
14 represent Manal; is that correct?

15 A Yeah.

16 Q Okay. And did you give Mr. Hymes money?

17 A Yeah. Otherwise, he wouldn't do nothing.

18 Q Okay. And --

19 MR. HYMES: Counselor, let me indicate to
20 you that you're getting awful close to
21 attorney-client privilege, and I caution you

1 not to go too deep into that rabbit hole.

2 Q And, and who communicates with Mr. Hymes
3 with regard to Manal's interests in this case? Do
4 you do that or does Jamil do that?

5 A Jamil.

6 Q Okay. So --

7 A Jamil, many question he ask. He ask me
8 just to clear things, yeah.

9 Q Okay. So, and is it Jamil who arranges
10 for the payment to Mr. Hymes?

11 A Yes.

12 Q Okay. And --

13 A I didn't hear you.

14 Q No, I'm sorry. I paused.

15 A Oh.

16 Q Do you yourself participate any more in
17 the discussions with Mr. Hymes or with Manal about
18 this case, or is that now all Jamil?

19 A Jamil, but sometimes Mr. Hymes, he send,
20 he send me some paper to like question me or answer
21 you, and it's me when he come to me personally.

1 Q Okay. But Mr. Hymes doesn't represent
2 you, does he? He represents Manal, right?

3 A And represent me, too.

4 Q Okay. And he represents Jamil, too?

5 A Oh, Jamil, too, yeah.

6 Q Yeah. Okay. So do you pay, do you pay
7 him separately for the work he does for you --

8 MR. HYMES: Counselor, I ask you to
9 withdraw that question. You know darn well
10 that that's an improper attorney-client
11 privilege matter. Stay out of it, please.

12 Q You can direct your client not to answer,
13 but I'm not going to withdraw the question. Are you
14 directing your client not to answer?

15 MR. HYMES: At this point, no.

16 Q Okay. Then sir, you have to answer the
17 question.

18 A What the question is?

19 Q The question is, do you pay Mr. Hymes
20 separately for his representation of you from his
21 separate, his representation of Manal?

1 A No, not separately. I pay for the three
2 of us because my, my sister, she make me, she let me
3 use her money for so many years. I make money on
4 it. My son, he collected \$3000. He cannot afford a
5 lawyer and pay it, and when the case finish, I get
6 my (inaudible) ID.

7 Q Okay. And how do you make those payments?
8 Is that by check or by money order?

9 A Money wire transfer.

10 Q Wire transfer. And what bank does that
11 wire transfer originate from?

12 A Windward Island Bank.

13 Q Say, could you say that again?

14 A Windward Island Bank.

15 Q Windward, W-I-N-D-W-A-R-D?

16 A Yeah.

17 Q Island Bank?

18 A Bank, or First Caribbean Bank.

19 Q Or First Caribbean Bank?

20 A Yeah.

21 Q Okay. And do you know what the respondent

1 bank is, the one that you're depositing it to?

2 A I really cannot remember. I could look.
3 You mean Mr. Hymes' bank? That's what you mean?

4 Q Yes.

5 A Yeah, I could look at it and send it to
6 you.

7 Q No, that's fine. I just wondered if you
8 recalled at the moment.

9 A To my head.

10 Q Okay. And do you get reimbursed for any
11 of these funds by Fathi Yusuf or anybody else?

12 A No. I must get reimbursed from Manal when
13 she get her money back and her interest, everything,
14 that I should get some.

15 Q Okay. And can you tell me approximately
16 how much money the attorney's fees have been that
17 you've paid to Mr. Hymes from the beginning of the
18 case to this date?

19 MR. HYMES: Mr. Yousuf, I instruct you not
20 to answer that question.

21 Q Okay. And can you tell me what the amount

1 of money that you've advanced to Manal Yousef other
2 than attorney's fees for the purpose of this case?

