

1 IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

2 DIVISION OF ST. CROIX

3 _____
4 HISHAM HAMED, individually, and
5 derivatively on behalf of
6 SIXTEEN PLUS CORPORATION,

7 Plaintiff,

8 v.

Case No.

9 FATHI YUSUF, ISAM YOUSUF, and
10 JAMIL YOUSUF,

SX-2016-CV-00650

11 Defendants,

12 and

13 SIXTEEN PLUS CORPORATION,

14 a nominal Defendant.

15 _____
16 SIXTEEN PLUS CORPORATION,

17 Plaintiff,

18 v.

Civil No.

19 MANAL MOHAMMAD YOUSEF,

SX-2016-CV-00065

20 Defendant,

21 and

22 MANAL MOHAMMAD YOUSEF,

1 Counter-Plaintiff,
2 v.
3 SIXTEEN PLUS CORPORATION,
4 Counter-Defendant.

5 _____

6 MANAL MOHAMMAD YOUSEF,
7 Plaintiff,

8 v. Civil No.
9 SIXTEEN PLUS CORPORATION, SX-2017-CV-00342
10 Defendant,

11 and

12 SIXTEEN PLUS CORPORATION,
13 Counter-Plaintiff,

14 v.
15 MANAL MOHAMMAD YOUSEF,
16 Counter-Defendant.

17 _____

18 VIDEOTAPED DEPOSITION OF
19 JAMIL ISAM YOUSUF

20 DATE: Wednesday, July 26, 2023

21 TIME: 10:06 a.m.

22 LOCATION: Remote Proceeding

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2132 Company Street,
Christiansted, VI, US 00820
REPORTED BY: Shondra Dawson, Notary Public
JOB NO.: 6014353

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A P P E A R A N C E S

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ALSO PRESENT:

Ben Pelta Heller, Videographer (by
videoconference)

Shawn Hamed, Plaintiff (by videoconference)

Pam Bayless, Dudley Newman Fuerzeig (by
videoconference)

Walli Hamed, Defendant (by videoconference)

Nejeh Yousuf, Plaintiff (by videoconference)

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I N D E X

EXAMINATION:	PAGE
By Mr. Hartmann	10

E X H I B I T S

NO.	DESCRIPTION	PAGE
	(None marked.)	

D O C U M E N T S R E Q U E S T E D

NO.	DESCRIPTION	PAGE
1	Copy of Power of Attorney	49
2	Two Letters; One Sent to Bank, One Received from Bank	50

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Good morning. We
3 are going on the record at 10:06 a.m. on Wednesday,
4 July 26, 2023. This is media unit One for the
5 videorecorded deposition of Jamil Yousuf taken by
6 counsel in the matter of Hamed, et al. vs. Yusuf, et
7 al.

8 My name is Ben Pelta Heller,
9 representing Veritext. I am the videographer. The
10 court reporter is Shondra Dawson from the firm
11 Veritext.

12 Counsel and all present, including
13 remotely, will now state their appearances and
14 affiliations for the record, and will the reporter
15 please swear in the witness.

16 MR. HARTMANN: This is Carl Hartmann,
17 the examining attorney for Hisham Hamed.

18 MR. HOLT: Joel Holt on behalf of
19 Sixteen Plus.

20 MR. HYMES: Good morning. This is Jim
21 Hymes on behalf of Jamil Yousuf.

22 MS. PERRELL: Good morning. Charlotte

1 Perrell on behalf of Fathi Yusuf.

2 MR. YOUSUF: Good morning. I'm Jamil
3 Yousuf.

4 THE REPORTER: Good morning. My name
5 is Shondra Dawson; I am the reporter assigned by
6 Veritext to take the record of this proceeding.

7 I am a notary authorized to take
8 acknowledgments and administer oaths in the District
9 of Columbia. Parties agree that I will swear in the
10 witness remotely, outside of his or her presence.

11 Additionally, absent an objection on
12 the record before the witness is sworn, all parties
13 and the witness understand and agree that any
14 certified transcript produced from the recording
15 virtually of this proceeding:

- 16 - is intended for all uses permitted
17 under applicable procedural and
18 evidentiary rules and laws in the
19 same manner as a deposition recorded
20 by stenographic means; and
21 - shall constitute written stipulation
22 of such.

1 Mr. Yousuf, will you please raise your
2 right hand.

3 WHEREUPON,

4 JAMIL ISAM YOUSUF,

5 called as a witness and having been first duly sworn
6 to tell the truth, the whole truth, and nothing but
7 the truth, was examined and testified as follows:

8 THE REPORTER: Thank you.

9 You may proceed.

10 EXAMINATION

11 BY MR. HARTMANN:

12 Q Good morning, Mr. Yousuf. My name is Carl
13 Hartmann. I'm the attorney who will be taking your
14 deposition today. I'm going to go through a couple of
15 basic rules of the deposition before I start
16 questioning you. I know that you heard these
17 yesterday when you attended your father's deposition,
18 but for the record, I'll ask them again. Okay?

19 A Sure.

20 Q Where are you physically located at the
21 moment?

22 A In St. Maarten, Simpson Bay Road.

1 Q And is that on the French or the Dutch side
2 of St. Maarten?

3 A Dutch side.

4 Q Okay. And have you taken any medications or
5 are you in any kind of mental or physical condition
6 that would not allow you to fully and truthfully
7 answer the questions put to you today?

8 A No, I'm not.

9 Q Okay. And could you, for the record, just
10 spell your full name as it appears on your passport?

11 A Sure. Jamil, J-A-M-I-L, Isam, I-S-A-M,
12 Yousuf, Y-O-U-S-U-F.

13 Q And could you state your country of
14 residence?

15 A St. Maarten.

16 Q And your address in St. Maarten, your
17 physical residence address?

18 A 3D Billy Folly Road, Pelican, St. Maarten.

19 Q And could you spell those for the court
20 reporter?

21 A Okay. 3D Billy, B-I-L-L-Y, Folly, F-O-L-L-
22 Y, Road; Pelican, P-E-L-I-C-A-N.

1 Q Thank you. And of what country are you a
2 citizen?

3 A Say that again?

4 Q Of what country are you a citizen?

5 A I'm American and Jordanian.

6 Q Okay. And I'd like to ask you some
7 questions about that. Where were you born?

8 A St. Croix.

9 Q Okay. And do you have a birth certificate?

10 A Yes, issued from St. Croix.

11 Q Okay. And on the birth certificate, what is
12 your name listed as?

13 A Just the way I spell it to you.

14 Q Okay. And how long did you live in St.
15 Croix after you were born?

16 A I was born in '84 November. My father moved
17 to St. Maarten with my mom in '85, sometime in '85,
18 I'm not sure. So maybe six, seven months.

19 Q Okay. And what was the date of your birth?

20 A November 21st, '84.

21 Q Okay. And after you left -- and you carried
22 an American passport by dint of your birth in the

1 United States?

2 A At birth, yes.

3 Q Okay. And after your parents left St.
4 Croix, where did they go?

5 A St. Maarten.

6 Q And have you lived in St. Maarten
7 continuously from that date forward?

8 A Until '89, '88.

9 Q Okay. Could you tell me what happened in
10 1988?

11 A I moved with my mom to Jordan.

12 Q Okay. And where did you move to in Jordan?

13 A Amman.

14 Q Could you spell that for the court reporter?

15 A A-M-M-A-N.

16 Q Thank you. And when you lived in Amman,
17 Jordan, where did you live? What residence did you
18 live in?

19 A Dessah Street, Gardens Area, Amman.

20 Q And could you spell the name of the street
21 for the court reporter?

22 A I will try. I think it's Dessah, D-E-S-S-A-

1 H, Street, Gardens Area, Amman.

2 Q Thank you. And how long did you live there?

3 A From '89, '88 to '89 'til 2003.

4 Q And did you attend school there?

5 A Yes, high school.

6 Q Okay. And did you graduate from high
7 school?

8 A Yes.

9 Q And what year did you graduate?

10 A In 2003, 2002 to 2003.

11 Q And when you left Jordan, where did you then
12 go?

13 A To Miami, to attend college, university.

14 Q And which university did you attend?

15 A Johnson & Wales University.

16 Q And did you receive a degree?

17 A Yes, a bachelor in hospitality.

18 Q And what year was that, I'm sorry?

19 A 2000 -- 2006, yeah, 2000 -- August -- May
20 2007.

21 Q August of 2007?

22 A May 2007.

1 Q Oh, May of 2007. Thank you. And when you
2 lived in Florida for schooling, did you own property
3 or did you rent?

4 A Rent. Rent and dorms.

5 Q Okay. And I forgot to ask you this earlier,
6 but you said you also hold a Jordanian passport?

7 A Yes, I do.

8 Q Could you explain to me how and when you
9 obtained that?

10 A By birth 'cause my father is Jordanian as
11 well.

12 Q I see. And did you eventually apply for a
13 Jordanian passport?

14 A I have it on me.

15 Q Okay. But did you have to make an
16 application for it?

17 A Of course.

18 Q And do you know what year you applied for
19 it?

20 A My father or my mom applied it for me.

21 Q When you were a child?

22 A When I moved to Jordan or if I visited

1 Jordan, when I was young.

2 Q So you've held it since you were a child?

3 A I believe so. I go -- I start -- when I --
4 when I start to get older, I know I have a Jordanian
5 passport on me, but since when I don't know.