3 In other words, have you given her any money --

4 A No, no, no. Her husband working and he
5 have business, and if I, if I give anything, social,
6 really. Not that I owe her or something, no, or she
7 need, no, but we always like with even my sister,
8 she's a millionaire. She like to see couple of
9 hundred from her brother just to mean oh, I'm still
10 your brother, even you didn't need it. Same way my
11 father. He have money, but he like to see a
12 thousand from me. Just, you know, that's the way we
13 live.

14 Q Okay. That's fine.

15 A Yeah.

16 Q Let me, let me go back to the time before
17 you retained Ms. Walker or Attorney Hymes. I
18 believe that at some point, either you or Jamil took
19 to Manal a power of attorney; is that correct?

20 A What it is?

21 Q Did you ever, did you ever take a power of

1 attorney to Manal?

2 A From Manal.

3 Q No, to Manal for her to sign.

4 A For her to sign. She sign for Jamil a
5 power of attorney.

6 Q Did she, did she ever sign a power of
7 attorney to Fathi Yusuf?

8 A Yes, she did.

9 Q How did she get that document?

10 A Waleed send it over a fax, and he made
11 somebody write it for him because he told me there's
12 a way we want it. We want power of attorney for
13 your uncle, from Manal to her uncle.

14 Q Okay. And who handled that? Was that you
15 or Jamil?

16 A Me.

17 Q And you said Waleed sent it to you by a
18 fax. Where did, where did he send that fax?

19 A I really right now, I think probably in
20 hotel. I think yeah, probably in hotel he send it.

21 Q Okay. And did you take it to Manal?

1 A I took -- okay. Put it this way. Waleed
2 call me to do that, and I ask him why. He give that
3 this and that, we need the power of attorney from
4 Manal, so, to her uncle because maybe we have a
5 buyer, we speed up the process. I told him okay,
6 what you want. We need power of attorney from
7 Manal. I told him okay, we go to make appointment
8 with notary. He say but I will send you one that
9 will be one accepted in the Virgin Islands. He send
10 it to me, and I think the notary, she didn't give me
11 exactly come over or something. Maybe she give me
12 after report, and when the day before I go or that
13 morning, I find out Waleed is in the island in
14 St. Maarten, and we went to the notary, the three of
15 us, me, Manal and Waleed. I didn't know what kind
16 of execute he get to me and this. We, Manal sign it
17 and we hand it out -- well, after he went accompany,
18 you know, we hand it out to Waleed.

19 Q Okay. And did you read that power of
20 attorney?

21 A For, for (inaudible), yeah.

1 Q You read the power of attorney?

2 A Yeah, I read it.

3 Q Okay. And did you note that the power of
4 attorney gave all of the rights to operate for Manal
5 to Fathi Yusuf?

6 A Yes. Fathi is her uncle. Our uncle, put
7 it this way, our uncle.

8 Q Right. And so you understood that the
9 power of attorney was giving him complete control
10 over the property, the note and the mortgage?

11 A Because Waleed you see make speed up the
12 process in case of any buyer.

13 Q Okay. And did you also notice that the
14 note, the power of attorney created an ability for
15 Fathi Yusuf to do so without any liability or
16 indemnification?

17 A I think -- well, I know power of attorney,
18 power of attorney, what, what it is. Yeah, I think
19 so.

20 Q Okay. And you didn't think it was odd
21 that even though no interest was being paid, Fathi

1 Yusuf now had complete control over the note and
2 mortgage?

3 A Yeah.

4 Q He had that without any recourse or
5 indemnification?

6 A I was promise nothing. I was promise all
7 the time that our problem will be over and we give
8 you the interest, everything. Then it come up the
9 sale, the sale of the land and give us the remaining
10 interest and the principal, and we have a trust in
11 my uncle Waleed. He didn't ask for it to his name,
12 maybe I have hesitate, all right. We didn't have no
13 problem or I don't have no problem with Waleed, but
14 I question it first, you know, but when he said to
15 your uncle, is right away we did it.

16 Q Okay. I'm going to, it's now an hour, and
17 I'm going to take another five-minute break. Then
18 when we come back, we will finish up in the next
19 hour. Okay?

20 A Okay. No problem.

21 Q All righty.

1 VIDEOGRAPHER: Going off the video record.

2 The time is 2:28 p.m.

3 (Brief recess.)

4 VIDEOGRAPHER: We are back on video
5 record. The time is 2:36 p.m. This begins
6 media unit No. 5.

7 BY MR. HARTMANN:

8 Q Okay. I just want to go over some of the
9 answers you gave earlier briefly, and then we'll end
10 this. First of all, I asked you about Island
11 Appliances, the business itself. I just want to
12 make absolutely clear what its status is. You said
13 that it's, that you are just an individual and it
14 was just a name you operated under as an individual.
15 Did anybody own any interest in it in any way,
16 including Fathi Yusuf or Manal or anybody else other
17 than you?

18 A No, nobody.

19 Q Okay.

20 A At that time, at that time, Waleed, he
21 could tell you, I had a problem with Fathi even we

1 don't speak together at that time, 1986.

2 Q You had a problem with Fathi in '86?

3 A Yeah. Before '86, before '86, we had a
4 problem. I was not talking.

5 Q Okay. So he wasn't involved in setting it
6 up or in any way?

7 A Huh, huh? No, no.

8 Q Okay. All right. And during the entire
9 time you owned it from the time you opened it until
10 you closed it, it was just you as an individual
11 doing business; is that correct?

12 A Yes, sir.

13 Q Okay. And at any time, did you do
14 business outside of St. Maarten? In other words, I
15 know that you said that you bought supplies from the
16 United States and had them shipped to you, but --

17 A Yes, sir.

18 Q -- did you ever ship any materials or
19 items either to the mainland or to St., St., the
20 Virgin Islands? I'm sorry.

21 A Ship back to me, ship back?

1 Q Or did you do, do any sales in the Virgin
2 Islands or on the mainland?

3 A No. I buy from, I buy from the mainland.

4 Q Okay. And when you bought from the
5 mainland, how did you pay for it? Was that by wire
6 transfer?

7 A Was mostly the same way. If I'm not
8 traveling to this company, I send them wire
9 transfer. If I'm going, I carry the cash with me.
10 Even one time, the custom officer in Puerto Rico, I
11 was going without money. He say how come you didn't
12 have money this time with you to report. I tell him
13 when I have, I report. When I didn't have, I didn't
14 report. I didn't have money. You want to search
15 me, sir. I didn't have money. He was surprised
16 that I'm not going with cash money, you know, and
17 both ways.

18 Q And, and when you retained Attorney
19 Walker, Kye Walker to represent you, did you
20 authorize her to go into court and file documents
21 for you?

1 A Well, of course. That's what I tell the
2 court to do something for me, to recommend me what
3 to do. She didn't do nothing.

4 Q Okay. And at that time that you
5 authorized her to do that --

6 A I didn't know if I make authorization, but
7 that's what I call her and send the, contact her to
8 do for me, to do what they were, what they were
9 supposed to be, or, or recommend me what to do.

10 Q Okay. And was there -- at that time, did
11 you sign a written retainer agreement for counsel?

12 A Yes, I think, yeah, we, I sign one.

13 Q Okay. And when you went to Attorney Hymes
14 and retained him to represent Manal, yourself and
15 Jamil, did you sign a written retainer agreement
16 with him?

17 A My son, my son sign it.

18 Q Do you still have a copy of it?

19 A I should.

20 Q Okay.

21 A You want a copy of that?

1 Q Okay. And you were asked by your lawyer
2 to supply all of your, Manal's and Jamil's passports
3 to him so he could supply them to the court. Did
4 you do that?