6 Q Okay. And when you left Florida after
7 schooling, where did you go next?

8 A St. Maarten.

9 Q Okay. And when you returned to St. Maarten,
10 did you become employed?

11 A Yes.

12 Q And do you remember when that employment
13 began?

14 A Maybe 2008.

15 Q I'm sorry? I coughed over that.

16 A Maybe 2008.

17 Q Okay. Thank you. And what was that
18 employment?

19 A At the hotel, Travel Inn Hotel.

20 Q Okay. And is that the hotel owned by your
21 father, Isam?

22 A Yeah, where my father works.

1 Q Okay. And does your father own that hotel?

2 A I'm not sure who's the owner, but I know I
3 work by my father. He's my manager.

4 Q Okay. And have you worked there
5 continuously since then?

6 A Yes. I did -- I work -- I had -- I open a
7 business in 2000, maybe, 12, and I closed it before
8 Corona, it's a tire center.

9 Q And what type of business was that?

10 A Tire center.

11 Q Oh, tire center. And have you spent time in
12 the United States Virgin Islands after the time of
13 your high school education?

14 A In 2010 I had to go there to issue apostille
15 birth certificate so I could get my residence here in
16 St. Maarten. So I stayed there for two days. That's
17 in 2010, and I believe I visited Ayed before that.

18 Q Okay. And tell me about the application and
19 your status on St. Maarten at the moment.

20 A I'm a permanent resident.

21 Q Okay. Have you ever applied for a Dutch
22 passport?

1 A Yes, and it wasn't issued to me, and they
2 withdraw it by mistake.

3 Q I'm sorry. What year did you apply for it?

4 A I was recognized as a Dutch, and they tell
5 me come pick up the passport. Then after that was a
6 situation, and they asked me to -- when my father got
7 naturalized, I was not resident of St. Maarten, so I
8 don't -- I'm not -- I could not be naturalized to my
9 father 'cause I didn't have resident at the time my
10 father was. So it was a mistake on their office, and
11 they asked me to give it back.

12 Q Okay. And what year was this?

13 A I issue it, I think, yeah, in 2010. That's
14 when I went to St. Croix to issue the apostille birth
15 certificate, to issue the Dutch passport. And then
16 after my daughter was born, I went to issue a Dutch
17 passport to my daughter, and they find out that I'm
18 not really Dutch in the system, and they ask me to
19 prove resident permit when my father was naturalized.
20 And then they came to -- I had a court with them, and
21 I -- I lost the case.

22 Q I see.

1 A So I'm not Dutch anymore. I was Dutch for
2 four years.

3 Q For four years?

4 A I think so. The date I issue a -- no, I was
5 Dutch all the time, I think, by then, but I issue it
6 in 2010, and then when I issue it for my daughter,
7 they found there's a mistake in the system and they
8 put me as Dutch by mistake.

9 Q Okay. So right now your status is that
10 you're an American citizen by birth, a Jordanian
11 citizen by lineage through your parents, and a St.
12 Maarten legal permanent resident?

13 A Yes.

14 Q Okay. Do you hold, in St. Maarten -- and
15 just to be clear, which side of St. Maarten are you a
16 resident? Dutch you already said?

17 A Yes.

18 Q Okay. And do you hold, in St. Maarten, a
19 St. Maarten driver's license?

20 A Yes, an ID.

21 Q Okay. Thank you very much.

22 A My pleasure.

1 Q And do you hold any other sorts of licenses,
2 degrees, or government certifications in any of those
3 three countries?

4 A I have a driver's license and ID in Jordan.

5 Q Okay. Do you have a driver's license or any
6 other certification in the United States?

7 A Expired, and I don't know where it is.

8 Q Okay. When you had it, was it in Florida?

9 A Yes.

10 Q Okay. And that was for college; correct?

11 A Living there, yes.

12 Q Yeah. Okay. Do you hold any sort of
13 professional certifications or licenses such as
14 teaching certificates, professional licenses, or
15 certifications?

16 A My school degree.

17 Q Okay. Have you pursued your education on
18 St. Maarten after you graduated from college?

19 A No.

20 Q And where do you file your income tax?

21 A In St. Maarten and the U.S.

22 Q Okay. And I know this is a difficult

1 question, but do you know what year you started filing
2 income tax returns in the United States?

3 A Maybe starting in 2010, 2011. I'm not sure.
4 But for the last five, six years for sure I'm filing
5 them. And sometimes I skip one year, but I file it
6 the year after, which they allow me to do, so --

7 Q Okay.

8 A An -- an accounting office on Texas.

9 Q Okay. And on that, where do you file that
10 tax filing? Do you file it in mainland U.S., or do
11 you file it with the Virgin Islands?

12 A No, mainland. There's an accounting office
13 in Texas. He file it to me, he send it to me, and
14 then he send me to mail it to the Treasury Department,
15 and keep the receipt that's my proof.

16 Q Okay.

17 A During Corona, I did with him
18 electronically, he tell me, and he sign on behalf of
19 me or something. He said he was allowed to do that.

20 Q Okay. And could you tell me what your
21 present -- you work for the hotel -- what your
22 occupation is; what your job title and duties are?

1 A Right now? Hotel manager.

2 Q Okay. And just generally what are your
3 duties?

4 A Managing a hotel.

5 Q What does that entail?

6 A Going through reservation, accounting,
7 laundry, maintenance, payrolls.

8 Q Okay. And are you one of several managers
9 or are you the primary manager?

10 A My father on top of me, and my uncle.

11 Q And who?

12 A My uncle.

13 Q Who's your uncle?

14 A Ayed.

15 Q Could you spell his first and last name?

16 A Ayed, A-Y-E-D.

17 Q And his last name?

18 A Y-O-U-S-E-F.

19 Q Okay. And is he the husband of Yussra?

20 A Yes.

21 Q And what is her full name?

22 A Yussra? Ask -- ask somebody else. I don't

1 know what's her full last name. But she is Fathi
2 daughter, so I think the spelling is the same, but I
3 don't know how she spell her name or what's her exact
4 last name.

5 Q Could you spell her first name for the court
6 reporter?

7 A I'm not sure. It could be Y-U-S-S-R-A.

8 Q Thank you. And in your capacity as the
9 manager of the -- first of all, how large is the
10 hotel?

11 A Forty rooms. Forty rooms.

12 Q Forty rooms. Thank you. Okay. Besides the
13 things we've discussed, have you spent any time either
14 in the USVI or the mainland United States from 2010
15 forward?

16 A I think the last time 2010, as I remember.

17 Q The visit that you described to St. Croix,
18 to get your birth certificate?

19 A Apostille birth certificate.

20 Q Okay. Now this case involves a note and a
21 mortgage on land in St. Croix in the United States
22 Virgin Islands. Are you aware of that?

1 A Yes.

2 Q Okay. And can you tell me when you first
3 became -- I know that you weren't involved in the
4 early stages of it because, let's see, when the --

5 A 2012 I was involved.

6 Q I.m sorry?

7 A I was involved from July 2012.

8 Q 2012.

9 A That's my early stage.

10 Q So you have no personal knowledge, and you
11 knew nothing about the situation from the inception of
12 the note and mortgage in 1997 through 2012. Is that
13 correct?

14 A I start to learn it from my father and my
15 aunt in 2012.

16 Q Okay. And tell me what happened in 2012
17 that caused you to learn about what was involved with
18 the note and mortgage.

19 A In 2012 my daughter was born then in Jordan,
20 so I went there for a while. My wife, she was
21 delivering by her mom, so I spent quite a good time
22 there. In the meantime, my aunt was there and she was

1 discussing it with my father. And we all agreed, so
2 she give me general power of attorney so when I came
3 back to St. Maarten, I could act on behalf of her.