5 A Whose lawyer, Mr. Hymes?

6 Q Yeah.

7 A Jamil and he supplying them, I think.

8 Q Did you supply yours?

9 A Of course. If he ask, I must supply it.

10 Q Okay. I guess what I'm getting is
11 Attorney Hymes has supplied documents to the court
12 that are supposed to be the passports of you, Manal
13 and Jamil. To the best of your knowledge, have you
14 supplied him with a copy of all of your passports?

15 A All of my passport. Anyway, I didn't have
16 much, but all, you mean the old passport?

17 Q Any passports you have.

18 A If I had one or two, maybe I supplied. I
19 really cannot remember what I supply and when.

20 Q Okay. Let me, let me take it back a step.
21 You presently are the holder of a Dutch passport, a

1 United States passport and a Jordanian passport; is
2 that correct?

3 A Yes, sir.

4 Q Did you supply all three of your current
5 passports to him?

6 A I really cannot remember what I supply him
7 where. Maybe I just supply him American because I
8 thought is the case American case and then I just
9 gave him the case. I cannot remember.

10 Q Okay. And do you have any older
11 passports, Dutch, American or Jordanian?

12 A I must have some in Jordan or here, yes,
13 older passport, yeah, but is not always --
14 especially Jordanian, they don't give you or most of
15 the time the passport back.

16 Q Okay. All right. Let's talk briefly
17 about your travel in the last few years. Have you
18 been to St. Croix from 2016 to the present?

19 A 2016? No. I been to the USA, the
20 mainland.

21 Q Okay. Where have you been to in the USA,

1 the mainland?

2 A One time I went to Texas by my daughter.
3 One time I went to Orlando.

4 Q Have you been to Rhode Island or
5 Massachusetts?

6 A No, no. Not me, no.

7 Q Have you been anywhere in the northeast?

8 A What do you call northeast? Where is
9 that?

10 Q North of, north of or, north and east of
11 Pennsylvania.

12 A Before '2 or '3, I used to go a lot as I
13 told you, but after that, no. I been in North
14 Carolina a lot, Atlanta, Georgia, Memphis a lot, but
15 all this is all passing through Chicago or Miami,
16 but not after between 2'03, I think, and 2015, I
17 didn't go, so the Virgin Islands and I went to
18 Texas, Orlando, and now, I am traveling through to
19 Jordan through Washington.

20 Q Okay. And besides the note and mortgage
21 we've talked about today, do you have any business

1 relationships or any kind of financial interaction
2 with Fathi Yusuf, United Corporation, Waleed Hamed
3 or Sixteen Plus Corporation?

4 A No.

5 Q Okay. You don't have any other personal
6 loans or, or amounts that you owe them or they owe
7 you?

8 A No, they don't owe me nothing, none of
9 them. Yeah.

10 Q And, and do you know if Manal has any
11 other financial relationships with --

12 A Beside that, beside that transaction with
13 Sixteen Plus, she didn't have any.

14 Q Okay. And do you know if Manal has any
15 other investments other than the investment we've
16 talked about here today?

17 A No. Her husband does, her husband does.
18 He have business, yes, but she, no.

19 Q I'm sorry. What was that?

20 A No, she don't.

21 Q But her husband does?

1 A Yeah, her husband, he's a businessman,
2 yeah.

3 Q And what businesses does he have?

4 A He had a supermarket before. He had, he
5 have auto mart shop in the island. He have business
6 in, in Palestine in hometown, some kind of hardware
7 business, he and his family, his brother. I really
8 don't know what capacity, but I know that his
9 family, they have business.

10 Q And do you know if either she or her
11 husband have any business relations or financial
12 dealings with Fathi Yusuf, Waleed Hamed, Sixteen
13 Plus or United --

14 A I know about this because we are in it and
15 we are in this trouble and we not going to repeat
16 it. If it happen, that's it, you know. After, you
17 know, we don't have, she didn't have nothing.