4 Q And when you say your aunt, do you mean the
5 defendant Manal Yousef?

6 A My aunt, yes.

7 Q Okay. And what exactly were you told at
8 that time and who told you about the note and the
9 mortgage?

10 A Both my father and my aunt.

11 Q And what did they tell you?

12 A That she lend them money, and they have to
13 pay her back the money plus interest and late fees, I
14 believe.

15 Q Okay. And I take it from that that you had
16 nothing to do with the 2009 power of attorney to Fathi
17 Yusuf?

18 A I'm not aware of it.

19 Q Okay.

20 A Until you start bring it up in this case.

21 Q Okay. Now up until 2012, isn't it true that
22 your father, Isam, acted as the agent of your aunt

1 Manal for the purposes of the note and mortgage?

2 A From day one? Yes. And then I start from
3 2012. After I get the general power of attorney from
4 her, I start to be her agent, her legal agent.

5 Q And why did they -- when they explained the
6 situation there, why was it decided that you would
7 start working on it rather than your father, Isam?

8 A As I told you, I was in Jordan for a period
9 of time, and I was the one there, and she give it to
10 me while I was there. My father was not there at the
11 time.

12 Q I guess what I'm asking you is, if he was
13 handling it already, why did he and she believe that
14 it was necessary for you to start taking care of it?

15 A He was, I think, busy at some of works, he
16 could not come to Jordan at that time, and I was the
17 one there at that time to discuss it, and she gave it
18 to me. And I'm, like -- I'm -- lately I'm close to my
19 father, and I'm dealing with everything close to him.

20 Q Okay. So would it be fair to say that you,
21 in your capacity as the manager directly under your
22 father, are privy to most of his business dealings and

1 dealings with the family?

2 A Say that again.

3 Q You said that you are the general manager of
4 the hotel, directly under your father. Is that
5 correct?

6 A I'm the only son, one of two sons that --
7 that's why I'm working with my father. And then my
8 father -- my brother came late in 2017.

9 Q Okay. And in that capacity, are you privy
10 to -- are you involved with most of your father's
11 business and personal dealings?

12 A Not -- not banking and signing, but
13 everything toward work, payroll and employees, I'm
14 taking care of that.

15 Q Okay. And from the time in 2012, when you
16 received the power of attorney from your aunt Manal,
17 moving forward, did you take over Isam's role as the
18 agent for Manal with regard to the note and mortgage,
19 or did you both work on it together?

20 A Three of us work on it; me, my aunt, and my
21 father work on it together.

22 Q Okay. So even though you were given the

1 power of attorney, your father continued also to act
2 as her agent. Is that correct?

3 A He was educating me about the case, you
4 know. I don't know what happened from 1997 or before
5 1997 or after, so I still need information, and he was
6 close to me so I don't have to go on the phone call
7 and she explain to me over the phone. He would
8 discuss it maybe with her most of the time, and he
9 will tell me, this, this, this, and so --

10 And I replied back to the lawyers with the
11 typing and Mr. Hymes, Attorney Hymes, needed a lot of
12 description so I was the one typing and taking the
13 ideas from them.

14 Q Okay. And under that power of attorney,
15 what authority did you have with regard to the note
16 and the mortgage?

17 A Sorry? Again.

18 Q I'm sorry?

19 A Say the question again.

20 Q Okay. Under the 2012 power of attorney that
21 you received from your aunt Manal, what authority did
22 you have regarding the note and mortgage?

1 A The general power of attorney she gave me.
2 The copies are with Mr. Hymes.

3 Q So you could act in all ways for her with
4 regard to that land?

5 MR. HYMES: I'm going to object. We
6 produced a copy of that, and I think it speaks for
7 itself.

8 MR. HARTMANN: You can answer, Mr.
9 Yousuf.

10 THE WITNESS: Mr. Hymes, I should
11 answer?

12 MR. HYMES: Yes.

13 THE WITNESS: It's a general power of
14 attorney. I'm sure you're a lawyer, and you know what
15 it means, a general power of attorney.

16 BY MR. HARTMANN:

17 Q Okay. And, by the way, just as an aside, if
18 your attorney has an issue with a question I ask you,
19 he'll make an objection for the record. You'll then
20 be required to answer the question unless he expressly
21 directs you not to answer the question. Okay?

22 A To me or to my lawyer?

1 Q To you.

2 A Okay.

3 Q In other words, if he objects as he just
4 did, he makes his objection for the record, and then,
5 unless he instructs you not to answer, you answer the
6 question. Okay?

7 A Okay.

8 Q Okay. So at that point, in 2012, did you
9 know that there was also a power of attorney by Manal
10 to Fathi Yusuf?

11 A I'm not aware.

12 Q You were never told in 2012 by Manal, that
13 she had signed a power of attorney to Fathi Yusuf?

14 A I'm not aware of anything like that.

15 Q Okay. So let's talk about what Manal -- I
16 understand that you talked to both your father and
17 Manal, but let's talk about what Manal told you at the
18 time you were given the power of attorney. She did
19 not tell you that she had issued a power of attorney
20 to Fathi Yusuf in 2009. Is that correct?

21 A No. She talked basics with me, you know. I
22 was there busy with my daughter. After discussing it,

1 you know, with my father and my aunt, she give me the
2 general power of attorney, and I start learning more
3 into details when they start contacting the lawyers.
4 And you did depositions you were sending us online.

5 I start to learn more, more, more, more,
6 more about it. And as of yesterday, when you was
7 taking my father's deposition, I was still learning
8 more about it.

9 Q Okay. And I'm asking you specifically to go
10 back to the time when she first gave you the power of
11 attorney. When she first gave you the power of
12 attorney, what kind of details did she give you? Do
13 you recall?

14 A That she lend the money, 4.5 million, and
15 she had a promissory note there that I read, with the
16 -- with First Priority Mortgage, and she tell me she
17 want her money plus her interest.

18 Q And did she tell you why she wasn't getting
19 her money?

20 A She tell me that had an issue with the FBI
21 or something. She waited and she got fed up, and she
22 wants her money. I don't know what she had urgent

1 going on that she wanted the money at that time.

2 Q Okay. But you are specific that at that
3 time she did not tell you that in 2009 she had issued
4 a power of attorney to Fathi Yusuf with regard to the
5 note and mortgage? Is that correct?

6 A She -- she didn't go into deep details like
7 what I'm learning. You know, you -- we have about 500
8 pages in this case, so she didn't go over the 500
9 pages.

10 Q Okay. Let me ask you the question a
11 different way. I'm trying to find out specifically
12 about this power of attorney that she signed and
13 issued to Fathi Yusuf to do the same thing you were
14 given the power of attorney, to deal with this land
15 and property. I'm just trying to find out when you
16 found out about that power of attorney. And I think
17 what we've established is --

18 A I think when you brought it up --

19 Q Wait, wait, wait, wait. Let me finish my
20 question. I think what we've established is that at
21 the time that you were given the power of attorney in
22 2012, you were not told that there was another power

1 of attorney out there from her to Fathi Yusuf. Is
2 that correct?

3 A I don't know what power of attorney she give
4 to Fathi Yusuf. The power of attorney I get to act on
5 behalf this to force, you know, Sixteen Plus to pay
6 her her money plus interest. That's what I know
7 about. So you tell me what's the power of attorney
8 for Fathi. I'm not sure what is it about.

9 Q Okay. So that's my next question. From
10 2012, from the time you got your power of attorney,
11 did you ever -- have you ever been told about the
12 power of attorney to Fathi Yusuf in 2009? Have you
13 ever been given a copy of it, have you ever read it,
14 has anyone ever told you about it?

15 A The first time I see it is when you guys
16 mention it. That's the first time I learn about it.

17 Q And when you learned about it, did Manal
18 Yousef, tell you that in fact she had issued that
19 power of attorney?

20 A I don't recall. I don't recall me
21 discussing it with her. It was nothing toward me. My
22 father and her discuss it, and I don't know what is

1 it. You could ask my father about it. And I think
2 you asked him about it.

3 Q Okay. I understand that and I appreciate
4 that, but today I'm just trying to find out about what
5 you knew and when you learned about it. Okay?

6 A When you send it. When one of you send it,
7 or mentioned it, or brought it up.

8 Q Okay. And since that time it was supplied,
9 have you read it?

10 A I went over it fast.

11 Q Okay. And did you see that it was signed by
12 Manal Yousef and notarized by her?

13 A Maybe. If you show it to me, I will tell
14 you, but you know how many documents? I think, yes,
15 but I -- I'm not sure.

16 Q Okay.

17 A Yeah. I saw so many documents, I could not
18 recall which document.

19 Q Okay. And do you know if your father, Isam,
20 has the power of attorney from Manal to act with
21 regard to the mortgage and to the note?

22 A As my knowledge, I don't think so. That's

1 why -- that's why when I was in Jordan, I get the
2 legal ones from her.

3 Q So let me ask the question a different way.
4 Besides the power of attorney that you have seen from
5 Manal to Fathi, and the power of attorney that was
6 given to you in 2012, do you know if anybody else is
7 authorized to act as an agent for Manal Yousef, with
8 regard to the note and mortgage?

9 A As my knowledge, no.

10 Q Okay.

11 A I'm the only one, as I know now.

12 Q Okay. And since Isam does not have such a
13 power of attorney, any sort of action with regard to
14 the note and mortgage, other than acts by Manal
15 herself, therefore have to be undertaken by you.
16 Isn't that correct?

17 A Repeat that question.

18 Q Are you the -- other than acts by Manal, in
19 other words, we agree that your aunt could do an act
20 with regard to the mortgage. Is that correct?

21 A Again, my aunt could what?

22 Q Could do X, could, for instance, she could

1 hire an attorney, she could direct the attorney. Is
2 that correct?

3 A Of course. She's the main -- she the one
4 that lend the money. And she give me -- she give me
5 general power of attorney, so she -- she's the one.

6 Q Okay. So other than yourself, do you know
7 of anybody else that could act with regard to that
8 land and mortgage; could legally act?

9 A No.

10 Q Okay. And so with regard to the litigation,
11 and the various lawsuits, and the answers to questions
12 that have been going on from 2012 forward, have you
13 been the actor. In other words, your father yesterday
14 described retaining Kye Walker as an attorney to
15 represent your aunt's interest. Okay?

16 A Both of us.

17 Q Okay. But you're the only one that can
18 actually act under power of attorney for her. Is that
19 correct?

20 A Correct. And if you see the contract with
21 Kye Walker, I just send it today to Mr. Hymes, my
22 signature on it.

1 Q Okay. Well that answers my next question.
2 So as legal matters progressed from 2012 forward, for
3 instance the retention of Kye Walker, you were the
4 person authorizing them and signing the documents?

5 A After submitting the general power of
6 attorney, yes. The lawyer was -- she had to make sure
7 I had the general power of attorney before acting on
8 behalf of her.

9 Q Okay. And you said that you produced to
10 your lawyer yesterday the retention agreement between
11 yourself and Kye Walker for the benefit of Manal?

12 A Plus the payment; proof of the payment.

13 Q Okay. And where did those payments come
14 from? Were they from you or from your father?

15 A Father business.

16 Q Okay. And when you retained Kye Walker,
17 what did you retain her to do?

18 A I could -- to -- to get Manal money, plus
19 the interest.

20 Q Okay. And Manal had been sued by Sixteen
21 Plus Corporation in 2016. Isn't that correct?

22 A Yes.

1 Q Okay. And did you authorize Kye Walker to
2 act for Manal Yousef in that lawsuit?

3 A Correct. That's when I hired her.

4 Q Okay. And at some point, did you or your
5 father become unhappy with the representation by Kye
6 Walker?

7 A Yes. She didn't do nothing.

8 Q Okay. And when that happened, did you
9 retain attorney Hymes?

10 A Yes.

11 Q And again it was you entering into the
12 agreement?

13 A Yes.

14 Q Okay. And not to repeat myself, but you
15 entered into that agreement with regard to the note
16 and mortgage, and authorized him to both defend or
17 bring lawsuits on Manal's behalf. Is that correct?

18 A Yeah. They were suing us, and there's
19 counter-claims, and, you know, a law thing. The first
20 time I get involved so I start to have more ideas
21 about how courts works in the U.S. So it was, I
22 believe, Hisham. I don't know why he was suing us.

1 So I had to hire a lawyer, and then starts from on,
2 you know, case after case, and, you know, suing my
3 father, suing me, suing my aunt. I don't know for
4 what reason.

5 It's a simple case. She just lend him the
6 money, 4.5 million, that's what I thought. It should
7 be simple, but it's complicated now. I don't know for
8 what reason, that she have 4.5 million she lend to
9 them. She have a promissory note, she have a First
10 Priority Mortgage with them, and they must pay her 4.5
11 million plus the interest, plus the late fees.
12 Simple. I went to school. I study hospitality. It
13 looked logic to me, looks fine. So I don't know why
14 it went suing and cases and took six, seven years.
15 So that's what I know should have happened.

16 Q Okay. I just want to go back over a point.
17 When you spoke to Attorney Walker, and when you spoke
18 to Attorney Hymes, and you discussed the fact that it
19 was her money that was lent to Sixteen Plus to receive
20 the promissory note, when you had all those
21 discussions, you personally had no knowledge
22 whatsoever about where that money had come from; did

1 you? In other words, you weren't there at the time
2 that money was transferred to Sixteen Plus; were you?

3 A I was not there, but after learning she had
4 money from her father, that my father was taking care
5 of it, I believe, after agreeing with her, he agreed
6 to lend it to them so she could make money. That's
7 what I know about it.

8 Q Okay. But do you, for instance, have any
9 personal knowledge about whether in 1997 your
10 grandfather, Mohammad Yousuf Hamdin, owned any assets
11 or had any money? Do you personally know?

12 A What I know is when my grandfather, he
13 traveled, he used to bring me a lot of presents, so
14 that's what I was waiting for.

15 Q Okay. How old were you in 1997?

16 A Thirteen.

17 Q Okay. Did your grandfather discuss with you
18 what assets he had?

19 A Sorry?

20 Q Did you grandfather ever discuss with you
21 when you were 13 what assets he had?

22 A He passed away in March '97, so I think '96,

1 but I never -- I was 12 years old. So 12 years old, I
2 was playing soccer. I don't think I had interest of
3 what he's doing, other than his presents, I mean, you
4 know, and money during Christmas, which is our
5 Christmas.

6 Q Okay. And so by that same logic, you don't
7 know -- you personally didn't know or weren't able to
8 personally tell Attorney Walker or Attorney Hymes
9 whether your grandfather actually transferred money
10 into your father's BFC dollar account?

11 A Details. I know my father -- my grandfather
12 was in Jordan well-known. A lot of people, you know,
13 not worshipped, like, respect him, and I look at him
14 as he's my model, you know.

15 Q But you personally didn't know anything
16 about any of the facts about him transferring four or
17 five million dollars to Isam's BFC dollar account; did
18 you?

19 A No, but my grandfather he looked to me
20 fancy, smoking cigars, driving nice cars, you know,
21 and a lot of fancy people with fancy cars coming to
22 visit him; that's what I know. Yeah.

1 Q Okay. And were you good at soccer?

2 A Yes, until I start smoking.

3 Q Fancy cigars got you.

4 A No. I didn't get there yet.

5 Q Okay. So you said he was a much-admired
6 man. At that time, when you were at the age of 12 or
7 13, had you heard the stories about his having been
8 arrested in Syria, with regard to smuggling of goods,
9 of trades goods?

10 A No. I was probably -- at home he had a big
11 picture with the King Hussein, the King of Jordan, and
12 I used to bring my friend and, you know, just to show
13 up -- that -- show off on them that's my grandfather
14 is good friend of the King of Jordan, and the Crown
15 Prince, and the Prime Ministers. He all had pictures
16 with them. So that's -- was my knowledge.

17 Q But at the time you don't remember being
18 told about his being arrested for violating customs
19 laws, smuggling, or being placed in jail; do you?

20 A Yesterday when you was discussing it with my
21 father, in 1974, that was ten years before I was born.

22 Q Okay. And you hadn't heard those stories at

1 13, when you thought he was an important guy?

2 A You think somebody's going to tell me this
3 story when I'm 12 years old? That my mother
4 grandfather he was arrested for stupid reasons?

5 Q No I don't, really.

6 A No.

7 Q Okay. So the point I'm making here is that,
8 although you have the power of attorney with regard to
9 this case, this litigation in these matters, all of
10 the information that you have regarding those things
11 comes from either your father or your aunt. Is that
12 correct?

13 A Correct.

14 Q Okay. You have no personal information
15 about -- you had no personal firsthand information
16 about any of these things in 2012 when you took the
17 power of attorney. Is that correct?

18 A In 2012, I know she borrowed them money, and
19 she want her money back plus interest. That's exactly
20 --

21 Q But that came from her and your father only.
22 You had no knowledge?

1 A Yeah, of course.

2 Q Okay. So have you ever discussed the things
3 that happened back then? I know you've talked to your
4 aunt and your father about it. Have you ever
5 discussed what happened back then in 1997 when the
6 note and mortgage were issued with Fathi Yusuf?