18 Q And you've stated that after you sold the
19 Island Appliances -- or not sold. I'm sorry. You
20 didn't sell. You just closed down Island
21 Appliances; is that correct?

1 A Yeah, yes, sir.

2 Q And after you closed down Island
3 Appliances, you invested in and now own the hotel
4 you discussed?

5 A Yeah.

6 Q Okay. Other than that, do you own any
7 major pieces of property or have any major
8 investments?

9 A I have another property. You see, I work,
10 me and my brother. I have property in, in the
11 island, maybe worth \$2 million. We have another
12 building, like condominium type. It cost 4 to \$5
13 million.

14 Q Where is that?

15 A In the island of St. Maarten.

16 Q Okay.

17 A Yeah.

18 Q Do you have any, any real estate or
19 investments outside of St. Maarten?

20 A Outside of St. Maarten? No.

21 Q Okay. And none of the people that I've

1 discussed, Fathi, Waleed, United Corporation or
2 Sixteen Plus Corporation have any interest in that
3 real estate that you, or you and your brother have?

4 A No, we not interested to go back to
5 St. Maarten. That's said as I would be an immigrant
6 for almost 40 year. That's the last stop,
7 St. Maarten, and we not going back to the Virgin
8 Islands.

9 Q Okay. Well, I have no --

10 A Our interest just to get my sister
11 investment, and that's it.

12 MR. HARTMANN: Okay. I have no more
13 questions for you, sir. Thank you very much.
14 You've been a gentleman and a wonderful
15 witness.

16 THE WITNESS: All right, sir. Thank you.

17 MR. HARTMANN: You have a good day now.
18 Don't hang up. The others, your counsel may
19 want to ask you some questions.

20 THE WITNESS: Yeah.

21 MR. HYMES: I want to ask if any of the

1 other attorneys have any questions first.

2 MS. PERRELL: No questions, no questions
3 from us.

4 MR. HOLT: I have no questions.

5 MR. HYMES: Mr. Yousuf, I have no
6 questions. All the questions I wanted to ask
7 have already been asked and answered. Thank
8 you.

9 THE WITNESS: I was too fast, huh?

10 MR. HARTMANN: No, you're just too good at
11 it.

12 THE WITNESS: I was too fast. No, I try
13 to explain ourself. We are family, and we went
14 in business in a good faith, and I guess they
15 went in a good faith, but when they find in a
16 problem, everybody back up and including Fathi,
17 Waleed, and they accusing us, we are bad people
18 you, know.

19 BY MR. HARTMANN:

20 Q Wait, wait a second, everyone. If we're
21 still on the record, I want to ask one more

1 question, then. This is just, this is just for my
2 benefit. I just want to try to understand this.
3 Fathi and Waleed come to you and say I want to
4 borrow \$4 million and I'll give you interest, and
5 you do this, okay. So now, you've lent them this
6 money and they're your close family and your friends
7 and all that kind of stuff, and I understand that
8 Fathi and Waleed get into a fight with each other
9 and they're now in a dispute, but how --

10 A Yeah.

11 Q -- come Fathi has never paid back even his
12 half of that \$4 million, much less any of the
13 interest?

14 A I really didn't know. I really didn't
15 know, plus it's not I am with Fathi. It's Sixteen
16 Plus. Sixteen Plus, what the situation of Sixteen
17 Plus, I didn't know, and I guess why he have to pay
18 for Sixteen Plus.

19 Q So you've never said to him Fathi, come
20 on, you borrowed -- forget the \$4 million. You, you
21 and Waleed borrowed \$2 million each, basically, from

1 me and --

2 A But I'm not looking for the \$2 million.
3 That's you talking about from '97 up to '23. That's
4 about, is no longer \$2 million.

5 Q No, it's a lot of money, right?

6 A It's a lot of money, and the way is
7 interest over interest. We not talking that oh,
8 they say I say 2, \$2 million and they say 1, \$2
9 million one or is not that, that we could try
10 something. Is not the small number to us anymore.