7 A I just like my -- my grandfather left the
8 money for my aunt, with my father, and he invested in
9 Sixteen Plus.

10 Q Right. But have you personally, since 2012,
11 when you got the power of attorney, have you ever
12 discussed -- have you ever found out any of the facts
13 by talking to Fathi Yusuf?

14 A I don't -- I don't remember seeing Fathi
15 Yusuf, or sitting down close to him since that time.

16 Q Well sitting down or otherwise, you're the
17 legal representative of Manal, and you are involved in
18 litigating a number of cases by retaining counsel and
19 directing counsel. And what I'm asking is, have you
20 ever gotten facts about what happened in '97 or about
21 these cases by talking to other of the people that
22 were involved such as Fathi Yusuf?

1 A No, just my father and my aunt.

2 Q Okay. And have you ever discussed anything
3 that happened back then, or what the facts might
4 really be with Waleed [sic] Hamed?

5 A I don't know Waleed [sic]. Maybe I saw him
6 once in my life.

7 Q Okay. So you haven't ever discussed his
8 view of those facts?

9 A I don't know Walleed [sic]. Maybe you show
10 me his picture, I'll tell you that's him, or I'm not
11 sure. That's how I don't know him.

12 Q Okay. And have you ever -- I guess the more
13 general question is, have you ever tried to determine
14 or found out facts about what actually happened back
15 in 1997 from any other person other than your father
16 and your aunt?

17 A I'm not the type of son to do that. I trust
18 my father's -- I trust the word of my father. Why I
19 would dig somewhere else?

20 Q Okay. And have you ever tried to, in your
21 capacity as Manal's agent and acting under her power
22 of attorney, with regard to the note and mortgage,

1 ever independently tried to obtain documents with
2 regard to what happened back then, with the facts of
3 her funding of the note and mortgage?

4 A Retain documents?

5 Q Yeah.

6 A Lately when you were trying us -- when you
7 start telling us to -- to get the bank record for
8 Island Finances, we get a letter from them that this
9 account had no records at deposition now. That's --
10 that's when I --

11 Q Did you do that or did your father do that?

12 A My father was in Jordan. He give me
13 authorization letter, and I send it to the bank.

14 Q Okay. Do you have a copy of that letter?

15 A Mr. Hymes, he have it.

16 Q Okay.

17 A No. The -- the -- which letter?

18 Q The letter to the bank?

19 A The letter to the bank? The letter to the
20 bank? Okay. The letter to the bank is authorization
21 letter from my father to the bank in case they were
22 going to tell me who's account holder. So my uncle

1 Ayed wanted that letter in case they tell him, Isam,
2 but the bank give them the letter without asking for
3 letter. And we get the letter.

4 Q Okay. So did either you or Isam or Ayed
5 take anything to the bank in writing?

6 A No, by word.

7 Q That was by word?

8 A Yes. In case they asked for authorization
9 letter from my father, it was ready on the side.

10 Q Okay. And in return, the bank gave you a
11 letter?

12 A Yeah -- no, in return the bank said --
13 the -- the bank was bought with other bank and we
14 tried to look back into the records, and no, we don't
15 have any records. So we tell them if you don't have
16 any records, we need something in written. They tell
17 us wait two weeks. When the manager comes, we give
18 you something in written, and that's what -- and it
19 was in French, and we send it to Mr. Hymes.

20 Q Okay. And when did all that take place?

21 A May, April, May.

22 Q Of what year?

1 A This year. That's the second time he
2 attempt to ask. The first time he was contacting a
3 lawyer, and nothing happened in 2016, '15, he was
4 saying yesterday. The one -- the French lawyer, he
5 would give you his name yesterday, Serg Deli [sic],
6 Serg something, remember?

7 Q Yep.

8 A Okay. And then -- and after Mr. Hymes,
9 he -- he kept insisting that where's the bank
10 record -- bank record? We went another time and we
11 asked for the letter -- we asked for the record, and
12 they give us in details that the bank in 2015 or '16
13 was bought from another bank, and there's no records.
14 That was the immediate answer.

15 We tell them that we need something in
16 written for court. They ask us to send us a demand, a
17 legal demand from our -- yes, now I remember. Mr.
18 Hymes wrote them a letter asking them for the record.
19 Yes. Mr. Hymes send them a letter asking them for the
20 records, and they replied, based on that letter.

21 Q Okay. And do you personally have a copy of
22 that letter still?

1 A In my email, and Mr. Hymes has it for sure.

2 Q But Mr. Hymes has it. Okay.

3 A He send it to me, the letter.

4 Q Okay.

5 A He send the letter requesting the bank, and
6 bank replied, so both letters is in the possession of
7 Attorney Hymes.

8 Q Okay. It's now 11 o'clock, so I'd like to
9 take a five-minute break just so you can get up, walk
10 around, get a drink, or whatever you'd like to do. So
11 will you come back in five minutes?

12 A Sure.

13 MR. HARTMANN: Okay. We can go off the
14 record.

15 THE VIDEOGRAPHER: Going off the
16 record. The time is 10:58 a.m.

17 (Off the record.)

18 THE VIDEOGRAPHER: We are back on video
19 record. The time is 11:05 a.m. This begins media
20 unit number two.

21 MR. HOLT: Before we begin, I would
22 request a copy of the power of attorney that Manal

1 gave Jamil, because I don't have it. And I'd also
2 request a copy of the two letters; the one he sent to
3 the bank and the one that the bank sent back to him,
4 'cause I don't have that either. Is it possible to
5 get those after the deposition?

6 THE WITNESS: Mr. Hymes has them in
7 possession. I think he will send it to you.

8 MR. HYMES: I'm sure we can do that.

9 MR. HOLT: Okay. I don't have any
10 further at this time. Go ahead.

11 BY MR. HARTMANN:

12 Q Okay. I'd like to turn now to the various
13 litigation that has been brought since 2012. I'd like
14 to get a sense of a number of things. What is the
15 level of Manal's involvement with you and your father
16 in terms of directing the attorneys, other people that
17 you speak to about it, and generally the conduct of
18 the litigation?

19 So I'm going to start in 2012, back when you
20 were given the power of attorney, and ask you, when
21 Manal explained to you what was going on in her case,
22 and gave you the power of attorney, was anybody else

1 there with the two of you?

2 A I -- I don't think so. I don't -- maybe my
3 wife was passing, my mom was passing, but discussing
4 it was directly me and her, and my father on the
5 phone.

6 Q Okay. And nobody else was on the phone;
7 nobody else took part in it? You have to say "yes" or
8 "no."

9 A It's no.

10 Q Okay. And so to what extent were you then
11 involved in the things that started happening from
12 2012 going forward?

13 A Ask me the question again.

14 Q Yeah. So in 2012 you got a power of
15 attorney; right?

16 A Yes.

17 Q Okay. And at that point you said you didn't
18 know that Manal had given Fathi Yusuf a power of
19 attorney. And so you are the only person, besides
20 her, who legally could act with regard to this note
21 and mortgage; correct?

22 A Yes, from 2012. Yes.

1 Q Yes. Okay. So now what I'd like to do is
2 slowly move forward from 2012 and find out what kind
3 of things you did, what kind of things your father
4 did, your interaction with Manal about it, and things
5 like that. So my first question of that is, after
6 2012, after you got the power of attorney, what things
7 did you start doing, either by yourself or with your
8 father?

9 A I know after I got the power of attorney, my
10 father contacted his lawyers know, and I believe that
11 he send them a letter asking for Manal's money, plus
12 the interest.

13 Q Okay. And who did that? Was that you or
14 him?

15 A My father to his lawyer.

16 Q Okay. And did your father supply him with -
17 - do you know if your -- see I'm just a little
18 confused because your father didn't have a power of
19 attorney; you did. So when you say your father
20 contacted the lawyer, I'm just trying to figure out --

21 A It's -- it's my father lawyer. It's my
22 father lawyer and deal with him on several cases so he

1 went -- he goes all the time on different cases with
2 him, and he mentioned that case for him.

3 Q Okay. So do you know if your father told
4 his lawyer that you had the power of attorney to
5 direct the litigation in this case?

6 A I'm sure he did.

7 Q Okay.

8 A And I'm sure the lawyer asked him that
9 question.

10 Q Okay. So when I ask you a question about
11 what happened with that lawyer, and I say when you
12 told the lawyer to do something, I mean either you or
13 your father. Okay?

14 A Yes.

15 Q Okay. So were you physically present when
16 the discussion happened with that lawyer about sending
17 the demand letter?

18 A No. I was aware of it.

19 Q Okay. You were aware of it.

20 A Yes.

21 Q Okay. And do you know if -- did either you
22 or your father talk with Manal about that demand

1 letter?

2 A Maybe my father. I did not.

3 Q Okay. But you don't know whether he did or
4 not?

5 A She? Sorry?

6 Q You don't know whether he talked to her or
7 not?

8 A No, no, I'm not sure. I'm not sure. But
9 she gave us a general power of attorney, go ahead and
10 act and get my money. So, you know, unless he need to
11 find the small details or something, he will -- my
12 father will give her a call, and I -- even I'm
13 listening or I'm busy at work, you know?

14 Q Okay. So generally -- maybe I can shortcut
15 this. Generally speaking, there was not a discussion
16 going back and forth between you and your father and
17 Manal. She gave you the power of attorney, and told
18 the two of you to go out there and do everything
19 necessary to get this money. Is that basically --

20 A Exactly -- exactly for my part. But my
21 father, I hear him all the time talking to him and
22 giving me a feedback of what's going on. And same

1 thing I give feedback to -- to any of the lawyers,
2 James Hymes or Kye Walker at that time. I mean, some
3 -- I mean, some occasions she did speak with Kye
4 Walker and with Mr. Hymes at the time. We had a
5 conference. Sometimes we had a conference calls.

6 Q Okay. So it wasn't a situation where she
7 just said, here it is, and then she walked away. She
8 was pretty involved through the whole thing; right?

9 A She was touching bases with my father. I --
10 I'm sure my father update her, but not every single
11 day, every single email from the lawyer. You know,
12 maybe once a month he give her an update on
13 everything. Just like I read -- just like I read the
14 email from Mr. Hymes, I give my father update what's
15 going on, and that's how it goes.

16 Q Okay. But she not only was talking to your
17 father and you, but she was also talking directly to
18 the lawyers; right?

19 A On some occasions. We had conference call
20 with Kye Walker, I believe once because she was not
21 for long, and with Mr. Hymes I believe maybe a couple
22 of times.

1 Q Okay. So let's move forward. When do you
2 think that the demand letter was sent by that lawyer
3 to Sixteen Plus Corporation?

4 A Sorry?

5 Q When do you believe that your father's
6 lawyer sent the demand letter to Sixteen Plus?

7 A Yesterday I looked at it 'cause I was
8 looking at documents. I saw it was in December.

9 Q December of?

10 A 2012.

11 Q 2012. Okay.

12 A And the general power of attorney I showed
13 it, I was given in July. I'm sure it's in July. My
14 daughter was born on July 6th, so I was there, so
15 that's why I'm pretty sure of that date.

16 Q Okay.

17 A So somewhere in July.

18 Q Okay. So by the end of 2012, we arrived at
19 a point where the demand letter had been sent by your
20 father's lawyer. Just a quick side question, you said
21 that this lawyer was your father's regular lawyer.
22 Was he the lawyer for family matters or for business

1 matters or for both?

2 A Business matters. We don't have no family
3 matters here on this side of the island.

4 Q Okay. Do you have family matters on the
5 other side of the island?

6 A In St. Croix, the money. That's a big
7 matter. Yes.

8 Q Okay. I see. Okay. So by the end of 2012,
9 your father's lawyer had sent this demand letter to
10 Sixteen Plus. What do you understand happened next?

11 A What happened next?

12 Q Yeah.

13 A Waiting for the response from them and how
14 they going to be paying it, and then they start --
15 start to be problems with the two partners, and my
16 father start to get involved in details I don't know.
17 But they were saying, whether it was him or to my
18 father, or maybe something would work out, and we
19 finalize it through the family, not through the court.

20 So that's why it was held back until 2016, I
21 believe. They send Hisham suing my aunt -- it was --
22 no, I read this. It was, like, 50 pages, a summons of

1 whatever, whatever, and that's when we -- my father
2 was in Jordan, he spoke to my aunt, and then when he
3 came back, we decide we hire a lawyer in St. Croix.

4 Q Okay. So after your father's business
5 lawyer decided he wasn't going to go further with it,
6 and Sixteen Plus had responded saying that it wasn't
7 going to be paid, the next thing you think you
8 remember is legal papers in 2015. Is that correct?

9 A '16 I believe, '16. But I remember that
10 they were trying to finalize a thing with them, trying
11 to get something, they fix the problem, and my father
12 was trying to get involved, so he could secure my
13 aunt's money, but nothing worked out after that.

14 Q Okay. Are you aware of the fact that in
15 2015 Fathi Yusuf brought a lawsuit against Sixteen
16 Plus trying to close Sixteen Plus down and get that
17 mortgage paid; the note mortgage paid?

18 A No, sir.

19 Q You didn't know that in 2015 he brought a
20 lawsuit?

21 A I'm learning that -- he did?

22 Q I'm sorry?

1 A He did? I'm asking you. I don't know. Did
2 he?

3 Q Yes. I will represent to you that in 2015
4 he filed a lawsuit in which he tried to -- one of the
5 elements of it was trying to get the note and mortgage
6 paid.

7 A Then he's not trying to pay us. That's why
8 we have a lawyer; to get our money from both of them,
9 or Sixteen Plus.

10 Q No, I'm sorry. I said that he brought a
11 lawsuit the purpose of which was to get Manal's note
12 and mortgage paid.

13 A Oh. I don't know about that. That will be
14 nice of him to do.

15 Q Okay. But you didn't know anything about
16 it?

17 A No. He did? He win the case?

18 Q Well, the reason I ask because you became
19 involved in that case in an odd way. When subpoenas
20 and summons were sent --

21 A One second. One second. I don't think even
22 my father knows that, or any of them know, or my

1 lawyer, he knows that.

2 Q Okay. Well do you remember in 2015 and '16
3 that there were several attempts to serve documents in
4 that lawsuit on you and your father in St. Maarten?

5 A 2015?

6 Q Legal documents were sent to your house?

7 A 2015?

8 Q Yep.

9 A I believe in 2016 it -- the -- it was sent
10 to the -- nobody's living in the house by the way.
11 And we sent sometimes a maintenance man to fix the
12 house, and that's when he found out the letter, and he
13 brought it to my uncle. My father was not here. And
14 my uncle brought it to the hotel. I start reading it,
15 I call my father about it.

16 He said, wait, let me see it when I come
17 back. I think he discussed it with my aunt too. And
18 then when he comes back, he read it, and he said we
19 have a general power of attorney, to go ahead, after
20 discussing it -- him discussing it with my aunt, and
21 we hired Kye Walker, based on that. I think it was in
22 2016 because if 2015 why wait one year to hire and not

1 to act; correct?

2 Q Okay. I --

3 A Unless they send it in 2015, and fall in my
4 possession in 2016; correct?

5 Q Okay. Here's my problem. You received
6 legal documents, did you not, about the case that
7 Fathi Yusuf had brought?

8 A Oh, no, no. Not that document. The
9 document Hisham suing my aunt or something like that.
10 I don't recall. Something -- Hisham suing my aunt, or
11 I think it was --

12 Q This is a different lawsuit.

13 A Oh, this is a different -- okay. That's
14 what I know.

15 Q Just for the record, I'm going to note that
16 this is action ST-15, Fathi Yusuf vs. Sixteen Plus, et
17 al. So as we sit here today, you don't recall
18 anything about the 2015 case that Fathi Yusuf brought
19 to try to get the note and mortgage paid to Manal?

20 A No, but how do you think I know. If it's
21 something between Fathi and Sixteen Plus? How do you
22 assume I would know?

1 Q Well I'm -- that's what I'm trying to find
2 out. I'm trying to find out what --

3 A If Fathi is suing you for some reason, you
4 think I would know about it? No.

5 Q Okay. So you don't have any recollection of
6 being involved in that case in any way. Is that
7 correct?

8 A I'm involved anything related to my aunt
9 Manal through my lawyer.

10 Q Okay. All right. So you don't remember
11 receiving documents being sent to your aunt in that
12 case?

13 A Nothing prior to 2016 fell in our
14 possession. First thing, and that's when we hired Kye
15 Walker.

16 Q Okay.

17 A Maybe they send a lot of documents; it did
18 not reach to us or anything. But what fall in the
19 hand of us, the maintenance guy, which is the house we
20 have in Bash [sic], nobody live in it. We send from
21 time to time a maintenance guy to -- to fix the garden
22 and stuff, and he found that letter, I believe in

1 2016. It must be because that's when I hired Kye
2 Walker.