11 Q Okay. So let me ask you these two
12 questions. First, how much is it now?

13 A The last time I calculate it is over \$20
14 million.

15 Q Okay. And how much do you think the land
16 is worth?

17 A Which land?

18 Q The land that the mortgage is on.

19 A Oh, right. First, I didn't know exactly.
20 I didn't have any notice about St. Croix average the
21 land, but they used to tell me we had somebody,

1 maybe he want to pay \$30 million or he offer \$30
2 million, and that's long time ago. I don't know how
3 they can say. St. Croix probably still going up
4 because here we have the real estate going up every
5 day, day by day.

6 Q Okay. So let me go back to my original
7 question, then.

8 A Yeah.

9 Q Fathi and Waleed come to you and they
10 borrow a bunch of money. That one is now worth at
11 least the \$20 million you said, and maybe the land
12 is worth \$30 million.

13 A Yeah.

14 Q How come, how come you've never said to
15 Fathi look, you're my family. You got me to invest
16 in this thing. While this thing is going on, why
17 don't you give me my money?

18 A He don't have my money. Sixteen Plus, he
19 have my money.

20 Q But he's Sixteen Plus.

21 A He is, no, not he is.

1 Q Okay. Okay.

2 A Yeah.

3 Q Save me, save me from my relatives.

4 A I'm after Sixteen Plus. Fathi goes, have
5 it already gone. I'm not -- after I smell the
6 problem between them, I'm not going to leave it open
7 just like this like family.

8 Q No, I'm not, I'm not asking you, I'm not
9 asking you why you didn't get the whole \$20 million
10 during this litigation. I'm asking you why you
11 didn't get the \$10 million, Fathi's half of it. Why
12 are you the one that's out the money?

13 A Fathi, but why Fathi, how I going to ask
14 Fathi and he going to pay for money in behalf of
15 everyone? Would you do that?

16 Q Just his half.

17 A Huh?

18 Q Just his half, just \$10 million.

19 A Because he already he's not showing. Even
20 if he give me a payment, it going to be to the
21 account of Sixteen Plus.

1 Q Okay.

2 A Right.

3 Q If you say so.

4 MR. HYMES: Are we done now?

5 A No, no, it is. Who, even if you give me
6 money, it will be to account of Sixteen Plus.

7 MR. HARTMANN: Okay. We can go off the
8 record.

9 VIDEOGRAPHER: Off the video record. The
10 time is 2:55 p.m.

11 REPORTER: Mr. Hymes, do you want a copy?

12 MR. HYMES: I'll let you know.

13 MS. PERRELL: We would like a copy as well
14 of both the video as well as the transcript.
15 The mini transcript is fine.

16 (The deposition concluded at 2:55 p.m.)

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CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me.

Any additions or corrections that I feel are necessary will be made on the Errata Sheet.

Name of Witness

Date

(If needed, make additional copies of the Errata Sheet on the next page or use a blank piece of paper.)

6014339

ERRATA SHEET

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6014339

STATE OF MARYLAND

1
2 I, Kathryn M. Benhoff, a Notary Public in and
3 for the State of Maryland, do hereby certify that the
4 within named ISAM YOUSUF personally appeared before me
5 at the time and place herein set according to the law
6 and was interrogated by counsel.

7 I further certify that the examination was
8 recorded stenographically by me and then transcribed
9 from my stenographic notes to the within printed matter
10 by means of computer assisted transcription in a true
11 and accurate manner.

12 I further certify that the stipulations
13 contained herein were entered into by counsel in my
14 presence.

15 I further certify that I am not of counsel to
16 any of the parties, not an employee of counsel, nor in
17 any way related to any of the parties, nor in any way
18 interested in the outcome of this action.

19 AS WITNESS my hand and Notarial Seal this 14th day
20 of August, 2023.



21 Kathryn M. Benhoff, Notary Public
My Commission expires October 7th, 2023.

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