3 Q Okay. And are you saying that you didn't
4 read any of the documents the maintenance guy found?

5 A Summons -- law, you know. I went over it
6 fast, but I know it's related to my aunt lending the
7 money, and maybe they don't want to pay; they're suing
8 her back, something related to that. Yeah, I was
9 aware of the general, and it's -- it's a lot of pages
10 that we had to get the lawyer to explain to us what's
11 -- what is that. That's how -- yeah.

12 Q Okay. So let's move forward to 2016, and do
13 you recall that Sixteen Plus then brought an action
14 against your aunt Manal Yousef to have the note and
15 mortgage declared invalid?

16 A I think that's the letter we're talking
17 about in 2016.

18 Q Okay. So at some point you became aware of
19 the fact that there was a lawsuit trying to invalidate
20 the note and mortgage. Is that correct?

21 A Correct.

22 Q Okay. And what were you personally told

1 about that?

2 A Told about that. What do you mean?

3 Q Well you were the representative of Manal
4 Yousef under the power of attorney.

5 A They're trying to dispute it and we need to
6 hire a lawyer to try to get our money to my aunt.

7 Q Okay. So in 2016 this lawsuit was brought
8 against Manal, and you, as her representative, and
9 your father, went out and hired Kye Walker to --

10 A Explain to us what's going on, and to find
11 out what's going on, and to represent us if there's
12 any case. And to -- to file a counter-claim, a
13 counter-claim you call it, yeah, to get Manal money at
14 the same time. Yeah. That's was -- that's was our
15 intention, you know.

16 Q Okay. And during that time, when you found
17 out about that suit, and you started to talk to Kye
18 Walker, did you talk to anybody else about it? Did
19 you talk to Fathi Yusuf, did you talk to anyone?

20 A My father was -- everything was discussed
21 with my father, and my father discussed it with my
22 aunt only.

1 Q And did you discuss it with your aunt?

2 A No. My aunt on the phone -- since I saw her
3 in 2012, maybe I talked to her generally when we have
4 conference calls, but most of the time my father was
5 involved calling her. You know what, it's her sister.
6 He understands her more, the age difference, you know,
7 he knows when to call her, he wakes up early, he call
8 her maybe early in the morning time. Yeah, so he was
9 -- and they are the main knowledge about the -- about
10 -- about the case more than me.

11 Q Okay. And at some point along there, you
12 just said that they brought a counter-claim, and did
13 you authorize Kye Walker to bring that counter-claim?

14 A Yeah, I signed a paper, it says -- a three-
15 page paper. I could read it, or you could take a look
16 at it. That's my -- that's my intention. Of course
17 that's my intention, you know. You know, why I put --
18 so why -- they owe her 4.5 million, plus interest,
19 plus late fees.

20 So of course it's our intention in there,
21 and we were very upset with her because we don't see
22 her moving toward getting the money. And I thought --

1 I thought it was, you know, it's a month case 'cause,
2 you know, the promissory note is there, the First
3 Priority Mortgage, the signature of Waleed [sic] and
4 Fathi is on these pages, and it's just a full motion
5 that -- you know, simple as that.

6 Q Okay. So let me just check something that
7 your father said yesterday. You were in attendance
8 for the deposition of your father yesterday?

9 A Yes.

10 Q Okay. And during that, he said that his
11 computations of the value of the note at this time is
12 approximately 20 million dollars. Did you hear him
13 say that?

14 A More. More he said.

15 Q More than 20 million. Okay. And do you
16 agree with that?

17 A If you contact accountant, yes. If you
18 contact accountant, but we have to contact accountant
19 to calculate it, but that -- he's better at
20 calculation than me, but last time he calculated, it
21 was 20, more than 20.

22 Q Okay. And he also said that at one point an

1 offer had been received for the land at 30 million
2 dollars, and so he thought the property was worth more
3 than 30 million dollars now. Do you recall that?

4 A He -- he told you, I don't know what's the
5 real estate in St. Croix, and what's worth and does
6 not worth, but at some point it was worth -- it had an
7 offer of 30 million. That's his knowledge, yeah.

8 Q Okay. And do you agree with that?

9 A I don't know what's -- where's the land. I
10 don't know how big is the land. I don't know --
11 Diamond Keturah. I thought always it's Diamond
12 Quarter, so I know it's Diamond Keturah, 'cause we
13 have French Quarter, I assume something like that.
14 But I took my time -- where is it? I know it's in St.
15 Croix. It have a mortgage for my aunt on it. That's
16 what I know.

17 Q Okay. But you don't know for instance that
18 it's beachfront property on the south shore of St.
19 Croix?

20 A It's front? That's beautiful.

21 Q Okay. And do you therefore agree with his
22 assessment that, based on the fact that there was a

1 prior offer of 30 million dollars, that it is worth
2 somewhere in the neighborhood of 30 million or more?

3 A I don't know what's the value in St. Croix
4 now. How business -- how is real estate there. I
5 don't know. Maybe somebody have offer for it, for 30
6 million, it's not worth it. I don't know, I -- I
7 don't nothing. I don't know the land to tell you
8 anything about the land. How big is the land? I
9 don't know.

10 Q I can't testify here. I'd love to. Okay.
11 So by the end of 2016, you knew that Manal Yusuf had
12 been sued to void the note mortgage, and that you had
13 filed a counter-suit -- she had filed a counter-suit,
14 you and your father had done so for her, and do you
15 know whether in 2017 she brought her own suit, a new
16 suit, trying to foreclose on that land?

17 A Repeat the question.

18 Q Okay. I'm sorry. That was a long and
19 dragged-out question. Do you know that Manal Yousef
20 filed a lawsuit in 2017 seeking to foreclose on the
21 property?

22 A I think -- from day one we want to file a

1 lawsuit for -- that's what we're trying to go to court
2 and file a lawsuit. I don't know if it happens, but
3 that's our intention, you know, to take this case to
4 court to get her money, plus the interest and the late
5 fees. The lawyer did -- I don't know how the law --
6 Corona came, was the delay, but our intention from day
7 one is to get her money, plus the interest.

8 Q Okay. I get that. I understand those
9 things. But try to focus for a moment on this
10 specific question, which is, in 2016 Sixteen Plus
11 brought a suit against Manal. We've agreed to that.

12 A Yes.

13 Q And as part of that suit, Manal brought a
14 counter-claim against Sixteen Plus. We've agreed to
15 that.

16 A Yes.

17 Q Okay. Do you know -- are you aware of the
18 fact that in 2017, the next year, that Manal brought a
19 separate suit, her own suit, in her own name against
20 Sixteen Plus seeking to foreclose on the note and the
21 mortgage?

22 A I think Mr. Hymes, Attorney Hymes did that.

1 Yeah. But I don't know exactly.

2 Q Okay. Do you know anything about that suit?

3 A Anything like what?

4 Q Well what I'm really getting at is, did you
5 or your father, or you and your father acting
6 together, authorize the filing of a separate lawsuit
7 in 2017 where Manal sued Sixteen Plus over the note
8 and the mortgage?

9 A Of course we did with Mr. Hymes, and that's
10 what our intention to do.

11 Q Okay. So we know that you authorized him to
12 file that suit in general terms.

13 A Yes.

14 Q Now what I'm asking is a separate question,
15 which is, were you personally involved in his bringing
16 it. Did you talk to him about bringing it, did you
17 give him information, did you participate in the
18 filing of that suit, or did he just kind of do that
19 for you?

20 A Every month I -- I call Mr. Hymes and I tell
21 him what happened with the case, why is not -- I think
22 -- thought it was going to take two, three months. So

1 every -- every other month, I'm telling, what's
2 happened with the case, why is not finish, what's
3 moving -- why is not moving. So I am the one pushing
4 towards it, you know?

5 Q I get that. And it looks like your efforts
6 succeeded. In other words, he brought a separate suit
7 in 2017. I'm just trying to find out, for instance,
8 in your conversations back and forth to him, did he
9 ever say -- did you ever talk about the issue of
10 bringing a new suit, a second suit, a different suit
11 than the 2016 action?

12 A Hisham starts suing -- there was a lot of
13 things going on. Hisham start -- it was Sixteen Plus,
14 then Hisham jump in it. He starts suing me, suing my
15 father, suing Manal, you know. I'm intention -- I'm
16 not focusing suing his - my intention is, you know,
17 suing Sixteen Plus to get the 4.5 million, plus the
18 interest.

19 That's all my talk to Mr. Hymes, is when we
20 take this case to court, and why is delaying. Let's
21 go, let's go, pushing on this. And he tell me he's
22 working on it, and he's doing this, and he's doing

1 that. Exactly I cannot remember, but I am on top of
2 it, and he was progressing in the case until Corona
3 came to delay it, and after Corona finish, we start
4 talking about it again. Take it to court. No?

5 Q Okay. Let me just -- I'll ask -- I'm sorry
6 if I'm frustrating you. On September 31, 2017, your
7 attorney, Jim Hymes, filed action SX-17-CV-342, which
8 was Manal Yousef vs. Sixteen Plus for the foreclosure
9 of the note and mortgage.

10 A Yes. That's our intention to get Mr. Hymes
11 to do from day one, and that's why we move Kye Walker,
12 and we move with Jim Hymes to, you know, to proceed
13 faster, to accelerate moving on in the case.

14 Q Okay. And prior to his filing that suit,
15 did you talk to him about that specific suit?

16 MR. HYMES: Excuse me. I'm going to
17 object to your continuing asking of questions
18 regarding comments between attorney and client. I
19 think it's inappropriate, and I am raising an
20 objection.

21 MR. HARTMANN: Okay. I withdraw the
22 final question.

1 BY MR. HARTMANN:

2 Q All right. Now during the time Attorney
3 Hymes was bringing these suits, did you speak to any
4 person, other than your father, and Manal Yousef, and
5 Attorney Hymes about any of this litigation?

6 A At any time, I'm just telling you for the
7 hundred time, only my lawyer, Jim Hymes, and before
8 Kye Walker, and my father, and my aunt. That's all,
9 and if you want to keep asking me, you could keep
10 asking.

11 Q Okay. And I'll ask again, I'm sorry if this
12 seems repetitive, but -- and at the time that this
13 lawsuit was brought in 2017, had you obtained any
14 documents from any source with regard to the facts in
15 that lawsuit, that 2017 lawsuit?

16 A Did I obtain any documents?

17 Q Yeah.

18 A Of course, my lawyer was updating me on
19 every move he -- he makes.

20 Q Did you personally try to obtain or obtain
21 any documents from any banks, any witnesses, any other
22 persons, any courts, any registers of deeds? Did you

1 obtain yourself any documents, related to the case?

2 A No, I did not. No, I did not, as I
3 remember, 2017. I did not, maybe at any point, other
4 than what I -- unless you be specified. But in
5 general -- in general, my answer is no. But
6 specified, I don't know, 'til you ask me, any -- any
7 document.

8 Q Okay. From the bringing of that suit from
9 2017 forward, have you discussed this litigation with
10 anybody besides your father and Manal Yousef?

11 A No.

12 Q Okay. Have you or your lawyer obtained
13 witness statements from any third person in this
14 action? This action being the 650 action, the 2017
15 action or the 2016 action? Do you know if you or your
16 lawyer obtained any witness statements from third
17 persons?

18 A No. I don't know if my lawyer -- you could
19 ask my lawyer. Me, no.

20 Q Okay. Do you know if you or your lawyer
21 have obtained any affidavits, declarations, or any
22 other sworn statements of any third persons with

1 regard to the 2016 or 2017 litigation, or this
2 litigation, the 650 litigation?

3 A I don't think so, or if he did, you could
4 ask that question to my lawyer.

5 Q And will you authorize your lawyer to
6 release that information to us?

7 MR. HYMES: I'm going to object to that
8 question. If you have a request for documents, just
9 make it. Don't ask him for that kind of release.

10 MR. HARTMANN: Well he's saying that he
11 may be in possession of documents, but he can't tell
12 without talking to you. Would you like to go off the
13 record and let him -- you can inform him whether --
14 what the answer is to that question?

15 As a matter of fact, let's do that.
16 Let's go off the record, and I'll re-ask him the
17 question after we go back on the record in five
18 minutes.

19 THE WITNESS: Okay.

20 MR. HYMES: And the question you want
21 to ask is does he have what?

22 MR. HARTMANN: I want to ask whether

1 he's obtained -- I mean, the most standard deposition
2 question in history. Has he obtained any witness
3 statements, affidavits, or documents from any third
4 party?

5 MR. HYMES: And third party would be
6 anyone other than a party to the litigation that he's
7 involved in?

8 MR. HARTMANN: Yeah, that would
9 generally be the third party.

10 MR. HYMES: I think he's answered the
11 question. He's answered no.

12 MR. HARTMANN: No, he said he doesn't
13 know, and that his lawyer would know. So we're going
14 off the record, since --

15 THE WITNESS: No, I didn't say that. I
16 said I don't know, maybe my lawyer. You could ask him
17 that question. That's what I said. Yeah. I said no,
18 but maybe my lawyer, so you could ask him. He's right
19 next -- he's here. Ask him yes or no. It's simple as
20 that. But my answer is no.

21 MR. HYMES: Lawyers are not testifying
22 in this deposition.

1 THE WITNESS: Okay, so the answer is
2 no. So my answer is no.

3 MR. HARTMANN: Okay. We're going off
4 the record for five minutes. Ben, would you take us
5 off the record?

6 THE VIDEOGRAPHER: Going off the video
7 record. The time is 11:42 a.m.

8 (Off the record.)

9 THE VIDEOGRAPHER: We're back on video
10 record. The time is 11:45 a.m. This begins media
11 unit number three.

12 BY MR. HARTMANN:

13 Q Have you had a chance to consult with your
14 attorney, Mr. Yousuf?

15 A Yes, I did. Yes.

16 Q And can you tell me whether you have taken
17 any sworn affidavits or declarations of any third
18 persons with regard to the 2016, 2017, or the 650
19 case?

20 A No.

21 Q Okay. And can you tell me if you have
22 received unsworn witness statements or other

1 communications from any third parties with regard to
2 those three cases?

3 A No.

4 Q And can you tell me whether you have
5 received from third parties any documents or any other
6 physical exhibits with regard to those three cases?

7 A No.

8 MR. HARTMANN: Okay. All right. I
9 have no further questions, but Mr. Hymes may have or
10 other counsel, so please stay where you are for a sec.

11 MR. HYMES: Any of the other counsel
12 want to ask Jamil questions, please feel free to go
13 forward.

14 MR. HOLT: I have no questions. I just
15 want to make sure we get those three documents we
16 mentioned. Thanks.

17 MS. PERRELL: No questions on behalf of
18 Fathi Yusuf.

19 MR. HYMES: I have No questions, so I
20 believe the deposition is concluded.

21 MR. HARTMANN: Okay. Do you want read
22 and sign?

1 MR. HYMES: Yes.

2 MR. HARTMANN: And we would like a copy
3 of both the video and the transcript.

4 THE VIDEOGRAPHER: Going off the video
5 record. The time is 11:47 a.m.

6 (Signature reserved.)

7 (Whereupon, at 11:47 a.m., the
8 proceeding was concluded.)

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CERTIFICATE OF DEPOSITION OFFICER

I, SHONDRA DAWSON, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Shondra Dawson

SHONDRA DAWSON

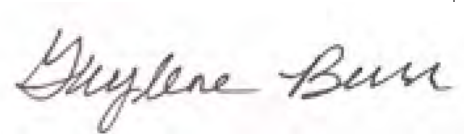
Notary Public in and for the
District of Columbia

Review of the transcript was requested.

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CERTIFICATE OF TRANSCRIBER

I, GAYLENE BURR, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



GAYLENE BURR

1 Hamed, Hisham Et Al v. Yusuf, Fathi Et Al

2 Jamil Yousuf

3 INSTRUCTIONS TO THE WITNESS

4 Please read your deposition over
5 carefully and make any necessary corrections.
6 You should state the reason in the
7 appropriate space on the errata sheet for any
8 corrections that are made.

9 After doing so, please sign the errata
10 sheet and date it.

11 You are signing same subject to the
12 changes you have noted on the errata sheet,
13 which will be attached to your deposition.

14 It is imperative that you return the
15 original errata sheet to the deposing
16 attorney within thirty (30) days of receipt
17 of the deposition transcript by you. If you
18 fail to do so, the deposition transcript may
19 be deemed to be accurate and may be used in
20 court.

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22 6014353

1 Hamed, Hisham Et Al v. Yusuf, Fathi Et Al
2 Jamil Yousuf

3 E R R A T A

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5 PAGE LINE CHANGE

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1 Hamed, Hisham Et Al v. Yusuf, Fathi Et Al

2 Jamil Yousuf

3 ACKNOWLEDGMENT OF DEPONENT

4 I, _____, do
5 hereby certify that I have read the foregoing
6 pages and that the same is a correct
7 transcription of the answers given by
8 me to the questions therein propounded,
9 except for the corrections or changes in form
10 or substance, if any, noted in the attached
11 Errata Sheet.

12
13 _____
14 DATE

13 _____
14 SIGNATURE

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